High Desert Corridor Project

Los Angeles and San Bernardino Counties, CA
District 7 - LA - 14 - PM 57.8 to PM 64.1
District 8 - SBD - 18 - PM 84.3

Project ID #0712000035 (EA:2600U)
SCH #2010091084

Final Environmental Impact Report/ Environmental Impact Statement and Section 4(f) (De Minimis Findings)

High Desert Corridor

Volume 3 of 3

Prepared by the
State of California Department of Transportation

The environmental review, consultation, and any other action required in accordance with applicable federal laws for this project is being, or has been, carried-out by Caltrans under its assumption of responsibility pursuant to 23 U.S. Code 327.

June 2016

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Chapter 1 Introduction to Comments and Responses

1.1 What is in this Document

This Volume 3 of 3 accompanies the final environmental document (Volume 1 of 3 and Volume 2 of 3). Volume 3 addresses the comments received on the draft environmental document during the public review period between September 30 and December 28, 2014, and the public hearings on November 5, November 6, November 12, and November 13, 2014.

All issues raised by the public were addressed through clarification of text in the final environmental document (see Volume 1 of 3 and Volume 2 of 3) or are responded to here in Volume 3 of 3. Minor project design refinements have also been adopted.

1.2 Summary of Public Input

1.2.1 Summary of Comments on Draft Environmental Document

Comments received during the public review period are summarized below. Note that some people submitted multiple letters and/or multiple copies of the same letter. All copies received are included in each chapter of this Volume 3 document.

Type of Comment	Number Received
Written comments from federal agencies	6
Written comments from state agencies	5
Written comments from local agencies and organizations	26
Written comments from businesses	11
Written comments from individuals (representing the general public)	43
Electronic comments from individuals (representing the general public)	72
Oral comments received at the November 5, 2014 public hearing	9
Oral comments received at the November 6, 2014 public hearing	6
Oral comments received at the November 12, 2014 public hearing	8
Oral comments received at the November 13, 2014 public hearing	14

1.3 Responses to Comments

Caltrans appreciates all comments and input provided by stakeholders on this important transportation project. The project team would like to thank everyone that took the time to inquire, provide viewpoints and comments, and express their concerns.

Several approaches have been used to respond to the comments that were received. Responses to each individual comment are organized and presented in the following chapters of this volume:

- Chapter 2, Responses to comments from federal agencies
- Chapter 3, Responses to comments from State agencies
- Chapter 4, Responses to comments from local agencies and organizations
- Chapter 5, Responses to comments from businesses
- Chapter 6, Responses to written comments from the general public
- Chapter 7, Responses to electronic comments from the general public
- Chapter 8, Responses to oral comments from the November 5, 2014 Public Hearing
- Chapter 9, Responses to oral comments from the November 6, 2014 Public Hearing
- Chapter 10, Responses to oral comments from the November 12, 2014 Public Hearing
- Chapter 11, Responses to oral comments from the November 13, 2014 Public Hearing

Chapter 2 Responses to Comments from Federal Agencies

This section provides a summary of the comments received from federal agencies on the draft environmental document. Notices of Availability were sent to the following federal agencies:

- Federal Emergency Management Agency
- Federal Transit Administration
- Federal Aviation Administration
- U.S. Department of Agriculture, Natural Resources Conservation Service
- U.S. Department of the Interior
- Advisory Council on Historic Preservation
- Federal Bureau of Prisons
- U.S. Environmental Protection Agency, Region IX
- Bureau of Land Management
- U.S. Army Corps of Engineers
- U.S. Fish and Wildlife Service
- U.S. Department of Housing and Urban Development
- U.S. Department of Commerce
- National Park Service, Pacific West Region
- U.S. Department of Energy
- Federal Railroad Administration

A total of five comment letters were received as summarized below.

Table 2.1. Summary of Comment Letters Received from Federal Agencies

Comment Code	Agency	Commenter Name	Date Letter Received	Comment Topic
F-1	U.S. Department of the Interior, Office of the Secretary, Office of Environmental Policy and Compliance	Patricia Sanderson Port	12/2/2014	Biological environment
F-2	U.S. Department of Air Force, Sustainability Office			Land use, traffic and transportation, water quality, noise, energy

Comment Code	Agency	Commenter Name	Date Letter Received	Comment Topic
F-3	U.S. Department of Transportation, Federal Aviation Administration	Victor Globa	12/2/14	Coordination, general
F-4	U.S. Environmental Protection Agency	Connell Dunning	12/10/2014	Project design and alternatives, air quality, water quality, biological environment, cultural resources, community impacts, hazardous waste or materials, noise, energy
F-5	U.S. Department of Justice, Bureau of Prisons	Craig Meyers	12/9/2014	Project design and alternatives
F-6	U.S. Army Corps of Engineers	Spencer MacNeil	12/12/14	Project design and alternatives; biological environment

Comment F-1

F-1

United States Department of the Interior

OFFICE OF THE SECRETARY
Office of Environmental Policy and Compliance
Pacific Southwest Region
333 Bush Street, Suite 515
San Francisco, CA 94104

IN REPLY REFER:
(ER 14/0646)

Filed Electronically

2 December 2014

Ron Kosinksi
Caltrans Deputy District Director
Office of Environmental Analysis
100 S. Main St.
Los Angeles, CA 90012

Subject: Draft Environmental Impact Statement for the High Desert Corridor Project, Los Angeles and San Bernardino Counties, California (ER14-0646)

Dear Mr. Kosinksi,

The California Department of Transportation (Caltrans) is proposing to construct the High Desert Corridor, a 63-mile-long transportation corridor between Palmdale in Los Angeles County and Apple Valley in San Bernardino County. The corridor would include a freeway for vehicular traffic, a high-speed rail line, and bicycle lanes. The Department of Interior offers the following comments on the draft environmental impact report/environmental impact statement (draft EIR/EIS) for your consideration.

3.2.1 Hydrology and Floodplain. The draft EIR/EIS notes that Caltrans would construct bridges over the deeper streams, such as Little Rock Wash, Big Rock Wash, Turner Wash, Ossam Wash, and Mojave River, and culverts under smaller drainages. The USFWS supports the use of bridges over the larger water courses because they will allow for more natural hydrological processes within the washes and stream channels and also function as wildlife corridors. Caltrans should design any crossings of the Mojave River with the intent to eliminate, if possible, the need to remove riparian vegetation from the river bed, as is necessary at the Interstate 15 bridge. F-1-1

We encourage Caltrans to construct all culverts to be effective in allowing for movement of wildlife; in general, Caltrans should the largest possible culverts and ensure that animals of all sizes can enter and exit the culverts without being trapped in riprap or other erosion control measures.

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3.3.3 Plant Species. This section of the draft EIR-EIS, which discusses plant species that may be affected by the proposed action, states that section 3.3.5 of the document contains detailed information regarding threatened and endangered species. However, section 3.3.5 contains no discussion of listed plant species. Table 3.3.3-1 lists the special-status plant species with potential to occur in the biological study area but does not identify the several federally listed and candidate species on that list as such. The draft EIR-EIS notes that "focused surveys were conducted during an extended period of drought conditions" and that the lack of rainfall may have reduced the likelihood that some species were detectable during the surveys.

The draft EIR-EIS also does not describe the methodology used during the surveys nor the qualifications of the surveyors.

F-1-2

To reduce the adverse effects on sensitive plant species, Caltrans proposes to implement "avoidance and minimization measures" and to replant individuals that cannot be avoided. For species that may not have been detected during the surveys because of drought, Caltrans proposes to conduct focused plant surveys prior to construction "when detection is most optimal, such as normal rain fall years."

If any of the other species identified in the table are detected, Caltrans would then implement the measures described previously in this paragraph to reduce the adverse effects on these species.

As described in the draft EIR-EIS, these measures seem inadequate. We expect that most of the rare species that may be present in the project area occur in small patches of suitable habitat; if a portion of that habitat is removed by the project, the potential for stochastic effects to extirpate individuals on the remaining, smaller patch of habitat would increase. Additionally, the indirect effects of the proposed action, such as altered drainage or the spread of non-native plants, may also affect the remaining patches of habitat. Transplanting displaced plants into the remaining areas of habitat could also disrupt ecological processes in the area or resident disturb individuals.

Finally, the remaining patches of habitat may occur on lands that would be subject to future development, possibly even as a result of growth inducement by the proposed high-speed corridor. As an alternative to this approach, we recommend that Caltrans work with the appropriate agencies and local land conservancies to acquire and secure suitable habitat for affected species offsite.

We are unaware of occurrences within the project area of any of the federally species in Table 3.3.3-1. However, if any federally listed species plant species occur within the right-of-way, Caltrans would be required to address the potential impacts of the proposed action through the Endangered Species Act's section 7(a)(2) process.

3.3.5 Threatened and Endangered Species. The draft EIR/EIS states that:

F-1-3

> Formal Section 7 consultation with USFWS has been initiated for the following species: desert tortoise, southwestern willow flycatcher and least Bell's vireo. Caltrans will seek concurrence from USFWS that the proposed project may have adverse effects to the desert tortoise and is not likely to have adverse effects to the southwestern willow flycatcher and least Bell's vireo. An incidental take permit from the USFWS for these species would be

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required prior to project construction for any project-related effects to these species.

This information is incorrect. Caltrans and the Service have engaged in informal consultation regarding the proposed action; neither Caltrans nor any Federal agency has requested formal consultation at this time. Additionally, Table 3.3.5-1 incorrectly identifies the western yellow-billed cuckoo as a Federal candidate species; the USFWS listed the western distinct population segment of the yellow-billed cuckoo as threatened on October 3, 2014. We suggest that this section be revised to read:

F-1-3 (con't)

> To date, Caltrans and USFWS have engaged in informal Section 7 consultation with regard to the desert tortoise, southwestern willow flycatcher and least Bell's vireo; Caltrans will also address the western yellow-billed cuckoo in future discussions. Following identification of a Preferred Alternative, Caltrans will request the initiation of formal consultation with the USFWS regarding, at a minimum, the desert tortoise. The potential effects of the proposed action on the southwestern willow flycatcher, least Bell's vireo, and western yellow-billed cuckoo and critical habitat of the southwestern willow flycatcher remain under discussion. If USFWS concludes in its biological opinion that the proposed action is not likely to jeopardize the continued existence of the species, it will provide an incidental take statement for the species under formal consultation.

Page 3-527 of the draft EIR/EIS states that "the continued existence of both species (i.e., the least Bell's vireo and southwestern willow flycatcher) in this area along the Mojave River would not be jeopardized." The USFWS renders a determination of whether a proposed action is likely to jeopardize the continued existence of a federally listed species through the formal consultation process, pursuant to section 7(a)(2) of the Federal Endangered Species Act. F-1-4

We recommend that Caltrans correct this statement by assessing the potential impacts to these species in terms that do not imply the USFWS has issued a final biological opinion.

Measure BNC-1 calls for the revegetation of road shoulders and graded slopes with plant species from the plant communities that are present prior to construction. Although reducing the loss of native plant communities is a worthy goal, restoring habitat near the edges of the freeway may draw wildlife closer to the road and increase the likelihood of collisions with vehicles. F-1-5

Caltrans should consider a mitigation alternative in which disturbed habitat elsewhere is restored so that the overall loss of habitat is reduced and animals are not attracted to high-speed roads.

Measure BNC-5 says that "(f)encing will be used as needed to guide wildlife into the culverts and along the (right-of-way) to prevent wildlife from trying to cross the highway." The phrase "as needed" does not provide any meaningful information with regard to the value of the fencing in directing wildlife to culverts. Additionally, in section 2.4.10, the DEIR/EIS states that the entire right-of-way would be fenced and that, in rural areas, the fencing would be barbed wire and wire mesh. Barbed wire would not preclude individuals of any species of wildlife likely to be found in this portion of the desert from entering the right-of-way; depending on the size of the mesh, wire mesh would allow individuals of many species to pass through it. Based on our experience with desert tortoises, we recommend that Caltrans use 1-by-2-inch wire mesh for fencing in any area where wildlife may enter the right-of-way and where fencing would be needed to guide wildlife into culverts. F-1-6

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Decreasing the number of animals that are killed in the corridor would reduce the amount of carcasses made available to common ravens (*Corvus corax*); common ravens routinely prey on desert tortoises and human activities in the desert, including highways along which animals are frequently killed, have greatly increased their numbers. Measure BNC-13 seems to expand the commitment to fence the right-of-way more widely but is still too vague to gage its utility in reducing wildlife mortality within the right-of-way. F-1-7

Measure BAN-2 describes Caltrans' proposal to avoid impacts to nesting birds during construction. The proposed measures should be adequate to avoid the loss of nesting birds during construction; we appreciate Caltrans' inclusion of these measures in its proposed action. F-1-8

The site of the proposed project provides habitat for several species of migratory birds. Migratory birds are important economically; they help control insect and rodent pests and are important to numerous communities where bird-watching attracts tourists. Migratory birds are also a public trust resource of the USFWS and are protected by the Migratory Bird Treaty Act. You can find a list of species protected by the Migratory Bird Treaty Act at 50 Code of Federal Regulations 10.13.

The Migratory Bird Treaty Act prohibits the "take" or possession of migratory birds; "take" under this law means to pursue, hunt, shoot, wound, kill, trap, capture, or collect, or attempts to do so (50 Code of Federal Regulations 10.12).

The Migratory Bird Treaty Act is a strict liability statute, meaning that proof of intent, knowledge, or negligence is not an element of a violation of this statute. The statute's language is clear that an action resulting in the "taking" of an individual of a protected species is a violation of this law. The Migratory Bird Treaty Act does not specifically authorize the incidental take of migratory birds; consequently, the Service does not issue permits authorizing such take. F-1-9

The USFWS carries out its mission to protect migratory birds by fostering relationships with entities that have taken effective steps to avoid take, by encouraging others to implement measures to avoid take, and through investigations and enforcement when appropriate. We encourage companies to work closely with the USFWS to identify available protective measures when developing project plans to safeguard wildlife and to implement those measures where applicable.

We also encourage companies to apply for permits authorizing otherwise prohibited activity, such as special purpose utility permits to collect the carcasses of migratory birds. Ultimately, those parties involved with the planning, design, construction, operation, maintenance, and decommissioning of projects are responsible for conducting relevant evaluations of the area and for determining, which, if any, bird species may be affected and for seeking and obtaining necessary permits to avoid liability.

Depending on the alternative that Caltrans selects, the construction of the right-of-way would result in the loss of up to 4,651acres of "natural communities" and additional agricultural lands that migratory birds use for nesting, foraging, and roosting; additionally, trains and vehicles traveling at high speeds will kill many birds and others will collide with or be electrocuted by

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powerlines associated the proposed corridor. These effects of the proposed corridor need to be considered in combination with bird mortalities and tens of thousands of acres of destroyed habitat in the California desert that have resulted from the construction and operation of solar power plants in recent years, migratory birds.

For these reasons, we strongly encourage Caltrans to undertake additional measures to offset the impacts of the proposed action on migratory birds and their habitats. We recommend that Caltrans construct all aboveground electrical lines as described in the Avian Powerline Interaction Committee's http://www.aplic.org/uploads/files/I1218/Reducing Avian Collisions 2012watermarkLR.pdf to reduce the likelihood of electrocution of large birds, such as raptors. We also recommend that Caltrans mitigate for the loss of habitat by funding or undertaking specific activities to restore, enhance, or conserve important habitat for migratory birds or to remove other mortality sources from the Pacific Flyway. Such funding may be directed to the Sonoran Joint Venture (http://sonoranjv.org) or other groups able to implement conservation of migratory birds within the Pacific Flyway. F-1-9 (con't)

Joint ventures are interagency Federal, State, and non-governmental partnerships with the mission of conserving the priority bird species and other wildlife characteristic of their geographic areas.

The National Park Service has no objection to the Section 4(f) approval of the proposed improvements. F-1-10

We appreciate the opportunity to participate in your planning process. If you have any questions regarding comments provided by the USFWS, please contact Ray Bransfield of the Palm Springs Fish and Wildlife Office at 805-644-1766, extension 317.

Sincerely,

Patricia Sanderson Port
Regional Environmental Officer

cc: OEPC Staff Contact: Lisa Treichel, (202) 208-7116, Lisa_Treichel@ios.doi.gov
Ray Bransfield, Palm Springs Fish and Wildlife, (805) 644-1766, ray_bransfield@fws.gov

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Response to Comment F-1

Comment Code (Topic)	Response
F-1-1 (Hydrology)	Bridges and culverts will be designed and incorporated into the project corridor as appropriate so as to minimize the hydrology and floodplain impacts at the specific locations and to mitigate impacts to wildlife crossing as described in Section 2.2.4 of the Final EIR/EIS.
F-1-2 (Biology)	During Spring of 2015, Caltrans conducted a focused plant survey covering all areas with potential to support special-status plants. Section 3.3.3 has been updated to include the results of this focused study. The related discussion on impacts and proposed mitigation measures have also been updated. Table 3.3.3-1 has been updated to include listed and candidate species. Qualifications of surveyors are included in each technical report and in the Natural Environment Study report (NES) Appendix J. The methodology used during the focused plant surveys is included in the technical report.
F-1-3 (Biology)	Caltrans recognizes that formal consultation under Section 7 of the Endangered Species Act was not initiated prior to release of the Draft EIR/EIS, and that the only discussions with U.S. Fish and Wildlife Service (USFWS) with regard to potential impacts on listed species that occurred were for early planning purposes. Text in Section 3.3.5 – Threatened and Endangered Species, Affected Environment section, has been revised to reflect the correct information. Section 3.3.5 has also been updated to be consistent with the information presented in the Biological Assessment and Biological Opinion. The status of the western yellow-billed cuckoo in Table 3.3.5-1 has also been revised from FC to FT.
F-1-4 (Biology)	Caltrans understands that only USFWS has the authority, pursuant to Section 7(a)(2) of the federal Endangered Species Act, to make a formal jeopardy determination for a listed species. The text in this section of the Final EIR/EIS has been revised.
F-1-5 (Biology)	Native species from the local plant community will establish themselves and thrive better on the highway shoulders than non-native species, and will require less maintenance. The populations of native species along the shoulders of the highway will also serve to propagate these species into adjacent open space areas. Due to the "edge" effect, these narrow strips of vegetation will not be high-quality habitat for local wildlife, and few animals are expected to become resident in these areas. Appropriate fencing will discourage wildlife from entering the shoulders of the highway. Caltrans biologists are working with the design team to develop the most effective wildlife exclusion fencing.
F-1-6 (Biology)	Desert tortoise-proof fences will be installed around all work areas in desert tortoise habitat where the probability of injuring or killing a desert tortoise, without such fencing in place, is considered to be reasonably foreseeable.

Comment Code (Topic)	Response
	Section 3.3.5 of the Final EIR/EIS has been amended to address this topic.
F-1-7 (Biology)	Section 3.3.1 has been amended to further address the potential for wildlife/vehicle collisions and the effect it will have on the local population of the common raven. The type of fencing used will be of small diameter openings now typically used as desert tortoise fencing which will direct wildlife toward crossings.
F-1-8 (Biology)	Measure BAN-2 was included to reduce or eliminate the potential for impacts on nesting birds during construction. This comment in support of Measure BAN-2 is noted for the record.
F-1-9 (Biology)	Measure BAN-2 is intended to assure full compliance with the Migratory Bird Treaty Act (MBTA) by comprehensively addressing the potential for accidental "take" of migratory birds, eggs, or nests during construction. Cumulative impacts will be reduced by designing and constructing above-ground electrical facilities in accordance with current standards, including measures to avoid the unintended electrocution of large birds such as raptors. As part of the proposed project and in compliance with Federal and State resource agency permits, Caltrans will restore and preserve natural communities to mitigate for impacts resulting from the permanent conversion of natural plant communities to structures within the project limits.
F-1-10 (Section 4(f))	Your comment regarding the Section 4(f) approval of the proposed project is noted.

Comment F-2

Submitted electronically by U.S. Department of Air Force, Sustainability Office

F-2-1

There is little mention and no discussion of potential negative impacts to AFP 42, Palmdale Airport or Palmdale Regional Airport associated with the project. Therefore, the environmental document does not adequately address potential negative impacts to AFP 42, Palmdale Airport or Palmdale Regional Airport.

No mention of potential development impacts within Runway 04 Approach APZ II.

F-2-2

The Traffic & Transportation component of the environmental document fails to mention AFP 42, Palmdale Airport or Palmdale Regional Airport.

PTC Rail Options 1 & 7 appear to be in Accident Potential Zone I (APZ I) for both AF Plant 42 Runways. Per Air Force & Department of Defense guidance, rapid rail transport is an acceptable land use HOWEVER, the Air Force would discourage a passenger terminal or a major above-ground transmission line to be co-located along that corridor.

Map depicts Passenger Transportation Center southwest of Air Force Plant 42's Runway 22/4. Initial evaluation indicates that site may be in Runway 22/4's Accident Potential Zone II (APZ II). Due to a statistical increased potential for aircraft mishaps in this area, low-density land uses are recommended. Additionally, meeting places are not recommended.

F-2-3

No mention of potential storm water retention basin location impacts to AFP 42 (located with APZs).

F-2-4

The environmental document classifies Air Force Plant 42 (AFP 42) as Category 3, institutional lands with primarily daytime use with regards to noise and vibration impacts However, due to the 24/7 and noise/vibration sensitive activities, AFP 42 is not typical "institutional land" and does not have "primarily daytime" uses. The document then states "there is no vibration impact expected to occur along the entire length of the project corridor as a result of the HSR operation," without providing any

documentation to support the claim. Therefore, until demonstrated otherwise there remains a potential noise and vibration impact to the activities at AFP 42.

F-2-5

No mention of potential glint/glare impacts to AFP 42 due to any solar generating systems.

No mention of potential electro-magnetic interference (EMI) impacts to AFP 42 due to any electric-based rail systems.

F-2-6

The HDC Scoping Summary Report fails to mention Air Force Plant 42 (AFP 42).

The environmental document does not always properly identify Air Force Plant 42 (AFP 42) as first a military airport (PMD) and industrial center, and second a potential civilian airport (Palmdale Regional Airport) via a future joint-use agreement. Further, the terms Palmdale Airport and Palmdale Regional Airport are used throughout in different sections, almost interchangeably, yet both are used to describe the airport as well as the LAWA owned property south and east of AFP 42, which is confusing at best and erroneous at worst. The document, in 5.3.6, documents the "need to acquire property at the Palmdale Regional Airport," which would lead one to believe that there is an intention to acquire land from the AF, which is not the case. If all references were consistent with Table 1-7 there would be fewer issues.

The document is difficult to decipher, leaving one unsure of recommendations regarding the need for encroachments onto AFP 42. Therefore, there remain potential impacts associated with routes of electric-based rail systems encroaching onto AFP 42 and/or defense contractor properties.

It doesn't appear that the Air Force was requested to be a Cooperating and/or Participating Agency for the project, despite the potential direct and indirect impacts to AFP 42.

Response to Comment F-2

Comment Code (Topic)	Response
F-2-1 (Land use)	Caltrans and Metro have held several meetings with representatives from the Federal Aviation Administration (FAA), Air Force Plant (AFP) 42, defense contractors, and Los Angeles World Airports (LAWA) to discuss potential impacts and conflicts with these facilities. Information regarding these meetings is discussed in Chapter 5. Concerns raised during these meetings include potential encroachment into the runway protection zones (RPZ), potential impacts regarding access to the facility during construction, and potential impacts on sensitive test equipment due to noise and vibration. As a result, Caltrans worked to develop alternatives that avoid encroachment into the RPZ. Caltrans has also prepared a study to assess potential effects of electromagnetic interference and concluded that the project would not result in any impacts to AFP 42 (the study is summarized in Section 3.1.9 of the Final EIR/EIS). Finally, Caltrans will work closely with FAA, AFP 42 and LAWA during the final design process to ensure that facility access is not hindered during construction. Based on these added considerations, Caltrans believes that there will be no significant adverse impacts to these facilities resulting from this project.
F-2-2 (Traffic)	Accident Potential Zone II (APZ II) is 3,000 feet wide, 7,000 feet long and extends 15,000 feet from the runway threshold. The existing Palmdale Transportation Center (PTC) is 1000 feet due south of this APZ II zone. Future high-speed rail (HSR) station platforms will be located at the existing PTC or even further south of the APZ II zone. Exhibits depicting this have been added to the Final EIR/EIS in Section 2.1.4.
F-2-3 (Water Quality)	No impacts are anticipated to AFP 42 from storm water retention basins. Based upon preliminary engineering studies, infiltration basins are proposed at most interchanges/intersections within the future highway right-of-way (ROW). The locations of the proposed infiltration basins are shown in Appendix A of the HDC Water Quality Assessment Report (June 2014). In the vicinity of AFP 42, eight (8) basins are located approximately 2,000 feet south of Avenue P and north of the HDC alignment at Division Street, 10th Street, 20th Street, 25th Street, 30th Street, 40th Street, and 50th Street. In addition, four (4) off-site infiltration basins are proposed approximately 1,000 feet south of the HDC alignment: two (2) near 40th Street and two (2) near 25th Street. Water is only expected to be present within the basins for 48 to 72 hours after a rain event. Furthermore, Caltrans Maintenance Division operates a routine maintenance schedule and would inspect the basins on a regular basis. Maintenance triggers have also been established for vegetation control which will reduce the potential for waterfowl in the area.
F-2-4 (Noise)	A report on Future High-Speed Rail Vibration and Impacts to AFP 42 was prepared as part of the Draft EIR/EIS preparation. The results are summarized in Section 3.2.7. It was determined that the closest the HSR centerline tracks would be to the nearest building or facility was

Comment Code (Topic)	Response
	approximately 700 feet. At this distance and the operating parameters of the project the Root Mean Square (RMS) vibration velocity level would be approximately 59 VdB. Note that AFP 42 was classified as Category 3 in the Draft EIR/EIS according to Federal Railroad Administration guidelines. Category 3 sensitivity rating is used for institutional land uses that include schools, places of worship (e.g., churches), other institutions, and quiet offices. Category 2 is for residential land uses. Category 1 is for high sensitivity land uses. Included in Category 1 are buildings where vibration would interfere with operations within the building, including levels that may be well below those associated with human annoyance. Concert halls and other special-use facilities are covered separately under Special Buildings. Typical land uses covered by Category 1 are vibration-sensitive research and manufacturing, hospitals with vibration-sensitive equipment, and university research operations. The degree of sensitivity to vibration will depend on the specific equipment that will be affected by the vibration. Since the Department of Air Force stated that AFP 42 is not a typical institution and operates 24/7 with ground-borne noise and vibration sensitive activities, the potential vibration impact has been re-analyzed under Category 1 sensitivity, which utilized a lower impact threshold. The results have been incorporated into Section 3.2.7 of the Final EIR/EIS.
F-2-5 (Energy)	Glare issues from solar generating systems, specifically photovoltaic panels, have been virtually eliminated by recent technological improvements through the use of dark panels and anti-glare coatings. Impacts from glint/glare are not anticipated. Regarding the impacts from electromagnetic interference, Caltrans has prepared a study to assess the potential impacts due to electromagnetic interference. The study concluded that the project would not result in any impacts to AFP 42. Please see Section 3.2.9 of the Final EIR/EIS for a summary of the results of this study.
F-2-6 (Other)	Your comments have been noted and revisions have been made throughout the Final EIR/EIS to properly refer to Air Force Plant 42 and the Palmdale Regional Airport. Our assumption that FAA and LAWA were the appropriate agencies to consult with was incorrect. We apologize for the oversight in not inviting the Air Force to be a Cooperating and/or Participating Agency. A letter inviting the Air Force to be a Cooperating and/or Participating Agency was sent on June 11, 2015, and a copy is included in Appendix K.

Comment F-3

U.S Department
of Transportation
**Federal Aviation
Administration**

Western-Pacific Region
Los Angeles Airports District Office

Federal Aviation Administration
P.O. Box 92007
Los Angeles, CA 90009-2007

December 2, 2014

Mr. Ronald Kosinski RK
Deputy District Director for Environmental Planning
Caltrans District 7
100 South Main Street, Mailstop 16A
Los Angeles, CA 90012

Dear Mr. Kosinski:

Draft High Desert Corridor Environmental Impact Report/Environmental Impact Statement and Section 4(f)(De Minimis Findings)

This letter provides changes and corrections on the submitted proposed Draft High Desert Corridor Environmental Impact Report/Environmental Impact Statement and Section 4(f)(De Minimis Findings for the State of California Department of Transportation (Caltrans) received on October 20, 2014. The document review was conducted by staff at the Federal Aviation Administration (FAA), Los Angeles Airports District Office (LA ADO) and other FAA Lines of Business. F-3-1

It appears that based on earlier correspondence and our July 15, 2014, meeting that Caltrans has addressed issued in the FAA's, April 25, 2011 letter. Additionally, enclosed are changes and corrections to assist in your preparation of the Final EIR/EIS. Please continue to inform the FAA as the proposed project progresses.

If you have any questions concerning this review, please contact me at (310) 725-3637 or victor.globa@faa.gov.

Sincerely,

Victor Globa
Environmental Protection Specialist

Enclosure

U.S. DEPARTMENT OF TRANSPORTATION
FEDERAL AVIATION ADMINISTRATION

CHANGES/CORRECTIONS TO DRAFT ENVIRONMENTAL IMPACT REPORT/ENVIRONMENTAL IMPACT STATEMENT AND SECTION 4(F)(DE MINIMIS FINDINGS) FOR THE PROPOSED HIGH DESERT CORRIDOR LOS ANGELES AND SAN BERNARDINO COUNTIES, CALIFORNIA DATED DECEMBER 2, 2014

The Federal Aviation Administration's (FAA) has the following changes and corrections to the Proposed High Desert Corridor Draft EIR/EIS received on October 20, 2014.

General Corrections/Changes:

Cover Sheet

1) The turtle on top of the page appears to be personalized with the name Brad. F-3-2

Summary

2) Page S-19, Unresolved Issues - If not already completed, identify release of airport land at Palmdale Airport. F-3-3

Table of Contents

3) Page ix, List of Figures - Formatting errors

4) Page xv, List of Tables - Formatting error. F-3-4

Chapter 1 - Proposed Project

5) Page 1-21, Airports, paragraph one, last sentence - "Of these, SCLA and Los Angeles/Palmdale Regional Airport are two public airports located near each end of the subject corridor that have generated considerable interest as potential centers for future economic growth." Please clarify this sentence since it is ambiguous. F-3-5

6) Page 1-21, Airport Name - Please remove "County" from Apple Valley Airport. F-3-6

7) Page 1-21, Airports, paragraph two, third sentence - "The City of Adelanto's Traffic Circulation Improvement Plan emphasizes "improved access/visibility to Adelanto's primary commercial, business, and industrial sectors, *including a new major airport*" (emphasis added). Is the plan referring to SCLA or another new airport? F-3-7

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Chapter 2 - Project Alternatives

8) Page 2-26, Section 2.3.1, Variation A - Add a reference to law that gives Caltrans the easement: On April 5, 2000, Section 731 of Public Law 106-181, the Wendell H. Ford Aviation Investment and Reform act for the 21st Century granted an easement to the City of Los Angeles owner and operator of Palmdale Regional Airport to "provide sufficient right-of-way to facilitate the construction of the California State Route 138 bypass."[1] F-3-8

9) Page 2-69, Agreement with LAWA, last sentence - A Cooperative Agreement was signed between Caltrans and LAWA on April 2003." The day in the date is missing. Also, is there a copy of the Cooperative Agreement? F-3-9

Chapter 3 - Affected Environment, Environmental Consequences, and Avoidance, Minimization, and/or Mitigation Measures

10) No Comments

Chapter 4 - California Environmental Quality Act Evaluation

11) No Comments

Chapter 5 - Comments and Coordination

12) Page 5-2, Table 5-1, Cooperating and Participating Agencies List - Please change the contact for the U. Federal Aviation Administration, Western Pacific Region from Mr. Ruben Cabalbag to Mr. Patrick Lammerding. F-3-10

13) Page 5-13, 5.3.7, Federal Aviation Administration - This section indicates that the FAA sent an FAA to the September 9, 2013, meeting at Air Force Plant 42. Which branch of the FAA attended this meeting? F-3-11

END OF COMMENTS

[1] http://www.gpo.gov/fdsys/pkg/PLAW-106publ181/html/PLAW-106publ181.htm

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Response to Comment F-3

Comment Code (Topic)	Response
F-3-1 (Other)	Your acknowledgement that Caltrans has addressed issues raised by the Federal Aviation Administration (FAA) on April 20, 2011, is well received. Your suggested edits have been incorporated into the Final EIR/EIS.
F-3-2 (Other)	That was homage to Brad Mitzelfelt, the San Bernardino County Supervisor who helped spearhead this project.
F-3-3 (Other)	Caltrans agrees with the requested revisions, and the text about the release of airport land at Palmdale Airport has been added to the Unresolved Issues.
F-3-4 (Other)	The formatting has been corrected in the Final EIR/EIS.
F-3-5 (Other)	Text revision has been made in the Final EIR/EIS.
F-3-6 (Other)	The text has been revised in the Final EIR/EIS.
F-3-7 (Other)	The new major airport mentioned here is the Southern California Logistics Airport (SCLA).
F-3-8 (Other)	Reference to the Cooperative Agreement between Caltrans and the City of Los Angeles, which cites the Wendell H. Ford Aviation Investment and Reform Act for the 21st Century, has been added.
F-3-9 (Other)	The Cooperative Agreement was approved on April 13, 2003. That date has been added to the text. In addition, a reference to the Cooperative Agreement, located in Appendix K, has been added.
F-3-10 (Coordination)	The text has been revised in the Final EIR/EIS.
F-3-11 (Coordination)	The Final EIR/EIS has been revised to remove the reference regarding FAA attendance at the AFP 42 meeting.

Comment F-4

F-4

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION IX
75 Hawthorne Street
San Francisco, CA 94105

DEC 10 2014

Ronald Kosinski
Deputy District Director
Caltrans District 7
Division of Environmental Planning
100 South Main Street, Mail Stop 16A
Los Angeles, CA 90012

Subject: Draft Environmental Impact Statement for the High Desert Corridor Project, Los Angeles and San Bernardino Counties, CA (CEQ# 20140291)

Dear Mr. Kosinski:

The U.S. Environmental Protection Agency has reviewed the Draft Environmental Impact Statement for the High Desert Corridor Project pursuant to the National Environmental Policy Act, Council on Environmental Quality regulations (40 CFR Parts 1500-1508), and Section 309 of the Clean Air Act. EPA was a "Participating Agency" (as defined in 23 USC 139) in previous High Desert Corridor efforts, and we will continue to participate in this expanded project. We provided Caltrans with recommendations via scoping comments on November 9, 2007, October 25, 2010, and September 3, 2013, and we offer additional recommendations to protect human health and the environment through this letter and our attached detailed comments. F-4-0A

The State of California has assumed responsibilities under the National Environmental Policy Act for the High Desert Corridor Project pursuant to the *Memorandum of Understanding Between the Federal Highway Administration and the California Department of Transportation Concerning the State of California's Participation in the Surface Transportation Project Delivery Pilot Program*. This project consists of a new expressway extending approximately 63 miles east-west between SR-14 in Los Angeles County and SR-18 in San Bernardino County. Potential features along the expressway right-of-way include: a toll-way, high-speed rail feeder service, a bike path, renewable energy production, electric vehicle charging stations, and a utility corridor. EPA appreciates the California Department of Transportation (Caltrans) decision to revise the project scope to look at a broad range of uses within the proposed corridor. We commend Caltrans for considering alternative modes of transportation and energy infrastructure, which have the potential to help offset project impacts and provide environmental benefits to the region. F-4-0B

Based on our review of the Draft EIS, the document does not contain sufficient information for EPA to fully assess environmental impacts. It is unclear which decisions Caltrans plans to make within this Record of Decision and which project decisions would later tier off of this EIS and require additional National Environmental Policy Act analysis. In addition, important project elements are not described consistently within the Draft EIS, such as the speed of high-speed rail service and the type of structure that would be used to cross the Mojave River. Such project features heavily impact the magnitude of impacts and, therefore, must be analyzed consistently across all resource categories. Descriptions of certain project elements are also incomplete, such as the utility corridor and the width of the project right-of-way with and without HSR, among other project elements. Full descriptions of all project F-4-0C F-4-0D F-4-0E

features are needed to ensure that impacts are clearly disclosed and all appropriate avoidance, minimization, and mitigation measures are considered. F-4-0F

We appreciate early consultation on transportation conformity and have no further comments on that portion of the air quality analysis. Nevertheless, we have identified specific environmental impacts that should be avoided, minimized, or mitigated in order to fully protect human health and the environment. This major new transportation corridor would bring heavy vehicle and truck traffic near sensitive receptors that currently do not experience high traffic volumes, which could result in elevated local air emissions and associated health effects. Construction emissions could also exacerbate asthma and other respiratory conditions. Emissions do not appear to be fully disclosed, and additional mitigation measures are available. F-4-0G

We are also concerned that the project traverses several desert washes, creeks, and the Mojave River, which play important roles in the natural hydrologic system and serve as valuable wildlife corridors. The Mojave River is a particularly unique and important resource that supports a perennial flow in an arid region and provides habitat for protected species, and additional avoidance, minimization, and mitigation measures are available. F-4-0H

Please see our attached detailed comments for further discussion on the issues mentioned above and recommendations for improving environmental outcomes. Our attached comments also address our concerns with: indirect impacts; tribal, environmental justice, and noise impacts; impacts to the cleanup remedy at George Air Force Base Superfund Site and potential exposure to on-site contamination; and considerations for incorporating renewable energy. We believe the recommendations provided herein can be addressed in the Final EIS. We are rating the Draft EIS "Environmental Concerns – Insufficient Information" (EC-2). Please find a summary of our rating system attached. F-4-0I

Prior to the release of Draft EISs for future projects, EPA requests the opportunity to comment on the range of alternatives and methodologies for analyzing impacts to major environmental resources. This would enable EPA to provide recommendations at a stage in the project when comments can most efficiently be addressed, which could help streamline the environmental review process. F-4-0J

We appreciate the opportunity to review this Draft EIS, and are available to discuss our comments. When the Final EIS is released for public review, please send one hard copy and one CD-ROM to the address above (Mail Code: ENF 4-2). If you have any questions, please contact me at 415-947-4161, or contact Jen Blonn, the lead reviewer for this project. Ms. Blonn can be reached at 415-972-3855 or blonn.jennifer@epa.gov. F-4-0K

Sincerely,

Connell Dunning

Connell Dunning, Transportation Team Leader
Environmental Review Section

Enclosure: Summary of the EPA Rating System

CC Via Email:
Don Gronstal, U.S. Air Force
Mark Cohen, U.S. Army Corps of Engineers

Mark McLoughlin, California High-Speed Rail Authority
Robert Machuca, Los Angeles County Metropolitan Transportation Authority
Edmund J. Pert, California Department of Fish and Wildlife
Linda Stone, California Regional Water Quality Control Board

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SUMMARY OF EPA RATING DEFINITIONS*

This rating system was developed as a means to summarize the U.S. Environmental Protection Agency's (EPA) level of concern with a proposed action. The ratings are a combination of alphabetical categories for evaluation of the environmental impacts of the proposal and numerical categories for evaluation of the adequacy of the Environmental Impact Statement (EIS).

ENVIRONMENTAL IMPACT OF THE ACTION

"LO" (Lack of Objections)

The EPA review has not identified any potential environmental impacts requiring substantive changes to the proposal. The review may have disclosed opportunities for application of mitigation measures that could be accomplished with no more than minor changes to the proposal.

"EC" (Environmental Concerns)

The EPA review has identified environmental impacts that should be avoided in order to fully protect the environment. Corrective measures may require changes to the preferred alternative or application of mitigation measures that can reduce the environmental impact. EPA would like to work with the lead agency to reduce these impacts.

"EO" (Environmental Objections)

The EPA review has identified significant environmental impacts that should be avoided in order to provide adequate protection for the environment. Corrective measures may require substantial changes to the preferred alternative or consideration of some other project alternative (including the no action alternative or a new alternative). EPA intends to work with the lead agency to reduce these impacts.

"EU" (Environmentally Unsatisfactory)

The EPA review has identified adverse environmental impacts that are of sufficient magnitude that they are unsatisfactory from the standpoint of public health or welfare or environmental quality. EPA intends to work with the lead agency to reduce these impacts. If the potentially unsatisfactory impacts are not corrected at the final EIS stage, this proposal will be recommended for referral to the Council on Environmental Quality (CEQ).

ADEQUACY OF THE IMPACT STATEMENT

"Category 1" (Adequate)

EPA believes the draft EIS adequately sets forth the environmental impact(s) of the preferred alternative and those of the alternatives reasonably available to the project or action. No further analysis or data collection is necessary, but the reviewer may suggest the addition of clarifying language or information.

"Category 2" (Insufficient Information)

The draft EIS does not contain sufficient information for EPA to fully assess environmental impacts that should be avoided in order to fully protect the environment, or the EPA reviewer has identified new reasonably available alternatives that are within the spectrum of alternatives analysed in the draft EIS, which could reduce the environmental impacts of the action. The identified additional information, data, analyses, or discussion should be included in the final EIS.

"Category 3" (Inadequate)

EPA does not believe that the draft EIS adequately assesses potentially significant environmental impacts of the action, or the EPA reviewer has identified new, reasonably available alternatives that are outside of the spectrum of alternatives analysed in the draft EIS, which should be analysed in order to reduce the potentially significant environmental impacts. EPA believes that the identified additional information, data, analyses, or discussions are of such a magnitude that they should have full public review at a draft stage. EPA does not believe that the draft EIS is adequate for the purposes of the NEPA and/or Section 309 review, and thus should be formally revised and made available for public comment in a supplemental or revised draft EIS. On the basis of the potential significant impacts involved, this proposal could be a candidate for referral to the CEQ.

*From EPA Manual 1640, Policy and Procedures for the Review of Federal Actions Impacting the Environment.

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U.S. EPA DETAILED COMMENTS ON THE HIGH DESERT CORRIDOR DRAFT ENVIRONMENTAL IMPACT STATEMENT, CALIFORNIA, DECEMBER 10, 2014

Scope of the Draft Environmental Impact Statement

The Draft EIS discusses several potential project elements, including: expressway/toll way, high-speed rail (HSR) feeder service, renewable energy generation, electric vehicle charging stations, utility corridor, on-site concrete batch plant, and bikeway. The Draft EIS states that "environmental clearance would need to be obtained" by the utility providers prior to using the corridor, and siting renewable energy would "likely require additional environmental review" (3-413). The Draft EIS does not fully explain which decisions the California Department of Transportation (Caltrans) intends to make for this project in this Record of Decision (ROD). F-4-1

Recommendations for the Final EIS:

For each project component, explicitly state: (1) which decisions Caltrans intends to make within this ROD, and (2) which decisions would later tier off of this EIS and require additional National Environmental Policy Act (NEPA) analysis. Include the following project components: expressway/toll-way, HSR track-way including portions that would integrate with the statewide California HSR system, HSR supporting facilities, HSR station and parking, renewable energy generation and supporting features, electric vehicle charging stations, utility corridor, on-site concrete batch plant, and bikeway.

Consistency and Completeness

Some project features and impacts are not described consistently within the Draft EIS, and descriptions of the proposed project right-of-way, Mojave River bridge options, utility corridor, and HSR system are incomplete. Please consider the following recommendations.

Recommendations for the Final EIS:

Right-of-Way

- Please clearly describe the ROW widths for alternatives with and without HSR and disclose the widths that were used to analyze environmental, cultural, and community impacts. Ensure each alternative is analyzed consistently across all resource categories. The Draft EIS describes the corridor as being the same width for alternatives with and without HSR (typically 500 feet from SR-14 to US 395 and 300 feet from US 395 to SR 18; image on page 2-31). This is inconsistent with Page 3-490, which states that alignments without HSR are comparatively narrower. If the same amount of ROW is proposed with and without HSR, please explain why and, for alternatives without HSR, consider reducing the ROW to avoid environmental impacts. F-4-2A

Mojave River Crossing

- Clearly and consistently indicate whether Caltrans is proposing to span the Mojave River, and revise analyses of impacts on the Mojave River so that bridge crossings are consistent for all resource categories. Figure 2-30 shows the Mojave River Bridge Option A with piers in river, and Section 3.3.2 (Wetlands and Other Waters) discusses impacts from footings below the ordinary high water mark of the Mojave River. This is inconsistent with Section 3.3.1 (Natural Communities), which says the proposed roadway is expected to span the river on a bridge with no footings within the river (page 3-424). F-4-2B
- As part of the description of alternatives, please clearly explain the alternative bridge options for crossing the Mojave River. Section 3.3.2 mentions: (1) Mojave River Bridges Option 1, Option 2, Option 3; (2) Mojave River Bridges Option A and Option B; (3) Mojave River F-4-2C

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Bridges Rail with Freeway Option 1A; (4) Mojave River Bridges Rail with Freeway Option 2; and (5) Mojave River Bridges Rail with Freeway Option 3. It's unclear what each of these bridge options entails. F-4-2C (cont.)

Relocations

- Provide a clear table indicating residential and nonresidential relocations and partial acquisitions by community. Table 3.1.4-18 lumps "main alignment/common areas" together, and does not breakdown impacts by specific communities. Please also revise Section 3.1.4.2, *Relocation and Property Acquisition*, and Section 3.1.4.1, *Community Character and Cohesion*, so that relocation impact numbers are consistent between sections. F-4-3

Utility Corridor

- Provide programmatic-level information for the proposed utility corridor, such as the potential location within the corridor, the potential footprint, and grade profile options. While we realize that project level analysis is being deferred to a later date, programmatic analysis could help Caltrans minimize the risk of designing other project features in a manner that would interfere with the utility corridor or result in the need for duplicative construction activities and associated environmental impacts. F-4-4

Rail

- Describe why 160 feet of ROW is needed for the HDC HSR line when only 100 feet is needed for the statewide HSR system, and, if safety requirements could still be met, consider reducing the rail ROW in order to minimize environmental impacts. F-4-5
- Clarify whether the proposed project would allow for diesel trains to run along the HDC, and if so, ensure that the air, noise, and health impacts from diesel trains are fully analyzed. The Draft EIS mentions both electric and diesel train technology, and does not appear to make a definitive commitment to one or the other (page 2-15). EPA encourages electric technology because it has zero local air emissions. F-4-6
- Explain why there would be more relocations for the "main alignment/common area" alternatives that do not have HSR relative to alternatives with HSR, as indicated in Table 3.1.4-18 (page 3-103). Explain how the "main alignment/common area" alternatives are different with and without HSR. F-4-7
- Clearly indicate the proposed speed of the HSR system, and ensure that the same speed is used to analyze all impacts. Page 2-5 says the maximum speed would be 180, and the noise analysis on page 3-391 assumes a maximum speed of 125. F-4-8
- Explain whether the Palmdale HDC HSR station would be co-located with the Palmdale station for the statewide HSR system. If they would not be co-located, please justify the need for two HSR stations within Palmdale, explain how this may impact HSR ridership, and disclose other impacts of having two stations. F-4-9
- Clarify whether the footprint for rail electrical substations and transformers was included in the impact analyses, and add it to analyses if it has not already been included. F-4-10
- Please explain whether the Metrolink station would move if Option 1 is selected, which would move the existing Palmdale Transportation Center south approximately 800 feet. If the Metrolink station would move as a result of the HDC project, please ensure that all impacts are disclosed in the Final EIS. F-4-11
- Please include a map to depict the grade separation of HSR as it enters Palmdale. The Draft EIS says a combination of aerial and cut-and-cover or tunneling structures may be used (page F-4-12

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2-6). Please ensure that the appropriate grade profile is used to analyze community cohesion, noise, and air emission impacts. F-4-12 (cont.)

- Clarify whether air emissions were updated to correspond with the updated traffic information in Appendix M for the Palmdale HSR station options. Ensure that emissions from induced traffic caused by the Palmdale HSR station are disclosed in the EIS, along with measures to minimize emissions, such as designing the station and parking lots to encourage local transit connectivity and walkability. F-4-13
- Explain how HDC decisions could be revised after the California HSR alignment is selected in Palmdale in order maximize system efficiencies and avoid duplicative construction impacts on air quality. It is unclear how Caltrans could select a HDC rail alignment at this time that would connect the systems because the California HSR alignment in Palmdale has not yet been selected. F-4-14

Air Quality and Health

We appreciate Caltrans' responsiveness to EPA comments through the interagency consultation process for transportation conformity, which is particularly important given regional air quality challenges. The Antelope Valley Air Quality Management District covers the western portion of the proposed project and is a nonattainment area for the ozone National Ambient Air Quality Standard (NAAQS). The Mojave Desert Air Quality Management District covers the eastern portion and is a nonattainment area for the ozone and PM_{10} NAAQS. Due to existing air quality challenges and the magnitude of this project, EPA remains concerned that operational and construction emissions could significantly harm air quality and exacerbate local health risks.

Freight and automobile movement along the new corridor could result in long-term localized health impacts to receptors in the project area. In discussing operational impacts, page 3-379 states, "while diesel exhaust may pose potential cancer risks to receptors spending time on or near high risk diesel particulate matter facilities, most receptors' short term exposure would only cause minimal harm, and these risks would greatly diminish in the future operating years of the project due to planned emission control technology." EPA strongly disagrees with this conclusion. Exposure would not be short-term for individuals living and working near the new roadway. In addition, while emission control technology will likely reduce emissions per vehicle, future total emissions with the new roadway would still be significantly greater than emission levels currently experienced by individuals who reside next to the proposed corridor. F-4-15

Further, construction emissions from the proposed project do not appear to be fully disclosed. Table 3.6-3 includes several categories of construction emissions. Material hauling, potential concrete batch plant operations, potential tunnel boring for HSR in Palmdale, use of other heavy equipment, and employee vehicle trips are not discussed. The roadway would require 9 feet of fill and the HSR would require 15 feet of fill (3-544). It is unclear whether emissions from importing this fill material have been accounted for. Further, in discussing construction impacts, page 3-555 states, "health effects from carcinogenic air toxics at sensitive receptors would be considered less than significant because the risk posed by these pollutants is based on long term (70-year lifetime) exposure" and construction would only last 5 years. EPA strongly disagrees. Exposure to elevated levels of exhaust from heavy duty construction equipment and dust during a 5-year construction period has the potential adversely impact local sensitive receptors, particularly those with asthma or other respiratory diseases. F-4-16

Recommendations for the Final EIS:

- Assess how local air quality impacts during project construction and operation may affect health and exacerbate asthma or other respiratory conditions in children and adults. This F-4-17

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discussion should include qualitative as well as quantitative information and mitigation options for those most impacted. F-4-17 (cont.)

- Clearly indicate the number of total traffic and diesel trucks that are expected to use the HDC daily in 2020 and 2040 so that residences and businesses neighboring the alignment have clear expectations. F-4-18
- Revise the analysis of construction emissions to ensure that all sources of emissions are included, such as material hauling, concrete batch plant operations, potential tunnel boring (for HSR in Palmdale), employee vehicle trips, and any other heavy equipment that would be required. Estimate construction emissions for each alternative and provide a table comparing results. F-4-19
- Commit to locate the potential concrete batch plant at least 1,000 feet away from sensitive receptors, including schools, daycare centers, senior care facilities, residences, parks, and other areas where children may congregate. Specify other control measures that would be used for the concrete batch plant to minimize pollution. F-4-20
- Analyze children's health risks from operational and construction emissions to demonstrate that the proposed project meets the intent of Executive Order 13045, which directs each federal agency to make it a high priority to identify, assess, and address environmental health risks that may disproportionately affect children. Children breathe more relative to their body mass than adults do and their natural defenses are less developed, making them particularly vulnerable to elevated air pollution levels. F-4-21
- Establish truck traffic routes away from schools, daycares, and residences, or at a location with the least impact if those areas are unavoidable. Notify nearby sensitive receptors of construction periods and the expected amount of heavy truck traffic. Crossing guards should be provided in areas where construction activities are located near places where children congregate. F-4-22
- Revise the statement of page 3-340 which says that the Mojave Desert Air Basin has been designated as an attainment area for the PM_{10} federal standard. The Mojave Desert Air Quality Management District portion of the Mojave Desert Air Basin is not in attainment for the federal PM_{10} standard (page 3-339). F-4-23

Page 3-346 states that, per Federal Highway Administration (FHWA) Guidance, the HDC warrants quantitative MSAT analysis to differentiate alternatives because the project would: (1) create or add significant new capacity to urban highways…with traffic volumes where the average annual daily traffic is projected to be in the range of 140,000 to 150,000 or greater by the design year; and (2) be located near population areas or in rural areas near concentrations of vulnerable populations (i.e. schools, nursing homes, hospitals). EPA agrees with Caltrans' conclusion that the severity of impacts from this project warrant a quantitative MSAT analysis. Numerous recent studies have examined the association between living near major roads and different adverse health endpoints, such as cardiovascular effects, premature adult mortality, reduced lung function, impaired lung development in children, and adverse birth outcomes, including low birth weight and size. [1,2] The Draft EIS further states that available technical tools do not enable reliable predictions of project-specific health impacts of the emission changes associated with the alternatives. EPA disagrees; tools are available to perform the analysis, and results should be used to inform mitigation measures for areas where truck traffic will be within 500 feet of sensitive receptors. F-4-24

[1] For additional information on MSATs, please see EPA's MSAT website http://www.epa.gov/otaq/toxics.htm.
[2] Smith, Martyn. "Advances in Understanding Benzene Health Effects and Susceptibility." *Annual Review of Public Health.* Vol. 31: 133-148. April 2010. http://www.ncbi.nlm.nih.gov/pubmed/20070208?dopt=Abstract

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Recommendations for the Final EIS:
Analyze potential health impacts from MSATs within 500 feet of the new roadway to inform decision-making between project alternatives and to inform avoidance, minimization, and mitigation options. EPA is available to discuss tools for assessing such impacts and mitigation measures, such as providing new heating, ventilation and air conditioning systems to schools within 500 feet of the corridor. F-4-24 (cont.)

Construction Air Quality Mitigation
Due to the serious nature of air pollution in the Mojave Desert Air Basin, best available control measures should be implemented at all times.

Recommendations for the Final EIS:
Include a Construction Emissions Mitigation Plan for fugitive dust and diesel particulate matter in the Final EIS, and include all components listed below.

Fugitive Dust Source Controls:

- Stabilize open storage piles and disturbed areas by covering and/or applying water or chemical/organic dust palliative where appropriate. This applies to both inactive and active sites, during workdays, weekends, holidays, and windy conditions.
- Install wind fencing and phase grading operations where appropriate, and operate water trucks for stabilization of surfaces under windy conditions.
- When hauling material and operating non-earthmoving equipment, prevent spillage and limit speeds to 15 miles per hour (mph). Limit speed of earth-moving equipment to 10 mph.

Mobile and Stationary Source Controls:

- Minimize use, trips, and unnecessary idling of heavy equipment.
- Maintain and tune engines per manufacturer's specifications to perform at EPA certification levels, where applicable, and to perform at verified standards applicable to retrofit technologies.
- Employ periodic, unscheduled inspections to limit unnecessary idling and to ensure that construction equipment is properly maintained, tuned, and modified consistent with established specifications. The California Air Resources Board has a number of mobile source anti-idling requirements which should be employed (http://www.arb.ca.gov/msprog/truck-idling/truck-idling.htm). F-4-25
- Prohibit any tampering with engines and require continuing adherence to manufacturer's recommendations.
- Commit to the best available emissions control technologies for project equipment.
  - *On-Highway Vehicles:* On-highway vehicles used for this project should meet, or exceed the U.S. EPA exhaust emissions standards for model year 2010 and newer heavy-duty on-highway compression-ignition engines (e.g., long-haul trucks, refuse haulers, shuttle buses, etc.).[3]
  - *Nonroad Vehicles & Equipment:* Nonroad vehicles & equipment used for this project should meet, or exceed the U.S. EPA Tier 4 exhaust emissions standards for heavy-duty nonroad compression-ignition engines (e.g., construction equipment, nonroad trucks, etc.).[4]
  - *Low Emission Equipment Exemptions:* The equipment specifications outlined above

[3] http://www.epa.gov/otaq/standards/heavy-duty/hdci-exhaust.htm
[4] http://www.epa.gov/otaq/standards/nonroad/nonroadci.htm

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should be met unless: 1) a piece of specialized equipment is not available for purchase or lease within the United States; or 2) the relevant project contractor has been awarded funds to retrofit existing equipment, or purchase/lease new equipment, but the funds are not yet available.

Advanced Technology Demonstration & Deployment – Caltrans is encouraged to demonstrate and deploy heavy-duty technologies that exceed the latest U.S. EPA emission performance standards for the equipment categories that are relevant for this project (e.g., plug-in hybrid-electric vehicles, battery-electric vehicles, fuel cell electric vehicles, advanced technology locomotives, etc.).

Administrative controls:

- Identify all commitments to reduce construction emissions and update the air quality analysis to reflect additional air quality improvements that would result from adopting specific air quality measures. F-4-25 (cont.)
- Specify the means by which Caltrans will minimize impacts to sensitive receptors, such as children, elderly, and infirm. For example, locate construction equipment and staging zones away from sensitive receptors and fresh air intakes to buildings and air conditioners.
- Prepare an inventory of all equipment prior to construction.
- Develop a construction traffic and parking management plan that minimizes traffic interference and maintains traffic flow.
- Identify where implementation of mitigation measures is rejected based on economic infeasibility.

Cumulative Air Quality Impacts

The cumulative air quality impacts analysis presents unsupported conclusions. The Draft EIS concludes that, "The proposed project would not substantially contribute to the cumulative impacts because criteria pollutants and GHG emissions would decrease in association with the diversion of passenger vehicles" (page 3-596). It's unclear whether Caltrans assumes that some car trips would be diverted if the train option is selected, or whether cars and trucks would be diverted to another location. Either way, the Draft EIS should acknowledge that creating a new highway in an area with existing high freight volumes and providing direct connectivity to the Southern California Logistics Airport could induce a significant number of additional freight truck trips, which could result in cumulative air emissions. F-4-26

Recommendations for the Final EIS:

- Revise the cumulative impact assessment for air quality so that it considers future air emissions from the proposed project in combination with other existing and planned projects in the area, including the Southern California Logistics Airport and other freight/cargo centers.
- Please use the June 2005 *Guidance for Preparers of Indirect and Cumulative Impacts Analysis* developed jointly by Caltrans, FHWA, and EPA (http://www.dot.ca.gov/ser/cumulative_guidance/purpose.htm). This guidance describes a methodology for analyzing cumulative effects.

Valley Fever

The incidence of Valley Fever (Coccidioidomycosis) has recently increased in much of California, including the Antelope and Victor Valleys. The Draft EIS discusses the possibility of exposure to the spores during construction and states that through the use of mitigation measures, the risk would be minimized (page 3-557). EPA believes that additional mitigation measures are important for the protection of human health. F-4-27

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Recommendations for the Final EIS:
Include a requirement for a formal Environmental Awareness Program to be implemented for construction and maintenance workers. The program should include training on:

- Health hazards of Valley Fever,
- How it is contracted,
- What symptoms to look for,
- Proper work procedures to minimize exposure,
- How to use personal protective equipment,
- The need to wash prior to eating, smoking or drinking and at the end of the shift, and
- The need to inform the supervisor of suspected symptoms of work-related Valley Fever.

The training should identify those groups of individuals most at risk and urge individuals to seek prompt medical treatment if Valley Fever symptoms develop, which include flu-like illness with cough, fever, chest pain, headache, muscle aches and tiredness. F-4-27 (cont.)

Aquatic Resource Impacts
The Draft EIS explains that, in general, the hydrologic regime along the entire corridor exhibits the characteristics of an alluvial fan, with several streams and channels, including the Mojave River, Bell Mountain Wash, Fremont Wash, Mescal Wash, Big Rock Creek, and Little Rock Creek. Along the alignment, most soil is characterized as type A or B, meaning it is more pervious with low runoff potential. Several portions of the alignment are within 100 year flood zones (Table 3.2.1-1). EPA is concerned that increasing the acreage of impervious surface could worsen flood impacts and harm natural hydrology. The proposed alternatives would add approximately 995 to 1,365 acres to the existing 80 acres of impervious surface area (pages 3-279, 3-280). The Draft EIS discusses elevating the project to protect against flooding and incorporating drainage facility controls, but specific commitments for managing stormwater are not made. F-4-28

The Mojave River is a major system with significant stretches of dense riparian vegetation, which are habitat for protected species, such as willow flycatcher and least Bell's vireo. We are particularly concerned with portions of the Mojave River that support perennial flow and high functioning wetland habitat, such as the proposed location of the HDC crossing (3-278). High priority should be given to avoidance of impacts to such unique and high value resources in an otherwise arid region. Additionally, Little Rock and Big Rock Washes are braided, large sandy ephemeral stream systems that appear to play an important function within floodplains. These two washes are already recognized by the City of Palmdale and the County of Los Angeles as significant ecological areas with high resource values (see City of Palmdale General Plan).

Recommendations for the Final EIS:

- Analyze and fully disclose how the project could impact 303(d) listed water bodies, including Little Rock Reservoir, Mojave Forks Reservoir outlet to Upper Narrows, and the Mojave River Upper Narrows and Lower Narrows. Add measures to avoid, minimize, or mitigate impacts and ensure that this project does not impede attainment of water quality standards. F-4-29
- Disclose temporary impacts to Waters of the U.S. The Draft EIS says they will be determined during the final design as each phase proceeds (page 3-561). This information should be disclosed to the public through the EIS process. F-4-30
- Include quantified estimates of increases in stormwater runoff from the proposed project. F-4-31
- Commit to use runoff control features that mimic existing flow conditions to the maximum extent possible in order to avoid exacerbating downstream flooding conditions and associated erosion. This is currently included as a "recommendation" for the project, but not a F-4-32

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commitment (page 3-279). If Caltrans cannot make this commitment in the Final EIS, then disclose all potential downstream flooding and erosion impacts that would likely result from diverting flows. F-4-32 (cont.)

- Characterize the functional condition of waters and adjacent riparian areas. F-4-33
- Commit to bridge over deeper water resources, such as Little Rock Wash, Big Rock Wash, Turner Wash, Ossam Wash, and Mojave River. This is currently a "recommendation" for the project, but not a commitment (page 3-279). F-4-34
- Consider whether the 100-year storm event, which is the current design standard for this project, would be sufficient to protect against flooding given predictions for more severe storm events under climate change scenarios and discuss in the Final EIS. F-4-35

Clean Water Act Section 404

This project involves the discharge of dredged or fill material into jurisdictional waters. Discharges of dredged or fill material into Waters of the U.S. require authorization by the U.S. Army Corps of Engineers (Corps) under Clean Water Act (CWA) Section 404. The Federal Guidelines at 40 CFR Part 230 promulgated under CWA Section 404 (b)(1) provide substantive environmental criteria that must be met to permit such discharges into Waters of the U.S.

The purpose of the Guidelines is to restore and maintain the chemical, physical, and biological integrity of Waters of the U.S. These goals are achieved, in part, by controlling discharges of dredged or fill material (40 CFR 230.1(a)). Fundamental to the Guidelines is the principle that dredged or fill material should not be discharged into the aquatic ecosystem, unless it can be demonstrated that there is no less environmentally damaging practicable alternative that achieves an applicant's project purpose. In addition, no discharge can be permitted if it will cause or contribute to significant degradation of Waters of the U.S., cause or contribute to a violation of a State water quality standard, or jeopardize a federally listed species. Caltrans will have to demonstrate that potential impacts to Waters of the U.S. have been avoided and minimized to the maximum extent practicable prior to obtaining a CWA Section 404 permit (40 CFR 230.10(a) and 230.10(d)). F-4-36

The Draft EIS states that several aquatic resources within the project area are non-jurisdictional and identifies the Mojave River and four of its tributaries as jurisdictional. The Draft EIS explains that determinations on whether waters are jurisdictional and actual impact numbers are subject to Corps verification. Caltrans anticipates between 3.537 and 4.707 acres of impacts to Waters of the U.S., depending on the alternative selected.

Recommendations for the Final EIS:

- Incorporate information from a Corps-approved final jurisdictional delineation into the Final EIS in order to accurately disclose impacts to the public and other stakeholders. F-4-37
- Clearly commit to measures to avoid and minimize impacts to water resources, especially Waters of the U.S. We are particularly concerned with the Mojave River, Little Rock Wash and Big Rock Wash, and we recommend that the Final EIS commit to completely span these features. F-4-38
- Include a draft 404(b)(1) analysis as an appendix to the Final EIS in order to more fully disclose impacts to the public and to help ensure that the 404(b)(1) analysis aligns with the NEPA analysis. F-4-39
- Include the draft compensatory mitigation plan as an appendix to the Final EIS. The Draft EIS says the mitigation plan would be determined during the permitting process, and EPA believes this information should be disclosed to the public through the EIS process (3-561). F-4-40

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- Describe how mitigation for unavoidable impacts to waters would be consistent with the Compensatory Mitigation Rule (40 CFR 230.91-98). F-4-41
- Direct mitigation towards restoration, enhancement and long-term protection of aquatic resources in the Mojave River, Little Rock Wash, and Big Rock Wash. F-4-42
- Recognize that washes are difficult aquatic resources to replace and, at a minimum, address the following components of compensatory mitigation for impacts to waters: F-4-43
  - Mitigation type, amount, and location, including through purchase of credits at available and appropriate mitigation banks or in-lieu fee programs,
  - Use of a watershed approach to identify mitigation,
  - Use of buffers, and
  - Long term preservation (e.g., conservation easements) and management of the site.

Wildlife

The new 63 mile corridor, with expressway on 9 feet of fill and HSR on 15 feet of fill, could be detrimental to wildlife movement along established wildlife corridors if wildlife crossings are not planned well. The Draft EIS explains that wildlife use natural drainages as movement corridors throughout the project area. Wildlife movement corridors are linkages of natural habitat between larger areas that are not contiguous or otherwise connected, and loss of linkages can have extremely negative effects on individual populations and whole species (page 3-416). Key wildlife corridors are highlighted in Figures 2-31 through 2-33, and descriptions are provided in Table 2-1. The level of coordination with U.S. Fish and Wildlife Service (FWS), California Department of Fish and Wildlife (CDFW) and other wildlife experts is not described, and it is unclear which best practices will be followed to site and design of wildlife crossings. F-4-44

Recommendations for the Final EIS:

- Document coordination with U.S. FWS, CDFW, and other wildlife experts on the placement and design of wildlife crossings.
- Clearly site and explain the best practices that will be followed in order to protect wildlife corridors. For examples, EPA directs you to the Federal Railroad Administration and California HSR Authority's Programmatic Final EIS for the statewide California HSR system and the project-level Final EIS for the Fresno to Bakersfield section of the California HSR system. F-4-45

Indirect Impacts

The Council on Environmental Quality NEPA Regulations state that an EIS must disclose indirect effects (40 CFR 1502.16). Indirect impacts do not appear to be fully disclosed within the Draft EIS. The biological study area is generally 500 feet wide over most of the 63 mile alignment (page 3-416). Similarly, the Area of Potential Effect for cultural resources extends 250 foot that from the centerline of the proposed alignments. The project ROW is also 500 feet wide for most of the alignment, meaning that the Biological Study Area and the Area of Potential Effect do not include any buffer to account for indirect impacts to waters, plants, wildlife or cultural resources. EPA is concerned that resources outside of the ROW may be indirectly disturbed due to staging activities, construction, and operations. F-4-46

Recommendations for the Final EIS:

Please use an appropriate buffer to capture indirect impacts to natural and cultural resources. Describe methodologies, provide qualitative discussions of impacts, quantify impacts, and commit to avoidance, minimization, and mitigation measures. EPA directs you to the Federal Railroad Administration and California HSR Authority's Final EIS for the Fresno to Bakersfield section of the California HSR Project as an example. F-4-47

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Tribal Impacts & Consultation

Section 106 of the National Historic Preservation Act requires federal agencies to consider the effects of their actions on cultural resources, and Executive Order 13175, *Consultation and Coordination with Indian Tribal Governments*, directs federal agencies to establish regular and meaningful consultation and collaboration with tribal officials. Page 3-237 describes outreach to the Native American Heritage Commission, key Native American groups, and individuals, and it states that they provided feedback to Caltrans. Issues raised and measures to address issues are not discussed. It is unclear whether the full range of potential impacts and avoidance, minimization, and mitigation measures are considered in the Draft EIS. F-4-48

Recommendations for the Final EIS:

- Include the completed Memorandum of Agreement between Caltrans, affected Native American tribes, and the State Historic Preservation Officer to document the process that will be followed if any Native American resource are discovered. F-4-49
- Discuss the issues raised by Native American groups and individuals and describe how those issues would be addressed. F-4-50
- Ensure that all potential impacts to traditional cultural properties, sacred sites, and other features important to tribes are clearly disclosed. F-4-51
- Commit to spanning the Mojave River area to avoid potential impacts to cultural resources. Page 3-263 indicates that the Mojave River area possesses high potential to contain subsurface cultural resources, which furthers the importance of avoiding impacts in that area. F-4-52

Environmental Justice

The Draft EIS states that census block groups were compared to city and countywide demographics to help determine where disproportionate impacts to low income and minority residents might occur (page 3-177). However, it does not appear that this methodology was followed. The analysis concludes that because impacts would be distributed similarly through the corridor, impacts would not fall disproportionately on low-income and minority populations (pages 3-119, 3-122, 3-549). It is not accurate to conclude that consistent impacts along the corridor precludes findings of disproportionate impacts. If the greater region would benefit from the project, but only localized impacts exist, then disproportionate impacts may occur. Disproportionate impact determinations should be made by comparing populations in the project area with an appropriate reference community, such as the county or the area that would benefit from the project. EPA is available to assist Caltrans in developing a more robust environmental justice analysis. F-4-53

Recommendations for the Final EIS:

- Ensure that the environmental justice analysis compares impacts between (1) communities in the immediate project area, and (2) an appropriate reference community, such as the county or the area that would benefit from the project. Revise environmental justice conclusions so that they reflect such an analysis. F-4-54
- Consider linguistic isolation in the environmental justice analysis. F-4-55
- Discuss special outreach efforts to environmental justice communities, issues raised, and measures taken to address issues. F-4-56

Hazardous Materials Sites

The main corridor (without Variation E) for all alternatives would pass through the George Air Force Base National Priority List Superfund Site. The U.S. Air Force is the lead agency for site cleanup, with the U.S. EPA and the State of California Lahontan Regional Water Quality Control Board (RWQCB) F-4-57

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providing regulatory oversight through Federal Facilities Agreement Base Closure Team procedures. The Draft EIS does not discuss any coordination with the Base Closure Team, nor does it describe potential impacts on cleanup efforts or public health. U.S. EPA encourages appropriate reuse of contaminated lands, such as Superfund sites. Analysis must be done upfront to ensure that reuse does not pose a threat to human health and the environment and does not present a risk to the cleanup remedy. F-4-57 (cont.)

Recommendations for the Final EIS:

- Describe coordination with the U.S. Air Force, U.S. EPA, and the Lahontan RWQCB and explain: (1) how the proposed project may impact cleanup activities at George Air Force Base Superfund Site, and (2) whether the proposed project could potentially result in the release of site contaminants and pose a health risk. If needed, refine the project to avoid, minimize, and mitigate impacts. Document all coordination, potential impacts, and measures to address issues in the Final EIS. F-4-58
- Add a summary column to describe the hazardous material sites listed in Table 3.2.5-1 so that the format is the same as Tables 3.2.5-2 through 3.2.5-5. As currently presented, the types of sites and potential risks are not disclosed from SR-14 to 100th Street East. F-4-59

Community Isolation & Relocation

Rail Option 1 in conjunction with the main freeway alignment would create an "island" effect for residences located along 10th Street East in Palmdale (page 3-98). The Draft EIS states that measures would be implemented to offset indirect noise and visual impacts if Rail Option 1 is selected. EPA is concerned that community impacts could be significant, and the Draft EIS does not make strong commitments to avoid, minimize, and mitigate these impacts. In addition, Section 3.1.4.1, *Community Character and Cohesion*, discusses several residences where partial acquisition of the properties would be required, but not the whole home. EPA is concerned that the proposed project could potentially leave homes immediately adjacent to the new expressway without providing residents with an option to relocate, resulting in elevated exposure to emissions and noise. Mitigation measures for such properties are not specified. F-4-60

Recommendations for the Final EIS:

- Consider tunneling within Palmdale and/or other vertical profiles to minimize community impacts. Discuss feasibility within the Final EIS. F-4-61
- Provide a fuller description of the neighborhood that would experience an "island" effect if Rail Option 1 is selected. Include the number of impacted residences, businesses, and community facilities as well as measures to minimize and mitigate impacts, such as improving street and bikeway connectivity. F-4-62
- Discuss community cohesion concerns raised during previous public outreach and explain how these concerns will be addressed during relocation, demolition, construction, and operation. F-4-63
- Commit to form a workgroup to gain input from businesses and residents who would be impacted, and use their input to inform the design of infrastructure, location of under and over passes, landscaping, and designation of uses under any aerial track-way. Document coordination and outcomes in the Final EIS. F-4-64
- Coordinate with the California HSR Authority to conduct common community outreach in parts of Palmdale that would experience impacts from both the HDC and statewide California HSR projects. F-4-65
- Commit to offer relocation packages for residential and business properties that would be partially acquired as a result of the High Desert Corridor Project in order to minimize exposure to elevated emissions and noise. F-4-66

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Noise Impacts

The noise analysis assumed electric train technology and operating speeds of 125 miles per hour (page 3-391). Diesel technology and train speeds of 180 miles per hour are discussed elsewhere in the Draft EIS and are not explicitly ruled out (pages 2-15 & 2-5). Altering these parameters in the noise analysis could yield very different impact estimates. F-4-67

Recommendations for the Final EIS:

- If diesel technology or operating speeds of 180 miles per hour may be incorporated as part of this project, revise the noise analysis to reflect these parameters. Include updated information in the Final EIS. F-4-68
- Include a map (or clearly point a map within reference materials) to depict the location of the sensitive noise receivers that are included in tables beginning on page 3-392. F-4-69
- In locations where sound walls are deemed economically infeasible, commit to offering noise-proof insulation and window treatments to residences, schools, hospitals, and other facilities. This mitigation measure was included for the statewide California HSR project, and it is especially important for the HDC project because so many of the proposed sound walls were deemed economically infeasible (Tables 3.2.7-14 to 3.2.7-19). F-4-70
- Make it a priority to provide sound walls for schools even if they do not meet Caltrans threshold for economic feasibility to avoid harming children's learning environments and to meet the intent of Executive Order 13045, *Protection of Children from Environmental Health Risks and Safety Risks*. F-4-71
- Clearly disclose noise impacts that would remain significant after mitigation, especially to sensitive receptors (e.g. health facilities, elderly care and housing centers, schools and daycares). F-4-72
- Consider the noise impacts from Mitigation Measure CI-COM-1, which says, to the extent practical, street closures required during construction shall be scheduled to occur during nighttime hours. F-4-73

Addressing Climate Change Under NEPA

Climate change and greenhouse gas (GHG) emissions are discussed in Draft EIS Section 4.5, entitled *Climate Change under [the California Environmental Quality Act (CEQA)]*. We are aware that the EPA and FHWA have not issued specific climate change guidance or a methodology to conduct project-level GHG analyses. This does not preclude a lead agency's responsibility, under NEPA, to disclose potentially significant impacts related to GHG emissions or to assess how climate change may affect the project itself or influence the project's impacts on other resources. F-4-74

Recommendations for the Final EIS:

- Include a climate change analysis in the NEPA portion of the Final EIS or state that the CEQA analysis for climate change is relevant for NEPA and informing the federal decisions. F-4-75
- Ensure that the GHG analysis fully accounts for increases in freight traffic that could be induced from the project. Consider proximity to nearby freight centers. F-4-76

Station Area Planning & Green Building

The HDC proposes utilizing the Xpress West HSR station in Victorville and creating a new HSR station in Palmdale. HSR stations can become economic centers, support more walkable, transit-oriented neighborhoods, and serve as multi-modal hubs for the region. Caltrans can help to minimize long-term air impacts by promoting alternative modes of transportation to access HSR stations. The California HSR Authority has already committed to fund station-area planning efforts in Palmdale to promote F-4-77

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smart growth strategies and multi-modal connectivity. Caltrans can promote similar best practices in Palmdale and Victorville. Caltrans can also reduce environmental impacts and promote public health by incorporating green building strategies into the proposed project, including roadways, trackway, station, and other support facilities. Such strategies can facilitate long term savings in cost, energy, and water usage. F-4-77 (cont.)

Recommendations for the Final EIS:

- Work closely with the California HSR Authority to seamlessly integrate HSR systems and work to co-locate a station. Having two HSR stations in Palmdale would duplicate environmental impacts, as well as hinder the efficiency of HSR service in California. F-4-78
- Coordinate with the City of Palmdale on a parking strategy to avoid providing excessive parking that could hinder smart growth and transit development. Document coordination and outcomes in the Final EIS. Page 3-185 states that adequate parking would be provided as part of the Palmdale station design for this project, and it is therefore important for Caltrans to ensure that impacts are fully considered in the EIS. F-4-79
- Provide resources for station-area planning in Palmdale and Victorville as a means to help communities: (1) reduce environmental impacts from vehicles accessing the station, (2) reduce impacts from expansive parking lots, and (3) promote walkable, livable communities, which have numerous environmental, community, and economic benefits. Describe these efforts in the Final EIS. F-4-80
- Commit to achieving LEED certification at the platinum level or design for net-zero energy usage at the Palmdale HSR station. At a minimum, EPA encourages Caltrans to commit to analyze the strengths and feasibility of these strategies. F-4-81
- Identify which recycled materials would be used to replace raw materials for particular infrastructure components. Some options include: F-4-82
  - Use recycled materials to replace carbon-intensive Portland Cement in concrete as "supplementary cementitious material,"
  - Use tire-derived aggregate in lightweight embankment fill, retaining wall backfill, and as underlay to rail tracks, and
  - Use recycled materials in pavement applications, such as crushed recycled concrete, recycled asphalt pavement, and rubberized asphalt concrete. Also, in some circumstances, on-site asphalt can be re-used (e.g., cold in-place recycling or full depth reclamation).

NEPA Analysis for Renewable Energy

The Draft EIS states that this project seeks to establish a truly sustainable corridor that addresses the goals set forth in California legislation such as Assembly Bill 32 and Senate Bill 375. To this end, green energy generation, the development of a new utility corridor, and electric vehicle charging stations are being considered for potential integration into the HDC. The Draft EIS explains that subsequent NEPA would likely be needed for the renewable energy component of this project. F-4-83

Recommendation for the Final EIS:

Please expand upon plans for the future environmental reviews for siting renewable energy, including expectations for levels of analysis (i.e. environmental assessments or environmental impact statements) and plans for timing. EPA has expertise on renewable energy and would appreciate the opportunity to work with Caltrans on future studies for selecting renewable energy technologies and siting.

Recommendations for Subsequent NEPA Analyses: F-4-84

- Incorporate, as applicable, best practices from the following resources:

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- The California Desert Renewable Energy Conservation Plan project team has developed *Best Management Practices and Guidance Manual: Desert Renewable Energy Projects*[5] for the development of renewable energy projects in the arid regions of California.
- The Bureau of Land Management's Solar Programmatic EIS[6] also contains a listing of Best Management Practices and Design Features associated with siting and design, construction, operation and maintenance, and decommissioning of solar energy projects. F-4-84 (cont.)

- Consider creating contract specifications to require contractors to address the full life cycle of photovoltaic equipment by sourcing product components from a company that: F-4-85
  - Minimizes environmental impacts during raw material extraction,
  - Manufactures solar panels in a zero waste facility, and
  - Provides future solar panel disassembly for material recovery for reuse and recycling.
- Identify bonding or financial assurance strategies for decommissioning, module recycling, and reclamation. F-4-86

Availability of Supporting Documentation

The Draft EIS summarizes environmental impacts and frequently states that supporting analyses are in technical reports. The technical reports are cited, but during the review period for the Draft EIS they were not publically available on the internet. The absence of readily available information on environmental analyses makes it difficult to understand and thoroughly review environmental impacts. F-4-87

Recommendation for the Final EIS and Future Caltrans' NEPA Documents:
Please make all technical reports that the EIS relies upon to reach conclusions on environmental impacts available to the public through the project website.

[5] California Energy Commission, California Department of Fish and Wildlife, U.S. Bureau of Land Management, U.S. Fish and Wildlife Service. *Best Management Practices and Guidance Manual: Desert Renewable Energy Projects*, Dec 2010, Publication #REAT-1000-2010-009-F. Available at http://www.drecp.org/documents/

[6] Office of Energy Efficiency and Renewable Energy, U.S. Department of Energy, and U.S. Bureau of Land Management. *Solar Energy Development Programmatic EIS*. October 2012. Available at http://solareis.anl.gov/

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Response to Comment F-4

Comment Code (Topic)	Response
F-4-0A (General Comment)	EPA's comments on the HDC Draft EIR/EIS, as well as its previous scoping comments, are appreciated. The scoping comments were addressed in the Draft EIR/EIS, and EPA's comments on the Draft EIR/EIS have been addressed in the Final EIR/EIS.
F-4-0B (General Comment)	This comment summarizes the project description and scope, and it acknowledges Caltrans' approaches to addressing the project's scope and range of alternatives. No specific response is needed.
F-4-0C (General Comment)	With the clarifications of and additions to the Draft EIR/EIS provided in the responses to comments, the Final EIR/EIS is expected to be sufficient for EPA's purposes. In particular, a more-detailed description of those decisions to be made on the basis of the Final EIR/EIS and those decisions to be based on further NEPA documentation is provided in the Final EIR/EIS (see response to Comment F-4-1).
F-4-0D (General Comment)	The actual operating speed of the HSR has been consistently presented as 125 mph (see Sections 2.1.4 and 3.2.7). The description of this element of the project will be further clarified in the Final EIR/EIS (see response to Comment F-4-6). The structure proposed to span the Mojave River is a bridge (see Section 2.4.4). The description of this element of the project is clarified in Sections 3.3.1 and 3.3.2 of the Final EIR/EIS (see response to Comment F-4-2B).
F-4-0E (General Comment)	The width of the HDC has been consistently presented in the Draft EIR/EIS as 500 feet from SR-14 to US 395 and 300 feet from US 395 to SR-18 (see Sections 2.1.2, 2.3.1, 2.3.4, and 2.4.1 of the Draft EIR/EIS; see also Sections 3.1.1 and 3.2.9). The utility corridor would run within the HDC, but its exact location would depend to an extent on the locations of other optional project elements. Specification of the exact alignment of the utility corridor within the HDC is not necessary for a complete and accurate environmental impact analysis because its impacts are primarily related to ground disturbance and those effects would be completely encompassed within the ground disturbance of the overall HDC itself. Ground disturbance within the corridor has been fully analyzed within the Final EIR/EIS.
F-4-0F (General Comment)	Project elements have been described to the extent needed to support a complete and accurate environmental impact analysis.
F-4-0G (General Comment)	The air quality impacts of the project, including heavy truck emissions and construction emissions, and the potential public health effects associated with air pollutant emissions are fully analyzed and disclosed in the Final EIR/EIS (see Sections 3.2.6 and 3.6). Air pollutant emissions limits and ambient air quality standards are intended to protect public health, with an

Comment Code (Topic)	Response
	adequate margin of safety, so compliance with these requirements is presumed to minimize the incidence of asthma and other respiratory conditions. The comment indicates that "additional mitigation measures are available" but does not identify specific measures that could be considered. Additional construction measures suggested in EPA's detailed comments were added to the Final EIR/EIS (see response to Comment F-4-25).
F-4-0H (General Comment)	This comment expresses concern for the Mojave River as a unique and important resource and states that "additional avoidance, minimization, and mitigation measures are available." Avoidance measures have been incorporated into the project design to minimize impacts to the Mojave River, such as construction of the bridge that spans over the river.
F-4-0I (General Comment)	This comment references EPA's detailed comments attached, expresses EPA's belief that the comments can be addressed in the Final EIR/EIS, and indicates that EPA rated the Draft EIR/EIS "Environmental Concerns – Insufficient Information (EC-2)." Comment noted. Your detailed comments are identified as Comments F-4-1 through F-4-87 and are addressed below.
F-4-0J (General Comment)	EPA requests an opportunity on future projects, prior to the release of the Draft EIR/EIS, to comment on the range of alternatives and impact analysis methods so that EPA can provide input early in the NEPA process. This is the purpose of project scoping under NEPA and, as EPA notes in the first paragraph of its comment letter, EPA provided scoping comments on the project.
F-4-0K (General Comment)	Caltrans will provide copies of the Final EIR/EIS to EPA as requested.
F-4-1 (Design)	The comment requests that the Final EIR/EIS clearly distinguish between those decisions to be made by Caltrans in the Record of Decision and those decisions that would require further environmental review. A discussion regarding how and when decisions will be made for various project components, and the type of environmental document required for clearance (either program level or project level), is provided in Section 1.1.3 of the Final EIR/EIS.
F-4-2A (Design)	Early in the environmental review process, prior to the addition of the HSR alternatives, Caltrans set the width of the corridor at 500 feet between SR-14 to US 395,to preserve adequate ROW for a potential future HSR system. The width was set at 300 feet from US 395 to SR-18 due to ROW constraints in Adelanto and Victorville. Later, when it was decided to include an alternative that would design and construct an HSR system, the same footprint was used for alternatives with and without HSR. The ROW that is not required for the freeway, or freeway plus HSR, is being reserved

Comment Code (Topic)	Response
	for the inclusion of Green Energy elements. The statement that the alignment would be wider for alternatives that included the HSR has been removed from Section 3.3.4 of the Final EIR/EIS.
F-4-2B (Design)	As described in Section 2.4.4 of the Draft EIR/EIS (Bridges and Culverts), large drainages such as the Mojave River would be spanned by bridges. Figure 2-31 (formerly Figure 2-30) was corrected to show only the one option that spans the Mojave River. The text in Section 3.3.1 was accurate. The text in Section 3.3.2 has been revised for consistency with Section 3.3.1 and the Project Alternatives description in Chapter 2, and conclusions about the impacts of the bridge on natural communities have been adjusted as needed in the Final EIR/EIS.
F-4-2C (Biology)	The alignment options for spanning the Mojave River are described in the "Victorville Rail Connection" section of Chapter 2 in the Final EIR/EIS as the Variation E Main and Variation E Alignment Option; they are illustrated in Figure 2-10. This section has been revised to more clearly explain the options for spanning the Mojave River. The discussion of the Mojave River crossing in Section 3.3.2 has been clarified and made consistent with Chapter 2.
F-4-3 (Right-of-way)	Section 3.1.4, including Table 3.1.4-18, has been revised to provide information on partial parcel acquisition, and new Table 3.1.4-9 has been added to indicate the residential and non-residential properties subject to relocation. A breakdown of the potential acquisition and relocation impacts by community has been provided. Sections 3.1.4.1 and 3.1.4.2 have been revised for consistency.
F-4-4 (Design)	The conceptual layout of the green energy corridor is included in Figure 2-13 in the Final EIR/EIS. Due to the ongoing evolution and development of new green and renewable energy technologies, specific impacts from the green energy corridor cannot be comprehensively evaluated at this time. However, there is flexibility in how/where the green energy elements will be located so that future conflicts can be minimized. Selection of specific technologies, including funding, construction and operation, would be done through a Public-Private Partnership or by a utility company. Specific impacts would be evaluated in a supplemental document once funding and an appropriate sponsor are identified.
F-4-5 (Design)	The required typical width for two HSR tracks is 100 feet of ROW. Section 2.1.4 of the EIR/EIS has been revised to clarify this.

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F-4-6 (Design)	Page 2-15 (the “Technology Options for Trains” subsection of Chapter 2) of the Draft EIR/EIS states that both diesel and electric train technologies were initially considered but that a decision was made to pursue only the electric option to ensure compatibility with the XpressWest rail system. Subsequent to circulation of the Draft EIR/EIS, in a letter to Caltrans dated December 3, 2014 (see comment letter L-21 in Volume 3 of the Final EIR/EIS), XpressWest reaffirmed their intent to use only Electric Multiple Unit trains and not diesel. To enhance clarity of our discussion, the "Technology Options for Trains" subsection (part of Section 2.1.4) of the Final EIR/EIS has been revised.
F-4-7 (Right-of-way)	Table 3.1.4-18 in the Draft EIR/EIS presented the properties that are subject to relocation (i.e. developed parcels) under various alternatives and variations, not the overall affected properties (which could include both developed and undeveloped parcels). Section 3.1.4 of the Final EIR/RIS has been revised to present the overall number of affected parcels (residential and non-residential) that are subject to both full and partial acquisition under each alternative/variation followed by the revised table summarizing the affected parcels that are subject to relocation. See Tables 3.1.4-18 and 3.1.4-19.
F-4-8 (Design)	The text on pages 2-5 and 2-15 in Section 2.1.4 of the Draft EIR/EIS states that an electric train technology (the only one carried forward for impact analyses in Chapter 3) would have a maximum operating speed of 180 mph. However, 180 mph is the maximum design speed of the electric train rather than the maximum operating speed; the text in Section 2.1.4 has been revised. All impact analyses assume a maximum operating speed of 125 mph within the limits of the HDC.
F-4-9 (Design)	The HDC HSR feeder service would share station platforms with the California HSR Palmdale station. The Palmdale station would utilize bypass tracks, northbound and southbound inner station tracks for the California HSR service and northbound and southbound outer station tracks for HDC HSR service, to allow for simultaneous operation. The HDC HSR is designed to be compatible with California HSR standards.
F-4-10 (Design)	Preliminary HDC HSR traction power substations and switching station sites have been identified. Systems facility footprints and access roads are included in the preliminary engineering plan sets. The impacts were analyzed and included in each of the various resource sections of Chapter 3 in both the Draft and Final EIR/EIS.

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F-4-11 (Design)	As stated on page 2-8 in Chapter 2 of the Draft EIR/EIS, Rail Option 1 would include moving the Palmdale Transportation Center (PTC) approximately 800 feet to the south. The Metrolink rail station is a part of the PTC, so this option would include moving the Metrolink station 800 feet to the south. The impacts of various rail options and variations were evaluated and disclosed in the draft (and final) EIR/EIS. Relocation of the Palmdale Station is addressed in Sections 3.1.1, 3.1.4, 3.1.7, 3.2.5, 3.2.9, 3.3.1, 3.3.2, and 3.7.
F-4-12 (Design)	Figures 2-3, 2-4, 2-5, 2-6, 2-7, and 2-8 in the Draft EIR/EIS indicate where the HSR tracks will be in a tunnel or on an aerial structure for the variations of Option 1 and Option 7. This information was used in the analysis of impacts on the various environmental resources in the EIR/EIS. Figures 2-3, 2-4, 2-5, 2-6, 2-7, and 2-8 have been revised in the Final EIR/EIS to more clearly show the locations of the tunnel and aerial sections.
F-4-13 (Air quality)	The estimates of project-related operational mobile source emissions presented in the Air Quality section of the Final EIR/EIS were based upon the final traffic study data. Additionally, Appendix M of the Final EIR/EIS indicates that the traffic caused by the Palmdale HSR Station was accounted for in the traffic study. The Traffic attachment to Appendix M states, in part: "We have reviewed the Revised Southern Palmdale Rail Station Plans and Options. The proposed parking location and traffic circulation has been addressed in the current HDC traffic report."
F-4-14 (Design)	The locations of the Palmdale HSR station Options 1 (A, B, C) and 7 (A, B, C) were developed in consultation with the California High-Speed Rail Authority (CHSRA). Option 1C was selected as part of the Preferred Alternative based on an evaluation of all six options in relation to the HDC Project. We are aware that the CHSRA recently entered into a Station-Area Planning Agreement with the City of Palmdale to evaluate potential rail station options in an area south of the existing Palmdale Transportation Center and west of Sierra Hwy. The results of the study are due in September 2017 (see http://palmdale.granicus.com/MetaViewer.php?view_id=&clip_id=1551&meta_id=111644). The Final EIR/EIS for the California HSR Bakersfield-to-Palmdale segment, in which a station location will be selected, is due in winter 2017 (see www.hsr.ca.gov/Programs/Statewide_Rail_Modernization/Project_Sections/bakersfield_palmdale.html). Caltrans has done its due diligence in the selection of Option 1C by coordinating closely with the CHSRA and the City of Palmdale throughout the environmental review process for the HDC and will continue to do so. If an alternate station location is selected by the CHSRA and the City, Caltrans will evaluate the environmental impacts of connecting to it in a supplemental environmental document.

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F-4-15 (Air quality)	Daily emissions of diesel exhaust in terms of Diesel Exhaust Organic Gas (DEOG) have been evaluated for the current level as well as for all Alternatives in the future years; and are summarized in Table 3.2.6-10. Based on the summary table, DEOG emissions are anticipated to decrease for all future Build Alternatives when compared to the base year emissions of DEOG. When compared to the base year emissions of DEOG, the decrease in daily DEOG emissions is anticipated to range from approximately 23% to 32% for the Build Alternatives in 2020; and from approximately 29% to 35% for the Build Alternatives in 2040. On the national trend, according to the analysis by the Federal Highway Administration (FHWA) in the Interim Guidance Update on Mobile Source Air Toxic (MSAT) Analysis in NEPA, dated December 6, 2012, even if vehicle miles traveled increases by 102 percent as assumed from 2010 to 2050, a combined reduction of 83 % in the total annual emissions for the priority MSAT is projected for the same time period based on the MOVES2010 analysis. The FHWA Guidance indicates that MOVES2010 incorporates updates and enhances the quality of MSAT emissions estimates. The FHWA Interim Guidance indicates that the data reflect advanced emission control technology and modern fuels, plus additional data for older technology vehicles.
F-4-16 (Air quality)	Construction-related emissions of criteria pollutants have been estimated using the Sacramento Metropolitan Air Quality Management District's (SMAQMD's) Road Construction Emissions Model, Version 7.1.4, the latest available at the time of the analysis. While the model was developed for Sacramento conditions in terms of fleet emission factors, silt loading, and other modeling assumptions, it is considered adequate for estimating road construction emissions by the San Joaquin Valley Air Pollution Control District under its Indirect Source regulations and the South Coast Air Quality Management District in its CEQA guidance, and is used for that purpose in this project analysis. The SMAQMD model employs a simplified methodology to assess emissions of linear construction projects based on such basic project data inputs as project lengths, daily soil import/exports, types of projects, disturbed area, etc. The model utilizes its program algorithm to calculate emissions from such sources as soil hauling, worker commute, fugitive dust and off-road equipment that are expected from a typical roadway construction project. The quantities of off-site fill required for the project are accounted for in the emissions calculations; however, the concrete batch plant and tunnel boring were not explicitly included in the model. The construction emissions calculations have been updated to include these and are included in the Final EIR/EIS (Section 3.6, Construction Impacts). With regard to the discussion of health effects from carcinogenic air toxics on page 3-555, the text cited in the comment has been deleted and the discussion on air quality in Section 3.6 has been revised in the Final EIR/EIS. The intent was to point out that health risk factors based on a 70-year exposure would be pro-rated for shorter exposures, and a

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	maximum 5-year exposure would represent a much lower risk than a 70-year exposure. According to the FHWA Interim Guidance, the methodologies for forecasting health impacts include emissions modeling; dispersion modeling; exposure modeling; and then final determination of health impacts – each step in the process building on the model predictions obtained in the previous step. All are encumbered by technical shortcomings or uncertain science that prevents a more complete differentiation of the health impacts among a set of project alternatives. In other words, the margins of error in estimating the health risk for any single alternative would be greater than the differences among the alternatives, so a quantitative analysis would not be useful in evaluating the relative environmental merits of the alternatives. Furthermore, in accordance with 40 CFR 93.123(c)(5), hot-spot analyses are not required to consider construction-related activities which cause temporary increases in emissions. The emissions from the construction of the project are considered temporary, as defined in 40 CFR 93.123(c)(5), because they occur only during the construction phase and last five years or less at any individual site. The proposed corridor project is within the jurisdictions of Mojave Desert AQMD and Antelope Valley AQMD, so contractors working on this project must comply with each District's strict Fugitive Dust Control Rule (Rule 403). Furthermore, the Caltrans Standard Specifications mandate the contractors to comply with air pollution control rules, regulations, ordinances, and statutes that apply to work performed under each construction contract, including air pollution control rules, regulations, ordinances and statutes provided in Government Code § 11017 (Pub Cont Code §10231).
F-4-17 (Air quality)	Per the FHWA's Interim Guidance Update on MSAT Analysis, information is incomplete or unavailable to credibly predict the project-specific health impacts due to changes in mobile source air toxic emissions associated with a proposed set of highway alternatives. The outcome of such an assessment, adverse or not, would be influenced more by the uncertainty introduced into the process through assumption and speculation rather than any genuine insight into the actual health impacts directly attributable to mobile source air toxics exposure associated with a proposed action. The U.S. Environmental Protection Agency (EPA) is responsible for protecting the public health and welfare from any known or anticipated effect of an air pollutant. They are the lead authority for administering the Clean Air Act and its amendments, and they have specific statutory obligations with respect to hazardous air pollutants and mobile source air toxics. The EPA is in the continual process of assessing human health effects, exposures, and risks posed by air pollutants. They maintain the Integrated Risk Information System, which is "a compilation of electronic reports on specific substances found in the environment and their potential to cause human health effects." Each report contains assessments of non-cancerous and cancerous effects for individual compounds and quantitative

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	estimates of risk levels from lifetime oral and inhalation exposures with uncertainty spanning perhaps an order of magnitude. Other organizations are also active in the research and analyses of the human health effects of mobile source air toxics, including the Health Effects Institute (HEI). Two HEI studies are summarized in Appendix D of the FHWA Interim Guidance Update on MSAT Analysis (2102). Among the adverse health effects linked to mobile source air toxic compounds at high exposures are cancer in humans in occupational settings; cancer in animals; and irritation to the respiratory tract, including the exacerbation of asthma. Less obvious is the adverse human health effects of mobile source air toxic compounds at current environmental concentrations or in the future as vehicle emissions substantially decrease. The methodologies for forecasting health impacts include emissions modeling; dispersion modeling; exposure modeling; and then final determination of health impacts – each step in the process building on the model predictions obtained in the previous step. All are encumbered by technical shortcomings or uncertain science that prevents a more complete differentiation of the mobile source air toxics health impacts among a set of project alternatives. These difficulties are magnified for lifetime (i.e., 70-year) assessments, particularly because unsupportable assumptions would have to be made regarding changes in travel patterns and vehicle technology, which affects emissions rates, over that time frame, because such information is unavailable. It is particularly difficult to reliably forecast 70-year lifetime mobile source air toxic concentrations and exposure near roadways, determine the portion of time that people are actually exposed at a specific location, and establish the extent attributable to a proposed action, especially given that some of the information needed is unavailable. There are considerable uncertainties associated with the existing estimates of toxicity of the various mobile source air toxics because of factors such as low-dose extrapolation and translation of occupational exposure data to the general population, which is a concern expressed by HEI. As a result, there is no national consensus on air dose-response values assumed to protect the public health and welfare for mobile source air toxic compounds and, in particular, for diesel particulate matter. The EPA and the Health Effects Institute have not established a basis for quantitative risk assessment of diesel particulate matter in ambient settings. There is also the lack of a national consensus on an acceptable level of risk. The current context is the process used by the EPA as provided by the Clean Air Act to determine whether more stringent controls are required to provide an ample margin of safety to protect public health or to prevent an adverse environmental effect for industrial sources subject to the maximum achievable control technology standards, such as benzene emissions from refineries. The decision framework is a two-step process. The first step requires the EPA to determine an "acceptable" level of risk due to emissions from a source, which is generally no greater than approximately 100 in 1 million. Additional factors are considered in the second step, the

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	goal of which is to maximize the number of people with risks less than 1 in 1 million due to emissions from a source. The results of this statutory two-step process do not guarantee that cancer risks from exposure to air toxics are less than 1 in 1 million; in some cases, the residual risk determination could result in maximum individual cancer risks that are as high as approximately 100 in 1 million. In a June 2008 decision, the U.S. Court of Appeals for the District of Columbia Circuit upheld EPA's approach to addressing risk in its two-step decision framework. Information is incomplete or unavailable to establish that even the largest of highway projects would result in levels of risk greater than deemed acceptable. Because of the limitations in the methodologies for forecasting the health impacts described, any predicted difference in health impacts between alternatives is likely to be much smaller than the uncertainties associated with predicting the impacts. Consequently, the results of such assessments would not be useful to decision makers, who would need to weigh this information against project benefits, such as reducing traffic congestion, accident rates, and fatalities plus improved access for emergency response, that are better suited for quantitative analysis. To further illustrate the points made above, the FHWA reviewed health risk assessments for a hypothetical roadway under a National Cooperative Highway Research Program research project and three major roadway projects (FHWA-AZ-EIS-14-01-F): The FHWA's review focused on the methodologies used in the studies and the findings related to the incremental health risk attributable to the projects. All four of the health risk assessments involved very conservative assumptions regarding emissions and exposure. For example, each of the studies assumes constant near-term emissions rates, even though national projections by EPA and the emissions analysis for this project show that there will be a large decline in emissions over the lifetime of the project. Likewise, all 4 of the modeling studies assume constant breathing of outdoor air at a fixed location for either 30 years (1 study) or 70 years (3 studies). They assume that people will not change residence (which occurs every 8 years on average in the United States), change jobs (which occurs every 3 years on average), or travel to different parts of a metropolitan area over the course of a given day (even though people travel 26 miles per day on average). The studies even assume that students will remain at elementary schools 24 hours per day for 30 or 70 years. These assumptions are not realistic and introduce a considerable amount of uncertainty into the results. Even with these conservative assumptions, the 4 studies all report very low risk. Estimated incremental cancer risk from vehicle traffic at the worst-case location in each study ranged from 0.08 case of cancer per million people to 2 cases per million people. As a point of reference, the risk management framework in EPA's Air Toxics Risk Assessment Reference Library defines risk levels between 1 in 1 million and 100 in 1 million as "acceptable." (A risk level of "1 in 1 million" is frequently mentioned in discussions of cancer risk, but under EPA risk assessment guidelines, this represents a level below which risk is considered

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	"negligible" and is not a standard or other type of pass/fail threshold.) For non-cancerous health risks, the EPA uses a metric known as the "hazard quotient," where the estimated risks for each pollutant are added together, and a total of less than 1 is considered acceptable. Each of the locations modeled in 3 of the studies had hazard quotients from vehicle emissions of less than 1, in most cases much less; the remaining study did not calculate a hazard quotient. In short, none of these health risk assessments for major roadway projects (including the 2 examples provided by the EPA) identified health risks in excess of the "acceptable" thresholds in the EPA's risk management framework. To help put these low health risks from roadway emissions into perspective, the FHWA compared them with health risks from traffic fatalities. In 2010, there were 2.47 million deaths in the United States, and 32,728 of these were due to traffic fatalities, meaning that the risk of dying in a traffic accident in 2010 was 0.0106 percent. Converted to terms of risk per million people, this represents a risk of 106 in1 million per year, or 7,420 in 1 million as a 70-year lifetime risk, consistent with cancer risk estimation. While this risk is very high, and while the FHWA is actively working to improve highway safety, most people seem to consider this risk "acceptable" in the sense that they do not avoid vehicle trips to reduce it. In addition, if the mobile source air toxics risk estimates in the studies summarized above are correct, it means that the incremental risk of cancer from breathing air near a major roadway is several hundred times lower than the risk of a fatal accident from using a major roadway. The EPA must make decisions regarding acceptable risk when it develops regulations to control hazardous air pollutants (air toxics) under Titles II and III of the Clean Air Act. The EPA's National Emission Standards for Hazardous Air Pollutants for benzene emissions is based on attaining a risk level of no more than 100 cases of cancer per 1 million people. The EPA's 2007 mobile source air toxics rule, covering vehicles, fuels, and fuel containers, is designed to result in a remaining risk of approximately 5 in 1 million. Both of these risk levels, considered acceptable by the EPA as an outcome of its rulemaking processes, are much higher than the estimated risk from the highway projects that the FHWA reviewed.
F-4-18 (Air quality)	Year 2020 and Year 2040 traffic volumes and truck percentages are provided in Table 14 of the Air Quality Study Report, which is among the technical reports provided on the project web site. Under Year 2020 open to traffic conditions, the Preferred Alternative is forecast to carry 75,910 vehicles per day at the Los Angeles/San Bernardino county line. Of these vehicles, 8,050 are forecast to be heavy trucks and 2,385 are forecast to be medium trucks. Under Year 2040 build HDC conditions, the Preferred Alternative is forecast to carry 113,750 vehicles per day at the county line. Of these vehicles, 8,920 are forecast to be heavy trucks (tractor trailer) and 2,545 are forecast to be medium trucks. This volume of trucks represents 10 percent of the total number of vehicles. (Reference Table 3-15, Link ID 53 + 54, High Desert Corridor Traffic Study, Volume I.)

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F-4-19 (Air quality)	The analysis of construction emissions has been revised to include all sources, such as concrete batch operations and tunnel boring. The revised calculations are included in the Final EIR/EIS (Section 3.6, Construction Impacts). The estimate of construction emissions is done for the Preferred Alternative, which essentially represented the worst-case scenario.
F-4-20 (Air quality)	Concrete batch plants will be sited and operated in accordance with all applicable air pollution control requirements and will not be located near sensitive receptors. The California Air Resources Board (CARB) adopted a portable equipment registration program to register portable equipment so that the equipment is allowed to operate in any of California's 35 AQMDs or air pollution control districts (APCDs). Certain AQMDs, such as Antelope Valley AQMD, have adopted their own permit process to regulate the operation of mobile equipment such as concrete batch plants. In accordance with the Caltrans Standard Specifications, all construction contractors must comply with air pollution control rules, regulations, ordinances, and statutes that apply to the work performed. Furthermore, in accordance with Rule 403 (in both jurisdictional areas of the Southern California AQMD and Mojave Desert AQMD), contractors are required to reduce the amount of particulate matter entrained in the ambient air as a result of anthropogenic fugitive dust sources by requiring actions to prevent, reduce, or mitigate fugitive dust emissions. Therefore, no further measures are needed to assure that the health of children and other sensitive receptors is protected.
F-4-21 (Air quality)	Executive Order (EO) 13045 provides, in part, that federal agencies make it a high priority to identify and assess environmental health risks and safety risks that may disproportionately affect children and to ensure that their policies, programs, activities, and standards address disproportionate risks to children that result from environmental health risks or safety risks. It further directs federal agencies to protect children from environmental health and safety risks in carrying out their missions. For each "covered regulatory action" (e.g., any substantive action in rule making that is likely to result in a rule that is economically significant [EO 12866] or rule making an agency has reason to believe may disproportionately affect children) submitted to the Office of Management and Budget Office of Information and Regulatory Affairs pursuant to EO 12866, federal agencies should include an evaluation of the effects of the planned regulation on children and why it is preferable. Caltrans does not believe the proposed alternatives would disproportionately affect children, nor are the proposed alternatives described in the Draft EIR/EIS regulatory in nature. The Draft EIR/EIS incorporates an assessment of the potential impacts of the proposed project on all populations, including children. Sensitive receivers for air are already included in the air quality analyses in accordance with state and federal guidance. The Air Quality section has

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	addressed requirements under NEPA. The National Ambient Air Quality Standards (NAAQS), Clean Air Act (CAA) § 109(b)(1),require the U.S. Environmental Protection Agency (EPA) to promulgate primary NAAQS at levels that protect the health of the most sensitive portions of the public (e.g., children), with an adequate margin of safety and are requisite to protect the public health. As EPA noted in its 2013 rulemaking for particulate matter, CAA § 109's legislative history demonstrates that the primary standards are "to be set at the maximum permissible ambient air level ...which will protect the health of any [sensitive] group of the population" (78 *Federal Register* 3086 and 3090) (quoting S. Rep. No. 91-1196, 91st Cong., 2 Sess. 10 [1970]) (alterations in original). Accordingly, the NAAQS-based evaluation of criteria air pollutants in the Draft EIR/EIS included a health-based review of sensitive populations, including children, given the NAAQS's inherent consideration of those factors. Furthermore, the NAAQS-based assessment ensures adequate consideration of health based issues as "[t]he requirement that primary standards provide an adequate margin of safety was intended to address uncertainties associated with inconclusive scientific and technical information ... and to protect against hazards that research has not yet identified" (78 *Federal Register* 3090). Likewise, as noted in Section 3.2.7 of the Draft EIR/EIS, numerous receptors were modeled for carbon monoxide and particulate matter concentrations. Receptor placement met the criteria for selecting modeling locations specified in 40 CFR§ 93.123(a). (See also the responses to EPA comments above, which address particulate matter, air quality conformity, and mobile source air toxics.)
F-4-22 (Air quality)	The measures recommended by EPA have been incorporated into the project in Section 3.6, Construction Impacts (MM CI-AQ-4, 5, and 6), of the Final EIR/EIS.
F-4-23 (Air quality)	The statement that EPA referred to in Section 3.2.6 has been modified to indicate that the MDAB is in non-attainment status for the federal PM_{10} standard.
F-4-24 (Air quality)	Please see Response to Comment F-4-17. Also, to clarify, the cited average daily traffic volumes of 140,000 to 150,000 vehicles are applicable only for the portion of this project that involves modifications to SR-14. These traffic volumes will be present with or without the HDC.
F-4-25 (Air quality)	Applicable measures recommended in the comment have been incorporated into the Final EIR/EIS as minimization measure CI-AQ-7 (see Section 3.6, Construction Impacts), and will be incorporated into the special provision section of the specifications.
F-4-26 (Air quality)	The cumulative air quality analysis addressed 23 existing, planned, and reasonably foreseeable projects in the Antelope Valley, as documented in Section 3.7 (Cumulative Impacts) of the Draft EIR/EIS. The cumulative impact analysis is consistent with the standards in the industry and was

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	prepared utilizing the guidance recommended in the comment. The air quality analyses for the project were based on the results of the Traffic Study Report, High Desert Corridor (TSR, June 2014). The TSR evaluated the operation of existing roadways, projected those conditions 20 years into the future, and analyzed operations of the proposed action. The traffic projects for future years were generated from the Southern California Association of Governments (SCAG) 2008 Regional Transportation Model, which is based in part on regional growth forecasts indicating a population increase within the combined region of more than 500,000 between 2010 and 2040. SCAG periodically updates model components for specific applications and refines inputs such as land use or transportation network components. The model version used for the HDC traffic volume forecasts was provided by SCAG in February 2010. The traffic forecasts generated by the SCAG 2008 Regional Transportation Model do not reflect car trips diverted to the HDC HSR feeder service proposed between Victorville and Palmdale. The vehicle miles traveled (VMT) estimates prepared using the SCAG 2008 model do include an overlay of auto trips traveling to/from the California HSR station at Palmdale. The VMT calculations thus represent a worst-case scenario.
F-4-27 (Air quality)	More information related to Valley Fever and its health effects has been added to Section 3.6, Construction Impacts, of the Final EIR/EIS. Measure CI-AQ-8 has been added that would require the contractor to provide a formal Environmental Awareness Program related to Valley Fever to construction and maintenance workers. The program shall include training on: • Health hazards of Valley Fever and its symptoms • Proper work procedures to minimize exposure • Use of personal protective equipment • Reporting procedures
F-4-28 (Hydrology)	A Preliminary Hydrology and Hydraulics Report and the Final Preliminary Geomorphology Report were prepared following Caltrans' standards as prescribed in the Standard Environmental Reference (SER). The impacts on hydrology and floodplain were analyzed to be in compliance with EO 11988 (Floodplain Management) and are presented in Section 3.2.1 of the Draft and Final EIR/EIS. Please see our responses to Comments F-4-29 to F-4-35 that follow.
F-4-29 (Water quality)	Section 3.3.2 of the Final EIR/EIS provides a summary of potential water quality impacts to the 303(d) listed water bodies along the corridor, including the Little Rock Reservoir, Mojave Forks Reservoir Outlet to Upper Narrows and the Mojave River Upper Narrows and Lower Narrows. With incorporation of Temporary Construction Site BMPs (e.g., silt fence, fiber roll, soil binder, stabilized construction entrance/exit), Permanent BMPs (e.g., infiltration basins), avoidance and minimization measures

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	(CI-WQ1 through 7 in Section 3.6), and water quality discharges will be effectively managed to address chemical, biological and physical constituents prior to discharge into the environment. Therefore, impacts will be minimized and water quality objectives are expected to be met as a result of the Preferred Alternative.
F-4-30 (Water quality)	Temporary impacts to Waters of the U.S. have been determined and are summarized in Table 3.3.2-1 in the Final EIR/EIS.
F-4-31 (Water quality)	Section 3.2.2 of the Draft and Final EIR/EIS discloses the estimated increase in impervious surface area for each build alternative. The total disturbed area and impervious surface area was quantified in the Storm Water Data Report. Roadway runoff was estimated in the Hydrology Technical Report for the purpose of sizing the retention basins. The retention basins were sized to accommodate the total rainfall volume produced during a water quality storm event (referred to as the water quality volume) for the highway and for a 25-year storm along some of the adjacent roadways. Basins for local roads would provide sufficient storage to capture flows from a 24 hour - 25-year storm; and basins for state highways would provide sufficient storage to capture flows from the 85th percentile storm in order to accommodate the water quality volume. Rainfall data was obtained from the Los Angeles County Department of Public Works Hydrology Manual (2006) and the NOAA Atlas 14 Point Precipitation Frequency Estimates. The increase in stormwater runoff from the proposed project would depend on the watershed size, time of concentration, duration of the storm and the storm event used for the estimate. The estimated stormwater runoff was not used to determine the level of impacts; therefore, the number is not presented in the EIR/EIS. Note that the impervious surface for the Preferred Alternative is less than 0.1% of the watershed size. This, coupled with the proposed infiltration basins to be incorporated as a project feature, renders any increase in flow rate to be insignificant.
F-4-32 (Water quality)	Runoff control features that mimic existing flow conditions will be used to the maximum extent practicable. This feature has been added as minimization measure HF-1 of Section 3.2.1 of the Final EIR/EIS.
F-4-33 (Biology)	Caltrans has conducted an assessment of the impacts of the HDC on waters of the U.S., including wetlands that is sufficient for CEQA/NEPA purposes, and has presented that assessment in Section 3.3.2 of the final EIR/EIS. During the final design of the project, its effects on jurisdictional wetlands and other waters will be further refined and quantified, providing a sound engineering basis for the preparation of a detailed mitigation and monitoring plan. A functional/conditional assessment will be prepared as part of the permitting process.
F-4-34	The proposed project includes bridge structures crossing water resources at the following locations: Little Rock Wash, Big Rock Wash, Turner Wash,

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(Hydrology)	Ossum Wash, and the Mojave River, as described in Section 2.4.4, Bridges and Culverts (Chapter 2) of the Final EIR/EIS.
F-4-35 (Hydrology)	The comment questions whether the current design standard – a 100-year storm event – will be sufficient to accommodate the potential for more severe storm events resulting from climate change. Facilities designed to accommodate a maximum 100-year storm event would most likely be insufficient to accommodate more severe events with a lower probability of occurrence. The comment does not identify any potentially significant environmental impacts associated with the selected design standard which were not disclosed in the Draft EIR/EIS. In the judgment of the project team's engineers, the current design standards are sufficient to provide reasonable protection for their facilities, and are consistent with design standards for other similarly situated projects.
F-4-36 (Biology)	Caltrans acknowledges input from EPA regarding the requirements needed to be in compliance with Clean Water Act Section 404. Caltrans has continued to work with our team of engineers and scientists to avoid and minimize impacts to Waters of the U.S. to the maximum extent practicable. Refinements have been made to the alignment near Victorville and additional structures have been added to avoid permanent impacts. The estimates of the impacts to Waters of the U.S. have been revised and are presented in Table 3.3.2-1 in the Final EIR/EIS.
F-4-37 (Biology)	Caltrans has worked closely with the U.S. Army Corps of Engineers (USACE) on this project and has had several meetings with them to discuss it. A jurisdictional delineation was prepared and submitted to the USACE for their approval. Section 3.3.2 has been updated to incorporate information from the Approved Jurisdictional Delineation.
F-4-38 (Biology)	The proposed project includes full-span bridge structures at the following locations: Turner Wash, Ossum Wash, and Mojave River, as described in Section 2.4.4 - Bridges and Culverts (Chapter 2) of the Final EIR/EIS. Because of the length of the crossing at Little Rock Wash and Big Rock Wash, full-span structures are not feasible. However, the number of support columns within the delineated washes has been minimized.
F-4-39 (Biology)	The project impacts did not meet the threshold for entering into the NEPA/404 process. Therefore, the 404(b)(1) analysis will be prepared and shared with regulatory agencies during the permitting process.
F-4-40 (Biology)	The contents of the Habitat Mitigation Monitoring Plan (HMMP) is dependent upon discussions with the regulatory agencies that occurs during the permitting process. Therefore, it is not possible to prepare an HMMP that is thorough and accurate at this time. The HMMP will be prepared during the permitting process, in consultation with the regulatory agencies, at an appropriate time in the future.

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F-4-41 (Biology)	Your comments concerning the Compensatory Mitigation Rule have been noted and the appropriate revisions made in Section 3.3.2 of the Final EIR/EIS (see Mitigation Measure **BWL-4)**.
F-4-42 (Biology)	Appropriate mitigation for impacts to aquatic resources will be identified and implemented as a result of consultation with the regulatory agencies during the permitting process. This mitigation will likely include a combination of on-site restoration, off-site mitigation and in-lieu fee transfers to one or more mitigation banks. Every effort will be made to ensure that this mitigation is directed at the resources and/or watersheds that are impacted by this project, including the Mojave River, Little Rock Wash and Big Rock Wash.
F-4-43 (Biology)	Your comment concerning mitigating impacts on waters has been noted and the discussion in the Final EIR/EIS has been revised. Caltrans recognizes that washes are aquatic resources that are difficult to replace. A discussion of impacts to these resources is included in section 3.3.2 of the FEIR/EIS and are more specifically addressed in the Habitat Mitigation and Monitoring Plan.
F-4-44 (Biology)	Section 3.3.1 of the Final EIR/EIS has been updated to include more discussion regarding coordination and input from resource agencies with respect to wildlife crossings. Additional resources were also consulted and are included.
F-4-45 (Biology)	The Federal Railroad Administration (FRA) and CHSRA's Programmatic Final EIS for the statewide HSR system and the Final EIS for the Fresno to Bakersfield section of the HSR system were reviewed as part of the impact analysis. Wildlife crossings have been sited and are depicted in Figures 2-32, 2-33, and 2-34 in Section 2.4.4 of the Final EIR/EIS. Practices to protect wildlife are described in Section 3.3.1 of the Final EIR/EIS.
F-4-46 (Biology/ Cultural)	The Biological Study Area (BSA) and the Area of Potential Effects (APE) are both 500 feet wide along most of the corridor. The width of the highway/rail footprint is somewhat less than that, allowing room for all staging, construction, and operation activities to occur within the proposed corridor. This width also provides sufficient buffer to adequately assess the direct and indirect impacts resulting from construction and operation of the proposed project. The following text has been added to Section 3.6, Construction Impacts: “The analysis presented in this EIR/EIS assumes that all construction and staging areas would occur within the project footprint. In the event additional construction and staging areas are required, additional impact assessment will be conducted as a supplement to this environmental document.”
F-4-47 (Cultural)	All work areas such as staging, stockpiling, lay down zones etc. will be within the established BSA and APE, which provides a built-in buffer zone. Based on current engineering needs and requirements, there is no

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	need for any work to take place outside the APE. The following text has been added to Section 3.6, Construction Impacts: "The analysis presented in this EIR/EIS assumes that all construction and staging areas would occur within the project footprint. In the event additional construction and staging areas are required, additional impact assessment will be conducted as a supplement to this environmental document."
F-4-48 (Cultural)	An enormous amount of Native American consultation has occurred on this project. Minimally, four separate mailings to all concerned groups were sent out, and numerous follow-up calls were made. Meetings with tribal groups were recently held at the San Manuel Reservation and at a Caltrans facility to discuss potential concerns and issues. The large meeting was held on September 20, 2014 with the San Manuel Band of Mission Indians. There were subsequent field visits by representatives from this group to observe excavation and to examine artifacts. They requested, and Caltrans performed, geophysical testing in an extensive area beyond the known sites and between the sites and river. They also requested that two artifacts be repatriated to this group; this has been done. The remaining artifacts will be sent to the Western Science Center in Hemet, CA. The Tribal group has also received all cultural resource documents to date and has received progress reports on all testing. (Section 5.3.3 of the Final EIR/EIS has been expanded to more fully detail our Native American consultation efforts. At the time of Draft EIR/EIS circulation, a phased approach was undertaken to identify, evaluate, and assess effects to cultural resources. Impacts had not been fully identified at that point. Measures to avoid, minimize and/or mitigate all impacts have been detailed in the Programmatic Agreement (PA) executed between Caltrans and the State Historic Preservation Officer (SHPO). A Treatment Plan is included as part of the PA. All issues raised by Native American groups have been documented in Section 3.1.8 of the Final EIR/EIS. All impacts to historic properties have been disclosed in the Finding of Effect.
F-4-49 (Cultural)	Consultation with SHPO has been completed and the Finding of Adverse Effect has been approved. The PA is included in Appendix K in the final EIR/EIS.
F-4-50 (Cultural)	Most of the Native American comments dealt with the general cultural sensitivity of the area and the types of impacts anticipated from the project. Many groups were concerned about monitoring and strongly recommended that this measure be instituted for all types of excavation. A Native American monitor would be present at excavations performed in Archaeological Monitoring Areas that are identified by the Caltrans PQS for Archaeology.
F-4-51 (Cultural)	All traditional cultural properties, sacred sites, and other important Native American resources were fully disclosed in the Archaeological Survey

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	Report (ASR) and the Historic Property Survey Report (HPSR). This information is also disclosed in Section 3.1.8 of the Final EIR/EIS.
F-4-52 (Cultural)	The proposed project will fully span the Mojave River, as described in Section 2.4.4 - Bridges and Culverts, of the Final EIR/EIS. Figure 2-30 of the Draft EIR/EIS has been revised to remove Option A (Please refer to Figure 2-32 in the Final EIR/EIS). In addition, the alignment of the corridor was drawn in a way that avoids the most sensitive resources in the area. Also, much of the corridor will be on structure as it approaches the river to further reduce impacts. And finally, the Area of Potential Effect and Area of Direct Impact were drawn with the widest possible footprint and buffer to take into account any potential structures and auxiliary facilities near the Mojave River in this area.
F-4-53 (Community)	The block groups covering the study area for each town/community were defined in Section 3.1.4.1. The census data for each study area presented in each subsection of Section 3.1.4 - Community Impact, including Section 3.1.4.4, Environmental Justice, were based on the block groups defined in Section 3.1.4.1. The percentages of minority and low-income populations within the Study Area were compared to minority and low-income percentages for the city and county in Tables 3.1.4-19 and 3.1.4-20. These comparisons demonstrated that the minority populations in the Study Area were similar to those in the larger region, whereas the low-income populations were consistently higher in the Study Area. Thus, any concerns about environmental justice would pertain to low-income populations. The discussion of low-income populations in the impact analysis explains that while the low-income percentages in the Study Area are higher than in the city/county, this difference is based on the total population within the affected census tracts. However, a closer examination of the populations within the affected census tracts indicated that the low-income population was no more likely to be adversely affected than other sub-populations (see the Environmental Consequences portion of Section 3.1.4.4. in the Final Draft EIR/EIS).
F-4-54 (Community)	Tables 3.1.4-19 and 3.1.4-20 compare minority and low-income populations, respectively, to city and county populations. The impact analysis follows from this comparison. No changes to the text of Section 3.1.4.4, Environmental Justice, are warranted. Also, see the response to Comment F-4-53, above.
F-4-55 (Community)	Pursuant to Executive Order 12898, the Environmental Justice analysis in the Draft EIR/EIS addresses the potential for high or disproportionate environmental impacts on minority and low-income populations. Linguistic isolation is a concern for public involvement and for public notifications, but has no direct bearing on the Environmental Justice impact analysis. Linguistically isolated populations are not necessarily low-income populations, and minority populations are not necessarily

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	linguistically isolated.
F-4-56 (Community)	Please see response to Comment F-4-55. Special outreach measures may be warranted as part of the public participation process for the EIR/EIS, and information obtained through the public participation process is used to inform the impact analyses in the EIR/EIS (See Chapter 5 of the Final EIR/EIS), but a summary of outreach efforts is not normally part of the Environmental Justice impact analysis.
F-4-57 (Hazardous)	Table 3.2.5-4 in Section 3.2.5, Hazardous Materials, identifies the parcels within the former George Air Force Base (GAFB) that would be affected by the proposed project. The table text describes the need for coordination with AFB personnel and with the Lahontan Regional Water Quality Control Board. The table text also recommends testing activities to identify toxic materials potentially affecting public health due to disturbance by the proposed project. A preliminary site investigation (PSI) will be conducted during the plans, specifications and estimates (PS&E) phase of this project. Recommendations provided in the PSI including site remediation, if required, will be completed during the PS&E phase prior to project construction.
F-4-58 (Hazardous)	The former George AFB is heavily contaminated. Groundwater is contaminated with jet fuel, trichloroethylene, and pesticides and the soils are contaminated with petroleum hydrocarbons, pesticides, dioxins, and semi-volatile organic compounds. Remedial action is ongoing under a Federal Facilities Agreement signed in 1990. Because the main alignment of the HDC has been selected as part of the Preferred Alternative, three parcels or portions thereof will need to be acquired from the former air base. Section 3.2.5 of the Final EIR/EIS addresses the potential for contaminated soil or water on the air base parcels acquired for the HDC. As indicated in Table 3.2.5-4, soils on these parcels will need to be tested, structures will need to be surveyed for asbestos and lead-based paint, and existing monitoring wells may need to be relocated. Any ongoing remedial actions would continue; project construction would not conflict with ongoing treatment of soil and groundwater, and the proposed HDC would be a compatible land use. The sub-surface disturbance necessary for construction of HDC facilities would not result in releases of contaminants from the site because, per Caltrans' policy, areas to be disturbed would be investigated prior to construction and appropriate precautions would be taken to remove, contain, or remediate any contaminants in the areas of construction. Section 3.2.5 has been modified to state this.
F-4-59 (Hazardous)	Table 3.2.5-1 has been revised as requested.
F-4-60	Based on the current plan, Rail Option 1 will not cause an "island effect" for residences located along 10th Street East in Palmdale or anywhere

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(Community)	along the proposed corridor since the rail connection would use a tunnel configuration. In addition, neither 10th Street East nor Avenue Q will be closed or obstructed. Section 3.1.4 of the Final EIR/EIS has been modified to clarify anticipated impacts to residences. As far as the partial acquisition is concerned, if more than 70% of the property is required, Caltrans would consider a full acquisition for that property. In the event that partial acquisition of the property results in a loss of functional use of the property, Caltrans may authorize relocation assistance for the property owner. Air quality and noise impacts have been evaluated in the EIR/EIS in Sections 3.2.6 and 3.2.7, respectively. No long term air quality impacts are anticipated. Mitigation measures to mitigate traffic noise impacts are provided when reasonable and feasible.
F-4-61 (Community)	Option 1C has been selected for the Palmdale Wye connection. This will use tunnels for both the north and south connectors.
F-4-62 (Community)	Based on the current proposal, Rail Option 1 will not cause an "island effect" for residences located along 10th Street East in Palmdale or anywhere along the proposed corridor since the rail connection would use a tunnel configuration. In addition, neither 10th Street East nor Avenue Q will be closed or obstructed. The information in Section 3.1.4 of the final EIR/EIS has been changed to clarify this.
F-4-63 (Community)	Section 5.4 of the Final EIR/EIS provided a summary of the public participation throughout the project development phase. Common concerns from the public included: • Development of an equitable mitigation program that addresses construction and operational impacts • ROW impacts • Toll road fees and the impact to local residents • Potential impacts to local roads and traffic circulation • Maintaining rural character in rural communities • Adequate infrastructure for communities seeking growth • Impacts of light pollution • Noise impacts and soundwall criteria • Visual impacts and light pollution to current scenery • Unsafe street conditions (i.e., lack of pedestrian sidewalks along US 395) Although community cohesion is not among the common concerns, Caltrans has paid attention to ensure impacts, if any, are avoided and minimized. In each phase of the HDC Project, from planning through the environmental review, property acquisition and relocation, and into design and construction, meaningful community participation and efforts to

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	minimize community disruption have been and will remain a project cornerstone. The Preferred Alternative has been designed to minimize negative effects on existing neighborhoods and communities within the project area and it purposely avoids bisecting any densely populated areas. As shown in Figure 2-23 in the Final EIR/EIS, the project will provide overcrossing/undercrossing facilities to maintain local vehicular and pedestrian circulation across the new transportation corridor. These provisions will have the effect of allowing for continuous interaction between neighborhoods after project construction with the continuation of north-south access between alternate sides of the new corridor facility. The disruption of cohesive communities is further prevented with the recognition that many of the households who may be relocated would desire to stay as close as possible to their current place of residency, because of existing social relationships as well as general affinity for their local areas. This would allow potentially displaced persons to preserve their community ties, send their children to the same schools, and reduce disruption to their employment and personal activities. Caltrans ROW personnel understand that some households may need additional time to relocate, and such people will be offered special advisory assistance as allowed in accordance with the Uniform Relocation Assistance and Real Property Acquisition Policies Act of 1970, as amended. As discussed in Section 3.1.4, Community Impacts, Caltrans has identified general replacement neighborhoods that are homogeneous to the displacement areas. All potential displacees will be interviewed and any potential concerns about community cohesion addressed through an enhanced relocation counseling effort. With the exception of those property owners who request to apply for hardship acquisition, no project activities requiring a displacement will occur until the particular household is relocated to decent, safe, and sanitary housing. Caltrans will also give consideration to any opportunities to physically relocate houses to available vacant parcels, rather than demolition, if circumstances allow. Caltrans will continue to work with the impacted desert communities to consider any specific community needs and measures, which will include preparing a traffic management plan and evaluating traffic operations and safety both before and during construction. A project field office will be open and will serve as a visible presence to remind community members they have an ability to have a personal contact with the resident project engineer to effectively and promptly address any problems. The HDC facility is intended to be designed in such a manner as to contribute to the overall quality of life of the residents of the High Desert area. As discussed in Section 3.1.7, Visual/Aesthetics, Avoidance, Minimization, and Mitigation Measures, such measures as the use of context sensitive design, textures on structures, use of palette, colors characteristic of the natural environment, and incorporation of native trees and plants into landscape plans, among other project compatibility features, will all help promote the desert communities as a unique sense of place. Too, as discussed in Chapter 1 of the Final EIR/EIS, a bicycle path,

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	which will run parallel to the corridor facility, and which can also accommodate pedestrians, is planned as part of the HDC Project and will further help promote cohesiveness by improving connectivity within and beyond the various local communities from construction into project implementation, maintenance and operations.
F-4-64 (Community)	Caltrans and Metro are committed to working in a collaborative manner with the local neighborhoods and communities during the final design and construction stages to ensure that affected residents and business owners have an opportunity for providing meaningful input on design details and landscaping. Because of the unique aspects of the project, including a long corridor stretching over 60 miles, and construction of corridor segments in currently undetermined phases and funding sources, the formation of a single workgroup that would be applicable for providing input on all design and construction work across the entire scope and length of the project would be difficult to effectively achieve. However, Caltrans has worked and will continue to work with the planning offices of the affected city and county jurisdictions through which the HDC would traverse, to assure that each transportation segment will be specifically tailored to reflect the identified local preferences for enhancing the project's structural elements, including treatments for overpasses and underpasses, retaining walls, soundwalls, bridge work, and landscaping to help soften the impacts of the new infrastructure and better promote a sense of place. Caltrans and Metro have conducted extensive outreach activities to engage community members throughout the project development process. Metro has set up the project website and hotlines that allow any concerned individuals to provide their comments and input. Four public hearings to accept comments on the Draft EIR/EIS were organized at various locations along the proposed corridor. In addition to the conventional ways of submitting comments, a Smart Comment software was launched to allow any member of the public to submit their comments at their convenience during the 60-day comment period. All comments submitted by agencies, community members, or any interested parties are considered and responded to. No additional working group is needed at this time. Such a working group may be formed during the final design of the project to gain input on particular features of the project preferred by the affected residents and businesses.
F-4-65 (Community)	While jointly conducting community outreach could be more efficient than separate efforts, the implementation schedules for the two projects may not allow for such coordination. Accordingly, Caltrans cannot make a specific commitment in the EIR/EIS to implement the suggested measure, but will continue informally to seek opportunities to coordinate HDC activities with California HSR activities where appropriate. In addition to the above, the CHSRA and the City of Palmdale are planning to conduct a multi-modal HSR Station Area Plan which would include community outreach to solicit community input. Caltrans will take

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	this opportunity to provide input through the community outreach program to be developed by the CHSRA and the City of Palmdale.
F-4-66 (Community)	Caltrans is committed to avoid, minimize, and mitigate any environmental impacts that would result from the project construction and implementation. If more than 70% of the property is required, Caltrans would consider a full acquisition for that property. In the event that less than 70% of the property is required and such acquisition would result in a loss of functional use of the property, Caltrans may authorize relocation assistance for the property owner. Air quality and noise impacts have been evaluated in the EIR/EIS. No long term air quality impacts are anticipated. Mitigation measures to mitigate traffic noise impacts are provided when reasonable and feasible.
F-4-67 (Noise)	HSR track alignment and profile is designed for a maximum speed of 180 mph. The optimum operating speed of the train is 125 mph. Also at the Palmdale Wye area the tracks are limited to 125 mph maximum speed due to ROW constraints. Assumptions and criteria used in the rail noise study were discussed and concurred with by the FRA. The Final EIR/EIS text in Chapter 2 has been changed for consistency and clarification.
F-4-68 (Noise)	Subsequent to the circulation of the Draft EIR/EIS, in a letter to Caltrans dated December 3, 2014 (see comment letter L-21 in Volume 3 of the Final EIR/EIS), XpressWest indicated their intended use only of Electric Multiple Unit trains and not diesel. The rail noise study was conducted based on the use of electric trains and at the optimum operating speed of 125 mph.
F-4-69 (Noise)	As stated in the Affected Environment section on page 3-888 of the Draft EIR/EIS, receptor locations are shown in Appendix N.
F-4-70 (Noise)	According to the Caltrans Traffic Noise Analysis Protocol (May 2011), offering noise-proof insulation and window treatment to residences is no longer to be considered. For Activity Category D land uses only (such as schools, hospitals, libraries, etc), where interior traffic noise impacts are identified, noise abatement in the form of noise barriers will be considered first. In cases where a barrier clearly is not feasible because of driveway access or other issues, improvement of building shell acoustical insulation is then considered.
F-4-71 (Noise)	The Palmdale Learning Plaza School is the only school along the proposed corridor that will be adversely affected by noise pursuant to the

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	requirements set forth in Streets and Highways Code Section 216 and the Noise Abatement Criteria in 23 CFR772. According to Streets and Highways Code Section 216 under the provision: (g) Priority for noise abatement programs shall be given to those public and private elementary and secondary classrooms, libraries, multipurpose rooms, and spaces used for pupil personnel services constructed in conformance with Article 3 (commencing with Section 17280) of Chapter 3 of Part 10.5 of Division 1 of Title 1 of the Education Code or subject to paragraph (3) of subdivision (a). The Noise Study Report for the High Desert Corridor Project dated June 6, 2014 recommended soundwalls SW100 & SW101 for the Palmdale Learning Plaza School.
F-4-72 (Noise)	Noise impacts that would remain significant have been presented in the Final EIR/EIS. There are three impacted receptors (exceed Noise Abatement Criteria (NAC) noise levels and have substantial noise increase) that will be affected because a proposed wall did not pass the reasonableness criteria due to the excessive cost to construct the soundwall compared to the benefit. These receptors are all located in the Palmdale area; they are Receptors B5, 3, and M4.
F-4-73 (Noise)	Measures will be in place to address potential noise impacts due to nighttime construction. Section 14-8.02 Noise Control, of Caltrans' standard specifications provides the following measures to help minimize construction noise impacts: • Do not exceed 86 decibels (dBA) at 50 feet from the job site for activities from 9:00 p.m. to 6:00 a.m. • Equip an internal combustion engine with the manufacturer-recommended muffler. Do not operate an internal combustion engine on the job site without the appropriate muffler. If adverse construction noise impacts are anticipated, project plans and specifications must identify abatement measures that would minimize or eliminate adverse construction noise impacts on the community. When construction noise abatement is identified, Caltrans will consider the benefits achieved and the overall adverse social, economic, and environmental effects and costs of the construction noise abatement measures. If noise barriers are planned as part of the project, Caltrans will consider constructing the barriers when feasible and reasonable before beginning project construction, so that the barriers can reduce construction noise transmission to adjacent land uses. Construction of barriers before project construction can be accomplished through a separate contract or as a first phase of work under the project construction contract.
F-4-74 (Air quality)	Section 4.5 of the Final EIR/EIS describes the federal regulatory setting, including information on federal laws, regulations, executive orders,

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	standards, and policies. Therefore, it is appropriate to state that the climate change impact analysis in Section 4.5 is relevant for NEPA and for informing federal decisions. This has been clarified by adding the following text to the Climate Change Section in Section 3.2.6. "*The climate change impact analysis presented in Section 4.5.1, "Climate Change Under the California Environmental Quality Act," is also applicable to NEPA and is suitable for informing federal decisions."*
F-4-75 (Air quality)	Please see response to Comment F-4-74.
F-4-76 (Air quality)	The extent to which the HDC would induce additional truck freight traffic is unknown. The Southern California Logistics Airport (SCLA) and other potentially substantial local sources of truck traffic were included in the cumulative analysis in the Draft EIR/EIS. The cumulative analysis for air quality, which addresses greenhouse gases (GHG), was based on this cumulative list of projects. The analysis, however, is qualitative. The GHG estimates presented in the Draft EIR/EIS were based on the traffic study for the HDC Project, which fully accounted for existing and projected truck trips within the region. To provide input to calculations of air quality impacts, highway network utilization was measured based on an arbitrary system of one-mile square grids covering the HDC study area. These one-mile square grids numbered 606 in total. For each grid, the following information was tallied by facility type and travel forecast model period, for each network scenario: auto vehicle miles traveled, truck vehicle miles traveled, auto vehicle hours traveled, truck vehicle hours traveled, and average speed. (Reference Section 3.8 - Vehicle Miles Traveled, High Desert Corridor Traffic Study (Volume I) along with Figure 3-23 illustrating boundaries of HDC Corridor Grids for Highway Utilization Statistics, and Table 3-17 providing a sample of the highway utilization statistics tabulated for each individual grid by facility type and mode). Regarding inducement, the travel forecast model does not reflect "inducement." In other words, the number of truck trips is based on land use and maritime port activity. The model assigns truck trips by considering the relative accessibility and mobility offered by alternative route choices, typically selecting the minimum time and cost paths based on the congested roadway network. Path choice varies by time of day, depending on congestion of the highway network during the various time periods reflected by the model. As an example, when routes south of the San Gabriel Mountains are gridlocked during peak afternoon hours, the HDC may provide an alternative, time effective route for truck travel occurring between the I-15 corridor to/from Las Vegas and I-40, and the LA basin. These truck trips would be "induced" away from the I-210 and I-10 corridors to the HDC in this situation, thereby lessening emissions in the region.

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F-4-77 (Design)	Caltrans is committed to promoting multimodal connectivity to HSR stations for the HDC. Caltrans is incorporating all sustainable components and strategies into the project where feasible.
F-4-78 (Energy)	Caltrans has been working in coordination with the CHSRA and the City of Palmdale. HDC-HSR and California HSR will share station platforms in Palmdale at whatever station location is identified during the station-area planning process.
F-4-79 (Energy)	The City of Palmdale, in cooperation with the CHSRA, is conducting a Multimodal HSR Station Area Plan to guide the ultimate design of the station and station area. Station access and parking will be included in that planning effort.
F-4-80 (Energy)	Caltrans has been working in close coordination with the CHSRA for the rail connection planning. Caltrans will continue to provide input related to station area planning in both Palmdale and Victorville as necessary. However, Caltrans is not in a position to provide resources to conduct station area planning for the agencies/cities that have authority over the planning effort.
F-4-81 (Energy)	The Palmdale HSR station design is not a part of the HDC Project; therefore, Caltrans does not have the authority to commit to achieving Leadership in Energy and Environmental Design (LEED) certification at the platinum level or design for net-zero energy usage at the Palmdale HSR Station. As indicated in the prior response, the City of Palmdale in partnership with the CHSRA is conducting the HSR Station Area Plan. It is the intention of the City of Palmdale and the CHSRA to hire a consultant who can demonstrate knowledge of LEED for Neighborhood Development (LEED-ND). Therefore, Caltrans understands that the City of Palmdale and the CHSRA intend to design the station to achieve the LEED certification.
F-4-82 (Energy)	It is premature to identify any recycled materials to be used in the project. The use of recycled materials will be considered during the design phase of the project, and the project specifications will list the actual materials to be used. The following could be potential recycled materials to be applied on the project: • Rubberized asphalt concrete on local interchange ramps and local streets • Recycled water for landscape irrigation • Crushed recycled concrete from any existing man-made structure as aggregate base.
F-4-83 (Energy)	The renewable energy elements will be selected and designed during the final design phase of the project. They will be installed within the limits of the project study area. Since the siting of renewable energy elements would occur within the existing study footprint, the level of NEPA

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	environmental analysis is anticipated to be either a categorical exclusion, environmental assessment, or re-evaluation. Caltrans would welcome EPA's input in the selection of appropriate green energy technologies.
F-4-84 (Energy)	The best practices form the suggested references along with other sources will be considered during the development of renewable energy design.
F-4-85 (Energy)	The comment seeks to have photovoltaic equipment for the project selected on a life-cycle basis. The solar energy facilities proposed for the project are conceptual, and specific designs, equipment, installations, and locations have not yet been identified. Solar energy facilities may be designed, installed, and operated by Caltrans, or by other entities to whom Caltrans makes portions of the HDC available for such uses. Given these substantial uncertainties, it is premature to commit to specific contracting provisions. However, Caltrans will consider the inclusion of equipment life-cycle costs and benefits in its selection criteria for solar energy contractors.
F-4-86 (Energy)	In a section of the comment letter under the heading of "Recommendations for Subsequent NEPA Analyses," the comment indicates that the topic of best practices concerning decommissioning, module recycling, and reclamation would be appropriate to discuss in subsequent environmental documents. The risk of abandonment of project facilities, and the need for funding to return the project site to a condition where it could be used for other purposes, is not routinely addressed in CEQA/NEPA documents. Abandonment is most often a topic of concern for new, experimental, or exotic facilities that might not be useful long-term, especially if substantial financial resources would be needed to convert the site to another use. The risk of abandonment for the HDC is negligible. The highway portion of the HDC would be used indefinitely into the future, with suitable maintenance and upgrades. The HSR included in the Preferred Alternative would only be built once a vendor and technology have been identified. Decommissioning, module recycling, and reclamation are not reasonably foreseeable future events, so further discussion of them is unnecessary.
F-4-87 (Other)	The final technical studies have been placed on the Caltrans High Desert Corridor website. The technical studies were available for review upon request.

Comment F-5

U.S. Department of Justice
Federal Bureau of Prisons
320 1st Street, NW
Washington, D.C. 20534

December 9, 2014

Ronald Kosinski, Deputy District Director RK
Division of Environmental Planning
Department of Transportation, District 7
100 Main Street, Mailstop 16-a
Los Angeles, CA 90012-3606

Via Fax: (213)897-9572

Re: High Desert Corridor (HDC) Draft Environmental Impact Report/Draft EIS

Dear Mr. Kosinski:

The Federal Bureau of Prisons is in receipt of Volumes 1 and 2 of the September 2014 Draft Environmental Impact Report/Environmental Impact Statement and Section 4(f) (De Minimis Findings) for the High Desert Corridor project. We understand the need to improve east-west mobility through the High Desert region of southern California. We appreciate the opportunity to comment on this proposed project. F-5-1

The Federal Bureau of Prisons would prefer Variation E which would avoid impacts to our Federal Correctional Complex, Victorville, California. We look forward to working with you and your staff and the other agencies involved in this process. F-5-2

Sincerely,

Craig F. Meyers
Associate General Counsel
Real Estate and Environmental Law
Federal Bureau of Prisons

Response to Comment F-5

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F-5-1 (Other)	Your comment is noted for the record.
F-5-2 (Design)	Your comment in support of Variation E is noted for the record. See Section 2.7, Rationale for Selecting Preferred Alternative, for why this design option was not selected. Caltrans and Metro intend to continue our close collaboration on issues affecting your facility as this project moves forward.

Comment F-6

DEPARTMENT OF THE ARMY
LOS ANGELES DISTRICT, U.S. ARMY CORPS OF ENGINEERS
915 WILSHIRE BOULEVARD, SUITE 930
LOS ANGELES, CALIFORNIA 90017-3401

December 12, 2014

Mr. Ronald Kosinski, Deputy District Director
Division of Environmental Planning
California Department of Transportation, District 7
100 South Main Street, MS-16A
Los Angeles, California 90012-3606

Dear Mr. Kosinski:

The U.S. Army Corps of Engineers (Corps) has reviewed the combined Draft Environmental Impact Report/Draft Environmental Impact Statement (DEIR/DEIS), dated September 30, 2014, for the 63-mile-long **High Desert Corridor (HDC)** project proposed to occur in the arid region north of the San Gabriel and San Bernardino mountain ranges, and that would cross the cities of Palmdale, Victorville, Adelanto and Apple Valley, extending from Los Angeles to San Bernardino Counties, California. This letter transmits our comments on the DEIR/DEIS, received in our office on October 7, 2014. The Corps has assigned **File No. SPL-2013-00847-CLH** to this project, and any future correspondence with our office should reference this file number.

Our comments are provided pursuant to the National Environmental Policy Act (NEPA) Council on Environmental Quality (CEQ) regulations (40 C.F.R. Parts 1500-1508), the Corps Regulatory Program NEPA implementing regulations at 33 C.F.R. § 325, Appendix B, and our special expertise and jurisdiction by law pursuant to section 404 of the Clean Water Act (33 U.S.C. 1344) . We recognize that NEPA compliance for this project has been delegated from the Federal Highway Administration (FHWA) to the California Department of Transportation (Caltrans). The Corps is a "cooperating agency" (23 USC 139 Safe, Accountable, Flexible, Efficient Transportation Equity Act: A Legacy for Users (SAFETEA-LU), 40 C.F.R. § 1501.6, and 2006 *Memorandum of Understanding (MOU) for the NEPA/CWA 404 Integration Process for Surface Transportation Projects in California*)) for this project's environmental review and evaluation process. Our involvement is also focused on facilitating the Corps' ability to eventually adopt the Final EIS for our independent NEPA obligations related to our discretionary federal action (i.e., Clean Water Act section 404 permit decisions).

Cover Sheet

Based on CEQ NEPA implementing regulations, the Corps' logo (i.e., Corps castle) and name should appear on the cover page of the DEIR/DEIS as a cooperating agency (refer to 40 C.F.R. § 1502.11). F-6-1

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Project Alternatives

Chapter 2 of the DEIR/DEIS presents four alignment alternatives: 1) Freeway/ Expressway Alternative; 2) Freeway/Tollway Alternative; 3) Freeway/Expressway Alternative with High-Speed Rail (HSR) Feeder Service; and 4) Freeway/Tollway Alternative with HSR Feeder Service. The DEIR/DEIS also includes a "no build" alternative, and eleven (11) eliminated alignment alternatives. In compliance with the Section 404(b)(1) Guidelines at 40 CFR Part 230, we would evaluate various alternatives pertaining to the proposed discharge of dredged or fill material into waters of the U.S. to identify the least environmentally damaging practicable alternative (LEDPA). We remind you that for any project requiring a Corps standard individual permit the Corps may only issue a permit for a proposed action that is the LEDPA and is not contrary to the public interest (33 C.F.R. § 320.4). F-6-2

To ensure we have adequate information for our evaluation, please provide more information for the eliminated alternatives in addition to Table 2-6. Specifically, please quantify impacts of these alternatives to Corps jurisdictional waters, including wetlands. Also, please describe the adverse impacts expected to the types of cultural resources, visual aesthetics, sensitive habitats, and federally listed species and any designated critical habitat. The requested information will be necessary to support the elimination of these alternatives from further analysis. F-6-3

Impacts to Waters of the U.S.

To compare and evaluate further the effects of each alternative, per 33 C.F.R. § 332.3 (f), we recommend you conduct a functional or condition assessment (e.g., California Rapid Assessment Method) of the Corps jurisdictional areas that would be impacted, to accurately determine the amount of compensatory mitigation that would be required to offset losses of functions and services from unavoidable impacts to waters of the U.S., including wetlands. If you do not believe a functional or condition assessment would be feasible, we request you inform us as soon as possible so that we may determine an appropriate method for evaluating the expected impacts to waters of the U.S., including wetlands, for each alternative. The assessment method would support our identification of the LEDPA and assist us in determining appropriate compensatory mitigation for unavoidable impacts to waters of the U.S., including wetlands, such as evaluating mitigation proposals/options. F-6-4

Additionally, we recommend you prepare a more developed conceptual compensatory mitigation plan that presents a level of detail as to where, how, when, and who will accomplish the proposed compensatory mitigation for unavoidable impacts to waters of the U.S., including wetlands. We remind you that a final compensatory mitigation plan must be approved by the Corps prior to the issuance of a section 404 standard individual permit (33 C.F.R. § 332.4(c)). The conceptual mitigation plan will require substantial and additional site-specific information to comply with the standards of the Corps/U.S. Environmental Protection Agency's 2008 Mitigation Rule. F-6-5

-3-

I am providing courtesy copies of this correspondence to the following individuals: Ms. Elizabeth Goldmann, U.S. Environmental Protection Agency, Region IX, 75 Hawthorne St. (WTR-4), San Francisco, California 94105; Ms. Karin Cleary-Rose, U.S. Fish and Wildlife Service, 777 East Tahquitz Canyon Way, Suite 208, Palm Springs, California 92220

Thank you for the opportunity to engage in the HDC environmental review process and to provide input under our Clean Water Act section 404 authority. Should you have any questions or need additional information, please feel free to contact Ms. Crystal L.M. Huerta at (805) 585-2143 or at Crystal.Huerta@usace.army.mil.

Sincerely,

Spencer D. MacNeil, D.Env.
Chief, Transportation and Special Projects Branch

Response to Comment F-6

Comment Code (Topic)	Response
F-6-1 (General)	The last paragraph of 40 CFR 1502.10 states that the cover sheet (and other required sections of the document) shall be included "in any appropriate format." It is Caltrans' practice to identify cooperating (and responsible) agencies on the title sheet of the document. Besides Caltrans and Metro (the project proponents), no other agency's logos are included on the report cover.
F-6-2 (Alternatives)	In selecting the Preferred Alternative, Caltrans considered how well the various alternatives satisfied the project purpose and need, impacts to waters of the U.S., and impacts to the full range of environmental resources. We are aware of the Section 404(b)(1) Guidelines and have included a discussion concerning the Least Environmentally Damaging Practicable Alternative (LEDPA) in Section 3.3.2 (Wetlands and Other Waters) of the Final EIR/EIS. In addition, as part of the permitting process for the project, Caltrans would provide compensatory mitigation for HDC Project impacts to waters and wetlands, offsetting the impacts and thus assuring that the residual impacts on USACE jurisdictional areas are less than significant.
F-6-3 (Alternatives)	The Final EIR/EIS considers a range of reasonable alternatives that could feasibly satisfy the basic purpose and need of the project. These are the alternatives that should be carried forward into the USACE's evaluation. Section 2.8 of the Final EIR/EIS identifies those potentially feasible alternatives, variations, and rail options that were eliminated prior to detailed evaluation in the EIR/EIS. The USACE cannot consider, as practicable alternatives, those potential alternatives that were dismissed by the lead agency because they would not fulfill the needs of the project, are infeasible, or would have unacceptable environmental impacts. These potential alternatives cannot be implemented by the lead agency, so a detailed, quantitative analysis of their environmental impacts is neither required by NEPA nor relevant to the USACE's permitting process. Additional analysis of these potential alternatives in the Final EIR/EIS for the sole purpose of assisting the USACE in identifying different reasons to reject them is unwarranted. Additionally, where the *Guidelines for Specification of Disposal Sites for Dredged or Fill Material* state that "the analysis of alternatives required for NEPA environmental documents … will in most cases provide the information for the evaluation of alternatives under these Guidelines," we believe it is referring to the feasible alternatives that are evaluated in detail in the EIR/EIS rather than potential alternatives that were not analyzed in the document. Should USACE wish for its purposes to further evaluate their impacts on biological, visual, or cultural resources, the descriptions of the potential alternatives in the EIR/EIS provide a sufficient basis to do so.

Comment Code (Topic)	Response
F-6-4 (Biology)	Caltrans has already conducted an assessment of the impacts of the HDC on waters of the U.S., including wetlands, that is sufficient for NEPA purposes and has presented that assessment in the EIR/EIS. During the final design of the HDC Project, its effects on USACE jurisdictional wetlands will be further refined and quantified, providing a sound engineering basis for the preparation of a detailed mitigation and monitoring plan. Caltrans will work with the USACE to develop a mitigation plan that will offset any loss or degradation of jurisdictional wetlands in conjunction with the project.
F-6-5 (Biology)	See response to Comment F-6-4. Caltrans intends to prepare a detailed compensatory mitigation plan that will meet the requirements of the USACE for purposes of issuing a Section 404 individual permit. However, the plan must be based on detailed engineering plans for the overcrossings of USACE jurisdictional wetlands, and those plans have not yet been developed.

Chapter 3 Responses to Comments from State Agencies

This section provides a summary of the comments received from California state agencies on the draft environmental document. A copy of the draft environmental document was sent to the following state agencies:

- California Department of Parks and Recreation
- California High-Speed Rail Authority
- California Transportation Commission
- California Public Utilities Commission
- California Department of Fish and Wildlife
- Calfornia Regional Water Quality Control Board Region 6
- California Regional Water Quality Controal Board Region 4
- Calfornia Highway Patrol
- Antelope Valley Air Quality Management District
- Mojave Desert Air Quality Management District
- California Air Resources Board
- Calfornia Energy Commission
- Calfornia Department of Conservation
- Native American Heritage Commission

A total of five comment letters were received as summarized below.

Table 3.1. Summary of Comment Letters Received from State Agencies

Comment Code	Agency	Commenter Name	Date Letter Received	Comment Topic
S-1	California Department of Fish and Wildlife	Edmund Pert	12/2/2014	Biological Environment, project design and alternatives
S-2	Governor's Office of Planning and Research, State Clearinghouse	Scott Morgan	12/3/2014	General
S-3	California Transportation Commission	Andre Boutros	12/11/2014	General
S-4	Mojave Desert Air Quality Management District	Alan De Salvio	10/15/14	Dust Control Permit
S-5	California High-Speed Rail Authority	Mark McLoughlin	12/2/2014	Project design and alternatives

Comment S-1

S-1

State of California – Natural Resources Agency
DEPARTMENT OF FISH AND WILDLIFE
South Coast Region
3883 Ruffin Road
San Diego, CA 92123
(858) 467-4201
www.wildlife.ca.gov

EDMUND G. BROWN JR., Governor
CHARLTON H. BONHAM, Director

December 2, 2014

Mr. Karl Price
Department of Transportation, District 7 (Caltrans)
100 South Main Street, MS-16A
Los Angeles, California 90012
Karl.price@dot.ca.gov

Subject: Comments on Draft Environmental Impact Report (DEIR) for the High Desert Corridor Project (New State Route 138 between State Route 14 and State Route 18), Los Angeles and San Bernardino Counties, SCH # 2010091084

Dear Mr. Price:

The Department of Fish and Wildlife (Department) has reviewed the above-referenced Draft Environmental Impact Report (DEIR) for the High Desert Corridor (HDC) Project (Project), relative to impacts to biological resources. The DEIR was submitted by California Department of Transportation (Caltrans) acting as the Lead Agency under CEQA (§ 15367). If approved, the Project would construct a new 63-mile-long east-west multi-purpose transportation facility in the High Desert region of Los Angeles and San Bernardino counties. The Department previously commented on the HDC Notice of Preparation (NOP) on July 23, 2013.

The HDC Project would entail construction of a new multimodal link between State Route-18 (SR-18) in San Bernardino County and State Route-14 (SR-14) in Los Angeles County. It would connect some of the fastest growing residential, commercial, and industrial areas in Southern California, including Palmdale, Lancaster, Adelanto, Victorville, Hesperia, and Apple Valley. As currently planned, the Project would be implemented in three segments; the Antelope Valley segment, the High Desert segment, and the Victor Valley segment. The 10-mile-long Antelope Valley segment would start from a new freeway-toll-freeway SR-14/HDC interchange and extend east parallel with and near Avenue P-8 to 100th Street East in Palmdale. The right-of-way (ROW) to be acquired for this segment would accommodate ultimate expansion to four lanes in each direction plus a high-speed passenger rail line (HSR). The 26-mile-long High Desert segment would extend from Palmdale to Adelanto, running in a west-east direction parallel and south of Palmdale Boulevard. The freeway would be three lanes in each direction, with ROW acquired to support an ultimate facility of four lanes in each direction plus a HSR line. The 27-mile-long Victor Valley segment would generally follow the alignment of Air Expressway Boulevard, between Caughlin Road in Adelanto and Dale Evans Parkway east of I-15 in Apple Valley, and continuing southeasterly as an expressway to join SR-18 just east of Joshua Street. The freeway portion of this segment between Caughlin Road and Interstate-15 (I-15) would be 6 lanes wide, continuing to Dale Evans Parkway as a 4- or 6-lane freeway. ROW would be acquired to support a future freeway of 4 lanes in each direction plus a HSR line. The HDC would incorporate the following elements where possible along the 63-mile route: Highway/Expressway; HSR Feeder Service; Bicycle Route; and Green Energy.

The following statements and comments have been prepared pursuant to the California Environmental Quality Act (CEQA) under the Department's authority as Trustee Agency with jurisdiction over natural resources affected by the Project (CEQA Guidelines § 15386), and

Conserving California's Wildlife Since 1870

pursuant to the Department's authority as a Responsible Agency under CEQA Guidelines section 15381 over those aspects of the proposed Project that come under the purview of the California Endangered Species Act (CESA), (Fish and Game Code § 2050 *et seq.*), and/or Fish and Game Code section 1600 *et seq.*

1. Proposed Alternatives. The DEIR includes and analysis of four feasible alternatives and a No Build Alterative, each with several variations. The Department recommends approval of an Alternative that avoids impacts to sensitive species and their habitats.

   a. Preferred Alternative. According to the DEIR the Freeway/Expressway Alternative proposes impacts to approximately 3,216 acres, nearly 1,000 acres less than other alternatives. In addition, Variation E Highway Only alignment, in most instances, as it relates to highly sensitive animal and plant resources, has a smaller overall footprint. Therefore, the Department would suggest an Alternative, such as the Freeway/Expressway with Variation E Highway Only as a preferred alternative. S-1-1

   b. Staging Areas and Access Routes. The final EIR should describe and evaluate all temporary impacts including temporary construction impacts from staging and access. The final EIR should clarify if these activities are included in the 3,216 acres referenced as the total Project footprint. S-1-2

2. Shoulder Requirement. The Department recommended in the NOP that each Alternative be analyzed to exclude the requirements of an 8-foot-wide road shoulder in each direction. The DEIR states for each alternative the need for a 10-foot shoulder throughout the entirety of the alignment. The Department recommends Caltrans consider reducing or excluding the 10-foot shoulder requirement in locations adjacent undeveloped open space to reduce impacts to natural open space, especially at the bridge crossing. S-1-3

3. Analyses of the Potential Project-Related Impacts on the Biological Resources. The Department's previously requested the DEIR include an analysis of adverse effects to biological resources. The DEIR states, as it relates to several sensitive animal species, "...impacts to individuals of this species will be mitigated per consultation with the appropriate agencies." The Final EIR should describe the consultation efforts with the agencies and the mitigation measures that will be implemented to offset Project-related impacts specific to each species or its habitat. S-1-4

4. Impacts to Fully Protected Golden Eagle. The DEIR states potential impacts to golden eagle (*Aquila chrysaetos*) may occur as a result of Project implementation. Golden eagle foraging and nesting habitat occurs throughout the proposed project corridor. There is a reasonable possibility that golden eagles may scavenge on injured or dead animals on or near the new roadway and be subject to vehicle strikes. The Department recommends Caltrans analyze the potential impact to golden eagle and other wildlife in regards to vehicle strike mortality. The Department considers impacts to Fully Protected species, such as the golden eagle (Fish and Game Code §§ 3511, 4700, 5050, and 5515) for the purposes of CEQA, to be significant without mitigation. The Department has jurisdiction over fully protected species of birds, mammals, amphibians, reptiles, and fish, pursuant to Fish and Game Code sections 3511, 4700, 5050, and 5515. Except as provided in the Fish and Game Code (e.g., for necessary scientific research), take of any fully protected species is prohibited, and cannot be authorized by the Department. S-1-5

Mr. Karl Price
Department of Transportation, District 7 (Caltrans)
December 2, 2014
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5. California Endangered Species Act (CESA). The DEIR analyses impacts to the below list of CESA-listed species included in the NOP comments. The Department considers adverse impacts to a species protected by the CESA, for the purposes of CEQA, to be significant without mitigation. The measures proposed in the DEIR (please see Section 3; BTE 1-9; pp.532-534) are not suitable mitigation measures in the absence of an Incidental Take Permit (ITP), as to CESA, take of any endangered, threatened, or candidate species that results from the Project is prohibited, except as authorized by state law (Fish and Game Code, §§ 2080, 2085.) Consequently, if the Project, Project construction, or any Project-related activity during the life of the Project results in take of a species designated as endangered or threatened, or a candidate for listing under CESA, the Department recommends that the Project proponent seek appropriate take authorization under CESA prior to implementing the Project. Appropriate authorization from the Department may include an incidental take permit or a consistency determination in certain circumstances, among other options (Fish and Game Code §§ 2080.1, 2081, subds. (b),(c)). Early consultation is encouraged, as significant modification to the Project and mitigation measures may be required in order to obtain a CESA Permit. Revisions to the Fish and Game Code, effective January 1998, may require that the Department issue a separate CEQA document for the issuance of a 2081 permit unless the Project CEQA document addresses all Project impacts to CESA-listed species and specifies a mitigation monitoring and reporting program that will meet the requirements of a 2081 permit. For these reasons, biological mitigation monitoring and reporting proposals should be of sufficient detail, resolution and enforceability to satisfy the requirements for a CESA Permit. The final EIR should fully address potential impacts to the following species, specifically as it relates to proposed BTE 1, 2, 3. S-1-6

a. Swainson's Hawk (*Buteo swainsoni*). The DEIR states a moderate potential for the CESA-listed Swainson's hawk to occur in the Project footprint. Swainson's hawk is known to occur within multiple regions of the High Desert. The Department considers any nest to be active that has been used by Swainson's hawk within the past five years. Swainson's hawks forage in agriculture, non-native annual grassland, and other desert scrub habitats that support a suitable prey base present within the proposed HDC footprint. The Department would conclude that the HDC site supports suitable foraging habitat for Swainson's hawk and recommends protocol surveys be conducted to fully analyze the potential for impacts prior to the circulation of the DEIR. The Department has drafted modified protocol surveys for the Antelope Valley population included in the *Best Management Practices and Guidance Manual for Desert Renewable Energy Projects* that can be located at (http://www.energy.ca.gov/2010publications/REAT-1000-2010-009/REAT-1000-2010-009-F.PDF). The results of the surveys may influence the mitigation measures ultimately adopted within the final CEQA document. As described in the Department protocols for the species revised in 2010 for the Antelope Valley, a 5-mile survey radius of all potential nest trees, towers or other potential nest sites should be surveyed by a Department qualified raptor biologist. The Department recommends consultation with the Department prior to initiation of surveys, to ensure that the latest Department-approved protocol is used. Given the near proximity of known active nests and forage areas of the species, the Department would consider potential impacts to the species significant absent suitable mitigation. S-1-7

b. Least Bell's Vireo (*Vireo bellii pusillus*). The DEIR indicates suitable habitat along the banks of the Mojave River in the vicinity of a proposed new bridge to span the Mojave River. The

DEIR indicates the CESA-listed least Bell's vireo were observed in this habitat along the Mojave River during focused surveys and states impacts to this known occupied least Bell's vireo (vireo) habitat cannot be avoided except in The Freeway/Expressway with Variation E Highway Only alternative. Vireo is known to use marginal habitat throughout Los Angeles and San Bernardino counties. The Department recommends total avoidance of willow and mulefat scrub habitat in areas of known occurrences; as well as protocol level surveys conducted in areas where vireo may occur, including marginal willow and mulefat scrub habitat. The final EIR should disclose the direct and indirect impacts to the vireo and its habitat, a specific accounting of the acres of habitat to be impacted, and describe the mitigation that will fully mitigate the impacts to the species. S-1-8

c. Southwestern Willow Flycatcher (*Empidonax traillii extimus*). The DEIR indicates suitable habitat along the banks of the Mojave River in the vicinity of a proposed new bridge to span the Mojave River. The DEIR indicates that southwestern willow flycatcher (flycatcher) were observed in this habitat along the Mojave River during focused surveys and states impacts to this known occupied flycatcher habitat cannot be avoided except in The Freeway/Expressway with Variation E Highway Only alternative. The CESA-listed flycatcher is known to use marginal habitat throughout Los Angeles and San Bernardino counties. The Department recommends total avoidance of willow and mulefat scrub habitat in areas of known occurrences; as well as protocol level surveys be conducted in areas where flycatcher may occur, including marginal willow and mulefat scrub habitat. The final EIR should disclose the direct and indirect impacts to the flycatcher, a specific accounting of the acres of habitat to be impacted, and describe the mitigation that will fully mitigate the impacts to the species. S-1-9

d. Yellow-billed Cuckoo (*Coccyzus americanus*). The DEIR indicates although no yellow-billed cuckoos were observed during focused surveys, suitable habitat exists along the banks of the Mojave River. The DEIR indicates impacts to yellow-billed cuckoo (cuckoo) habitat cannot be avoided except in The Freeway/Expressway with Variation E Highway Only alternative. The CESA-listed cuckoo is known to use cottonwood galleries throughout Los Angeles and San Bernardino counties. The Department recommends total avoidance of cottonwood habitat in areas of known occurrences; as well as protocol level surveys be conducted in areas where cuckoo may occur, including marginal cottonwood galleries with associated willow and mulefat scrub habitats. The final EIR should disclose the direct and indirect impacts to the cuckoo and its habitat and describe the mitigation that will fully mitigate the impacts to the species. S-1-10

e. Mohave Ground Squirrel (*Xerospermophilus mohavensis*). The DEIR indicates impacts to high quality habitat for CESA-listed Mohave Ground Squirrel (ground squirrel) cannot be avoided except in The Freeway/Expressway with Variation E Highway Only alternative. - Ground squirrel trapping efforts for the HDC Project were conducted in accordance with the Department's *Mohave Ground Squirrel Guidelines,* resulting in no captures of ground squirrel through the end of the trapping efforts in 2012 *(MGS Biological Resources Report for the HDC Project, ESA).* Please note that the Department acknowledges negative findings for protocol-level trapping efforts for one calendar year from the final date of the last trapping effort. The Department recommends additional trapping surveys until such time the Project goes to construction. Impacts to ground squirrel and its habitat from Project-related activities should be mitigated through land acquisition. In an effort to identify parcels for mitigation acquisition, trapping surveys should occur in areas most likely to S-1-11

support ground squirrel, adjacent known occupied ground squirrel habitat, or in areas of recent ground squirrel occurrences.

f. Desert Tortoise *(Gopherus agassizii)*. The DEIR indicates impacts to high quality habitat for CESA-listed desert tortoise cannot be avoided except in The Freeway/Expressway with Variation E Highway Only alternative. The proposed alignment of the HDC is likely to negatively impact individuals of the desert tortoise (tortoise). Private land ownership along the proposed HDC alignment required modifications to the US Fish and Wildlife Service (Service) "*Pre-Project Field Survey Protocol for Potential Desert Tortoise Habitat*" protocol methodology. These pre-approved methodology modification were an attempt to accurately reflect the potential impacts to the species and its habitat. Measures to fully mitigate for impacts to the species and its habitat should be through large scale land acquisition and restoration. S-1-12

g. State Endangered Fish Species. The final EIR should identify areas along the proposed alignment where Project impacts could directly or indirectly negatively impact any extant pupfish species, or any other State endangered native fish species, within the Mohave Desert Watershed. S-1-13

6. Department Species of Special Concern (SSC). The DEIR states that the following species, in addition to the potential for numerous other species, are present in the Project footprint: Tricolored Blackbird (*Agelaius tricolor*), Northern harrier (*Circus cyaneus*), Burrowing owl (*Athene Cunicularia*), Short-eared owl (*Asio flammeus*), Loggerhead shrike (*Lanius Ludovicianus*), Summer tanager (*Piranga rubra*), Le Conte's thrasher (*Toxostoma lecontei*), Yellow Warble (*Setophaga petechial*) San Diego desert woodrat (*Neotoma lepida Intermedia*), American badger (*Taxidea taxus*), Silvery legless lizard (*Anniella pulchra pulchra*), Coast horned lizard (*Phrynosoma Blainvillii*). The Departments comments on the NOP identified several SSC species that the DEIR did not fully evaluate. The DEIR states in several measures, "…impacts to individual habitats and species will be mitigated per consultation with the appropriate agencies." The Final EIR should describe the consultation efforts with the agencies and the mitigation measures that will be implemented to offset Project-related impacts specific to each species or its habitat. S-1-14

a. Mohave Fringe-toed Lizard (*Uma scoparia*). The Department recommended the DEIR thoroughly evaluate dune habitat in the Mohave Desert. Dune habitat is a rare and sensitive desert community where the fringe-toed lizard has an obligate relationship. Eolian sand transport, the processes that erodes, transports and deposits sand that builds and maintains the dunes over time should be preserved. It is likely that the road alignment and the introduction of invasive species (e.g., annual grasses, weeds, and wildland pest species), would negatively impact the habitat and its natural processes. The final EIR should identify areas along the proposed alignment where dunes, and subsequently fringe-toed lizards could be negatively impacted and those areas should be avoided. S-1-15

b. Victorville Shoulderband Snail (*Helminthoglypta mohaveana*). The Department recommended that surveys for Victorville shoulderband snail (snail) be performed prior to the circulation of the DEIR. The snail is on the International Union for Conservation of Nature red-list and has a global ranking of G1, extremely endangered. The final EIR should identify areas along the proposed alignment where suitable habitat exists for the snail and S-1-16

evaluate how the species and its habitat could be negatively impacted. The Department recommends avoidance of snail habitat.

c. Ferruginous Hawk (*Buteo regalis*). The Department requested Ferruginous hawk (hawk) surveys in our NOP comment letter. Hawks are known to forage and winter within the vicinity of the Antelope Valley and several data points for hawks exist within the High Desert region. Surveys for the hawks would better inform the Project's potential impacts to the species. The results of the surveys would influence the types of mitigation ultimately adopted within the final EIR. The Department is available for consultation on raptor survey protocols and timing of the surveys to allow adequate time to adopt species specific mitigation measures as appropriate. S-1-17

7. Special Status Botanical Species. The DEIR indicated that several 1B listed plants, rare throughout their range, were present in the Project footprint, including Alkali mariposa lily (*Calochortus striatus*), White Pygmy Poppy (*Canbya candida*), Booth's evening primrose [(*Eremothera boothii* ssp. *Boothii*); (*Camissonia boothii* ssp. *Boothii*)], Crowned muilla (*Muilla coronate*), and Mojave fish-hook cactus (*Sclerocactus Polyancistrus*). CEQA provides protection not only for CESA-listed species, but for any species which can be shown to meet the criteria for CESA-listing (CEQA Section 15380). The Department recommended surveys for short-joint beaver tail cactus (*Opuntia basilaris* var. *brachyclada*), and it is unclear if these surveys were conducted. The Department recognizes that Lists 1A, 1B and 2 of the California Native Plant Society Inventory of Rare and Endangered Vascular Plants of California consist of plants that, in a majority of cases, would qualify for listing. Please see Attachment A for a complete list of desert plants to be fully considered during the planning of botanical surveys. S-1-18

In addition, desert dunes, alkali meadows, and dry lakebeds are sensitive habitat types in the Mohave Desert Region and should be avoided. If dry lakebeds are likely to be impacted fairy shrimp (*Branchinecta lynchi)* surveys should be completed. The DEIR states translocation as a mitigation measure for the above listed species. The Department does not recognize translocation as an appropriate mitigation measure. The final EIR should include measures designed to describe how the Project will completely avoid impacts and/or mitigation proposed to fully offset impacts, such as off-site acquisition and management in perpetuity.

a. Revegetation. The DEIR mentions restoration efforts will include mostly native plant species in areas grubbed or excavated as part of Project implementation. However, the Department recommends the Final EIR prepare a Habitat Mitigation and Monitoring Plan (HMMP) for restoration and revegetation. The HMMP should be prepared by persons with expertise in southern California ecosystems and native plant revegetation techniques. The use of reference sites is recommended to assist with species selection, adaptive management decisions, and determining success of the mitigation site. Each plan should include, at a minimum: (a) the location of the mitigation site; (b) the plant species to be used, container sizes, and seeding rates; (c) a schematic depicting the mitigation area; (d) planting schedule; (e) a description of the irrigation methodology; (f) measures to control exotic vegetation on site; (g) specific success criteria; (h) a detailed monitoring program; (i) contingency measures should the success criteria not be met; and (j) identification of the party responsible for meeting the success criteria and providing for conservation of the mitigation site in perpetuity. S-1-19

b. Lower Mojave River Narrows. The Mojave River Narrows is a unique natural geologic area that provides surface water year round. The final EIR should describe if Project-related impacts will alter the presence of or restrict wildlife access to the surface water. S-1-20

c. Avoidance Measures for Joshua Tree Woodland. The DEIR describes impacts to 246 Joshua trees on the Project site. It further describes how the Project has been designed to avoid and preserve as many displaced individual Joshua trees from the Project by uprooting them and storing them for later use on the Project periphery. Replaced individual trees do not have the same value or function as naturally occurring woodlands. The Department recommends acquisition of Joshua tree woodland of equal or superior quality, with similar densities, age classes and recruitment to fully offset Project impacts. Acquired habitat should be adjacent to large tracts of existing Joshua tree woodlands which have been identified by resource agencies as having a high priority for acquisition for conservation. All mitigation lands preserved onsite or acquired offsite should be deeded to a local land conservancy and protected in perpetuity under a conservation easement to prohibit incompatible uses on the site. Digging up Joshua trees and transplanting into other areas should not be considered appropriate mitigation of loss of Joshua tree woodland vegetative communities as these methods are experimental and there are no assurances of their success. S-1-21

8. Mitigation for the Project-related Biological Impacts. The DEIR states in several measures that "...impacts to individual habitats and species will be mitigated per consultation with the appropriate agencies." The Final EIR should address specific mitigation measures to offset impacts. Specifically, the Department recommends Caltrans continue coordination with the Department to refine the Project description for the final EIR to avoid, minimize and appropriately mitigate impacts to sensitive resources and meet the objectives of the Project. S-1-22

a. Proposed Mitigation Measures. The final EIR should include mitigation measures for adverse Project-related impacts to sensitive plants, animals, and habitats. Mitigation measures should emphasize avoidance and reduction of Project impacts. For unavoidable impacts, on-site habitat restoration or enhancement should be described in detail. If on-site mitigation is not feasible or would not be biologically viable and therefore not adequately mitigate the loss of biological functions and values, off-site mitigation through habitat creation, restoration and/or acquisition and preservation in perpetuity should be addressed. The Department recommends the large-scale acquisition of habitat of equal or superior quality, with similar densities, age classes and recruitment to fully offset Project impacts. Acquired habitat should be adjacent to large tracts of existing habitat which have been identified by resource agencies as having a high priority for acquisition for conservation. The Project as proposes will impact at least 3,600 acres. Therefore, based upon the type and quality of habitat, the biodiversity that exist within that habitat, the years it takes to restore the habitat will determine the type and acres of acquisition acres needed to fully offset Project-related impacts. The final EIR should include areas proposed for habitat acquisition and describe how these areas will compensate for the impacts associated with the proposed Project. S-1-23

b. Protection of Open Space Areas. For proposed preservation and/or restoration, the final EIR should include measures to perpetually protect the targeted habitat values from direct

and indirect negative impacts. The objective should be to offset the Project-induced qualitative and quantitative losses of wildlife habitat values. Issues that should be addressed including, but are not limited to; restrictions on access, proposed land dedications, monitoring and management programs, control of illegal dumping, water pollution, and increased human intrusion.. S-1-24

c. Relocation and Handling of Wildlife. The DEIR states that individuals of silvery legless lizard and coast horned lizard will be relocated if encountered during Project-related activities. The Department generally does not support the use of relocation, salvage, and/or transplantation as mitigation for impacts to rare, threatened, or endangered species. Studies have shown that these efforts are experimental in nature and largely unsuccessful. The Final EIR should evaluate the potential impacts to these, and other animals, that need to be handled as it relates to stress from handling, potential transmission of disease from one location to another, and long-term viability of a relocated species effectively remaining relocated. The Department recommends the Final EIR consider allowing animals encountered during Project implementation to move of their own accord and Project activities halted until the individual animal has moved out of the construction footprint under the observation of a dedicated onsite biologist. Physically handling an animal should only be after a pre-determined time has lapsed for the animal to move on its own. The Final EIR should include a species encounter and relocation strategy analyses so animal encounters are handled systematically and consistently throughout the life of the Project. S-1-25

9. Breeding and/or Nesting Birds. The DEIR described several sensitive bird species occurring within the Project footprint. Only one proposed alignment avoided impacts to SE species, The Freeway/Expressway with Variation E Highway. The Department recommends prior to circulating the final EIR a breeding bird avoidance and buffer plan be created and implemented for the Project. If breeding activities and/or birds are observed bringing nesting material to habitat within the Project footprint, and or nest are located during surveys, the breeding habitat/nest site shall be fenced and/or flagged a minimum of 300 feet for passerines (500 feet for raptors) in all directions, and this area shall not be disturbed until the nest becomes inactive, the young have fledged, the young are no longer being fed by the parents, the young have left the area, and the young will no longer be impacted by the Project. If active nests are observed and the recommended nest avoidance zones are not feasible, non-disturbance buffer zones shall be established by the qualified biologist based on, but not limited to site lines from the nest to the work site and observations of the nesting bird's reaction to Project activities. Continuous monitoring of the nest site by a qualified biologist shall occur during disturbance activities, and a nest observation log shall be updated once per hour during construction activities. If the monitoring biologist determines nesting activities may fail as a result of work activities, all work shall cease within the recommended avoidance area until the biologist determines the adults and young are no longer reliant on the nest site. The final EIR should include these areas and describe how they will be completely avoided, impacts minimized and reduced, and/or mitigation proposed. S-1-26

10. Desert Washes, Creeks and Rivers. The DEIR states between 25 and 60 acres of permanent impacts and 35 acres of temporary impacts are proposed to Department jurisdictional streams, including Big Rock Wash, Little Rock Wash, and the Mojave River. The DEIR further states that Variation E with the Mojave River Bridges Option 3 has the smallest footprint overall, when considering the different proposed alternatives. All of these S-1-27

jurisdictional hydrological features serve as wildlife corridors, all of which may become interrupted by the new highway. This interruption may severely limit wildlife access to food and water resources, create genetic isolation, and limit access to other distinct populations of species. Potential negative impacts could result in the loss of vital resources for many species and could potentially result in direct and indirect species mortality through the loss of wildlife movement. In areas of open space, the Department recommends the use of fencing, or another means to detour wildlife to the crossing versus onto the highway. The EIR discusses open span bridges will be used at Little Rock, Big Rock, and Mojave River crossing but that corrugated metal pipes and box culverts will be used at approximately 118 other Department jurisdictional crossings. The Final EIR should consider the individual sizes of the culverts based upon daylighting concerns from south to north undercrossing entrances and exits, the ability of large mammals to effectively utilize the proposed culverts, and the capacity needed to pass a 100-year storm event. S-1-27 (con't)

a. Impact to Streams and Wetlands. The Department has regulatory authority over activities in streams and/or lakes that will divert or obstruct the natural flow, or change the bed, channel, or bank (which may include associated riparian resources) of a river or stream, or use material from a streambed. For any such activities, the Project applicant (or "entity") must provide written notification to the Department pursuant to Section 1600 et seq. of the Fish and Game Code. Based on this notification and other information, the Department determines whether a Lake and Streambed Alteration Agreement (LSA) with the applicant is required prior to conducting the proposed activities. The Department's issuance of a LSA for a Project that is subject to CEQA will require CEQA compliance actions by the Department as a responsible agency. The Department as a responsible agency under CEQA may consider the Lead Agency's final EIR for the Project. To minimize additional requirements by the Department pursuant to Section 1600 et seq. and/or under CEQA, the final EIR should fully identify the potential impacts to the stream or riparian resources and provide adequate avoidance, mitigation, monitoring and reporting commitments for issuance of the LSA. S-1-28

b. Episodic Streams. The Department may take jurisdiction on episodic streams, including alluvial fan streams even where flow occurs as sheet flooding. The paper recently published by Fish and Wildlife, *A Review of Steam Processes and Forms in Dryland Watersheds*, discusses the alluvial process and the significance to water resources (Vyverber, Kris. California Department of Fish and Game, Review of Stream Processes and Forms in Dryland Watersheds. October, 2010 California Department of Fish and Game, California Wildlife Habitat Relationships website: (http://www.dfg.ca.gov/biogeodata). S-1-29

Thank you for this opportunity to provide comments. Please contact Ms. Jamie Jackson, Senior Environmental Scientist (Specialist) at (805) 382-6906 if you should have any questions and for further coordination on the proposed Project.

Sincerely,

Edmund Pert
Regional Manager
South Coast Region

Mr. Karl Price
Department of Transportation, District 7 (Caltrans)
December 2, 2014
Page 10 of 10

Attachment

ec: Ms. Betty Courtney, CDFW, Santa Clarita
Ms. Erinn Wilson, CDFW, Los Alamitos
Ms. Kelly Schmoker, CDFW, Mission Viejo
Ms. Mary Meyer, CDFW, Carpinteria
Mr. Scott Harris, CDFW, Pasadena
Ms. Becky Jones, CDFW, Bishop
Caltrans Liaison, USFWS, Carlsbad

Scientific Name	Common Name
Abronia villosa var. aurita	chaparral sand-verbena
Acanthomintha obovata ssp. cordata	heart-leaved thorn-mint
Allium howellii var. clokeyi	Mt. Pinos onion
Amaranthus watsonii	Watson's amaranth
Androsace elongata ssp. acuta	California androsace
Boechera dispar	pinyon rockcress
Boechera lincolnensis	Lincoln rockcress
California macrophylla	round-leaved filaree
Calochortus striatus	alkali mariposa lily
Canbya candida	white pygmy-poppy
Castilleja gleasoni	Mt. Gleason paintbrush
Castilleja plagiotoma	Mojave paintbrush
Chorizanthe spinosa	Mojave spineflower
Chorizanthe xanti var. leucotheca	white-bracted spineflower
Cryptantha clokeyi	Clokey's cryptantha
Cymopterus deserticola	desert cymopterus
Eriastrum hooveri	Hoover's eriastrum
Eriophyllum mohavense	Barstow woolly sunflower
Euphorbia misera	cliff spurge
Frasera neglecta	pine green-gentian
Fritillaria pinetorum	pine fritillary
Galium johnstonii	Johnston's bedstraw
Gilia latiflora ssp. cuyamensis	Cuyama gilia
Goodmania luteola	golden goodmania
Harpagonella palmeri	Palmer's grapplinghook
Hulsea vestita ssp. parryi	Parry's sunflower
Imperata brevifolia	California satintail
Layia heterotricha	pale-yellow layia
Linanthus orcuttii	Orcutt's linanthus
Loeflingia squarrosa var. artemisiarum	sagebrush loeflingia
Lupinus peirsonii	Peirson's lupine
Microseris sylvatica	sylvan microseris
Muhlenbergia appressa	appressed muhly
Muilla coronata	crowned muilla
Navarretia peninsularis	Baja navarretia
Navarretia setiloba	Piute Mountains navarretia
Opuntia basilaris var. brachyclada	short-joint beavertail
Orobanche valida ssp. valida	Rock Creek broomrape
Perideridia pringlei	adobe yampah
Phacelia mohavensis	Mojave phacelia
Plagiobothrys parishii	Parish's popcorn-flower
Selaginella asprella	bluish spike-moss
Sidalcea neomexicana	salt spring checkerbloom
Stylocline masonii	Mason's neststraw
Syntrichopappus lemmonii	Lemmon's syntrichopappus
Thermopsis californica var. argentata	silvery false lupine
Thysanocarpus rigidus	rigid fringepod
Viola purpurea ssp. aurea	golden violet
Opuntia basilaris var. treleasei	Bakersfield cactus

Response to Comment S-1

Comment Code (Topic)	Response
S-1-1 (Design)	Thank you for participating in the review of the EIR/EIS for the proposed HDC Project. Your preference for a preferred alternative that minimizes project impacts on biological resources, such as the Freeway/Expressway with Variation E Highway Only, is noted. However, the Preferred Alternative has been selected after weighing the potential impacts to a multitude of resources, considering how well the alternatives satisfy the project's stated purpose and need, and public/agency comments. The size of the overall footprint (the number of acres affected) is one factor of many that was considered in the decision making process.
S-1-2 (Construction)	Based on the current plan, all construction and staging areas would occur within the project footprint analyzed in the EIR/EIS (see Environmental Consequence subsection of Section 3.6, Construction Impacts). In the event additional construction and staging areas are required, additional impact assessment will be conducted.
S-1-3 (Design)	Current highway design standards require a 10-foot-wide shoulder wherever feasible. Design exceptions can be granted in certain cases to avoid or minimize impacts with sufficient justification. The reduction of highway shoulder widths in specified areas to reduce project impacts on sensitive natural resources will be considered during the final design of the project. With California Department of Fish and Wildlife (CDFW) assistance, Caltrans Division of Environmental Planning will aggressively pursue this measure; however, our agency may or may not decide to select this measure for implementation.
S-1-4 (Biology)	Section 3.3.5 of the Final EIR/EIS has been amended to include a more detailed discussion about coordination efforts with the CDFW and measures developed to avoid, minimize, or mitigate impacts to sensitive resources. With CDFW assistance, the Caltrans Division of Environmental Planning will aggressively pursue these mitigation efforts.
S-1-5 (Biology)	Sections 3.3.4 and 3.3.5 of the Final EIR/EIS have been amended to include additional discussion about potential impacts to raptors, including golden eagles, from foraging on road kill. To further reduce the potential of wildlife strikes on the roadway, additional measures, such as exclusionary fencing to keep animals off the highway, are included in the Final EIR/EIS. See measures BAN-6 in Section 3.3.4 and BTE-1 in Section 3.3.5.
S-1-6 (Biology)	The EIR/EIS identifies potential impacts to species that are designated as threatened or endangered or are a candidate for listing under the California Endangered Species Act. As such, Caltrans intends to apply for an incidental take permit from CDFW.

Comment Code (Topic)	Response
S-1-7 (Biology)	A focused survey for Swainson's hawk following the Department's recommended protocol was conducted and results of this study are included in Section 3.3.5 of the Final EIR/EIS. Additionally, a discussion of impacts and resulting mitigation measures are also included.
S-1-8 (Biology)	Variation E was not selected to be part of the Preferred Alternative for the proposed project, in part, because it would result in greater impacts to the Mojave River. In particular, those impacts would have occurred in habitat known to support least Bell's vireo. Protocol focused surveys for least Bell's vireo were conducted in 2012, 2013, 2014, and 2015 in the Mojave River. Results are presented in detail in the technical reports and are summarized in Section 3.3.5 of the Final EIR/EIS, which has been revised to include the additional impact analysis and mitigation measures (BTE-4 through 10) that have been proposed.
S-1-9 (Biology)	Variation E was not selected to be part of the Preferred Alternative, in part, because it would result in greater impacts to the Mojave River. In particular, those impacts would have occurred in habitat known to support southwestern willow flycatcher. Protocol focused surveys for southwestern willow flycatcher were conducted in 2012, 2013, 2014, and 2015 in the Mojave River. Results are presented in detail in the technical reports and are summarized in Section 3.3.5 of the Final EIR/EIS, which has been revised to include the additional impact analysis and mitigation measures that have been proposed.
S-1-10 (Biology)	Variation E was not selected to be part of the Preferred Alternative for the proposed project, in part, because it would result in greater impacts to the Mojave River. Although no protocol surveys have been officially adopted, focused surveys were conducted in 2015 to determine presence/absence of yellow-billed cuckoo within areas of suitable habitat. Results are presented in detail in the technical reports and are summarized in Section 3.3.5 of the Final EIR/EIS. The USFWS has issued a Biological Opinion (April 2016) for Western yellow-billed cuckoo based on Variation E Main Freeway/Expressway and Freeway/Tollway Alternatives with HSR Feeder Service. The determination is that the project will have no effect on the species because of negative focused surveys and lack of adequate suitable habitat. Therefore, avoidance and mitigation measures are not necessary.
S-1-11 (Biology)	Variation E was not selected to be part of the Preferred Alternative for the proposed project, in part, because it would have a greater impact to natural resources. Caltrans conducted protocol level surveys to determine presence/absence of Mohave ground squirrel within high to moderate suitable areas within the proposed project limits. However, because these surveys are valid for 1 year, and construction is not expected to begin within the next year, protocol level surveys will be conducted again within 1 year prior to initiation of construction of the proposed project. Should Mohave ground squirrel be found within the impact limits of the proposed project, Caltrans intends to apply for an incidental take permit for this

Comment Code (Topic)	Response
	species.
S-1-12 (Biology)	Variation E was not selected to be part of the Preferred Alternative for the proposed project, in part, because it would cause greater impacts to natural resources. Focused surveys for desert tortoise were conducted and presence of this species within the proposed project impact limits was confirmed. Caltrans intends to apply for an incidental take permit from CDFW for this species. Also, a Biological Assessment was produced and presented to the U.S. Fish and Wildlife Service and a Biological Opinion (BO) from the U.S. Fish and Wildlife Service was received. Measures described in the BO are included in Section 3.3.5 of the Final EIR/EIS. Measures to avoid, minimize, and/or mitigate impacts to this species include the purchase, restoration, and preservation of desert tortoise habitat (see BTE-11 through 43 in Section 3.3.5).
S-1-13 (Biology)	The preferred alternative will span the Mojave River and result in no direct impacts to the river; therefore, no direct take of fish is expected. Measures are also proposed to reduce or eliminate indirect affects to the Mojave River during the construction phase (see BWL-1 through 4 in Section 3.3.2).
S-1-14 (Biology)	Section 3.3.4 of the Final EIR/EIS presents an evaluation of impacts to these numerous special-status species, several of which were noted as occurring within the impact limits of the proposed project. Measures to avoid, minimize, or mitigate impacts are also included (BAN-1 through 8 and BNC 10 through 13). Coordination meetings with CDFW are further discussed in Chapter 5 of the Final EIR/EIS.
S-1-15 (Biology)	A plant community investigation was conducted and no dune habitat was found within the impact limits of the proposed project; therefore no suitable habitat for the fringe-toed lizard is present. As such, no further investigation for this species was conducted.
S-1-16 (Biology)	The Victorville shoulderband snail is not listed on any federal, state or local lists of special-status species. As such, no focused surveys for presence/absence were conducted for this species. A brief discussion on this species is included in Section 3.3.4 of the Final EIR/EIS.
S-1-17 (Biology)	Surveys for Ferruginous hawk were conducted as part of the focused surveys for raptors. The survey results are summarized in Section 3.3.4 of the Final EIR/EIS and a specific discussion about the Ferruginous hawk is presented in Section 3.3.4.
S-1-18 (Biology)	Focused plant surveys included a search for short-joint beaver tail cactus and the results of the focused survey are presented in the technical report in Appendix C of the Natural Environment Study and in Section 3.3.1 of the Final EIR/EIS.

Comment Code (Topic)	Response
S-1-19 (Biology)	Caltrans will prepare a Habitat Mitigation and Monitoring Plan (HMMP) for impacts to plant communities. This plan is included as an appendix to the NES.
S-1-20 (Biology)	Section 3.3.1 of the Final EIR/EIS was amended to include a discussion about wildlife access to the Mojave River lower narrows area. In general, it is expected that wildlife will continue to have access to this area because the design of the crossing includes a full-span bridge with no permanent direct impact to the river.
S-1-21 (Biology)	Caltrans has coordinated with CDFW regarding impacts to Joshua Tree woodland and agreed on a preferred area for land acquisition and preservation in perpetuity to offset impacts to this plant community. Section 3.3.1 of the Final EIR/EIS was updated to include more details on this topic.
S-1-22 (Biology)	Caltrans has coordinated closely with CDFW and developed specific mitigation measures to offset impacts to biological resources; the various resource sections in Chapter 3.3 of the Final EIR/EIS have been updated to reflect this. The measures also contained in the Environmental Commitments Record (ECR) in Appendix F. The coordination efforts with CDFW are documented in Chapter 5 of the Final EIR/EIS.
S-1-23 (Biology)	Caltrans intends to mitigate unavoidable impacts by implementing onsite restoration measures and by the acquisition, restoration and preservation in perpetuity of offsite lands. Caltrans has coordinated with CDFW in developing these measures and in the future development of a HMMP.
S-1-24 (Biology)	Caltrans acknowledges the importance of protecting the preserved land and will include these measures to do this in a HMMP. One appropriate measure would be to ensure the land is under proper management in perpetuity.
S-1-25 (Biology)	Caltrans has developed a wildlife relocation strategy for wildlife that are encountered during construction activities. This strategy was developed in cooperation with CDFW and is included in Sections 3.3.4 and 3.3.5 of the Final EIR/EIS.
S-1-26 (Biology)	Section 3.3.4 of the Final EIR/EIS includes measures to protect active nests as is required by the Migratory Bird Treaty Act and the Fish and Game Code. These measures are detailed as described in your comment and act as the requested breeding bird monitoring and avoidance plan.
S-1-27 (Biology)	Variation E has been eliminated from consideration as an alternative for the proposed project, in part, because it would cause the most impacts to natural resources including the Department's jurisdictional resources. A discussion about wildlife movement and impacts to known wildlife movement routes is included in Section 3.3.1 of the Final EIR/EIS.

Comment Code (Topic)	Response
	Avoidance measures are included in the project design including a full-span bridge design over the Mojave River, and reducing the number of columns located within washes to the fewest number feasible. Wildlife fencing will be installed along the facility directing wildlife to appropriate crossing locations at bridges, viaducts, and culverts. With the implementation of these measures the facility is not expected to create a barrier to wildlife movement.
S-1-28 (Biology)	Section 3.3.2 of the Final EIR/EIS provides detailed descriptions of all CDFW jurisdictional resources and impacts to those resources. Caltrans intends to obtain a Lake and Streambed Alteration Agreement from CDFW during the final design phase of the project; we anticipate that the Final EIR for this project will satisfy CDFW's requirements under CEQA.
S-1-29 (Biology)	Section 3.3.2 of the Final EIR/EIS provides detailed descriptions of all CDFW jurisdictional resources and impacts to those resources. Caltrans will further address potential impacts to episodic streams when it obtains a Lake and Streambed Alteration Agreement from CDFW during the final design phase of the project.

Comment S-2

STATE OF CALIFORNIA
Governor's Office of Planning and Research
State Clearinghouse and Planning Unit

Edmund G. Brown Jr.
Governor

Ken Alex
Director

December 3, 2014

Karl Price
California Department of Transportation, District 7
100 South Main Street, MS-16A
Los Angeles, CA 90012-3606

Subject: High Desert Corridor (New State Route - 138)
SCH#: 2010091084

Dear Karl Price:

The State Clearinghouse submitted the above named Draft EIR to selected state agencies for review. On the enclosed Document Details Report please note that the Clearinghouse has listed the state agencies that reviewed your document. The review period closed on December 2, 2014, and the comments from the responding agency (ies) is (are) enclosed. If this comment package is not in order, please notify the State Clearinghouse immediately. Please refer to the project's ten-digit State Clearinghouse number in future correspondence so that we may respond promptly.

Please note that Section 21104(c) of the California Public Resources Code states that:

S-2-1

> "A responsible or other public agency shall only make substantive comments regarding those activities involved in a project which are within an area of expertise of the agency or which are required to be carried out or approved by the agency. Those comments shall be supported by specific documentation."

These comments are forwarded for use in preparing your final environmental document. Should you need more information or clarification of the enclosed comments, we recommend that you contact the commenting agency directly.

This letter acknowledges that you have complied with the State Clearinghouse review requirements for draft environmental documents, pursuant to the California Environmental Quality Act. Please contact the State Clearinghouse at (916) 445-0613 if you have any questions regarding the environmental review process.

Sincerely,

Scott Morgan
Director, State Clearinghouse

Enclosures
cc: Resources Agency

1400 TENTH STREET P.O. BOX 3044 SACRAMENTO, CALIFORNIA 95812-3044
TEL (916) 445-0613 FAX (916) 323-3018 www.opr.ca.gov

Response to Comment S-2

Comment Code (Topic)	Response
S-2-1 (Other)	Comment noted; Caltrans acknowledges receipt of the California State Clearinghouse letter having satisfied the review requirements for the Draft EIR/EIS. We appreciate and thank you for your coordination efforts.

Comment S-3

S-3

CARL GUARDINO, Chair
LUCETTA DUNN, Vice Chair
BOB ALVARADO
DARIUS ASSEMI
YVONNE B. BURKE
JAMES EARP
DARIO FROMMER
JAMES C. GHIELMETTI
FRAN INMAN
JAMES MADAFFER
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SENATOR MARK DESAULNIER, Ex Officio
ASSEMBLY MEMBER BONNIE LOWENTHAL, Ex Officio

Andre Boutros, Executive Director

STATE OF CALIFORNIA

EDMUND G. BROWN Jr., Governor

CALIFORNIA TRANSPORTATION COMMISSION
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December 11, 2014

Mr. Ronald Kosinski, Deputy District Director
Caltrans District 7 Division of Environmental Planning
100 South Main Street
Los Angeles, CA 90012

RE: Draft Environmental Impact Report/Environmental Impact Statement (DEIR/DEIS) for the High Desert Corridor Project 07-LA-14, PM 57.8/64.1, 08-SBD-18, PM 84.3 (EA 2600U)

Dear Mr. Kosinski,

The California Transportation Commission (Commission), as a Responsible Agency, received the DEIR/DEIS prepared by the California Department of Transportation (Department) for the High Desert Corridor Project (project) in Los Angeles and San Bernardino Counties. This project will construct a new 63 mile multi-modal freeway/expressway linking SR-18 in San Bernardino County and SR-14 in Los Angeles County.

The Commission considered the DEIR/DEIS at its December 10, 2014 meeting. The Commission has no comments with respect to the project purpose and need, the alternatives studied, the impacts evaluated, and the evaluation methods used. S-3-1

This project is not yet programmed or funded; however if funds or actions under the purview of the Commission are anticipated, upon completion of the final environmental document, notification should be provided to the Commission as a Responsible Agency. The Commission cannot allocate funds to a project for design, right of way or construction, or approve a new public road connection or route adoption, until the final environmental document is complete and the Commission has considered the environmental impacts of the project and approved the environmentally cleared project for future consideration of funding. S-3-2

As tolling is under consideration for this project, the Commission encourages Caltrans and its partners to ensure early communication and coordination with the Commission in the event it is anticipated that the Commission will be requested to approve the project for delivery through a public private partnership procurement consistent with the provisions of S-3-3

Senate Bill 4 (SBX2 4, Statutes of 2009), or for construction approval to allow for financing approval by the California Transportation Financing Authority as provided for in Assembly Bill 798 (AB 798, Statutes of 2009). S-3-3 Con't

Upon completion of the CEQA process, prior to the Commission's action to approve the project for future consideration of funding, the Commission expects the lead and/or implementing agency to provide written assurance whether the selected alternative identified in the final environmental document is or is not consistent with the project programmed by the Commission and included in the Regional Transportation Plan. In the absence of such assurance of consistency, it may be assumed that the project is not consistent and Commission staff will base its recommendations to the Commission on that fact. The Commission may deny funding to a project which is no longer eligible for funding due to scope modifications or other reasons. S-3-4

If you have any questions, please contact Carrie Pourvahidi, Deputy Director, at (916) 653-3148.

Sincerely,

ANDRE BOUTROS
Executive Director

c: Katrina Pierce, Chief, Caltrans Division of Environmental Analysis
Art Leahy, Executive Director, Los Angeles County Metropolitan Transportation Authority
Karl Price, Senior Environmental Planner, Caltrans District 7

Response to Comment S-3

Comment Code (Topic)	Response
S-3-1 (Other)	Caltrans acknowledges your comment. Caltrans thanks the California Transportation Commission (CTC) for participation in the environmental processes for the High Desert Corridor.
S-3-2 (Other)	Caltrans acknowledges that the HDC Project is not yet funded or programmed. Caltrans will notify the CTC upon approval of the Final EIR/EIS and when there is a change in funding status.
S-3-3 (Other)	The Commission will be notified promptly in the event that funding through a Public-Private Partnership (PPP) or financing approval from the California Transportation Financing Authority is anticipated.
S-3-4 (Other)	Caltrans will ensure that the selected alternative is consistent with the project programmed by the Commission and included in the Regional Transportation Plan (RTP). Written assurance of this will be provided as requested.

Comment S-4

Mojave Desert Air Quality Management District
14306 Park Avenue, Victorville, CA 92392-2310
760.245.1661 • fax 760.245.2699
Visit our web site: http://www.mdaqmd.ca.gov
Eldon Heaston, Executive Director

October 15, 2014

Ronald Kosinski, Deputy District Director RK
Caltrans District 7, Division of Environmental Planning
100 South Main Street
Los Angeles, CA 90012

Subject Project: High Desert Corridor Project

The Mojave Desert Air Quality Management District (MDAQMD) has received the Draft Environmental Impact Report/Statement for the High Desert Corridor Project. The proposed project would provide various green energy oriented transportation improvements along a 63 mile study area between State Route 14 in Los Angeles County and State Route 18 in San Bernardino County.

The MDAQMD has reviewed the DEIR/S and has the following comments:

- Table S-2 should correctly reference MDAQMD Rule 403.2 – *Fugitive Dust Control for the Mojave Desert Planning Area*, and AVAQMD Rule 403 – *Fugitive Dust* as the appropriate rules referencing Dust Control Plans.

Thank you for the opportunity to review this planning document. If you have any questions regarding this letter, please contact me at (760) 245-1661, extension 6726, or Tracy Walters at extension 6122.

Sincerely,

Alan De Salvio
Supervising Air Quality Engineer

AD/tw High Desert Coridor DEIR

City of Adelanto | Town of Apple Valley | City of Barstow | City of Blythe | City of Hesperia | City of Needles | County of Riverside | County of San Bernardino | City of Twentynine Palms | City of Victorville | Town of Yucca Valley

Response to Comment S-4

Comment Code (Topic)	Response
S-4 (Air quality)	A correction was made to Tables S-2 and 2-6 as requested.

Comment S-5

CALIFORNIA High-Speed Rail Authority

S-5

December 2, 2014

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GOVERNOR

Mr. Ronald Kosinski
Caltrans District 7
Division of Environmental Planning
100 South Main Street, MS 16A
Los Angeles, CA 90012

Subject: Comments on the Draft Environmental Impact Report/Environmental Impact Statement and Section 4(f) De Minimis Finding for the High Desert Corridor Project

Dear Mr. Kosinski:

The California High-Speed Rail Authority (Authority) has reviewed the Draft Environmental Impact Report/Environmental Impact Statement (EIR/EIS) and Section 4(f) De Minimis Finding for the High Desert Corridor Project (HDC Project) and respectfully submits the following comments regarding the proposed plan for the HDC Project.

Since its formation in 1996, the Authority has conducted planning and engineering studies for the State's high-speed rail network. In the published and certified 2005 Final Statewide Program EIR/EIS, the Authority selected a corridor near the HDC Project area as the preferred corridor for the Palmdale to Los Angeles Section of the planned high-speed rail System (Figure 1) (*http://www.hsr.ca.gov/Programs/Environmental_Planning/EIR_EIS/index.html*) to carry forward for further study in project-level environmental documents

Additional project-level planning studies for the Palmdale to Los Angeles section, including the 2010 Preliminary Alternatives Analysis and subsequent Supplemental Alternative Analyses (which are available at *http://www.hsr.ca.gov/Programs/Statewide_Rail_Modernization/Project_Sections/palmdale_losangeles.html*) refined potential route alignments and station options in the vicinity of the Project area. The May 2014 Supplemental Alternatives Analysis specified a potential station option and alignment alternative in the vicinity of the Project area (refer to Figure 2 and available online at *http://www.hsr.ca.gov/docs/programs/statewide_rail/proj_sections/Palmdale_LA/Palmdale_to_LA_ATTACHMENT_Draft_Supp_Alt_Analysis_Report_PalmdaleLA.pdf*). S-5-1

Recently, the Authority adjusted its project sections in Southern California. On July 24, 2014, the Authority released the Notice of Preparation (NOP) and Notice of Intent (NOI) for the Palmdale to Burbank Section of the high-speed rail system where a potential station option and alignment alternative in the vicinity of the Project area are identified. The NOP, NOI, and the Initial Study are available online at *http://www.hsr.ca.gov/Programs/Statewide_Rail_Modernization/Project_Sections/palmdale_burbank.html*.

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Since the HDC Project has alternatives that allow for high-speed rail feeder service between the cities of Palmdale and Victorville, the Authority has reviewed the Draft EIR/EIS for methodological consistency and technical accuracy while evaluating the alternatives for potential feasibility to integrate with the California High-Speed Rail Program.

There are two proposed HDC Project alternatives that would provide high-speed rail feeder service between the cities of Palmdale and Victorville. These two alternatives are the "Freeway/Expressway Alternative with High-Speed Rail Feeder/Connector Service" and the "Freeway/Tollway Alternative with High-Speed Rail Feeder/Connector Service." Both of these alternatives have two connection approaches into Palmdale, Option 1 and Option 7, which propose to integrate with the Authority's high-speed rail system. S-5-2

The Authority would prefer a high-speed rail connection option that does not require the HDC Project rail connectors to go under the existing railroad tracks and be below ground in a bored tunnel or a cut and cover box. Recognizing that Caltrans does not want the highway element of the HDC Project to go under the existing railroad tracks, the Authority has developed a high-speed rail connection option that would allow for both the rail and highway elements of the HDC Project to pass over the existing railroad tracks. This configuration is shown in Figure 3. The Authority respectfully requests that this configuration option be added to the alternatives that will be studied in the Final EIR/EIS.

Additional comments include:

- Figure 2-21 of the HDC Project Draft EIR/EIS shows the high-speed rail alignment in the median of the HDC Project highway element. Based on high-speed rail operational and maintenance requirements, we recommend that a side running configuration should be added to the Final EIR/EIS as an option for implementation. Our review suggests that this reconfiguration will not change the nature of the project or the environmental impacts of the project in a manner that would require recirculation, and would have significant benefits in terms of constructability, maintenance, and reduced life cycle costs. S-5-3
- California high-speed rail platforms in Palmdale are currently planned to be centered approximately on Avenue Q. Figures 2-3 to 2-8 of the HDC Project Draft EIR/EIS show the platforms in various locations around Avenue Q. This should be correct and depicted consistently in all figures. S-5-4
- Figures 2-3 to 2-8 in the HDC Project Draft EIR/EIS refer to "end tunnel segment" and "end aerial segment." These seem to refer to the California high-speed rail program. There are no tunnels and/or aerial segments for the California high-speed rail program through Palmdale. These references should be corrected. S-5-5
- The HDC Project requires extensive modifications to the SR 14 freeway corridor between Palmdale Boulevard and Technology Drive. These modifications to SR 14 should be planned so as to not preclude a future direct access ramp connection from the existing carpool lanes on SR 14 to Avenue Q. Direct access for buses and carpools to Avenue Q and the future high-speed rail Palmdale Transportation Center Station would better meet the HDC Project's purpose and need to "provide improved access and connectivity to regional transportation facilities, including airports and existing and future passenger rail systems, which include the proposed California high-speed rail system." S-5-6

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The Authority looks forward to continuing to work with Caltrans as they design, analyze, and implement the proposed HDC Project. If you have any questions, please contact Mark McLoughlin at (916) 403-6934 or by email at Mark.McLoughlin@hsr.ca.gov or Michelle Boehm at (213) 308-4507 or by email at Michelle.Boehm@hsr.ca.gov.

Sincerely,

Mark A. McLoughlin
Director of Environmental Services

cc: Michelle Boehm, Southern California Regional Director
David Valenstein, Federal Railroad Administration
Stephanie Perez, Federal Railroad Administration

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Figure 1
Proposed California HSR Statewide System

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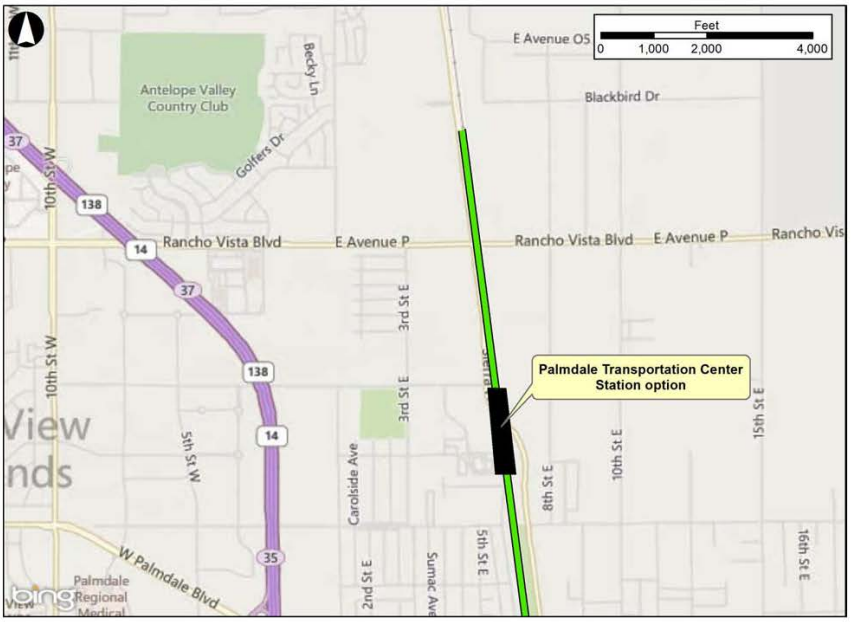

Figure 2
Palmdale Alignment Alternative and Transportation Center Station Option
from May 2014 Supplemental Alternatives Analysis

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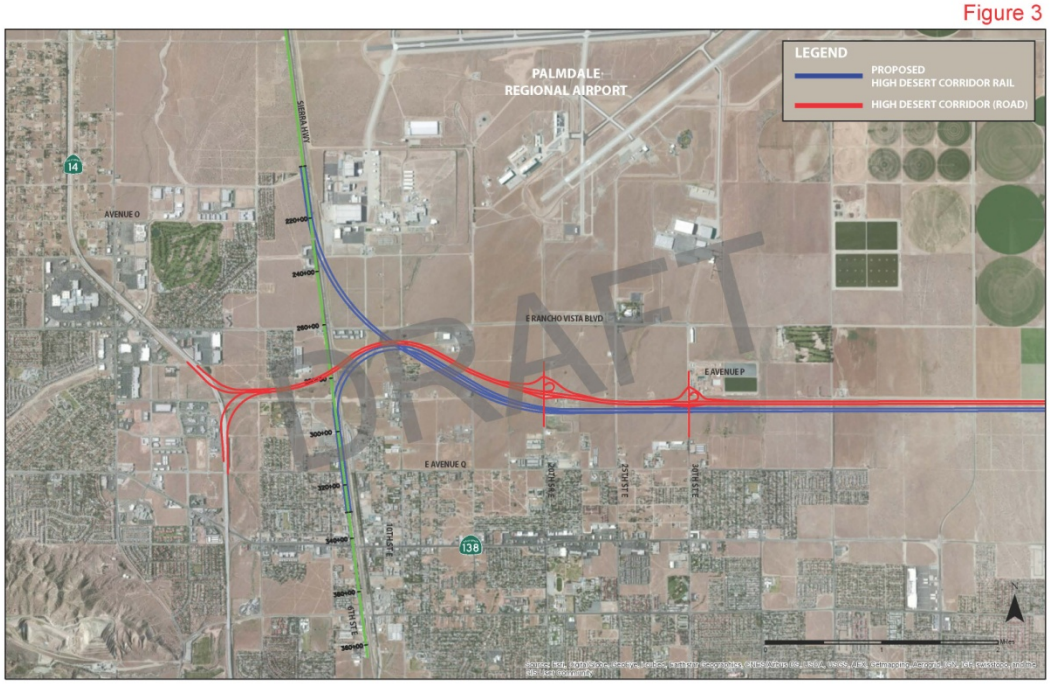
Figure 3


LEGEND
PROPOSED HIGH DESERT CORRIDOR RAIL
HIGH DESERT CORRIDOR (ROAD)
PALMDALE REGIONAL AIRPORT
SIERRA HWY
AVENUE Q
E RANCHO VISTA BLVD
E AVENUE P
E AVENUE Q
20TH ST E
25TH ST E
30TH ST E
10TH ST E
14
138
DRAFT

Response to Comment S-5

Comment Code (Topic)	Response
S-5-1 (Other)	Caltrans appreciates your review and comment on the Draft EIR/EIS for the HDC Project. We thank you for providing the electronic links to the planning documents related to the HSR network.
S-5-2 (Design)	Caltrans appreciates the Authority's input concerning the new station connection alternative. Caltrans and Metro have worked very closely with the Authority during the alternative development process prior to circulation of the Draft EIR/EIS. Our agencies have continued to work closely following the submission of your comment letter. Because the Authority and the City of Palmdale have recently entered into a Station-Area Planning Agreement to evaluate potential rail station options, our agencies have agreed that it is no longer feasible nor prudent for Caltrans to evaluate this option in the Final EIR/EIS.
S-5-3 (Design)	An extensive evaluation of the side-running rail alignment was conducted during the project development phase. This alternative was eliminated from further consideration because, as proposed, it would result in higher costs and more environmental impacts than the median alignment. Other benefits of placing the rail in the center of the HDC include: • It allows for utilization of joint freeway and HSR project development • It allows local interchanges to be added as needed based on demand on local roads • It is the most feasible alternative to pass through the constrained ROW in between the SCLA and federal prison complex in the city of Victorville These conclusions are documented in the “High Speed Rail Feeder Service Options Considered and Withdrawn Report,” which is available upon request. The decision to select a median alignment could be revisited based on refined analyses and consideration of possible benefits of a redesigned side-running rail alignment within the HDC footprint evaluated in the EIR/EIS.
S-5-4 (Design)	Figures 2-3 to 2-8 in the Final EIR/EIS have been developed to show possible locations for a joint HSR-HDC platform. These locations were developed based on discussions with the CHSRA and with the understanding that the Authority’s platform location is still subject to change and that this location of any joint platform must be mutually beneficial to both the HSR and HDC projects.
S-5-5 (Design)	Figures 2-3 to 2-8 in the Draft EIR/EIS were revised to clarify that the tunnel and aerial segments refer to the HDC and not the California HSR project.

Comment Code (Topic)	Response
S-5-6 (Design)	The current engineering concept does not preclude a future direct access ramp connection from the existing carpool lanes on SR-14 to Ave Q, and the future High-Speed Train Palmdale Transportation Center. However, this concept for a direct access ramp would require extensive bridge construction and would be very costly to build. Such a design would also require a Design Exception as a non-standard design because it would not be a full function local interchange, and nor would it meet the Federal Highway Administration (FHWA) required minimum distance needed for interchange spacing and weaving. We also refer you to response L-4-17 concerning consideration by the City of Palmdale for a new interchange with SR-14 at Technology Drive.

Chapter 4 Responses to Comments from Local Agencies and Organizations

This section provides responses to comments received on the draft environmental document from local/regional agencies and organizations. A copy of the draft environmental document was sent to the following local agencies and organizations:

- City of Adelanto
- City of Barstow
- City of Hesperia
- City of Palmdale
- City of Victorville
- City of Lancaster
- County of Los Angeles Department of Public Works
- Los Angeles County Department of Parks and Recreation
- Los Angelese County Department of Regional Planning
- Los Angeles Department of Water and Power
- County of San Bernardino Department of Public Works
- County of San Bernadino Regional Parks
- Desert Mountains Conservancy
- High Desert Corridor JPA
- Los Angeles World Airports
- Southern California Logistics Airport
- Metro
- Palmdale School District
- San Bernardino Associated Governments
- SCRRA – Metrolink
- Southern Califrnia Association of Governments
- Town of Apple Valley
- Metropolitan Water District of Southern California

A total of 26 comment letters were received as summarized below.

Table 4.1. Summary of Comment Letters Received from Local Agencies and Organizations

Comment Code	Agency	Commenter Name	Date Letter Received	Comment Topic
L-1	Town of Apple Valley		9/30/2-14	General
L-2	Desert and Mountain Conservation Authority	Jim Dodson	10/23/2014	Biological Environment
L-3	Lahontan Regional Water Control Board	Patrice Copeland	12/1/2014	Biological environment, water quality, construction impacts
L-4	City of Palmdale	Mike Behen	12/1/2014	Project design and alternatives, traffic and transportation, ROW/relocation
L-5	Alliance for Desert Preservation	Richard Ravana	12/1/2014	Cumulative impacts, air quality, biological environment, community impacts, hydrology and floodplain, visual
L-6	County of Los Angeles Department of Public Works	Anthony Nyivih	12/1/2014	Traffic and transportation, construction impacts, utilities/emergency services, geology/soils/seismic/topography
L-7	Morongo Band of Missions Indians	Franklin Dancy	12/10/2014	Cultural resources
L-8	Friends of Harbors, Beaches, and Parks	Jean Watt	12/4/2014	Biological environment
L-9	Southern California Edison	Nancy Jackson	12/2/2014	Utilities/emergency services
L-10	Town of Apple Valley	Lori Lamson	12/2/2014	Biological environment
L-11	California Ocean Outfall Group		10/13/2014	Biological environment
L-12	California Historic Route 66 Association	Glen Duncan	11/28/2014	Cultural Resources
L-13	Lucerne Valley Economic Development Association		12/1/2014	Traffic and transportation
L-14	Newberry Springs Community Alliance		12/2/2014	Project design and alternatives

Comment Code	Agency	Commenter Name	Date Letter Received	Comment Topic
L-15	Southern California Timing Association	Scott Andrews	12/2/2014	Hydrology and floodplain
L-16	Inland Empire Biking Alliance		12/2/2014	Project design and alternative
L-17	Los Angeles World Airports	Lisa Trifiletti	12/1/2014	Project design and alternatives
L-18	City of Victorville	John McGlade	12/1/2014	Project design and alternatives
L-19	County of Los Angeles Department of Parks and Recreation	Kathline King	11/26/2014	Section 4(f), project design and alternatives
L-20	County Sanitation Districts of Los Angeles County	Bryan Langpap	12/1/2014	Utilities/emergency services
L-21	XPressWest	Andrew Mack	12/2/2014	Project design and alternatives
L-22	Metrolink	Roderick Diaz	12/2/2014	Project design and alternatives
L-23	Sierra Club	Tom Williams	12/2/2014	Traffic and transportation, project design and alternatives
L-24	San Bernardino County Department of Public Works	Nidham Aram Alrayes	11/20/2014	Biological environment, hydrology and floodplain, community impacts, land use, air quality
L-25	Morongo Basin Conservation Association	Marina West	12/1/2014	Traffic and transportation, project design and alternatives
L-26	Los Angeles County Department of Regional Planning	Mitch Glaser	11/25/14	Land use, air quality, biological environment, construction impacts; coordination

Comment L-1

Submitted electronically by Town of Apple Valley

L-1-1

After quickly scanning the document I noticed a revision that I hope can be considered in the Final document. The revision I am requesting is in Volume one, pages 2-55 through 2-56, on Table 2-3, "Potential HDC Project Funding Scenarios for Discussion Purposes". In the various scenarios presented for project construction phasing, the ones that consider the east end of the Corridor consistently refer to an interim phase of the project terminating at Choco Road in Apple Valley. Unfortunately, an interim termination at Choco Road would not benefit the greater Apple Valley community, and in fact, Choco Road is not presently improved at the proposed HDC crossing. Dale Evans Parkway is the only currently improved and heavily traveled local road that would provide a logical eastern termination junction in the interim condition. Dale Evans Parkway extends north and south of the Corridor for miles, and serves the entire Apple Valley region, allowing easy access to the new Corridor.

L-1-2

In Scenarios 1-1, 1-3, 2-1, 2-2, 3-2, 3-3, and 4-3 please consider replacing each mention of Choco Road with Dale Evans Parkway. It will extend the eastern termination junction another mile or so to the east, but it would provide the only logical termini from a functional circulation standpoint for the HDC interim condition.

Response to Comment L-1

Comment Code (Topic)	Response
L-1-1 (Other)	While the phasing study is still at the preliminary level and several other factors will be considered prior to project implementation, Table 2-3 in the Final EIR/EIS has been adjusted to indicate Dale Evans Parkway as the HDC's interim construction termination point rather than Choco Road, per the request of the Town of Apple Valley.
L-1-2 (Other)	Please refer to response to Comment L-1-1.

Comment L-2

L-2

DESERT AND MOUNTAIN CONSERVATION AUTHORITY
44811 North Date Avenue, Suite G
Lancaster, California 93534
Phone (310) 589-3200 • Fax (310) 589-2408

October 23, 2014

Ronald Kosinski LK
Deputy District Director - Division 7
California Department of Transportation
110 South Main Street
Los Angeles, California 90012

Draft EIR - EIS Comments
High Desert Corridor Project
SCH No. 201009084 EA 2600U/071200035

Dear Mr. Kosinski

The proposed contiguous 63-mile-long project, and all of its build alternatives, will fundamentally and irreversibly alter and degrade the Antelope Valley ecosystem and much of its surrounding mountain ecosystems. The inevitable permanent, wholesale direct and indirect degradation of hundreds of square miles of habitat would result in multiple unavoidable, regionally significant, adverse biological impacts that have not been adequately mitigated. The Draft Environmental Impact Report - Environmental Impact Statement (Draft EIR-EIS) fails to analyze or even speculate on how this proposed bifurcation of a regional valley will erode the ecology of the area. The Draft EIR-EIS will remain inadequate until it includes extensive additional mitigation to reduce this inevitable degradation of the Antelope Valley ecosystem. L-2-1

The Draft EIR-EIS is deficient for totally failing to consider ecosystem-wide deterioration in both the immediate term, and there on in, for the life of the project and the growth it inevitably will induce over two centuries or more. The myopic document addresses just the proposed transportation corridor route as if it exists in an 8,000-acre ecological vacuum. L-2-2

The Draft EIR-EIS wholesale relies on a few under-crossings at just the largest north-south drainages to convey wildlife across the proposed 300-500 foot-wide transportation corridor. Four to five sizeable under-crossings to connect approximately 40 miles of natural desert interface over a 63-mile span is ecologically inadequate. The Draft EIR-EIS is also deficient for not addressing known and potential land use issues on either side of the four to five sizeable under-crossings that could significantly limit their future effectiveness as the only north-south quality freeway wildlife crossings in the entire Antelope Valley. L-2-3

Ronald Kosinski, Deputy District Director - Division 7
High Desert Corridor Project DEIR-EIS
October 23, 2014
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To our knowledge there is no wildlife-usable freeway under-crossing in the American deserts that spans underneath 500 feet of lighted, or unlit, transportation development. A 500-foot-long wildlife under-crossing works for a 500-1,000 foot trestle-elevated freeway span of a desert wash–such as Big Rock Wash. However, a 500-foot-long wildlife under-crossing via a 9-foot-tall and 12-foot-wide concrete culvert does not work based on viable culvert length to width - openness - ratios used by conservation biologists.

Of the 132 culverts addressed in Table 2-1 *High Desert Corridor Wildlife Crossings,* zero culverts have a height of 9-feet and just one has a width greater than 10-feet. The absolute minimum width of the transportation corridor that needs to be spanned underground by wildlife crossings is 300 feet. Recent Caltrans studies for a new dedicated wildlife under-crossing of the 101 freeway at Liberty Canyon show that a 10-foot-tall and 13-foot-wide concrete box that is 310 feet long would be marginally effective for many more-timid large and medium-sized mammals that are present in the Antelope Valley. Given that none of the proposed new HDC culverts even approach the necessary culvert dimensions for a 300-foot span, the Draft EIR-EIS analysis that relies on these 132 insufficient sized culverts for habitat connectivity mitigation is inadequate. L-2-3 Cont'd

Given that the HDC is 100 percent in the planning stages, there is no planning, financial, or ecological excuse not to provide at least one 15-foot-wide and 10-foot-tall wildlife culvert for each one-mile-long increment of natural desert crossed by the eventual transportation corridor alignment. In locations where a 10-foot-height is not obtainable, the width of the culverts should be 20 feet. These ecologically functional, larger dimension culverts should occur where some of the described 132 culverts are located to serve the dual use for drainage.

The EIR-EIS will remain deficient until it includes these larger culverts at minimum one mile intervals where natural or disturbed natural land now exists on both sides of the proposed alignments. It will remain further deficient until the EIR-EIS explicitly identifies these larger wildlife culverts as designated wildlife crossings and in addition provides reasonable analysis on their potential effectiveness for said purpose based on many natural and anthropomorphic conditions on both immediate sides of the transportation corridor, including lighting.

It is imperative that no wildlife crossing structure identified in the EIR-EIS be constructed at less of a dimension than is represented in the Final EIR-EIS. If such a reduction in culvert construction dimension occurs, there must be a substantial increase in the dimensions of a nearby culvert to compensate for the lost connectivity potential.

The EIR-EIS shall remain deficient until it addresses and mitigates for the indirect degradation of habitat that parallels the proposed project for a distance of up to 1000 feet. Undoubtedly habitat within 100 feet of a six to eight lane highway with a highspeed rail line down the center does not have the ecological value of that same habitat minus the roadway. Undoubtedly habitat 200 feet from the proposed project that is hemmed in by this said transportation

corridor on one side does not have the same ecological value as equivalent habitat that is not hemmed in on one side. These distances are definite and thus conservative. More likely the value of any habitat located within 300 feet of the proposed transportation corridor would be substantially and permanently diminished. If such habitat degradation were tallied for just half of the 63-mile-long transportation corridor at distance of 200 feet on each side of the roadway, the adversely affected habitat not addressed in the Draft EIR-EIS would be over 1500 acres. L-2-3 Cont'd

Although admittedly difficult to quantify, the amount of habitat degradation caused by every build project alternative must also include hundreds of additional acres of direct impact from growth-inducement.

The functionality of thousands of acres additional habitat within two miles of the corridor will also be adversely affected. For example, if a species now does not exist within such areas, or does exist and is eliminated by some cause, the potential for re-population of the site, or re-population with expanded genetic diversity individuals, will be reduced because the highway side is a barrier to wildlife immigration from that direction. L-2-4

The adverse effects of these unavoidable significant adverse impacts to wildlife movement and permanent indirect degradation of thousands of acres outside of the project boundary can be reduced by the immediate strategic permanent protection of land. That land acquisition ideally would occur by adequate-sized wildlife crossing culverts (minimum 10-foot-tall by 15-foot-wide) to better guarantee that long-term effectiveness. L-2-5

The EIR-EIS shall remain inadequate for the disruption of regional wildlife movement, indirect degradation of thousands of acres of right-of-way adjacent habitat, and severing of a regional desert ecosystem unless it includes mitigation that guarantees the permanent protection of over 6,000 acres of natural land that is situated to substantially minimize these impacts. Because large landscape scale connectivity in at least 4-5 acquisition areas needs to be protected with this land acquisition mitigation, no less that 6,000 acres is adequate to accomplish scale connectivity to nearby natural areas - protected or unprotected.

The Desert and Mountain Conservation Authority (DMCA) staff would like to participate in that land acquisition strategy. At $4,000 per acre, the minimum amount of funding to be set aside for the direct capital input on natural land acquisition is $20,000,000. That is in 2014 dollars. Each calendar year of delay should add $1,000,000. That funding should also include $1,000,000 for pre-acquisition costs by the government agency purchasing the property. This money must be made available in whole to the agency carrying out the mitigation as one of the first costs funded when the first phase of project implementation funding is awarded. Any later juncture in the project implementation sequence would jeopardize the ability to acquire key parcels at an affordable rate. If key parcels are not acquired, the mitigation measure loses substantial effectiveness. The DMCA recommends that Caltrans fund the DMCA or the L-2-6

Mountains Recreation and Conservation Authority (MRCA) with $2,000,000 immediately to begin an initial land acquisition effort once the EIR-EIS is beyond judicial challenge. L-2-6 Cont'd

For the record, the DMCA's October 29, 2010 comment letter on Notice of Preparation and Scoping was not included in the Draft EIR-EIS. It is attached for the record. L-2-7

Please direct any questions to Paul Edelman of our staff at 310-589-3200 ext. 128 and mail any comments to his attention at the above letterhead address.

Sincerely,

JIM DODSON
Chair

Enclosure

Response to Comment L-2

Comment Code (Topic)	Response
L-2-1 (Biology)	The Draft EIR/EIS contains extensive analyses of potential project impacts on natural communities (Section 3.3.1), plants (Section 3.3.3) and animals (Section 3.3.4), threatened and endangered species (Section 3.3.5), wetlands (Section 3.3.2), and invasive species (Section 3.3.6). It identifies numerous impacts of the project on the plants and animals and natural communities in Antelope Valley. The Draft EIR/EIS also identifies a long list of measures to mitigate the potentially significant impacts of the proposed project, including fencing, culverts to maintain the continuity of wildlife corridors, and habitat restoration. The comment states that there are still some unmitigated regionally significant adverse biological impacts that were not addressed in the Draft EIR/EIS. The comment does not describe these unaddressed impacts, however, other than to indicate that they would result from the bifurcation of the Valley by the HDC, so they cannot be distinguished from those potential biological impacts already addressed in the Draft EIR/EIS.
L-2-2 (Biology)	The comment expresses a concern that the analysis of biological resources was too limited in scope or time to fully capture the project's impacts, and that future growth (induced growth) and other development (cumulative impacts) were not taken into account. Biological resources are addressed in Sections 3.3.1 (Natural Communities), 3.3.2 (Wetlands), 3.3.3 (Plant Species), 3.3.4 (Animal Species), 3.3.5 (Threatened and Endangered Species), and 3.3.6 (Invasive Species). Additional biological surveys were conducted in spring and summer 2015, and the results have been incorporated into Sections 3.3.3, 3.3.4, and 3.3.5 in the Final EIR/EIS. Caltrans believes that the Final EIR/EIS fully addresses the potential impacts of the project on biological resources. The potential impacts of the project were projected far into the future. For example, the traffic analysis considered project impacts in both 2020 and 2040. Biological impacts, while not keyed to specific future dates, were considered over a similar timeframe. The potential for the project to induce growth was addressed in Section 3.1.2 of the Draft EIR/EIS. While the Antelope Valley has experienced tremendous growth in recent decades and is expected to continue developing in the future, the analysis concluded that the HDC Project would not contribute to growth over and above what already has been forecasted and planned for by local planning agencies. The potential for cumulative impacts was addressed in Section 3.7 of the Draft EIR/EIS. This cumulative analysis took into consideration over 20 planned or reasonably foreseeable future projects that would, along with the HDC Project, affect the biological communities in the Antelope and Victor valleys. In summary, the impact analysis for biological resources was thorough in its depth, broad in its scope, and addressed a reasonable planning horizon (future). The potentials for growth inducement and for cumulative impacts also were appropriately addressed.

Comment Code (Topic)	Response
L-2-3 (Biology)	Wildlife crossings are located where wildlife are known to exist and are known to travel, given the existing land use. Future projects not associated with this proposed project must evaluate potential impacts to these travel routes. Design and locations of wildlife crossings were developed in cooperation with resource agencies. Please refer to Section 2.4.4 in the Final EIR/EIS for a discussion of wildlife movement and, Figure 2-32 to Figure 2-34 which depicts wildlife crossing locations and types of crossings. With the implementation of the proposed project, these travel routes will be preserved.
L-2-4 (Biology)	Please see the response to Comment L-2-2 above regarding the potential of the HDC Project to induce growth. The California Environmental Quality Act (CEQA) requires the project proponent evaluate impacts to the existing conditions caused by implementing the proposed project. Wildlife crossings are presented in areas where wildlife are known to occur and are known to travel. These crossings will be preserved for use by wildlife in the future. As such, implementation of the proposed project is not expected to create an impermeable barrier to wildlife movement.
L-2-5 (Biology)	As identified in the Environmental Commitments Record in Volume 2 of the Final EIR/EIS, numerous commitments have been made to preserve land for many species and habitats that will be affected by this project. These are identified as BNC-4 (Joshua Trees), BNC-6 (Riparian), BWL-4 (Streams – based on project permits), BAN-7 (Burrowing Owl), BAN-8 (Desert Scrub), BTE-2 (Golden Eagle foraging habitat), BTE-3 (Swainson's Hawk foraging habitat), and BTE 25-28 (Desert Tortoise). The locations of the preserved areas will be coordinated with state and federal resource agencies. Wildlife crossings have been developed in cooperation with resource agencies and are included in the project design. Please refer to Section 2.4.4 in the Final EIR/EIS for a discussion of wildlife movement and, Figure 2-32 to Figure 2-34 which depicts wildlife crossing locations and types of crossings. Such wildlife crossings will provide for continued wildlife movement across the proposed multi-modal transportation route allowing wildlife to access habitat on either side. Preservation of land adjacent to the HDC can most ideally be accomplished through local land use planning efforts.
L-2-6 (Biology)	Please see the response to Comment L-2-5 regarding our commitment to land preservation. Acquisition and preservation of land as part of the mitigation requirements will be initiated when funding is obtained at a future date and prior to initiation of construction.
L-2-7 (Biology)	All comments on the NOP and scoping meetings received from the public are summarized in Section 5.2 of the Draft/Final EIR/EIS. No individual letter was included in the EIR/EIS. Caltrans thanks you for participating in the environmental review process for the HDC Project.

Comment L-3

L-3

Water Boards

Edmund G. Brown Jr. Governor

Matthew Rodriquez Secretary for Environmental Protection

Lahontan Regional Water Quality Control Board

MEMORANDUM

TO: Karl Price, Senior Environmental Planner
District 7 Division of Environmental Planning
California Department of Transportation
100 South Main Street, MS-16A
Los Angeles, CA 90012-3606
Email: karl_price@dot.ca.gov

FROM: Patrice Copeland, Senior Engineering Geologist
LAHONTAN REGIONAL WATER QUALITY CONTROL BOARD

DATE: December 1, 2014

SUBJECT: **COMMENTS ON THE DRAFT ENVIRONMENTAL IMPACT REPORT FOR THE HIGH DESERT CORRIDOR, LOS ANGELES AND SAN BERNARDINO COUNTIES, STATE CLEARINGHOUSE NUMBER 2010091084**

The Draft Environmental Impact Report (DEIR) for the above-referenced project (Project) was prepared by the California Department of Transportation, District 7 (Caltrans) and circulated for public comment in compliance with provisions of the California Environmental Quality Act (CEQA). As a responsible agency, the California Regional Water Quality Control Board, Lahontan Region (Water Board) is providing these comments to specify the scope and content of the environmental information germane to our statutory responsibilities pursuant to CEQA Guidelines, California Code of Regulations, title 14, section 15096. Based on Water Board staff's review of the documents, the portion of the Project that crosses the Mojave River at the Lower Narrows in Victorville has the potential to result in substantial and adverse impacts to water quality that were not identified in the DEIR. Caltrans is urged to evaluate these potentially substantial and adverse impacts and propose Project alternatives or incorporate mitigations that reduce such impacts to a less than significant level.

Project Description

The proposed Project will connect the City of Palmdale with the greater Victor Valley. Several build alternatives were evaluated including a freeway, expressway, and toll way, or combination thereof, with right-of-way for a high speed rail component. The proposed alignments are varied and include improvements to State Route 18, Avenue P-8, and Palmdale Boulevard. At build-out, the transportation corridor will be approximately 500 feet wide and 63 miles long. All of the build alternatives include

Amy L. Horne, PhD, chair | Patty Z. Kouyoumdjian, executive officer

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green energy technologies (i.e. photovoltaic solar highways, non-fossil refueling stations, and utility use of corridor right-of-way), bike paths, vista points, and a multiuse pullout.

Authority

All groundwater and surface waters are considered waters of the State. Surface waters include streams, lakes, ponds, and wetlands, and may be ephemeral, intermittent, or perennial. All waters of the State are protected under California law. State law assigns responsibility for protection of water quality in the Lahontan Region to the Lahontan Water Board. Some waters of the State are also waters of the U.S. The Federal Clean Water Act (CWA) provides additional protection for those waters of the State that are also waters of the U.S.

The *Water Quality Control Plan for the Lahontan Region* (Basin Plan) contains policies that the Water Board uses with other laws and regulations to protect the quality of waters of the State within the Lahontan Region. The Basin Plan sets forth water quality standards for surface water and groundwater of the Region, which include designated beneficial uses as well as narrative and numerical objectives which must be maintained or attained to protect those uses. The Basin Plan can be accessed via the Water Board's web site at http://www.waterboards.ca.gov/lahontan/water_issues/programs/basin_plan/references.shtml.

Specific Comments

Our comments on the Project are outlined below.

1. The Lower Narrows is a 1-mile section of the Mojave River downstream of the Interstate 15 bridge in Victorville. This section of the river is known as the "narrows" because it is confined within a rocky gorge. The Lower Narrows is an ecologically significant area and is one of only a handful of places along the Mojave River characterized by perennial flow. This perennial water source supports mature wetland and riparian vegetation, which is habitat for a variety of species. The proposed Project will result in numerous indirect impacts to this complex ecosystem. Specifically, shading has the potential to result in changes in surface water temperatures and vegetation health, the bridge structure and vehicular traffic and noise will likely result in disrupting nesting and migratory patterns, and storm water runoff, if not properly treated, has the potential to introduce chemical constituents that may degrade or pollute surface waters. These indirect impacts have the potential to result in the exceedance of one or more water quality standards as well as result in the overall degradation of the aquatic habitat. These impacts are potentially substantial and adverse and were not identified or evaluated in the DEIR. **Caltrans is urged to identify and evaluate Project alternatives that avoid or, at minimum, lessen the potentially substantial and adverse impacts to water quality at the Lower Narrows.** L-3-1

Mr. Price - 3 - December 1, 2014

2. Evaluating Environmental Consequences – Water quality objectives and standards, both numerical and narrative, for **all** waters of the State within the Lahontan Region, including surface waters and groundwater, are outlined in Chapter 3 of the Basin Plan. Water quality objectives and standards are intended to protect public health and welfare, and to maintain or enhance water quality in relation to the existing and/or potential beneficial uses of the water. The water quality standards most likely to be affected by the Project are listed below. **It is these objectives and standards that should be used when evaluating thresholds of significance for Project impacts.** L-3-2

    a. Chemical Constituents – Waters designated municipal and domestic supply (MUN) shall not contain concentrations of chemical constituents in excess of the maximum contaminant level (MCL) or secondary MCL based upon current drinking water standards.
    b. Nondegradation of Aquatic Communities – All wetlands shall be free from substances attributable to waste discharges that produce adverse physiological responses in humans, animals, or plants; or which lead to the presence of undesirable or nuisance aquatic life. All wetlands shall be free from activities that would substantially impair the biological community as it naturally occurs due to physical, chemical and hydrologic processes.
    c. Oil and Grease – Waters shall not contain oils, greases, waxes or other materials in concentrations that result in a visible film or coating on the surface of the water or on objects in the water, that cause nuisance, or that otherwise adversely affect the water for beneficial uses.
    d. pH – In fresh waters with designated beneficial uses of warm or cold freshwater habitat (WARM and COLD, respectively), changes in normal ambient pH levels shall not exceed 0.5 pH units.
    e. Temperature – For waters designated COLD, the temperature shall not be altered; for water designated as WARM, the temperature shall not be altered by more than 5 degrees Fahrenheit above or below the natural temperature.
    f. Turbidity – All waters shall be free of changes in turbidity that cause nuisance or adversely affect the water for beneficial uses. Increases in turbidity shall not exceed background levels by more than 10 percent.

3. Beneficial Uses of Waters – The beneficial uses of all water resources in the Lahontan Region are listed either by watershed (for surface waters) or by groundwater basin (for groundwater) in Chapter 2 of the Basin Plan. For example, the Lower Narrows, which is located in the Mojave Hydrologic Unit (628.00), is specifically identified as a **wetland** in the Basin Plan. Table 3.2.2-2 in the DEIR lists the beneficial uses of some of the primary surface water features within the Project area; however, this table is incomplete and does not list the beneficial uses for all waters potentially affected by the Project. Please revise this table to include the beneficial uses for the following waters: in the Mojave Hydrologic Unit (628.00) add "Lower Narrows of Mojave River," "minor surface waters," and "minor wetlands;" and in the Antelope Hydrologic Unit (626.00) add "minor surface waters" and "minor wetlands." L-3-3

4. Section 3.3.2, Wetlands and Other Waters – All surface waters and groundwater are waters of the State. Surface waters include streams, lakes, ponds, and wetlands, and may be ephemeral, intermittent, or perennial, isolated or connected to navigable water. Some, not all, waters of the State are also waters of the U.S. All waters of the State in the Lahontan Region fall under the jurisdiction of the Lahontan Water Board. Within the Project area, the Water Board's jurisdiction overlaps with that of the California Department of Fish and Wildlife (CDFW) with respect to waters of the State. Where our jurisdictions diverge is in our definition of wetland. For the Water Board, a wetland must meet the three parameter criteria of hydrology, soils, and vegetation. For those waters in the Project area that are also waters of the U.S., the Water Board's jurisdiction overlaps with that of the U.S. Army Corps of Engineers (USACE). Please revise Section 3.3.2 of the DEIR to identify that the Water Board's jurisdiction overlaps with that of both CDFW and USACE. In addition, Table 3.3.2-2 of the DEIR must be revised to be all inclusive of all waters impacted by the Project, with the exception of wetlands that do not meet the three parameter criteria. L-3-4

5. Global Comment – The environmental document refers to one of the tributaries to the Mojave River as either "Ossam Wash" or "Ossom Wash." Though this water body is not identified on the Victorville 7.5 Minute United States Geological Survey topographic map, it is informally referred to as "Ossum Wash." We request a global spelling change be made throughout the environment document from "Ossam" and "Ossom" to "Ossum." L-3-5

6. Rock Slope Protection – All rock slope protection and energy dissipation rip-rap placed within stream channels and floodplain areas should be **ungrouted** and the minimum amount necessary to provide scour protection. L-3-6

7. Construction Staging Areas – We request that construction staging areas be sited in upland areas outside stream channels and other surface waters on or around the Project site. Buffer areas should be identified and exclusion fencing used to protect the water resource and prevent unauthorized vehicles or equipment from entering or otherwise disturbing the stream channel. Construction equipment should use existing roadways to the extent feasible. L-3-7

8. Temporary Impact Areas – All temporary impact areas should be restored (recontoured and revegetated) to match pre-Project conditions. Where feasible, we request that existing top-soil be salvaged and used as a final cover over restoration areas. L-3-8

Permitting Requirements

A number of activities associated with the proposed Project appear to have the potential to impact waters of the State and, therefore, may require permits issued by either the State Water Resources Control Board (State Water Board) or Lahontan Water Board. The required permits may include:

9. Land disturbance of more than 1 acre may require CWA, section 402(p) storm water permits, including a NPDES General Construction Storm Water Permit, Water Quality Order (WQO) 2009-0009-DWQ, obtained from the State Water Board, or individual storm water permit obtained from the Lahontan Water Board; L-3-9

10. Water diversion and/or dewatering activities may be subject to discharge and monitoring requirements under either NPDES General Permit, Limited Threat Discharges to Surface Waters, Board Order R6T-2008-0023, or General Waste Discharge Requirements for Discharges to Land with a Low Threat To Water Quality, WQO-2003-0003, both issued by the Lahontan Water Board; and

11. Streambed alteration and/or discharge of fill material to a surface water may require a CWA, section 401 water quality certification for impacts to federal waters (waters of the U.S.), or dredge and fill waste discharge requirements for impacts to non-federal waters, both issued by the Lahontan Water Board.

Please be advised of the permits that may be required for the proposed Project, as outlined above. Should Project implementation result in activities that will trigger these permitting actions, the Project proponent must consult with Water Board staff. Information regarding these permits, including application forms, can be downloaded from our web site at http://www.waterboards.ca.gov/lahontan/.

Thank you for the opportunity to comment on the DEIR. If you have any questions regarding this letter, please contact me, at (760) 241-7404 (pcopeland@waterboards.ca.gov) or Jan Zimmerman, Engineering Geologist, at (760) 241-7376 (jzimmerman@waterboards.ca.gov).

cc: State Clearinghouse (SCH 2010091084) (state.clearinghouse@opr.ca.gov)
Veronica Chan, USACE (Veronica.C.Chan@usace.army.mil)
USEPA Wetlands Regulatory Office, Region 9 (R9-WTR8-Mailbox@epa.gov)
Becky Jones, CA Dept. of Fish and Wildlife (rebecca.jones@wildlife.ca.gov)
Scott Quinnell, Caltrans District 8 (scott.quinnell@dot.ca.gov)

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Response to Comment L-3

Comment Code (Topic)	Response
L-3-1 (Biology)	Caltrans recognizes the sensitive nature of the Lower Narrows section of the Mojave River. As a result, we have been careful to propose and select a bridge option that does not require the placement of columns within the bed of the river. This will help reduce construction-related impacts to water quality and habitat. It also means that there will be no impairment of water flow within the river. Caltrans has evaluated potential impacts to the Mojave River plants, wildlife and ecosystem. The effects of shading and stormwater runoff are addressed in Sections 3.3.1 and 3.3.2 of the Final EIR/EIS. The effects of noise are addressed in Section 3.3.5. Because this reach of the Mojave River is located within the Designated Critical Habitat for the southwestern willow flycatcher, impacts to the continued health of the riparian vegetation was evaluated and included Section 3.3.5 in the EIR/EIS. Plant health and water temperature changes are specifically addressed. This topic was also addressed in the Biological Assessment presented to the U.S. Fish and Wildlife Service as part of the Section 7 Consultation process under the Endangered Species Act. Additional evaluation and mitigation measures presented by the U.S. Fish and Wildlife Service are included in the resulting Biological Opinion and are included in the Final EIR/EIS in Section 3.3.5. Caltrans will implement a series of Best Management Practices to reduce or eliminate contaminants from reaching the Mojave River during construction; these are presented in Section 3.2.2 of the Final EIR/EIS. Measures to divert the flow of water from the resulting structure away from the Mojave River will be incorporated into the project design. The Preferred Alternative and column locations will continue to be refined throughout the final design process to protect sensitive areas and to maintain the hydrological integrity of the river. In those areas where impacts cannot be avoided, compensatory mitigation will be identified during the permitting process with the regulatory agencies.
L-3-2 (Water quality)	The standards and objectives referenced in the comment have been incorporated into Section 3.2.2, Water Quality and Storm Water Runoff, of the Final EIR/EIS and evaluated.
L-3-3 (Water quality)	Table 3.2.2-2 of the EIR/EIS has been revised to include the water resources referenced in the comment.
L-3-4 (Biology)	Section 3.3.2 of the Final EIR/EIS has been revised to indicate that the Water Board's jurisdiction overlaps that of both the CDFW and the USACE. Additionally, Table 3.3.2-2 of the Final EIR/EIS has been revised to include all waters impacted by the project, except for wetlands that do not meet jurisdictional criteria.

Comment Code (Topic)	Response
L-3-5 (Other)	Global changes to correctly spell Ossum Wash have been made in the Final HDC EIR/EIS.
L-3-6 (Design)	A statement indicating that all rock slope protection and rip-rap shall be ungrouted and the minimum amount used as necessary to provide scour protection has been added to the Avoidance, Minimization and/or Mitigation section of Chapter 3.2.1 (see MM HF-2).
L-3-7 (Construction)	Caltrans shares your goal of minimizing impacts to Waters of the State. It is our standard practice to locate staging areas away from waters/wetlands and incorporate exclusionary fencing for the protection of these important resources; the specific locations of these elements will be identified during the design phase of the project and will comply with any requirements of resource agency permits. Avoidance, Minimization and/or Mitigation Measure BWL-3, in Chapter 3.3.2, states that temporary construction staging areas and access roads will be strategically placed to avoid and/or minimize impacts to jurisdictional features to the extent feasible and are expected to be restored to pre-project conditions.
L-3-8 (Construction)	It is Caltrans' standard practice to restore temporary impact areas to match pre-project conditions as much as possible. Per your comment, the existing top-soil will be salvaged and used as a final cover over the restoration areas wherever feasible and is documented in Section 3.6 (Measure CI-WQ-7).
L-3-9 (Other)	It is acknowledged that permits will likely be required pursuant to the Clean Water Act. Caltrans will coordinate closely with the appropriate agency(ies) to obtain these permits during the design phase of the project. All anticipated permits are documented in Table S-2 of the Final EIR/EIS.

Comment L-4

L-4

PALMDALE
a place to call home

JAMES C. LEDFORD, JR.
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Mayor Pro Tem

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December 1, 2014

Mr. Ron Kosinski, Deputy District Director
Caltrans District 7, Division of Environmental Planning
100 South Main Street
Los Angeles, CA 90012

RE: COMMENTS - HIGH DESERT CORRIDOR (HDC) DRAFT EIR/EIS – PROJECT ID #071200035 (EA: 2600U) AND SCH #2010091084

Dear Mr. Kosinski:

The purpose of this letter is to provide comments regarding the above-referenced document. The City of Palmdale has been involved in the development of the HDC for over twenty years and views the project as an integral component of the overall transportation system in the City of Palmdale and Greater Antelope Valley. Providing highway, rail and bicycle connectivity from the Antelope Valley to the Victor/Apple Valleys will provide better and safer transportation options and broader opportunities for economic development and job growth. L-4-1

EIR/EIS Comments/Questions:

- The City of Palmdale is supportive of a highway design concept that integrates high speed rail. Development of a joint HDC/XpressWest, California High Speed Rail, Metrolink, etc., rail station is critical. Continued coordination with the California High Speed Rail Authority, Caltrans, Metrolink, Union Pacific Railroad (UPRR) and other important stakeholders should continue to be at the forefront as this project moves forward. L-4-2

- The document shows the bike lane ending at 20th Street East, adjacent to the HDC. To end the bike lane at 20th Street East and route it through local streets, rather than provide a direct connection to the Palmdale Transportation Center is less safe, circuitous and places a financial burden on the City of Palmdale due to right of way acquisition, construction and community impacts. In addition, how will bicyclists L-4-3

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access the PTC once reaching Sierra Highway? Will a bicycle/pedestrian bridge, over/under Sierra Highway be provided? Also, when will the bike path be constructed? Provide details.

- Additional details regarding how the public moves/transitions between transportation systems is needed. L-4-4
- It is unclear how pedestrians will access the Metrolink platform from the station? Provide details. L-4-5
- Avenue Q should be connected over or under Sierra Highway to provide adequate access to serve the future rail station. Provide details. L-4-6
- The document states that the majority of rail passengers will arrive from the south, from State Route 14. What methodology was used to arrive at this conclusion? Provide details. L-4-7
- Parking associated with Rail Option 1, Variation B and C and Rail Option 7, Variation A and B, is shown south of Technology Drive and east of Transportation Center Drive. This is approximately one-quarter to one-half mile away from the proposed platforms. This distance does not seem to be reasonable. Provide details. L-4-8
- There does not appear to be any discussion about the rail alternatives landing inside/outside of the existing rail right of way and potential impacts. Include details. L-4-9
- It appears that several business located along the west side of State Route 14, north of Rancho Vista Boulevard, will be impacted by the construction of the HDC. Have these business been notified? L-4-10
- Provide additional details regarding freeway interchange landscaping (including slope treatment) adjacent to future ramps.
- Provide additional details regarding the design and treatment (visual aesthetics) of proposed bridges and sound walls. L-4-11
- Provide additional details (location, conceptual design, timing of construction, etc.) regarding the proposed Park and Ride facility shown L-4-12

Ltr. to Mr. Ron Kosinski
RE: COMMENTS - HIGH DESERT CORRIDOR DRAFT EIR/EIS – PROJECT ID #071200035 (EA: 2600U) AND SCH #2010091084
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near 50th Street East and HDC.

- The Avenue S/Geiger Avenue Park and Ride should be listed as a City-owned facility; not a State Facility. This Park and Ride is owned and managed by the City of Palmdale. L-4-13
- Provide clarification/details regarding 4(f) mitigation measures for impacts to the Robert St. Claire parkway. L-4-14
- Several street names are incomplete or incorrect. For example: throughout the document the East or West part of the street name is not provided. For example: 20th Street (East or West)? The City of Palmdale is available to help resolve these discrepancies. Please contact Mike Behen at 661-267-5337 for more information. L-4-15
- At times throughout the document, the project description for the City of Palmdale is vague. The Parson's Technical Memoranda correspondence(s) are the best examples of this statement. The Palmdale General Plan and City website are helpful resources for additional information. L-4-16
- Question: What are the impacts to local businesses and roadways as a result of the closure of the State Route 14 ramps at Rancho Vista Boulevard? Provide details. L-4-17
- Question: What methodology was used to produce a need for 6,200 parking spaces near the Palmdale Transportation Center? Was this coordinated with the California High Speed Rail Authority? Does this number match the Authority's current rail station plans? Note: the proposed parking area is not consistent with the City's current plans for development in the area. Alternative parking locations should be considered. L-4-18
- Question: According to SCAG's Regional Transportation Plan (RTP), the Palmdale Regional Airport will have an estimated 2.8 million annual passengers (MAP) in 2035. Does the design and planning for the rail station and parking lot design consider this data? L-4-19
- Question: Does the solar component of the project provide all of the energy requirements for the project? Provide details. L-4-20

Ltr. to Mr. Ron Kosinski
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- Question: what is Union Pacific Railroad's position regarding encroachment into their right of way? L-4-21
- Question: will Caltrans relinquish ownership of State Route 138 (Palmdale Boulevard) once the HDC is built? Provide details. L-4-22
- Question: Page 2-54, Table 2-2. The roadway descriptions are unclear. Are these intersections being converted to an "L" configuration (preserving a north or south looping network that does not cross the HDC right of way) OR are they planned to be re-designed and constructed as cul-de-sacs? L-4-23
- Page S-10, Table S-1, No Build Alternative/Community Impacts. Include language regarding negative impacts to quality of life? L-4-24
- Page 1-7, Bike Route. Include language indicating that the ultimate terminus of the bike route will be at the Palmdale Transportation Center. Reflect this language throughout. L-4-25
- Page 1-8, Table 1-1. According to Measure R, 33 million dollars was allocated towards the project; not 30 million dollars, as reflected in the table. Provide clarification. L-4-26
- Page 3-102, Figure 3.1. Update the figure to reflect Palmdale's existing and future/proposed bikeways, in accordance with the City's General Plan. L-4-27
- Page 3-3, Palmdale, 2nd Paragraph. Suggest removing specific retailer names. L-4-28
- Page 3-3, Palmdale, 3rd Paragraph. Add additional language to better describe west Palmdale.
- Page 3-105, Palmdale Rail Option 7 (Government Properties in Palmdale). Impacts to Plant 42 including right of way and other areas that are sensitive in nature (due to geography and/or use) should be avoided. This statement is applicable throughout. L-4-29
- Page 3-547, Step 6: Manufacture and Commission Rolling Stock: Similar technology that is conducive to ensuring interoperability between the California High Speed Rail and XpressWest rail systems is L-4-30

Ltr. to Mr. Ron Kosinski
RE: COMMENTS - HIGH DESERT CORRIDOR DRAFT EIR/EIS – PROJECT ID #071200035 (EA: 2600U) AND SCH #2010091084
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imperative. This is especially important given the ultimate goal of a one-seat ride concept.

- Page 5-4, Table 5-1. Should the High Desert Corridor JPA and Air Force be included in this list? In addition, the City of Palmdale has been a participating/cooperating agency since the beginning of the project. This is proven through written and verbal correspondence with Metro, Caltrans, SCAG and the HDCJPA. Therefore, please update the table accordingly to show Palmdale staff as responsive participants. L-4-31
- Table 1 (Volume 2 of 2): Summary of Section 4f Properties and Use Status. Change spelling of Desert Sand Park to Desert Sand**s** Park. L-4-32
- The City of Palmdale and LA County Sanitation District share sewer maintenance responsibilities. Technical memoranda should be updated accordingly. L-4-33
- Include a reference to letters and oral testimony provided by the City of Palmdale during HDC public meetings and workshops regarding the bike lane extension to the PTC. L-4-34
- Include reference to all previous environmental documents, studies and related HDC documents prepared prior to the preparation of this EIR. L-4-35

In closing, we appreciate the opportunity to provide comments regarding this regionally significant transportation project. The HDC provides the rail and highway infrastructure necessary to accommodate the anticipated growth in the region. The City of Palmdale is pleased that the project is moving forward and look forward to its eventual construction. L-4-36

Please me at 661-267-5337 or mbehen@cityofpalmdale.org if you have any questions or would like to discuss the contents of this letter in more detail.

Sincerely,

Mike Behen
Transportation/GIS Manager

C: Dave Childs, City Council

Response to Comment L-4

Comment Code (Topic)	Response
L-4-1 (Other)	The City of Palmdale's long-term involvement and support for the connectivity that the highway, rail and bike path would bring about is noted for the record.
L-4-2 (Design)	Your support for integrating the highway and HSR components of the transportation system is acknowledged. Caltrans and Metro are coordinating closely with all stakeholder agencies, cooperating agencies, and responsible agencies throughout the project development process and will continue to do so until the completion of the project.
L-4-3 (Design)	Recent discussion between the City of Palmdale, Metro, and Caltrans indicated that the City is willing to accept that a dedicated bike structure from 20th Street E. to the Palmdale Transportation Center (PTC) has financial and geometric obstacles and will no longer be considered. Instead, the project proponents will relieve the financial burden from the City by including, as a mitigation cost, the necessary funds to improve city streets for the purpose of having a bike route connection between 20th Street E. and the PTC through a local network. This commitment is identified in Sections 1.1.3 and 2.2.2 of the Final EIR/EIS. Measure CI-T-2 has been added to Section 3.6 to formalize the commitment stated in Section 2.2.2.
L-4-4 (Design)	The preliminary design shows that California HSR station platforms will be adjacent to Metrolink station platforms. The location of the Palmdale station has not yet been finalized. However, Option 1 Variation C in the Final EIR/EIS, which would establish a joint Metrolink/California HSR/HDC HSR station approximately 1,000 feet south and 300 feet west of the existing Palmdale Metrolink Station, is the Preferred Alternative. The City of Palmdale is preparing an HSR Station Area Plan with input from Caltrans and the CHSRA. A pedestrian overcrossing or undercrossing will likely be used to facilitate movement between platforms. The exact details will be developed, in coordination with the City, during the final design process.
L-4-5 (Design)	Either a pedestrian overcrossing or tunnel will be provided for passengers to move between the HSR and conventional rail platforms. The exact details will be developed, in coordination with the City, during the final design process. See also response to Comment L-4-4 above.
L-4-6 (Design)	Avenue Q currently terminates at Sierra Highway; it does not connect to the PTC. The scope of for the rail component of the HDC Project is only to develop a rail connection from the proposed feeder line to the PTC and future California HSR. Extending Avenue Q across Sierra Highway is beyond the scope of this project.

Comment Code (Topic)	Response
L-4-7 (Traffic)	The HSR service operating between Palmdale and Victorville is envisioned as an extension of the XpressWest HSR service between Victorville and Las Vegas. A transfer is assumed at Palmdale to Metrolink and the California HSR Statewide System, once constructed. Ridership forecasts for this "two-seat ride" scenario were prepared by Infraconsult LLC on behalf of the Los Angeles County Metropolitan Transportation Authority (Metro) for the purpose of a "Public-Private Partnership Feasibility Evaluation" of the High Desert Corridor (December 2012). Table 15 of this document indicates the number of train users by origin county. Further, the "Las Vegas to Los Angeles Rail Corridor Improvement Feasibility Study," prepared for the Regional Transportation Commission of Southern Nevada by IBI Group (June 2007) identifies the origin of trips to Las Vegas from southern California counties (Figure 2-1). Both studies indicate potential market sheds for train service to Las Vegas, and indicate that the majority of trips to the feeder rail station in Palmdale would originate to the south of the proposed HSR station. The commenter is referred to the studies mentioned above for a complete discussion of the study methodologies.
L-4-8 (Design)	This is an initial proposal. The City of Palmdale and the CHSRA have initiated the planning process for a proposed HSR station near the current location of the PTC. The outcome of this effort will determine the ultimate location of the HDC rail station and parking facilities. Since this location is unknown at this time, a supplemental HDC document may need to be prepared to evaluate the connection to this facility
L-4-9 (Design)	The Palmdale Wye does not have any connector tracks within existing rail ROW. For Rail Option 1 (A, B and C) there will be minor, temporary construction impacts due to the connector tracks having to tunnel beneath the Union Pacific Railroad (UPRR) and Metrolink tracks. Rail Option 7 (A, B and C) will be on an aerial structure above the UPRR and Metrolink tracks; there will be no impact. The connector tracks will be within future California HSR ROW at the four track sections when joining the California HSR mainline tracks.
L-4-10 (Right-of-way)	Notices regarding the availability of the Draft EIR/EIS and the public hearings were sent to each property owner within the proposed footprint of the project. The actual properties that need to be acquired for the project will not be identified until the final design phase of the project. Once that is done, and funds for ROW acquisition are obtained, property owners will be personally notified in writing in accordance with the California Relocation Assistance Law (Government Code §7260 et seq.) or the Uniform Relocation Assistance and Real Property Acquisition Policies Act of 1970,as amended (42 U.S. Code Chapter 61 et seq.).
L-4-11 (Design)	The design and aesthetic details of these structures will be determined, in coordination with the City, during the final design phase of the project.

Comment Code (Topic)	Response
L-4-12 (Traffic)	Page 3-184 of the Draft EIR/EIS states that "two new park-and-ride lots are proposed adjacent to the HDC at 50th Street East in Palmdale and at US 395 in Adelanto. These proposed lots are not part of the project and would need to be constructed by others as add-on elements." Page 4-274 of the Traffic Study technical report provides some additional details as follows: "As an add-on element to the High Desert Corridor project, two park-and-ride lots are recommended for construction in conjunction with the build freeway alternatives. One of these lots should be located in Palmdale adjacent to the High Desert Corridor interchange at 50th Street East, and the second lot should be located in Adelanto near the High Desert Corridor interchange at US 395. Caltrans' "Park and Ride Program Resource Guide, 2010, should be consulted by local sponsoring agencies, such as the Los Angeles County Metropolitan Transportation Authority to advance the development of these recommended add-on elements." The Caltrans Park and Ride Program was established in 1975 and as of 2010, provided nearly 34,000 parking spaces in 326 lots. Due to budget shortfalls in recent years, the agency is seeking to partner with local agencies to assume responsibilities for maintenance and repair, and is pursuing relinquishment as opportunities arise. State law, SB 415 Chapter 353/2012, authorizes the California Transportation Commission (CTC) to relinquish a park-and-ride lot to a county transportation commission or a regional transportation planning agency on terms and conditions that the CTC finds to be in the best interests of the state. Caltrans has also relinquished park-and-ride lots to cities and counties pursuant to the statutory authority provided in Streets and Highways Code Section 73. At its September 22, 2011 meeting, the Metro Board authorized staff to begin initial work on transferring up to 41 state-owned park and ride lots to Metro. As of 2013 and 2014, the assessment of these potential transfers was well underway, focusing on the costs of upgrading and improving the lots. Due to budget shortfalls for ongoing maintenance and repair, Caltrans no longer constructs, owns or maintains new park-and-ride lots, and is gradually divesting itself of existing obligations.
L-4-13 (Traffic)	A correction has been made in Section 3.1.6, Parking Facilities sub-section of the Final EIR/EIS.
L-4-14 (Section 4(f))	According to the current design of the preferred project alternative, no impacts to Robert St. Clair Parkway are anticipated. Therefore, no mitigation measures are required.
L-4-15 (Other)	Corrections on the East-West part of the street name have been made throughout the Final EIR/EIS.

Comment Code (Topic)	Response
L-4-16 (Other)	Information about the City of Palmdale has been updated in the Land use section of the Final EIR/EIS, as applicable. Note that due to the large volume of information covering each city/community within the project planning area, the information provided in the EIR/EIS needs to be summarized. The reader can access the source document if detailed information is required.
L-4-17 (Community)	To achieve the optimum geometric operational design standard of a 2-mile spacing interval between local interchanges on SR-14, the on- and off-ramps serving the partial interchange at Rancho Vista Boulevard (West Avenue P), are proposed to be closed and relocated to 10th Street West; this is approximately 750 yards from Rancho Vista Boulevard (West Avenue P). The 10th Street West interchange is in closer proximity and will enhance access to the adjacent Antelope Valley Mall, the region's largest commercial retail shopping center. The analysis of traffic for the intersection indicates that the proposed relocation of ramps would maintain and/or improve traffic performance at the study intersections located in close proximity to the Antelope Valley Mall. The construction of the HDC will add an entirely new east-west connection for residents living on the east side of Palmdale and in the residential pockets of the unincorporated portions of Los Angeles and San Bernardino counties within the High Desert. From a regional standpoint, the improved accessibility to markets should have an overall positive effect on businesses and the local economy. In the short term, certain businesses that partially rely on pass-by traffic immediately adjacent to the existing Rancho Vista Boulevard on/off ramps, such as fast-food restaurants, may experience a slight reduction in commerce. However, these businesses will continue to benefit from being near other magnets for intentional destination commuter traffic, including Best Buy, Trader Joe's, Target, Embassy Suites, and the Mulligan Family Fun Center on the west side of SR-14, and the Home Depot, Baby Depot, Courtyard by Marriott and other businesses clustered in the Palmdale Promenade on the east side of SR-14. In addition, as part of a separate project, the City of Palmdale is considering the pursuit of a new interchange with SR-14 at Technology Drive. Such a new interchange is potentially feasible only if the northbound off-ramp and the southbound on-ramp to Rancho Vista Boulevard are relocated to the existing interchange location at 10th Street West. Furthermore, interchanges with split locations for the on and off ramps, as they currently are, tend to be confusing for the occasional traveler, such as shoppers destined to the auto mall operations and other businesses located south of Rancho Vista Boulevard near Technology Drive.

Comment Code (Topic)	Response
L-4-18 (Traffic)	The 6,200 parking expansion number was estimated by traffic specialists, and it applies to the extension of XpressWest service between Las Vegas and Victorville extended to Palmdale. The parking space requirement assumes that the PTC is the end of the line and that a transfer would be required to Metrolink or the California High-Speed Train. Parking that would be required to serve California HSR would be additional. The estimate was done based on how many riders would ride by day of the week and hour of the day based on auto vehicle arrival patterns crossing the CA/NV state line. These data were obtained from the Nevada Department of Transportation to use for the Ivanpah Airport Access Study, which was conducted for Clark County a few years ago. Ivanpah would be a new airport located to the south of Las Vegas, and is intended to serve growth beyond the capacity of McCarran Airport. Patrons would arrive at PTC using a number of modes, each having its own occupancy. Splitting out the auto/park arrivals yielded approach and departure volumes by day and hour. The auto arrivals build up in volume toward the end of the week, and decrease beginning with Sunday afternoon. The parking accumulation is highest on Sunday morning, before the vehicles returning from Las Vegas reach Palmdale. The City and the CHSRA have recently entered into a Station-Area Planning Agreement that will evaluate potential rail station options. Caltrans will work closely with the City and the CHSRA and will adjust our station and parking plans, as appropriate, based on the results of this study.
L-4-19 (Traffic)	The Southern California Association of Governments' (SCAG) 2.8 million annual passengers (MAP) forecast for the Palmdale Regional Airport translates to an average of 7,670 passengers per day, with approximately one-half (3,835) arriving and one-half departing, on average. This SCAG forecast assumes that the majority of the passengers will have a local origin or destination in the Antelope Valley area. For those passengers desiring to continue their journey on the HDC rail feeder service to Victorville and Las Vegas, a shuttle bus operating between the PTC (serving Metrolink, California HSR, and XpressWest rail plus regional and local bus services) is assumed. At such time that the MAP at the Airport increases to reflect the full development potential of the airport, and/or the inland port's aerospace economic cluster expands, a higher investment fixed guideway connection covering the 3.3 miles between the two transportation hubs may be warranted.
L-4-20 (Design)	One of the project purposes is to contribute to State greenhouse gas reduction goals by supporting plans for green energy features along the corridor. A number of viable green energy options have been studied and will be incorporated into the project to achieve a near net-zero energy consumption. The solar component is one of the viable options being considered, but solar energy, by itself, may not be sufficient to provide all of the energy requirements. Section 2.2.1 of the EIR/EIS provided a brief description of currently available green energy technologies. As the project proceeds and more technologies are available, they can be incorporated into the project.

Comment Code (Topic)	Response
L-4-21 (Right-of-way)	UPRR provided comments jointly with Metrolink (see comment letter L-22). They did not express a position on encroachments into their ROW.
L-4-22 (Other)	According to the Route Concept Reports (Route Concept Fact Sheet) for SR-138 and SR-18, Caltrans does intend to relinquish those segments of SR-138 and SR-18 within the HDC Project limits to local agencies. This relinquishment would require an action (approval) by the CTC and would occur following construction of the HDC. All facilities would be relinquished in a state of good repair.
L-4-23 (Design)	Ave P-5 at 10th Street E. and Ave P-8 at 10th Street E. would not be impacted based on the current engineering. Table 2-2 has been updated in the final EIR/EIS to clarify this. Ave P-8, however, would become a cul-de-sac just west of 50th Street E. upon construction of the 50th Street E. on-ramp to westbound HDC. Ave P-8 is meant to be upgraded to become the HDC, and the existing Palmdale Boulevard/SR-138 is to be relinquished to the City upon completion of the HDC. There will be no severing of any arterial streets running in the north-south direction within the city of Palmdale.
L-4-24 (Community)	The summary was revised to indicate that the No Build Alternative, which would result in increased traffic congestion and impaired mobility, longer travel times on local roadways, and increased air pollution and noise, could worsen quality of life.
L-4-25 (Design)	Please see the response to Comment L-4-3.
L-4-26 (Design)	The document has been revised to read 33 million dollars per Metro's Measure R project tracker website.
L-4-27 (Right-of-way)	The figure on page 3-102 of the Draft EIR/EIS shows the key relocation map to Table 3.1.4-18 (residential and non-residential impacts of the build alternatives). At that scale, unfortunately, it is not possible to depict a bike path as requested by the City. However, the “Bikeway and Future/Proposed Master Plan Route within Palmdale Study Area” is shown in Figure 3.1.1-11 of the Final EIR/EIS.
L-4-28 (Land use)	Specific retailer names were removed and the description of West Palmdale was expanded in the Final EIR/EIS, per your request.
L-4-29 (Right-of-way)	The EIR/EIS analyzes impacts to various resources including public facilities, residential, commercial, and industrial land uses. Several alternatives have been developed, working within established design and safety guidelines, in an attempt to avoid or minimize impacts to developed properties, including some of which are particularly sensitive, as you have noted. The selection of a Preferred Alternative (rail option) was based on a number of factors, including potential impacts to facilities such as Plant 42.

Comment Code (Topic)	Response
L-4-30 (Design)	Your comment is acknowledged. Compatibility of the HDC rail feeder system with the proposed California HSR system and XpressWest system will be one of the main factors to be considered in the system design.
L-4-31 (Other)	It was Caltrans' oversight to not invite the U.S. Air Force earlier in the project. Caltrans has sent the invitation letter to the Air Force in June 2015; it is documented in Chapter 5 of the Final HDC EIR/EIS. Note that the JPA comprises several local cities that have been invited and have accepted the invitation to be a participating agency; there is no need to include the JPA on the list. Table 5-1 has been updated to reflect a positive response from the City of Palmdale.
L-4-32 (Section 4(f))	Your comment on the spelling of the park is noted and the edit is reflected in the Final HDC EIR/EIS.
L-4-33 (Other)	Caltrans acknowledges your comment regarding the share sewer maintenance responsibilities between the City of Palmdale and LA County Sanitation District. The correction has been made.
L-4-34 (Other)	All verbal and written comments received from the public during the official comment period on the Draft EIR/EIS, as well as the responses, are included in the Final EIR/EIS. Testimony and letters provided at earlier public meetings and workshops are not considered "official" comments, though they are reviewed and seriously considered by the Project Development Team. Although the City is not specifically identified (no entity is), support for a bike route adoption is included in the "General Summary of Input" section of chapter 5.4.
L-4-35 (Other)	Previously prepared documents/studies/reports that were utilized in the preparation of this EIR/EIS have been identified throughout the document. Reports and documents prepared specifically for the analysis of this project (i.e., technical studies) are listed at the back of Volume 2.
L-4-36 (Other)	Your support for the project is acknowledged.

Comment L-5

December 1, 2014

Via e-mail (machucar@metro.net)
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Re: Proposed High Desert Corridor (HDC Project No. 80)

Dear Messrs. Machuca, Price, and Megalla:

We are writing to you on behalf of the Alliance for Desert Preservation (ADP), which is a nonprofit mutual-benefit corporation formed to protect the environmental and economic well-being of the High Mojave Desert and to support a sustainable future, while safeguarding against activities that may harm the High Mojave Desert.

In this letter, we will set forth our primary concerns regarding the proposed High Desert Corridor project (HDC) and point out inadequacies in the project EIS/EIR.

1. HDC Would Trigger the Urbanization/Industrialization of the High Desert; the EIS/EIR Does Not Adequately Consider this Cumulative Effect.

The High Mojave Desert, which is the southwestern Mojave area of San Bernardino County and Los Angeles County (sometimes collectively referred to herein as the Counties), has managed, through the Counties' careful and well-considered land use planning, to retain its essentially rural desert character, notwithstanding that it is located on the very edge of the greater Los Angeles metropolitan area. ADP is deeply concerned that, in transecting this part of the Counties with an extensive new freeway/high-speed railway system, the HDC would spark the urbanization and industrialization of the region, particularly the area east of Highway 15, by rerouting traffic and development into it, thereby contributing to the view that the entire affected region is "disturbed land" ripe for ever-greater disturbance, i.e., development of all sorts, including utility-scale renewable energy plants and extensive new transmission lines and electrical substations.

L-5-1

In short, HDC ought not be the opening gun in the process of remaking the region in the image of the urbanized and industrialized valley/foothill communities south of the mountains, all of which highlights the fact that the EIS/EIR does not adequately consider the "cumulative effect" that HDC would have in encouraging the transformation of the entire region. CEQA Guidelines, Section 15126.2(d), says that environmental documents must "…discuss the ways in which the project could foster economic or population growth, or the construction of additional housing, either directly or indirectly in the surrounding environment…."

The EIS/EIR grudgingly concedes that the "HDC Project would tend to shift some future development toward the new interchanges in Palmdale and Victorville/Adelanto," convert over 3,000 acres of farmland to nonagricultural use and contribute to "increased urbanization" [EIS/EIR, 3-580], but these generic references to such changes do not constitute the requisite *discussion* of the many ways in which the HDC "could foster economic or population growth."

Moreover, even as the EIS/EIR projects increased population growth in the High Desert—and touts it as a major justification for the HDC—it unjustifiably maintains that such growth would, as a result of the HDC, occur only around the Palmdale and Victorville/Adelanto interchanges (EIS/EIR, 3-580). The EIS/EIR cannot truly assess the extent to which the HDC would "foster economic or population growth" by pretending that the rest of the High Desert would remain unscathed.

. . ." (EIS/EIR, 2-20).[3] However, the cumulative impact—the "domino effect"—of such a use receives no mention at all in the EIS/EIR. This is a very critical omission, because using the HDC as a transmission corridor would encourage and enable the expansion of the electrical grid in and through the Counties, which would, in turn, encourage the siting of a large number of utility-scale renewable energy facilities in the High Desert, thereby expediting a form of energy generation that will permanently consume large portions of the desert, that is not at all environmentally friendly, and that increasingly appears to be destined for obsolescence. It is also a form of energy generation that is, for the reasons cited above, strongly opposed by local residents due to its enormous negative impact on natural habitats and human communities. L-5-1 (con't)

In short, the EIS/EIR is highly incomplete because it does not, as required by CEQA, consider the cumulative effects of the HDC project in inviting and facilitating major new development that will rapidly urbanize/industrialize and environmentally degrade the High Desert.

2. <u>The EIS/EIR Does Not Adequately Address the Negative Effects that the HDC Would Have on Air Quality</u>.

The whole Mojave Desert Air Quality Management District is in nonattainment for nitrous oxide and PM10. San Bernardino County already suffers from the highest ozone levels in the country. According to the EIS/EIR, the HDC would produce significant levels of PM10, PM5, nitrous oxide, ozone, carbon monoxide, and carbon dioxide during an extraordinarily lengthy, six-phase construction period of at least 26 years.[4] L-5-2

Approximately 25 million cubic yards of desert soil would be needed as fill for the project—with 10 million cubic yards consisting of on-site excavated fill and another 15 million

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[3] The EIS/EIR also states (EIS/EIR, S-4) that, in order to address the environmental goals set in AB 32 and SB 375, ". . . the development of a new transmission corridor . . . will be considered for potential integration into the HDC."

[4] According to the EIS/EIR (3-543), "because the proposed project would be incrementally built over several years as funding becomes available, ***the construction schedule is currently expected to extend from 2016 to 2040***, with the opening year for the initial segment of 2020 [emphasis added]." The EIS/EIR also acknowledges that the project proponents would have no real control of the "actual construction process [which] would be determined by the contractor in accordance with the requirements of the construction process [EIS/EIR, p. 3-543]." In other words, there is no telling how many decades the HDC would take to complete.

cubic yards imported from off site (EIS/EIR, Table 3.6-2, 3-546), all of which would have to be laboriously trucked to the site, thereby consuming 167 billion BTUs of energy (construction alone would consume 32 trillion BTUs of energy [EIS/EIR, 3-559 and 3-560]), to build 63 miles of freeway nine feet above grade, and to build a high-speed railway 15 feet above grade (EIS/EIR, 3-544). According to the EIS/EIR, this would involve prolonged use of heavy equipment for extensive land scraping to create a profile up to 500 feet wide for the freeway/railway, as well as off-site construction facilities and activities, including rock-crushing facilities, a concrete batch plant, a hot-mix asphalt facility, and staging areas for field trailers, storage, and equipment (EIS/EIR, 3-543 and 3-555).

All this would, in the EIS/EIR's highly understated language, result in "fugitive dust emissions" (EIS/EIR, 3-555), as well as 46,000 tons of carbon dioxide, 271 tons of PM 10 (inhalable particulate matter), 223 tons of carbon monoxide, 367 tons of nitrogen oxides, 70 tons of PM 2.5 (fine particulate matter), and 45 tons of reactive organic gases (EIS/EIR, 3-556). L-5-2 (con't)

The EIS/EIR attempts to dismiss all of these effects as "temporary," i.e., as only occurring during construction, while incorrectly asserting that the project "would not require more than five years to complete [without attempting to square this five-year projection with the 26-year projection referenced in Fn. 5 of this letter—for instance, did the EIS/EIR mean that it would take five years per each the project's six phases?]; therefore, construction emissions are not considered for conformity purposes" (EIS/EIR, 3-555). The EIS/EIR cannot, with any modicum of intellectual honesty, decline to consider construction emissions on the ground that they would be generated only "temporarily," over a five-year time horizon per each construction phase, and then claim that the cited standard, and highly ineffectual, mitigation measures "would control fugitive emissions" from a project of this magnitude.

Along those same lines, the EIS/EIR comes to the startling conclusion that the health effects of the resulting carcinogenic air toxic emissions "would be considered less than significant" because the risk posed by them is based on a "(70-year-lifetime) exposure," while construction is "anticipated to last less than five years at each individual segment for this phased project." We question the conclusion that exposure to air toxins requires a lifetime of exposure to be harmful, as well as the notion that, instead of assessing those impacts of those toxins over the entire lifetime of the construction process, this can be done as if the project took only five years (because the proponents adopted the expedient of breaking it down into six phases).

And even after construction would be completed, the HDC would continue to inflict long-term and ongoing damage to regional air quality. The EIS/EIR concedes that the traffic brought in by the HDC would spew out cancer-causing "mobile source air toxins" it calls

MSATs, and that the HDC "is a project with higher potential MSAT effects" because it would generate annual average daily traffic in the range of 140,000 to 150,000 or greater and be near populated areas and rural areas with concentrations of vulnerable populations (such as schools, nursing homes, and hospitals) (EIS/EIR, 3-346 and 3-347). Nevertheless, the EIS/EIR comes to the indefensible conclusion that this can all be mitigated using the typically prescribed measures.

The EIS/EIR does not consider another very serious negative impact that the HDC would continue to have long after construction: The HDC would tear up untold thousands of acres of virgin desert surface, which has been naturally cured and compacted over many geologic eras. When the desert's surface layer is destroyed, it loses its dust-retaining, microbiologically rich, and life-sustaining properties, as well as the stable homeostasis it has developed with plant and animal wildlife. The desert is something of a "reverse rain forest," where the most biologically productive systems—roots systems—are underground, meaning that, when the surface is destroyed, the root systems perish. Further, as a result of the destruction of the desert's upper biotic layer, it releases carbon dioxide that had long been sequestered, and loses its ability to sequester any further carbon dioxide.[5] In addition, destruction of this surface "skin" causes its dust-retaining properties to vanish. L-5-2 (con't)

3. <u>The EIS/EIR Does Not Adequately Address the Degree to Which HDC Would Inflict Valley Fever on the High Desert</u>.

The EIS/EIR says that the project would be constructed in an "endemic area" for valley fever, and that construction grading activities "could" cause spores to become airborne and put workers, residents, and wildlife at risk. Valley fever is a silent, insidious disease that kills people—and that can be contracted year-round simply by breathing. It is now well known that the microscopic spores that cause this devastating disease live in the desert soils, that they become airborne when the ground is disturbed, and a that good stiff wind can transport the spores as far as 500 miles, with an ever-increasing range; 2014 statistics show that cases in Arizona, California, Nevada, New Mexico, and Utah have risen 900 percent since 1998, with one-third of the cases in California alone.

The soil disturbance in the Western Antelope Valley resulting from large-scale renewable energy development, and from construction of Southern California Edison's grid line and power station infrastructure, is suspected of causing a recent outbreak of valley fever in that region, after fugitive dust impacted air quality to an extent never experienced before. The prevailing L-5-3

[5] In view of these alarming statistics, the effort in the EIS/EIR to depict HDC as a "green" project—one that will promote the State's HGH reduction goals—is unsupported.

westerly winds would blow these spores east all over the High Desert cities and Lucerne Valley, among other places.

Nevertheless, HDC's proponents propose to excavate, grade, and scrape more than 25 million cubic yards of desert soil—and to create a "soils disturbance area" of approximately 3,000 acres (EIS/EIR, 3-562), which would inevitably release into residents' lungs, bones, and brains many millions of disease-causing spores.

In the midst of a record-setting drought, the project proponents will not be able to muster the huge volumes of groundwater needed to control, suppress, and compact such a large volume of desert soil (see the groundwater discussion at pages 9–10, infra). Moreover, the application of that water might encourage valley fever; the spores thrive on alternating conditions of extreme wetting and extreme drying.

L-5-3 (con't)

The EIS/EIR concedes that construction activities "would cause fungal spores (if present) to become airborne" and to pose a health risk, but it calls this risk "temporary," as if the release of spores during the 26 to 30 years total projected construction period is temporary (EIS/EIR, 3-557). The EIR/EIR (at 3-557) also proposes to reduce the valley fever risk with use of dust masks, seeking prompt medical treatment, getting tested, and doing construction only in the winter. But these measures are inadequate, and it is unrealistic to think that the project proponents will refrain from construction other than during highly sporadic winter rains, which typically force the cessation of construction work. The EIS/EIR did not at all address valley fever in a meaningful way, which renders it defective and incomplete.

4. HDC's Effects on Natural Habitats, Threatened/Endangered Species, and Wildlife Corridors.

The proposed freeway/high-speed railway would, according to the EIS/EIR, be 63 miles long, as much as 500 feet wide, and as high as 9 to 15 feet above grade (EIS/EIR, 3-544). This giant causeway across the desert would permanently sever highly crucial and well-recognized wildlife corridors running north into the High Desert from the San Bernardino and San Gabriel Mountains, and destroy the critical mountain/desert habitat transition zone that runs along the base of those mountains.

L-5-4

This would likely spell doom for the many threatened and endangered species that depend on those wildlife corridors because, for them, a raised eight-lane freeway, with parallel railways, solar arrays, bike paths, and rows of fences, would amount to an impregnable "Berlin Wall." According to the preeminent work on wildlife corridors, titled *A Linkage Network for the California Deserts*, by South Coast Wildlands, severing natural functional habitat connectivity

among a region's ecosystems leads to species *extinction* for both plants and animals. This report identifies at least four major regional north-south wildlife corridors that would be severed by the HDC. In light of ongoing climate change, such north-south wildlife corridors have increasingly critical importance.

The DRECP designates an area running north into the desert from the San Gabriel Mountains—between Lancaster and Adelanto—as a Conservation Planning Area, which, in turn, connects to an ACEC (short for Area of Critical Environmental Concern) that runs northwest to the Tehachapi Mountains and northeast past Barstow all the way up to the central Mojave. The DRECP also designates, as National Landscape Conservation System land, and as ACECs, the north face of the San Bernardino Mountains, starting just southeast of Hesperia and running east into Lucerne Valley. Moreover, HDC would end where Bear Valley Road intersects with Highway 18, in Lucerne Valley, near where an ACEC crosses over Highway 18 in the direction of the Granite Mountains. This is obviously no place to build a freeway/railway corridor, particularly given that the end of the HDC freeway—where it would have to transition into existing Highway 18, which is a two-lane country road—would create a traffic choke point.

The EIS/EIR makes only a passing mention of wildlife corridors and connectivity, pausing only to propose that three of the water culverts that would be put in under the proposed freeway/railway could be used as wildlife crossings (EIS/EIR, 2-42 and Figure 2-31). The EIS/EIR does not take into consideration that the HDC runs through wild areas that have been naturally interconnected for eons in order to form working ecological systems, systems that cannot be severed without forever altering their functional integrity.

L-5-4 (con't)

Just as important, the EIS/EIR does not take into consideration exactly where in the desert 25 million cubic yards of soil would be obtained and where undesired soil (and the rubble created by the destruction of many buildings in the right of way to be acquired) would be disposed of. As stated in the EIS/EIR (3-543-544), "[s]oil disposal would be undertaken according to regulatory requirement. The contractor would be responsible for identifying sites to obtain borrow/fill material." Because these decisions have such obvious and momentous environmental implications, future, as yet unidentified contractors cannot be given carte blanche to make them. An entire EIS/EIR could be devoted to just those issues, and the fact that they are left unexamined in the existing EIS/EIR raises basic questions regarding the efficacy of the document.

Finally, the EIS/EIR acknowledges that HDC "may have adverse effects" on various federally and state-listed threatened species but does not describe the nature or extent of those effects on any one of the species it identifies. Instead, the EIS/EIR suggests that "compliance

with the standard condition and minimization and mitigation measures . . . would reduce construction impacts," without examining whether the standard "mitigation measures" would be in the least bit effective (EIS/EIR, 3-560 and 3-561). In sum, the EIS/EIR does not begin to truly assess HDC's construction impacts on the biological environment.

5. **The EIS/EIR Does Not Adequately Consider HDC's Negative "Environmental Justice" Impacts.**

The HDC would have a particularly heavy impact on the High Desert communities concentrated adjacent to and east of Highway 15—Adelanto, Victorville, and Apple Valley—because it would pass through established population centers there, displacing a great many residents and exposing those remaining to congestion, noise, and pollutants, both in the construction phase and once the freeway is in operation. Many of these residents are part of low-income and minority populations that are least able to cope with, and particularly vulnerable to, such dislocation and disturbance.

L-5-5

The EIS/EIR does not take into consideration that land values for existing homeowners and business owners would drop precipitously. The low-income and minority populations concentrated on and along the HDC's proposed route would be the least able to absorb the loss occasioned by this loss of value, and they would have the fewest resources to allocate toward avoidance of the HDC's negative effects.

The EIS/EIR does not consider the HDC's effect on anyone living anywhere to the east of the new freeway's proposed terminus in Lucerne Valley, even though such residents would bear the full brunt of the project, particularly given that the prevailing winds in the region blow from west to east toward Lucerne Valley. Ironically, the HDC would provide a raised viewing platform at Deadman's Point—where passers-by could gaze into Lucerne Valley—but the HDC's effects on Lucerne Valley's residents are ignored.

Instead, the EIS/EIR marshals a great deal of statistics concerning the makeup of the communities that would be negatively impacted by the HDC and then, contrary to logic, dismisses those impacts as acceptable and mitigatable.

6. **The EIS/EIR Does Not Adequately Consider HDC's Impacts on Groundwater Availability in the Mojave High Desert.**

L-5-6

As mentioned above, the HDC would require that 25 million cubic yards of desert soil be disturbed in building 63 miles of freeway nine feet above grade, and in building a high-speed railway 15 feet above grade, all of which would result in the disturbance of 3,000 acres of desert

soil. The EIS/EIR does not address whether or to what extent groundwater would be available to control the resulting "fugitive dust emissions," nor does it adequately identify the sources of that groundwater, i.e., specific aquifers.

Section 5 of the EIS/EIR, which is meant to assess the "Irreversible and Irretrievable Commitments of Resources" for the HDC, makes only a single passing reference to water, reporting that "considerable amounts" of water "would be expended during construction. . . . [EIS/EIR, 3-542]. This falls far short of the analysis needed.

L-5-6 (con't)

The EIS/EIR's failure to come to grips with the groundwater issue renders it inadequate in terms of the purposes that it must serve, particularly given that California is currently in the grip of a historic, record-setting drought that has made water especially scarce in already arid regions such as the High Desert. In light of it, there is no guarantee that existing residents and businesses dependent on particular groundwater basins will receive their allocations.

One need only look at the adjudicated groundwater basins in San Bernardino County, which are already in overdraft. The Alto groundwater basin (which includes parts of Lucerne Valley and the High Desert cities) has long been dependent on recharge from the State Water Project, but this year, the Mojave Water District will receive only 5 percent of its requested allocation. The Alto basin's allocation has, in turn, been ramped down to 60 percent. Eventually, any remaining water stored in the ground as a sort of "rainy day fund" could run out, and County residents and businesses could be shortchanged.

In short, the EIS/EIR is inadequate because it does not properly focus on whether available groundwater would be sufficient to service the project and protect surrounding communities.

7. <u>The EIS/EIR Does Not Adequately Consider HDC's Visual Impacts Throughout the High Mojave Desert</u>.

L-5-7

In bisecting the High Desert with a 63-mile-long raised causeway and railway system, the HDC would have an enormous, permanent, and undeniably deleterious impact on the visual appeal of the High Desert. The horizontal viewscapes presented by its undulating desert surface would become dominated and impeded by a visually intrusive man-made escarpment, a raised high-speed rail system, and extensive sound walls, all of which is confirmed by the "simulated project views" found in Chapter 3 of the EIS/EIR. This is of great significance, given the fact that the region, despite being on the doorstep of a major metropolitan region, has managed to keep relatively intact its natural landscapes and the vistas they present.

For this reason, the Open Space element of San Bernardino County's General Plan includes the goal "to preserve the unique environmental features and natural resources of the Desert Region, including native wildlife, vegetation, water, and scenic vistas." (Goal D/CO 1) Similarly, the County's Development Code (Section 82.19.010(b)) provides that "[s]cenic areas in the County contain vistas that rival many found elsewhere in the state and the nation. These scenic resources can be deteriorated by increased urbanization along scenic corridors. The Open Space Overlay seeks to preserve these resources and to provide additional opportunities for the public to enjoy these pleasing features." The EIS/EIR does not take into account that, in terms of its visual impact, the HDC would pose a gross affront to the County's General Plan and Development Code.

L-5-7 (con't)

The HDC would also reduce the visual appeal of the communities it would run through, such as Adelanto, Victorville, and Apple Valley. It would, in addition, obstruct views of beautiful desert landscapes to the north of Apple Valley—the HDC is proposed to arc through that area, where it would obstruct distinctive vistas of the Granite Mountains, whose foothills present unique and interesting rock formations.

The EIS/EIR concedes the HDC would have a negative visual impact but then comes to the unsupportable conclusion that, despite the intrusion of "large scale man-made elements," the overall "visual impact is moderate" (EIS/EIR, 3-232). This runs counter to case law, which states that "[a]ny substantial negative effect of a project on view and other features of beauty could constitute a significant environmental impact under CEQA." Ocean View Estates Homeowners Assn. Inc. v. Montecito Water Dist., 116 C.A. 4th 396, 401 (2004).

8. Conclusion.

ADP is mindful of the ongoing need to expand and upgrade the region's transportation infrastructure so that it keeps pace with its development but, for the reasons stated above, we believe that the HDC's negative impacts would greatly outweigh its benefits, especially given that a new freeway/railway is not justified by current needs.

L-5-8

We are also concerned that the HDC would have the cumulative impact of fostering the urbanization and industrialization of the High Desert. The region's land-use profile should not be fundamentally and forever altered unless there is a strong and well-informed consensus in favor of a comprehensive, regionwide plan, formed through an inclusive and transparent deliberative process undertaken through the active participation of all affected residents and all relevant state, local, and regional governments/agencies—one that takes into consideration all of

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the environmental, social, health, and economic impacts that urbanization/industrialization would bring. The EIS/EIR for the HDC is not the product of such a process.

Very truly yours,

ALLIANCE FOR DESERT PRESERVATION

Richard Ravana, President

cc: (by e-mail: Ron.Kosinski@dot.ca.gov)
Mr. Ron Kosinski, Chief of Environmental Planning
Caltrans District 7
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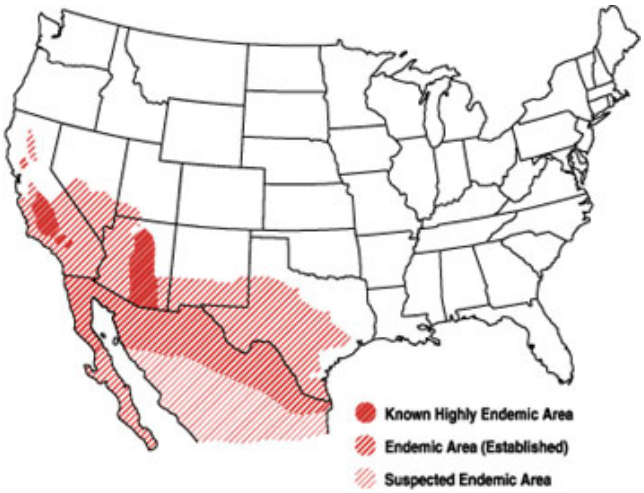
Los Angeles, CA 90012

Response to Comment L-5

Comment Code (Topic)	Response
L-5-1 (Cumulative)	Caltrans appreciates the comments submitted by the Alliance for Desert Preservation (ADP). In contrast to the impression the ADP has of Caltrans creating a self-fulfilling prophesy to cause the growth ("spark the urbanization and industrialization of the region") and open up new areas creating the traffic congestion that it would then solve with construction of the High Desert Corridor project, the reality is that the population and economic growth projections used in the project's traffic modeling were obtained from the independent regional planning organization, Southern California Association of Governments (SCAG), which was then supplemented with a review of the various pertinent land use plans of the corridor Cities and Counties. Specifically, SCAG's projections and the assumptions they use about land use in future years are based on California Department of Finance population projections, along with City and County General Plan concepts or forecasts of future land development. Growth projections from SCAG were included in the Draft EIR/EIS in Table 1-4 (see Section 1.2.2, under the heading, "Population Growth and Transportation Demand"), which shows predicted population increases for the HDC increments through 2040. Population growth will continue to be a driving force throughout much of the region, with the population of the High Desert Corridor rising from 651,000 people in 2010 to almost 957,000 in 2020, and to over 1.3 million by 2040. In addition to the population growth noted above, among economic factors, the logistics industry in the SCAG region (which includes transportation, warehousing, logistics services, and other sectors) has become an important component of the regional economy. Collectively, these industries rely on all components of the region's transportation system— trucking (for intra-regional shipments), and warehousing (to support both international trade and local delivery of consumer goods), and whose growth will need workers. In 2010, transportation and warehousing activities provided 311,000 jobs in the region and accounted for $22 billion in the SCAG regional economy. Growth pressures of increasing population and a dynamic economy create momentum for changes in land use that, if the transportation system were to leave unattended or ignore, are likely to worsen the overall environmental conditions and people's quality of life in the desert communities. Past research has shown that transportation plays only a minor role in development decisions. As discussed in the Community Impact Assessment, future development in the project area and within the region will be determined by many factors including the availability of services (sewer and water), local land use policies, and economic conditions. With the exception of land near interchanges becoming more attractive for commercial properties, the implementation of the HDC Project by itself will not induce new development if there are not market forces that support new developments. Furthermore, it is important to note that Caltrans has no authority over land use outside the State's ROW. Such matters fall under the

Comment Code (Topic)	Response
	jurisdiction of local units of government along the corridor. Furthermore, in order for development to occur, it must be consistent with local zoning ordinances and must meet both local and state environmental protection regulations under the California Environmental Quality Act (CEQA), and other laws and regulations. Sections 1.2.2 and 3.1.2 of the EIR/EIS describe the factors contributing to regional development and the potential influence of the HDC Project on future growth. The access provided into the study area via new or improved interchanges would help serve the projected future growth in Lancaster and Palmdale on the west and Victorville on the east, with the HSR Feeder Service likely fostering higher density and mixed-use development near the planned rail stations in Palmdale and Victorville. The pressure for conversion of land uses already exists, as demonstrated by the increased planned activity (for example, see the approved and proposed projects shown in Table 3.7-1 and Figure 3.7-1). The projections for traffic that were developed for the Draft EIR/EIS were based on future year build-out projections of land use development from SCAG, consistent with the existing corridor cities and the Los Angeles County and San Bernardino County General Plans and those future land use patterns. The project is planned to serve those forecasted or planned, future conditions. In terms of other developments, which are independent actions, all land use conversions and zoning changes would still require a decision by the appropriate local government body with jurisdiction, whether it be a County Board of Supervisors or City Council, to change the land use designations; they would also require separate environmental and public review under CEQA, and in the case of HSR components, compliance with the National Environmental Policy Act (NEPA). An assessment of cumulative and secondary impacts from past, present, and reasonably foreseeable projects was completed by Caltrans for the HDC Draft EIR/EIS in Section 3.7 in accordance with the requirements of NEPA. The report provided specific details on a resource by resource basis and concluded that some cumulative and secondary impacts, such as those for Visual/Aesthetic Resources and Biological Resources, from past, present, and reasonably foreseeable projects would be measurable. The HDC Project will help meet regional economic goals, address critical mobility challenges caused by future changes appearing on the horizon, protect environmental resources and help contribute to the various desert communities' livability and quality of life goals outlined by their citizenry through the planning process.
L-5-2 (Air quality)	The air quality analysis presented in Section 3.2.6 of the Draft EIR/EIS includes a description of existing conditions, anticipated operational impacts of the project on air quality, and measures to avoid or reduce air pollutant emissions. Construction air quality effects are analyzed in Section 3.6 of the Draft EIR/EIS. These analyses are consistent with industry standards and with Caltrans requirements. Construction of each phase of the project is estimated to be completed

Comment Code (Topic)	Response
	within 3 to 4 years. Typically, soil excavation and grading activities would occur only during the early phase of construction for a short period within that construction phase (e.g., 6-8 months out 48 months). Depending on the funding availability, construction of the project could be phased over a longer period, as documented in Table 2-3 of the Draft EIR/EIS. However, the construction that would occur during each phase would involve a smaller area of disturbance. Thus, the intervals of excavation and grading - and associated air pollutant emissions - would be separated in time by approximately 3 to 3.5 years, and were treated as separate events for purposes of air quality analysis. The construction emissions provided in Section 3.2.6 are estimated based on a conservative assumption that the construction of the first portions of the corridor would be completed by 2020, for the worst-case approach. The phased construction scenario in Section 3.6 provides a generalized construction sequence for this project based on an assumption that the project would be constructed in six phases, each about 10 miles in length. Based on this phased construction sequence, the construction emissions for each phase would be equated to approximately 17 percent of the total temporary construction emissions estimated for the worst-case approach. Please refer to response for F-4-16 for more information. Please also see response to U.S. Environmental Protection Agency (EPA) Comment F-4-17 concerning the effects of project-related air toxics on human health. With regard to the loss of desert lands and root systems with construction of the HDC, the extent to which they retain dust and sequester carbon is unknown. The quality of undeveloped lands along the proposed HDC alignment is highly variable. Unpaved portions of the HDC alignment would be re-vegetated following construction. This vegetation would also assist in controlling dust and would sequester carbon. The net loss in dust control and carbon sequestration capacities with implementation of the proposed HDC is not anticipated to be significant relative to the overall effects of the project on air quality and greenhouse gas emissions.
L-5-3 (Air quality)	The Centers for Disease Control and Prevention (CDC) indicates that *Coccidioides immitis* is a fungus found in the soil of dry, low rainfall areas and is native and common in many areas of the southwestern United States, Mexico, and Central and South America (see Figure below). As shown, the project is in an endemic area for *Coccidioides*. Coccidioidomycosis, also known as Valley Fever, is a common cause of pneumonia in the areas where *Coccidioides* occurs. *Coccidioides* spores circulate in the air after contaminated soil and dust are disturbed by such human or natural activities as winds, construction, farming, animal burrows, or burial. The spores are typically inhaled, although in rare cases spores can enter the skin through cuts or abrasions and cause infection. After the fungal spores are settled in the lungs, they change into a multicellular structure called a spherule. Fungal growth in the lungs occurs as the spherule grows and bursts, releasing endospores, which then develop into more spherules.

Comment Code (Topic)	Response
	 Endemic regions of *Coccidioides immitis* in the United States and northern Mexico. Source: USGS, 2000 At least 30 to 60 percent of people who live in endemic areas such as the High Desert where the fungus is present are exposed to the fungus at some point during their lives. In most people, the infection will go away on its own, but for a small segment of the population, including people of Asian descent (particularly those of Filipino descent), African-American, pregnant women, and people with weakened immune systems, the risk for the disease is increased. It is difficult to avoid exposure to *Coccidioides*, but people who are at higher risk should try to avoid breathing in large amounts of dust if they are in endemic areas. Most people who are exposed to the fungus do not develop symptoms or have mild flu-like symptoms that go away on their own. In severe cases, patients develop pneumonia or meningitis which can sometimes lead to death. Meningitis, the most lethal complication of disseminated Valley Fever, may cause a stiff neck, severe and persistent headache, nausea, vomiting, and various other central nervous system symptoms such as disorientation, loss of balance or equilibrium, inability to think clearly, and loss of consciousness. In addition to humans, Valley Fever affects many species of domestic and wild animals. Because the spores of *Coccidioides immitis* can become airborne during soil disturbance, dust suppression is an important aspect of managing its spread. Valley fever is not contagious, and therefore, cannot be passed on from person to person. Most of those who are infected will recover without treatment within six months and will have a life-long immunity to the fungal spores. In severe cases, such as patients with rapid and extensive primary illnesses, those who are at risk for dissemination of disease, and those who have disseminated disease, anti-fungal drug therapy is used. Only one to two percent of those exposed who seek medical attention will develop a disease that disseminates to other parts of the body than the lungs.

Comment Code (Topic)	Response
	There are measures that can be implemented to lower the incidence of infection and also reduce the numbers of spores inhaled, thereby decreasing the chances of developing a more serious form of the disease. These measures include dust control and prevention, use of dust masks with appropriate filters, use of construction equipment with enclosed, air-conditioned cabs, and/or positioning of construction workers upwind when possible. Furthermore, infection risk can also be lowered by conducting outdoor activities, such as field studies or construction activities, in the winter months; avoiding sites favorable for *Coccidioidesimmitis* growth; seeking prompt medical treatment if flu-like or respiratory illness occurs during or within a few weeks following fieldwork or construction activities; getting a coccidioidin skin test to determine susceptibility to the disease; or by educating all members of the field party and construction crew about the possibilities and consequences of infection. Construction of the proposed project would occur in an endemic area where *Coccidioides immitis* naturally occurs. Temporary soil disturbance during construction grading activities could cause fungal spores (if present) to become airborne, potentially putting construction personnel, residents, and wildlife at risk of contracting Valley Fever. However, as noted above, most Valley Fever cases are very mild, and more than half of infected people either have no symptoms or experience flu-like symptoms and never seek medical attention. Dust control measures are the main defense against infection, although all persons residing or traveling through the High Desert would be susceptible to the disease, regardless of whether or not the project is implemented.
L-5-4 (Biology)	Wildlife crossings have been developed in cooperation with resource agencies and are included as part of the project design. These crossings are located in areas where wildlife are known to occur and are known to move. Please refer to Section 2.4.4 of the Final EIR/EIS for a discussion of wildlife movement and Figures 2-32, 2-33, and 2-34 for wildlife crossings. Studies to determine absence/presence of individual plant and wildlife species within the proposed project impact limits were conducted. Potential impacts to individual species of plants and wildlife found to be present within those limits are presented in Sections 3.3.3, 3.3.4, and 3.3.5. Impacts or potential impacts to several species listed under the Endangered Species Act or California Endangered Species Act (CESA) are expected as a result of implementation of this proposed project. A Biological Assessment was prepared as required by Section 7 of the Endangered Species Act and presented to the U.S. Fish and Wildlife Service (USFWS) for their review. A Biological Opinion was prepared by the USFWS which includes an impact analysis for those listed species and related mitigation measures. Their evaluation and resulting measures are included in the Final EIR/EIS and can be found in Section 3.3.5. Because several species listed under CESA are expected to be impacted, a Section 2081 permit under that Act will be required. Caltrans is required to comply with all mitigation measures within this permit. Based on today's standards, measures have been developed and are presented in Section 3.3 of the Final EIR/EIS.

Comment Code (Topic)	Response
L-5-5 (Community)	The comment states that the HDC Project would be "displacing a great many residents." Discussion of residential displacement is included in Draft EIR/EIS Section 3.1.4.2. While any displacements of households is an effect Caltrans wishes to avoid, the Final Relocation Impact Report (and the final EIR/EIS) indicates that the overall housing stock in the High Desert communities, including Adelanto, Victorville, and Apple Valley, will not be impacted significantly. Table 3.1.4-18 presents a summary of the estimated displaced units for the various alternatives and design variations. The affected residential units, totaling fewer than 100 for the alternatives over a length of 63 miles, would represent well less than one percent of the existing total housing stock. Nevertheless, the Preferred Alternative will continue to be modified where possible to avoid and minimize ROW acquisitions to the greatest extent practicable while meeting the project's purpose and need. Project effects on low-income and minority populations living along the proposed HDC were identified in the Draft EIR/EIS Section 3.1.4.4. While precise numbers of those potential displacees broken down by race and ethnicity, and income level, cannot yet be known at this stage, it is assumed on the basis of demographic analysis of U.S. Census data, and as discussed in more detail in the EIR/EIS, that a roughly proportional percentage of minority populations and low-income populations reside adjacent to the proposed project area. Tables 3.1.4-19 and 3.1.4-20 provide the percentage comparisons of minority and low-income populations, respectively, in the study area and region. Therefore, any impacts to these residential areas, including displacement, will have an adverse effect on environmental justice populations, but not necessarily in a disproportionate manner compared with the non-environmental justice communities. The conclusion of the Draft EIR/EIS was that the proposed HDC Project would not cause disproportionately high and adverse effects on any minority or low-income populations as discussed in Executive Order 12898 regarding environmental justice; however, the Avoidance, Minimization, and Mitigation Measures contained in Section 3.1.4.4 provide several measures and outreach strategies to further reduce potential impacts on minority and low-income populations. You should also be aware that increased access to employment opportunities and enhanced mobility resulting from the HDC Project would benefit minority and low-income populations. Caltrans is aware that some people have an emotional attachment and strong ties to a particular home or neighborhood and may experience more difficulty than others adjusting to a new location, and Caltrans ROW staff is sensitive to that issue. In other instances, individuals and families required to relocate due to a project see an improvement in their quality of life because of a better housing situation than the one they left behind. This is due to the federal requirement that those who will be relocated must be provided a dwelling that is defined as "decent, safe, and sanitary", essentially one that meets applicable housing and occupancy codes. There is expected to be sufficient relocation housing for all the displaced residential units, either in the affected communities or in adjacent communities.

Comment Code (Topic)	Response
	Caltrans policy is that displaced persons shall not suffer unnecessarily as a result of programs designed to benefit the public as a whole. Those individuals or households who would be displaced by the HDC Project who may have difficulty finding suitable relocation resources would be eligible for assistance from Caltrans in finding comparable replacement residences. This assistance is provided under the State's Relocation Advisory Assistance Program and Last Resort Housing Program, though the Community Impact Assessment did not conclude that the Last Resort Housing Program would be necessary due to an ample supply of residential housing stock in the replacement area. For home owners, an appraisal will be performed to determine the fair market value of the property and an offer of fair compensation will be made to the property owner. Renters displaced by this project have the option under the Relocation Assistance Program to relocate into other types of housing. They could use the funds to help purchase replacement housing or relocate from an apartment to a single family or other residence. If needed, those renters who would be displaced would be provided with supplemental replacement housing payments to make up the difference between their resources and what would be needed to achieve successful relocation. With regard to land values for properties adjacent to the new transportation facility, the available literature and independent research does not generally support the notion that property values would dramatically decline. Residential properties abutting the new transportation facility could experience a decrease in property value, due to increased noise and air emissions. Studies, however, indicate that while there may be a short-term decline in property value for properties adjacent to a new freeway, in California especially, the values of houses in established neighborhoods will rebound and become normalized after a time span. Associated landscaping and refinements in project design to include community compatibility features and enhancements such as are proposed for the HDC Project, have tended to have a positive force on property values. These include incorporation of native planting and landscape screening, use of articulated or textural facades on soundwalls to provide contrast and avoidance of a monolithic appearance, and improved pedestrian and bicycle corridors which would generally improve community cohesion, creating a more inviting neighborhood, and improving residential desirability for those places. Implementation of the Preferred Alternative may have the effect of improving property values by providing residents in the region with a more efficient transportation system. Substantial adverse impacts to local property values are not anticipated from project implementation.
L-5-6 (Hydrology)	Information pertaining to groundwater resources within hydrologic sub-units covering the project corridor is presented in Section 3.2.2 (Water Quality and Stormwater Runoff) of the EIR/EIS. Caltrans acknowledges that California is in a severe drought condition and the use of fresh water from any sources must be carefully planned. We must also recognize the ever-changing nature of weather patterns and realize that drought conditions

Comment Code (Topic)	Response
	may, or may not, be present when construction is ready to begin. Construction of the HDC would be done in segments (most likely 10-15 miles per segment). Dust suppression would be required during excavation and grading operations. The sources of water to be used for dust suppression and other construction activities would depend on the availability of groundwater within the area. If it is not available, water will be transported from nearby water supply sources for use during construction. No long term water consumption is needed once construction is completed except for landscape irrigation, which will be minimal due to the use of drought-tolerant native plants. As far as the indirect impact is concerned, Section 3.1.2 (Growth) indicated that the proposed project would not individually result in significant impacts due to growth. The proposed project would tend to shift some future development toward the new interchanges and rail stations in Palmdale and Victorville/Adelanto but not along the desert area of the corridor. The Cities of Palmdale and Victorville/Adelanto would be responsible for supporting and controlling growth in their respective jurisdictional area.
L-5-7 (Visual)	The Visual Impact Assessment found that many visual resources would be affected by the proposed project. However, the assessment methodology is clear that changes in visual quality are not the same as visual impacts of the project. A negative change in visual resources is not equivalent to a significant impact under CEQA. Measures to Avoid, Minimize, and/or Mitigate impacts are described in the Draft EIR/EIS on pages 3-232 through 3-234.
L-5-8 (Other)	As stated in Section 1.2 of the Final EIR/EIS, the primary purpose of this project is to address the existing and future problems of limited and unreliable west-east connectivity within the High Desert region. After considering all impacts associated with project construction and implementation, Caltrans and its partners have determined that the project benefits would outweigh the impacts which could be minimize through careful project design and the implementation of proposed mitigation measures. As documented in the Draft/Final EIR/EIS, there is a potential for existing land uses located along interchange locations within Victorville and Palmdale to shift towards greater commercial and industrial use. For the unincorporated areas located centrally within the project area, existing land uses surrounding isolated interchange locations are anticipated to have minor changes. Based on the general plans for the local municipalities, growth and economic development are encouraged within the incorporated cities. For the unincorporated areas, existing land uses characterized by low-density development are desired to maintain the existing rural character within the area. Therefore, the proposed project is consistent with existing and future land use designations of the local municipalities and should not pose an adverse effect on surrounding existing land uses.

Comment L-6

L-6

COUNTY OF LOS ANGELES

DEPARTMENT OF PUBLIC WORKS

"To Enrich Lives Through Effective and Caring Service"

GAIL FARBER, Director

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December 1, 2014

IN REPLY PLEASE REFER TO FILE: LD-2

Mr. Karl Price, Senior Environmental Planner
California Department of Transportation, District 7
100 South Main Street, Mail Stop 16A
Los Angeles, CA 90012-3606

DRAFT ENVIRONMENTAL IMPACT REPORT (DEIR)
HIGH DESERT CORRIDOR (HDC) PROJECT
COUNTY OF LOS ANGELES DEPARTMENT OF PUBLIC WORKS COMMENTS

Thank you for the opportunity to review the DEIR for the HDC project located within portions of the unincorporated County of Los Angeles and County of San Bernardino.

The proposed project includes the construction of a new 63-mile-long, east-west freeway/expressway and possible toll or rail facility between State Route (SR) 14 in Los Angeles County and SR 18 in San Bernardino County. A bike path and other green energy elements are also being considered. The project is proposed as a mean of improving mobility and access for people and goods in the rapidly growing Antelope Valley, Victor Valley, and Apple Valley areas.

The following Public Works comments are for your consideration and relate to the environmental document only:

General

1. The DEIR should address the potential impacts to watersheds, natural channels, and County drainage facilities that may be impacted by the proposed project. The HDC should adhere to Title 20, Sections 20.94.020 and 20.94.040, of the Los Angeles County Code, otherwise known as the Channels Ordinance, which will establish the project proponent responsibility to maintain all drainage facilities that may be impacted by the proposed project. These maintenance responsibilities will include, but are not limited to, ensuring all drainage facilities are free of any trash, rubbish, sediment, vegetation, or other obstructions, so that drainage flows will not be obstructed at any time. L-6-1

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Additionally, please note that the maintenance of a channel or watercourse may require an additional permit from any or all of the following regulatory agencies: California Department of Fish and Wildlife, California Regional Water Quality Control Board, and the US Army Corps of Engineers. L-6-1 (con't)

For questions regarding the general comment No. 1, please contact Wai So of Public Works' Water Resources Division at (626) 458-6342 or nwaiso@dpw.lacounty.gov.

2. The DEIR should discuss and evaluate potential impacts and corresponding mitigations to County-maintained roadways as a result of construction traffic during the anticipated construction period for the proposed project. All mitigations shall be to the satisfaction of Public Works. L-6-2

For questions regarding the general comment No. 2, please contact Juan Sarda of Public Works' Land Development Division at (626) 458-4921 or jsarda@dpw.lacounty.gov.

Section 3.1.5-Utilities/Emergency Services

1. Appendix A–CEQA Checklist, Section XVII, Item d, page A-9: "Have sufficient water supplies available to serve the project from existing entitlements and resources, or are new or expanded entitlements needed?"

   Public Works does not concur with the determination of "Less Than Significant Impact" for this item. Additional information is required to corroborate this determination. The environmental document should identify the retail water agencies that will provide water service to the project and quantify the volume of water that will be required at the following stages:

   1) During construction for grading and dust control
   2) Irrigation for any proposed landscaping along the 63-mile alignment once the project is constructed.

   Language must be included in the DEIR identifying whether additional water supplies will need to be acquired to meet the projected water demands of the project area. A Water Supply Assessment, pursuant to California Water Code §10910, et seq., is required for the project. L-6-3

For questions regarding the utilities and service systems comment, please contact David Rydman of Public Works' Waterworks Division at (626) 300-3357 or drydman@dpw.lacounty.gov.

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Section 3.1.6-Traffic and Transportation/Pedestrian and Bicycle Facilities

1. The DEIR should additionally identify Palmdale Boulevard as an adopted master plan route. L-6-4

2. The DEIR should discuss the potential impact and corresponding mitigations of the proposed HDC alignment to the existing Metrolink Antelope Valley Subdivision rail line. The right of way for the Metrolink line is owned by the Union Pacific Railroad, which allows the Metrolink/Southern California Regional Rail Authority to operate its trains on their tracks. L-6-5

For questions regarding the traffic and transportation/pedestrian and bicycle facilities comment Nos. 1 and 2, please contact Bella Hernandez of Public Works' Programs Development Division at (626) 458-5926 or bhernan@dpw.lacounty.gov.

3. Regarding the traffic study, which was provided as an additional supplemental report by Caltrans, we offer the following comments:

    a. All County intersections should use existing traffic volume counts for baseline traffic volumes rather than modeled traffic volume counts for baseline traffic volumes.
    b. The Intersection Capacity Utilization methodology should be used for County intersection Level of Service analyses in addition to the Highway Capacity Manual delay methodology for County intersections.
    c. Traffic Index calculations along County roadways should be provided to show the change in truck traffic and their potential impact on any County roadway.
    d. Provide mitigations for all County intersections that operate at Level of Service E and F.

L-6-6

For questions regarding the traffic and transportation/pedestrian and bicycle facilities comment No. 3, please contact Kent Tsujii of Public Works' Traffic and Lighting Division at (626) 300-4776 or ktsujii@dpw.lacounty.gov.

Section 3.2.2 - Water Quality and Storm Water Runoff

1. The project, as proposed, adds new impervious surface but does not adequately mitigate the additional stormwater runoff generated from the project. Therefore, the DEIR should further discuss and evaluate the incorporation of Best Management Practice features that retain stormwater runoff on site. The County of Los Angeles' Low-Impact Development Ordinance and Green Infrastructure Guidelines may be used as a reference. These documents can be found at http://dpw.lacounty.gov/. L-6-7

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For questions regarding the water quality and storm water runoff comment, please contact Armond Ghazarian of Public Works' Watershed Management Division at (626) 458-7149 or aghazar@dpw.lacounty.gov.

Section 3.2.3–Geology/Soils/Seismic/Topography

1. All or portion of the site is located within a potentially liquefiable area per the State of California Seismic Hazard Zones Map–Littlerock and Lovejoy Buttes Quadrangles. The DEIR should include geotechnical reports that addresses liquefaction and recommends mitigation as necessary. L-6-8

2. The location of the proposed HDC in Palmdale should be clarified. Page 3-307 of the DEIR suggests that the HDC/SR-14 interchange will be located near the SR-14/Avenue S bridge site, but the proposed HDC/SR-14 interchange is located approximately 2 miles north of the SR-14/Avenue S bridge site. Also, the text in the Fault Rupture Section on page 3-303 may cause confusion on the location of the proposed HDC and should be clarified. L-6-9

For questions regarding the geology/soils/seismic/topography comments, please contact Jeremy Wan of Public Works' Geotechnical and Materials Engineering Division at (626) 458-7980 or jwan@dpw.lacounty.gov.

Please note that additional comments may be forthcoming upon revision of the requested information, submittal of any additional information, or any proposed modifications to the environmental document.

If you have any other questions or require additional information, please contact Mr. Sarda at (626) 458-4921 or jsarda@dpw.lacounty.gov.

Very truly yours,

GAIL FARBER
Director of Public Works

ANTHONY E. NYIVIH
Assistant Deputy Director
Land Development Division

JS:tb
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Response to Comment L-6

Comment Code (Topic)	Response
L-6-1 (Hydrology)	Impacts to watersheds, natural channels, and drainage facilities are discussed in Sections 3.2.1 (Hydrology and Floodplain), 3.2.2 (Water Quality and Stormwater Runoff), and 3.3.2 (Wetlands and Other Waters). Caltrans Maintenance personnel are responsible for maintaining all drainage systems within Caltrans ROW, including any drainage facilities constructed as a part of this project, and will do so in accordance with all appropriate laws, ordinances, and resource agency permits.
L-6-2 (Construction)	Caltrans will require the design team to develop a Traffic Management Plan (TMP) to offset the effects of access restrictions and traffic congestion during construction of the freeway, ramps, and on local streets. The TMP will consider methods such as adjustment of signal timing and/or signal coordination to increase roadway efficiency; turn restrictions at intersections and roadways necessary to reduce congestion and improve safety; and parking restrictions on detour routes during work hours to increase capacity, reduce traffic conflicts, and improve access. The TMP will include a traffic contingency plan with procedures to be implemented for possible unforeseen circumstances and emergencies. Coordination with the County of Los Angeles, Department of Public Works will be done during the final design period and throughout the duration of construction.
L-6-3 (Utilities)	The Water Quality Assessment Report (Parsons 2014) prepared for the project summarized potential and existing water supplies for the water agencies within the proposed Project footprint. As indicated in the Water Quality Assessment Report, all of the water agencies within the HDC corridor developed Urban Water Management Plans (UWMP) in accordance with the Urban Water Management Plan Act (California Water Code § 10610 et seq.). The Water Quality Assessment Report evaluated all of the UWMPs applicable to the project corridor and summarized existing and potential water supplies within the Project area. The EIR/EIS prepared for the proposed Project summarizes the UWMP information in Section 3.2.2. Overall, the water agencies within the Project corridor rely on water from the State Water Project or from groundwater resources. In the Antelope Valley Groundwater Basin, recharge is predominantly achieved through perennial runoff and minor recharge is achieved using irrigation water and septic system effluent. Recharge in the Mojave River Groundwater Basin is by infiltration of Mojave River water followed by infiltration of storm water runoff, irrigation return flows, wastewater discharge, and enhanced recharge with imported water. None of the build alternatives are expected to result in the destruction of groundwater wells or the permanent lowering of groundwater levels. There would be no placement of impervious road surfaces in recharge areas. Furthermore, all of the offsite water would be conveyed through the facility

Comment Code (Topic)	Response
	and back to the environment. All onsite water would be treated and then released into the environment via the proposed infiltration basins. Although all of the build alternatives would result in alterations to drainage, such as changes in ground surface permeability via paving and changes in topography via grading and excavation, a reduction in recharge is not expected to occur that could affect groundwater levels in the aquifers or existing and potential water supplies. Furthermore, the proposed Project would implement Design Pollution Prevention Best Management Practices (BMP), which are permanent measures to minimize pollution discharges by retaining source materials and stabilizing soils. Some of the Design Pollution Prevention BMPs proposed for the Project include the following: <u>Slope/Surface Protection Systems</u> The proposed Project would modify existing slopes and create new slopes. The preservation of existing vegetation would be maximized to help minimize the amount of clearing and grubbing that would be required on slopes and would also reduce the need for irrigation water for new landscaping. To minimize concentrated flows, benches or terraces would be provided during original construction on high cut and fill slopes, and slopes would be rounded or shaped accordingly. Proposed slopes would generally be 4:1 (horizontal: vertical) or flatter (Caltrans 2012). Disturbed slopes would be revegetated per the Erosion Control Plan, which would be approved by the District Landscape Architect and would most likely include drought tolerant, native desert xeriscape vegetation to minimize the need for potable water for irrigation purposes. <u>Preservation of Existing Vegetation</u> The Project design would consider minimizing the footprint and matching the existing grading as close as possible to preserve as much of the existing vegetation as possible. The need for potable water for landscape irrigation would be reduced by preserving existing vegetation to the maximum extent practicable. During the construction phase, to minimize the use of potable water during drought conditions, Caltrans would direct the Contractor to use soil binders or a dust palliative to control dust. Dust control binders and dust palliative materials would be directly applied to the surface without mixing with water and thereby the Project would minimize the use of potable water during construction. Another option that would reduce the use of potable water may also be offered by the Victor Valley Wastewater Reclamation Authority's project that includes construction of two sub-regional water reclamation facilities. Construction of the facilities began in April 2015 and the project is scheduled for completion by mid-2017. Potable water resources would be protected by utilizing reclaimed water for dust suppression and if necessary, landscape irrigation.

Comment Code (Topic)	Response
L-6-4 (Traffic)	The text of the "Existing Roads and Highways" section of Chapter 3.1.6 has been revised to read as follows: "East Palmdale Boulevard, a Los Angeles County Town and Country master plan route, is one of the longest east-west roadways, extending from Palmdale to 240th Street East; continuing east as El Mirage Road/East Avenue P."
L-6-5 (Traffic)	Caltrans has coordinated with Metrolink on this subject. Caltrans and Metrolink discussed the impacts of moving the Metrolink tracks and station since this would be required for all of the HDC rail options. Metrolink did not raise any objections as Caltrans would provide an additional track to mitigate this. Metrolink did indicate, however, that they would like the project design to not preclude them from expanding service or adding additional tracks in the future.
L-6-6 (Traffic)	Regarding Comment 3a, this comment applies to study intersections 46, 50, 53, 59, 63, 66, 69, and 74 which are all located within unincorporated Los Angeles county and did not have turning movement traffic counts available for the calculation of "Existing Condition" level of service analysis. The future year "No Build" alternative is the baseline for comparison with the "Build" Alternatives. As such, intersection turning movement counts would need to be collected for each of the identified intersections in order to comply with the request. While the availability of traffic counts for these intersections would correctly identify existing level of service (LOS) conditions, and therefore more accurately identify baseline LOS conditions, the comparison between baseline no build and build LOS conditions is nevertheless relative, with both assessments determined based on a consistent methodology. Please note that the location of intersection 56 is incorrectly illustrated throughout the Traffic Study Technical Report (Figure 9 of the Executive Summary and Figures 2-29, 3-24, 4-14, and 6-9) and Figure 3.1.6-1 page 1 of 3 of the Draft EIR/EIS; this has been corrected in the Final EIR/EIS. An intersection turning movement count is available for this intersection. All intersection turning movement counts are provided in Volume II of the Technical Study for reference. Also note that no existing intersection turning movement count is available for intersection 53 and therefore LOS for the existing condition cannot be computed. The following tables in the Traffic Study Technical Report (TSTR) have therefore been corrected, or errata noted: Tables 2-14, 4-42, 4-43, 4-44, and 4-45. Regarding Comment 3b, the HDC passes through two counties, five cities, two Caltrans Districts and two regional planning agencies (Metro and SANBAG). These entities all have their individual preferences for computing level of service metrics. For the purpose of the HDC Traffic Study, the Project Development Team elected to utilize LOS methodologies based on the Highway Capacity Manual. The Intersection Capacity Utilization methodology is considered to be a "planning level" analysis and therefore less specific than the operational methodologies used for the traffic study.

Comment Code (Topic)	Response
	Regarding Comment 3c, the build alternatives reduce traffic on all east-west roadways and most north-south roadways as indicated by the blue bandwidths, which indicate decreased volumes, on Figure 3-20 of the TSTR. The streets without blue bandwidths are forecast to have higher volumes as a result of the build alternatives, compared with the no build alternative. These locations without blue bandwidths are few in number, particularly within unincorporated Los Angeles County, and the volume increases are relatively small. Regarding Comment 3d, Table 6-19 of the TSTR lists all of the study intersections operating at LOS E or worse under design year no build or build conditions. Of the 50 intersections listed in the table, 18 intersections would operate at LOS E or F under the build alternatives. Mitigations are identified for four of the intersections. Of the remaining 14 intersections, only two perform at a lower (worse) LOS metric compared to the baseline no build alternative. These two locations are intersection 15, the SR-14 southbound off-ramp to West Avenue S in Palmdale, and intersection 28, 10th Street East and East Palmdale Boulevard, also located in Palmdale.
L-6-7 (Water quality)	Preliminary engineering has indicated that the proposed Project presents opportunities for implementation of Treatment BMPs. Each of the build alternatives would include Project design features such as the design and installation of Treatment BMPs to the maximum extent practicable. The targeted design constituent approach, outlined in the Project Planning and Design Guide (Caltrans 2010), would be used to determine the prioritization for potential Treatment BMPs. All nine Caltrans-approved Treatment BMPs were analyzed to determine their feasibility for implementation on the proposed Project from a water quality perspective in relation to the receiving water bodies within the proposed Project limits. Based on preliminary engineering, infiltration devices are proposed at most intersections within the ROW. Infiltration basins were selected based on their ability to treat the targeted design constituents (TDCs) (i.e., ammonia and general metals). It is expected that there will be no observable increase in the surface water quality constituent loadings at each of the local drainage areas.
L-6-8 (Geology)	Liquefaction susceptibility of the project area has been addressed in several documents prepared by Caltrans Geotechnical Services. Please refer to page 16 of "District Preliminary Geotechnical Report (DPGR) for the SR-14 Widening and Proposed High Desert Corridor, Los Angeles County Segment, Los Angeles , California" dated October 16, 2012. The DPGR mentions that active creeks such as Anaverde Creek, south Amergosa Creek, and potentially Big Rock Wash, Little Rock Wash, and Mescal Creek will require site- specific subsurface investigation and analysis to evaluate liquefaction potential and hazards. Also, please see Page 5 (under Secondary Seismic Hazards) of "Initial Seismic Hazard Assessment Report for the High Desert Corridor Project," dated November 18, 2012 for more information.

Comment Code (Topic)	Response
L-6-9 (Geology)	The text under Fault Rupture subsection of Section 3.2.3, Geology/Soils/Seismic/Topography, of the Final EIR/EIS has been revised to read: *Other potential bridge locations within the Los Angeles County segment of the HDC are not considered to be susceptible to ground surface rupture or displacement hazard due to fault movements because none of these bridges are mapped in the Earthquake Fault Rupture Hazard Zone except the SR-14/Avenue S Bridge site, which is located about 2 miles south of the HDC.* The text under Environmental Consequences subsection of Section 3.2.3, Geology/Soils/Seismic/Topography, of the Final EIR/EIS has been revised to read: *The proposed project alignment is not located within an Alquist-Priolo Earthquake Fault Zone and is not located over a previous well-defined fault trace, with the exception of the SR-14/Avenue S Bridge site, which is located about 2 miles south of the HDC.*

Comment L-7

MORONGO BAND OF MISSION INDIANS

A SOVEREIGN NATION

December 10, 2014

Ronald Kosinski RK
Deputy Director
Department of Transportation
District 7, Division of Environmental Planning
100 South Main Street, Suite 100
Los Angeles, CA 90012-3606

SUBJECT: 07-08 LA & SBD Co. HDC Corridor Project
(Duplicate of Letter dated October 21, 2014)

Dear Ms. Kosinski:

Thank you for contacting the Morongo Band of Mission Indians regarding the above referenced project. The Tribe greatly appreciates the opportunity to review the project and, respectfully, offer the following comments.

The project is outside of the Tribe's current reservation boundaries but within an area that may be considered a traditional use area or one in which the Tribe has cultural ties (e.g. Cahuilla/Serrano territory).

- If human remains are encountered during grading and other construction excavation, work in the immediate vicinity shall cease and the County Coroner shall be contacted pursuant to State Health and Safety Code §7050.5.

- In the event that Native American cultural resources are discovered during project development/construction, all work in the immediate vicinity of the find shall cease and a qualified archaeologist meeting Secretary of Interior standards shall be hired to assess the find. Work on the overall project may continue during this assessment period.

  If significant Native American cultural resources are discovered, for which a Treatment Plan must be prepared, the developer or his archaeologist shall contact the Morongo Band of Mission Indians ("Tribe")[1]. If requested by the Tribe, the developer or the project

[1] The Morongo Band of Mission Indians realizes that there may be additional tribes claiming cultural affiliation to the area; however, Morongo can only speak for itself. The Tribe has no objection if the archaeologist wishes to consult with other tribes and if the city wishes to revise the condition to recognize other tribes.

12700 PUMARRA ROAD - BANNING, CA 92220 - 951-849-4697 - FAX: 951-849-4425

archaeologist shall, in good faith, consult on the discovery and its disposition (e.g. avoidance, preservation, return of artifacts to tribe, etc.).

If I may be of further assistance with regard to this matter, please do not hesitate to contact me at your convenience.

Very truly yours,

MORONGO BAND OF MISSION INDIANS

Franklin A. Dancy

Franklin A. Dancy,
Director of Planning

Response to Comment L-7

Comment Code (Topic)	Response
L-7 (Cultural)	Caltrans thanks you for your participation in the environmental process for the HDC. Your comments are noted and the requirements have been incorporated in Measure CUL-1.

Comment L-8

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December 4, 2014

L-8

Karl Price
Senior Environmental Planner
California Department of Transportation
100 South Main Street, Mail Stop l6A
Los Angeles, CA 90012

RE: Comments on the High Desert Corridor EIR/EIS
SCH #2010091084

Dear Mr. Price:

Friends of Harbors, Beaches, and Parks ("FHBP"), an organization dedicated to the preservation, acquisition, protection, and long-term management of public wilderness, open space, and recreational lands, appreciates the opportunity to comment on this Draft Environmental Impact Report ("DEIR") and Environmental Impact Statement (EIS) for the High Desert Corridor Project ("Project").

By way of background, FHBP has been the leading environmental organization in partnering with the Orange County Transportation Authority (OCTA) to collaboratively create an advanced mitigation program. This program aims to comprehensively mitigate the Authority's 13 freeway projects with a landscape scale conservation program that streamlines permitting, reduces project delays, and brings projects in under budget. This program is becoming a national model for other infrastructure and transportation agencies and quickly gaining important support from the conservation community. OCTA works closely with the resource and permitting agencies to meet mitigation obligations. **(See Attachment 1)**

Similarly, the California Energy Commission in collaboration with the California Department of Fish and Wildlife, the U.S. Fish and Wildlife Service, and the Bureau of Land Management, has worked to create a comprehensive mitigation program for its renewable energy plan spanning seven counties in the Desert including the Antelope Valley portion of Los Angeles County. Called the Desert Renewable Energy Conservation Plan (DRECP), this effort has taken a similar landscape level approach by working to establish a conservation plan that is the basis for streamlined permitting for biological and other resource values for renewable energy projects. This plan meets the requirements of both the California Endangered Species Act and federal Endangered Species Act. **(See Attachment 2)**

The DRECP is out in draft form for public comments until February 23, 2015. Counties in the planning area as well as other agencies have the opportunity to use the data and information in the DRECP (which includes both an EIR and EIS) for their own planning purposes and/or to more formally benefit from the DRECP.

1

In addition to the draft Plan, the agencies have also released a web-based platform to make review of the Plan easier and to provide access to the data, mapping, and information underlying the Draft Plan. Called the DRECP Data Basin Gateway, this platform is also being used by counties in the Desert to prepare their renewable energy plans and general plan updates and can be viewed at: http://www.drecp.org/ with GIS information available at: http://drecp.databasin.org/.

In both cases (OCTA and the DRECP), the agencies created a Natural Communities Conservation Plan (NCCPs) and Habitat Conservation Plan (HCP). This approach provides for predictable conservation and permitting outcomes, while at the same time meeting Project needs, quickly, and efficiently. **(See Attachment 3)**

Like OCTA, LA Metro and Caltrans could significantly benefit from a more comprehensive approach to mitigating the environmental impacts of this project's 63 mile long route. The Biological Study Area (BSA) notes that 9,037 acres (page 3-415 and 3-416) will be impacted permanently and temporarily by the creation of the new highway. Such extensive environmental impacts from this Project means there is opportunity to benefit from an advanced mitigation program that provides for both a net environmental benefit coupled with the net benefit of the delivery of transportation improvements in the High Desert. The Draft DRECP and related "conservation plan" provide the necessary biological and "advanced mitigation" information for LA Metro and Caltrans to benefit quickly from work already completed.

L-8-1

FHBP believes there is alignment with this Project and the lessons learned from both the OCTA and DRECP mitigation programs as it relates to the High Desert Corridor. The Project could, with limited effort, replicate an advanced mitigation program for this transportation improvement project because the templates exist to create such a program, the conservation planning has already been done, and the permitting agencies are already involved.

Additionally, creating an advanced mitigation program for this Project (and potentially others in the queue) would support the Advance Mitigation Framework Policies adopted in June 2012 by the Southern California Association of Governments (SCAG) in its Regional Transportation Plan and Sustainable Communities Strategy. **(See Attachment 4)** It would also advance the Joint Work Program Memorandum of Understanding between SCAG and LA Metro. **(See Attachment 5)**

In its present form, the Project fails to utilize new, more thoughtful and biologically enhancing mitigation approaches. Unlike the business-as-usual approach recommended in the Project's mitigation measures (pages 3-429 through 3-431), a landscape level approach allows broad ecosystem wide processes and functions to remain intact and enhances biological diversity and species richness. Interestingly, the proposed Project is wholly contained within the DRECP boundary **(See Attachment 6)**. Caltrans and LA Metro can benefit from the research, monitoring, and science already completed for the DRECP mitigation effort. We refer you to the high value conservation lands recognized in the DRECP plan. **(See Attachment 7)** We recommend LA Metro and Caltrans request becoming a Plan Participant to allow for meaningful environmental mitigation.

We would welcome an opportunity to discuss these conservation programs with you at your earliest convenience and to facilitate a conversation about steps to quickly benefit from work already completed by federal and state agencies.

2

Finally, the Project fails to address the impacts to the Significant Ecological Areas (SEA) as designated by the County of Los Angeles. SEAs are land use designations given to areas that "contain irreplaceable biological resources" (LA County Department of Regional Planning, http://planning.lacounty.gov/sea/). **(See Attachment 8)** This program's objective is to protect biologically diverse areas that can maintain ecosystem functionality. Other than mentioning the SEA designation's existence in a Table (3.1.1.-2), the proposed Project's mitigation measure ignores this land use designation and the impacts to the region's biological resources. This is another opportunity missed in the DEIR/DEIS. L-8-2

Thank you again for the opportunity to provide these comments. In addition, please keep FHBP informed of all notices, hearings, staff reports, briefings, meetings, and other events related to the proposed Project. This request is filed pursuant to Public Resources Code section 21092.2. The requested notices should be mailed to the following individual at this address:

Melanie Schlotterbeck
Friend of Harbors, Beaches and Parks
P.O. Box 9256
Newport Beach, CA 92653

Sincerely,

Jean H. Watt

Jean H. Watt
President

cc: Osama Megalla, Caltrans
Robert Machuca, LA Metro
Jacob Lieb, LA Metro

ENCLOSURES:

Attachment 1: Orange County Transportation Authority's Environmental Mitigation Program Factsheet
Attachment 2: Providing Best Available Science for Planning for Renewable Energy and Conservation in California's Deserts Factsheet
Attachment 3: Desert Renewable Energy Conservation Plan Conservation Strategy Factsheet
Attachment 4: Southern California Association of Governments 2012 Regional Transportation Plan and Sustainable Communities Strategy
Attachment 5: LA Metro/Southern California Association of Governments Joint Work Program Resolution (July 2012)
Attachment 6: DRECP Boundary Map
Attachment 7: DRECP High Priority Conservation Areas
Attachment 8: LA County's Proposed Significant Ecological Area Map

3

Response to Comment L-8

Comment Code (Topic)	Response
L-8-1 (Biology)	Caltrans thanks you for participating in the environmental process for the High Desert Corridor Project. The Final EIR/EIS presents impacts to natural resources and related mitigation measures to reduce those impacts. Included in those mitigation measures are the purchase, restoration, and preservation of natural lands. These mitigation measures will be initiated upon project funding and prior to start of construction. The Desert Renewable Energy Conservation Plan (DRECP) has been reviewed and elements incorporated.
L-8-2 (Biology)	The Final EIR/EIS has been amended to include a discussion on Los Angeles County's Significant Ecological Areas and any impacts to those areas. Refer to Section 3.3.1 for this discussion.

Comment L-9

L-9

SOUTHERN CALIFORNIA EDISON
An EDISON INTERNATIONAL™ Company

Nancy Jackson
Local Public Affairs
12353 Hesperia Road
Victorville, CA 92395

December 2, 2014

Ronald Kosinski, Deputy District Director
Caltrans District 7, Division of Environmental Planning
100 South Main Street
Los Angeles, CA 90012
ron_kosinski@dot.ca.gov

Re: High Desert Corridor Project Draft EIR/EIS

Dear Mr. Kosinski:

Southern California Edison (SCE) appreciates the opportunity to review and provide comments on the Draft Environmental Impact Report/Environmental Impact Statement (EIR/EIS) for the High Desert Corridor Project (HDC). The proposed project is a Strategic Multipurpose corridor that might include highway, tollway, High Speed Rail (HSR), bikeway and green energy production/transmission elements extending 63 miles between State Route 14 in Los Angeles County and State Route 18 in San Bernardino County. The HDC considers five alternatives--No Build Alternative and four build alternatives below:

- Freeway/Expressway Alternative
- Freeway/Tollway Alternative
- Freeway/Expressway with HSR Feeder Service
- Freeway/Tollway with HSR Feeder Service

SCE's Electrical System

SCE operates and maintains a transmission system that consists of multiple electric transmission lines and substations. Within the project area, the HDC crossings of SCE's transmission lines would include, but not limited to, the following:

- Little Rock-Wilsona 66 kilovolt (kV) line (by Longview Rd & E Palmdale Blvd in Lake LA section)
- Kramer-Lugo No.1 & No.2 220 kV lines (by Air Expy Blvd & Raccoon Ave in Adelanto-Victorville section)
- Kramer-Victor & Victor-Roadway 115 kV lines (by Air Expy Blvd & Montezuma St. in Adelanto-Victorville section)
- Victor-Black Mtn.-Soport-Southcap-Southdown 115 kV line (by city of Mojave Heights in Adelanto-Victorville section)
- Victor-Rivertex 115 kV line (by city of Mojave Heights in Adelanto-Victorville section)
- Caldwell-Victor 220 kV line (by city of Mojave Heights in Adelanto-Victorville section)

Draft EIR/EIS contains incorrect references to SCE's transmission lines and SCE is requesting the following corrections:

1. Page 3-252, paragraph two. The Ivanpah Solar Electric Generating System Project is in service. Therefore, the Eldorado-Baker-Coolwater-Dunn Siding-Mountain Pass 115 kV Transmission line should be replaced with Ivanpah-Baker-Coolwater-Dunn Siding-Mountain Pass transmission 115 kV line and Eldorado-Ivanpah No.1 and No.2 220 kV transmission lines. L-9-1
2. Page 3-253. The SCE Kramer-Victorville Power Lines are actually the Kramer-Victor, Kramer-Roadway, and Victor-Roadway 115 kV transmission lines. The HDC only crosses the Kramer-Victor and Victor-Roadway 115 kV transmission lines; not Kramer-Roadway 115 kV transmission line.

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High Desert Corridor Project Draft EIR/EIS
Page 2 of 3

3. There are numerous references to the Edison Company Boulder Dam-San Bernardino 115 kV Transmission Line, which is actually called the Ivanpah-Baker-Coolwater-Dunn Siding-Mountain Pass 115 kV transmission line. This transmission line loosely parallels the 15 freeway between Daggett and Primm and is approximately 30 miles northeast of the HDC's eastern end point. Given this, all the references to this transmission line within the Area of Potential Effect (APE) are incorrect (pages 3-237, 3-260, 3-589, and S-12).
4. On Page 3-263, the Draft EIR/EIS discusses the SCE Kramer-Victorville Power Lines and Towers, which are the Kramer-Victor and Victor-Roadway 115 kV transmission lines. It states that "two transmission line towers, which would be considered character-defining features, are located within the APE but would not require displacement or relocation as part of the project." The HDC would cross under these transmission lines and may impact the vertical and horizontal clearances for the transmission line towers (see discussion below regarding safety and General Order 95). These towers may require modification to ensure compliance with vertical and horizontal clearances. L-9-1 (con't)

Supporting SCE Electrical Infrastructure and Interconnection

In order to determine electrical infrastructure necessary to support the proposed HDC, SCE requests that Caltrans and Metro submit a signed Method of Service (MOS) agreement to SCE and pay engineering fees for an electrical service study. L-9-2

Page 2-18 of the Draft EIR/EIS discusses suitable installation of solar generation in specific areas, such as highway interchanges and/or utility substations. Not all areas within SCE's substations may be suitable for installation of solar generation and SCE would need to provide approval of such uses (see section "Real Properties Review of Site Plans"). L-9-3

The Draft EIR/EIS Page 3-573 mentions that the Palmdale Hybrid Power Project is "awaiting Power Purchase Agreement (PPA) with Southern California (SCE) before beginning construction." SCE is not aware of any such PPA negotiations. L-9-4

Relocation of Transmission Lines

SCE is concerned that the proposed project will require the relocation and modification of SCE's transmission lines and impose constraints on SCE's ability to access, maintain, and operate its existing facilities. In order to identify potential relocation of SCE's electrical facilities, SCE requests more detailed maps and scaled drawings of the highway, expressway, tollway, and rail alignments. For all alignments that are adjacent or intersect SCE transmission lines or facilities, SCE requests information regarding elevations, plans and profiles, grading and drainage plans, and access information. L-9-5

Safety Concerns

SCE is concerned that potential HDC crossings or encroachment of SCE's facilities and rights-of-way may impact SCE's compliance with clearance requirements to General Order (GO) 95, which establishes rules and regulations for the overhead line design, construction, and maintenance. An increase in the ground elevation by the proposed project may require SCE to increase the structure heights to ensure proper vertical and horizontal clearance from thoroughfares, ground, and railroads. The overhead guide wires and related support posts for the HSR's electric train option may impact SCE's compliance with the GO 95 clearance requirements. In addition, the proposed project is in close proximity to airports. SCE is concerned about potential modifications and increased pole or tower heights near the airports may trigger a Federal Aviation Administration Aeronautical Study. L-9-6

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SCE's Regulatory Requirements
The construction, modification, and relocation of SCE's electrical facilities that operate at or above 50 kV may result in potentially significant environmental impacts and are subject to the California Public Utilities Commission's (CPUC) General Order 131-D[1], which contains rules relating to the planning and construction of electric generation, transmission/power/distribution line facilities and substations. Potentially significant environmental impacts from the construction, modification, and relocation of transmission lines should be thoroughly discussed in the Final EIR/EIS. If it is not adequately addressed in the Final EIR/EIS, SCE may be required to pursue a separate, mandatory California Environmental Quality Act (CEQA) review through the CPUC, which could delay approval of the SCE transmission line portion of the project for several years. L-9-7

Real Properties Review of Site Plans
The proposed project should not encroach on SCE's rights-of-way or impose constraints on SCE's ability to access, maintain, and operate its current facilities. SCE's rights-of-way and fee-owned properties are purchased for the exclusive use of SCE to operate and maintain its present and future facilities. Requests for the use of SCE's property should be submitted to the address below. Please forward six (6) sets of plans depicting the proposed project and SCE's facilities and associated land rights. SCE will review all plans on a case-by-case basis, which is based on compatibility with SCE's right-of-way constraints and rights. Approvals or denials will be provided in writing. Prior to finalizing the plan of development, impacts should be consented to and addressed by SCE. L-9-8

Real Properties Department
Southern California Edison Company
2131 Walnut Grove Avenue, G.O.3 – Second Floor
Rosemead, CA 91770

Coordination Meeting
SCE is requesting a meeting with the Caltrans and Metro to help identify potential conflicts between the proposed project and critical SCE facilities. We look forward to working with Caltrans and Metro on this project and minimizing impacts to SCE's electrical system. If you have any questions regarding this letter or would like to schedule a meeting to discuss the project, please contact me at Nancy.Jackson@sce.com or (760) 951-3160. L-9-9

Regards,

Nancy Jackson
Local Public Affairs Region Manager
Southern California Edison Company

[1] http://docs.cpuc.ca.gov/PUBLISHED/Graphics/589.PDF

Response to Comment L-9

Comment Code (Topic)	Response
L-9-1 (Cultural)	Thank you for providing comments. Your identification of the name of transmission line segments is appreciated and revisions have been made in the Final HDC EIR/EIS. However, it should be noted in some document locations the name of a particular transmission line segment is referred to by the name as previously used by archaeologists and which is already on file with the California Historical Resources Information System and the Office of Historic Preservation.
L-9-2 (Utilities)	Although the HDC is being proposed as an energy neutral facility, it is likely that interim power from the existing utility grid will be required until Green Energy technology advances to the point where an energy neutral corridor is achieved. Therefore, it is possible that Caltrans will need to utilize electricity from SCE's Victor Substation. Although there is a brief discussion of how a potential connection might work in Section 3.1.5 of the Final EIR/EIS, the exact details will be determined during the final design phase of the project. Those details will be outlined in a Method of Service (MOS) agreement that will be obtained at that time. Caltrans and/or Metro will contact SCE to obtain additional information and an estimated cost of the MOS.
L-9-3 (Utilities)	The selection of appropriate green energy facilities, including types and locations, will be made during the final design phase of the project. If necessary, a supplemental environmental document will be prepared. Caltrans and Metro will coordinate with all utility providers to obtain necessary approval if encroachment or uses of the respective utility facilities are required.
L-9-4 (Utilities)	Caltrans has email confirmation (May 2014) from a City of Palmdale planner, as well as newspaper articles from 2012 and 2013, that discuss a power purchase agreement.
L-9-5 (Utilities)	It is Caltrans' and Metro's goal to construct the HDC in a way that does not impair SCE's ability to access, maintain and operate its facilities. Caltrans and Metro will work closely with SCE and will provide SCE with the information requested for the Preferred Alternative so that any potential constraints can be identified early and addressed to the satisfaction of all parties.
L-9-6 (Utilities)	Caltrans and Metro will coordinate with SCE to ensure that all aspects of the HDC comply with General Order (GO) 95 clearance requirements. In addition, the Federal Aviation Administration (FAA) clearance requirements for tower locations will be evaluated; coordination with FAA will be conducted as needed.
L-9-7 (Utilities)	The comment refers to the construction, modification, or relocation of power lines, substations, and transformers. Construction would presumably refer to those electric power facilities needed to support elements of the HDC Project, while modification or relocation would refer to existing power lines that would need to be modified in some way or relocated to

Comment Code (Topic)	Response
	implement the project. Please see Section 2.1.4 of the Final EIR/EIS (Interim Utility Connection) for the information about the potential interim utility connection. With respect to the possible relocation of existing power lines over 50 kV, CPUC GO 131-D exempts from permitting requirements (and thus from CEQA review) those relocations of less than or equal to 2,000 linear feet. Of the more than 100 potential relocations identified in the utilities conflict matrix prepared for the EIR/EIS, all but about eight relocations would be less than 2,000 feet. The potential environmental effects of relocating existing power lines over 50kV have been addressed in the Final EIR/EIS to the extent practicable based on the design information available at the present time. With respect to the potential modification of existing power lines, such modifications would consist chiefly of increasing the height above ground of the lines passing over the HDC to maintain consistency with CPUC GO 95. The HDC corridor would be elevated above the existing terrain by approximately 12 feet, so some power lines (and power line towers) may need to be increased in height by up to 12 feet. These modifications could have incremental visual impacts and could trigger FAA notification (FAA Form 7460-1) and marking and lighting requirements pursuant to 14 Code of Federal Regulations Part 77. These potential effects of power line relocations are addressed in the Final EIR/EIS.
L-9-8 (Utilities)	The Final EIR/EIS has identified the project's potential conflicts with utilities, including those (overhead and underground power lines) belonging to SCE, and presented a preliminary list of properties to be acquired for the proposed HDC ROW. The actual process of communicating with and negotiating with property owners and acquiring the necessary ROW for the HDC would occur following completion of the environmental review process. Caltrans looks forward to working with SCE to achieve its goals for the HDC Project without adversely affecting SCE's services to the community.
L-9-9 (Utilities)	SCE's request for a meeting with Caltrans and Metro is noted. A coordination meeting took place on June 30, 2015.

Comment L-10

L-10

Town of Apple Valley

A Better Way of Life

December 2, 2014

Ronald Kosinki
Deputy District Director, Caltrans District 7
Division of Environmental Planning
NEPA/CEQA Lead Agency
100 South Main St., MS 16A
Los Angeles, CA 90012

Robert Machuca
Project Manager, High Desert Corridor
Los Angeles County Metropolitan Transportation Authority
One Gateway Plaza, M/S 99-22-9
Los Angeles, CA 90012

Re: Additional Town of Apple Valley Comments on High Desert Corridor Draft Environmental Impact Report/Environmental Impact Statement (EIR/EIS) (Project ID# 071200035/SCH# 2010091084)

Dear Mr. Kosinki and Mr. Machuca:

The Town of Apple Valley (Town) is one of four municipalities that the proposed east-west mobility corridor would cross. The proposed project traverses both portions of the Town and its Sphere of Influence (SOI).

Due to the potential impacts of this project on the Town's past and current planning efforts, the Town is providing the following comments on the draft EIR/EIS for the High Desert Corridor (HDC) *Project ID# 071200035/SCH# 2010091084*.

The Town is situated at the southern edge of the Mojave Desert in the Victor Valley Region of San Bernardino County and would be part of the proposed 27-mile-long Victor Valley segment of the HDC. Sweeping views, dramatic landscapes, and preservation of rural characteristics, combined with thriving business, education, and outdoor recreation opportunities provide the community and over 70,000 residents with an exceptional

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quality of life. The Town is committed to preserving its "Better Way of Life" by implementing its General Plan and protecting its surrounding desert environment.

The MSHCP/NCCP Planning Effort

To provide the necessary protections for its desert environment, the Town is currently working with the U.S. Fish and Wildlife Service and the California Department of Fish and Wildlife (jointly, "Resource Agencies") to complete a Multispecies Habitat Conservation Plan/Natural Community Conservation Plan (MSHCP/NCCP) for the Town, its SOI, and a 63 square mile area to the north of the Town. The Town's MSHCP/NCCP planning area encompasses approximately 265 square miles.

The Town's proposed MSHCP/NCCP is considered a keystone plan, because it provides the framework or building blocks for other communities in the Victor Valley Region to build their own resource conservation planning efforts.

The MSHCP/NCCP is projected to be completed in 2016. The MSHCP/NCCP planning effort should be acknowledged within the HDC draft EIR/EIS. And, because the Town's MSHCP/NCCP process will be completed well in advance of the final design and construction of the Victor Valley segment of the HDC, the key linkages and other environmental features identified in the MSCHP/NCCP should be addressed at the time of the design and avoided to the greatest extent possible. L-10-1

The Town is ideally situated to address the region's landscape conservation needs for climate change and species diversity. Three linkages, the Granite Mountain Corridor (a north-south linkage), the Northern Lucerne Wildlife Linkage (an east-west linkage), and the Mojave River (a north-south linkage), are important features of the landscape, and their preservation will benefit the region by maintaining connectivity for plant and wildlife species and helping to mitigate impacts from climate change. These linkages connect approximately 2.4 million acres of federal lands managed for conservation of species and habitats. Portions of these linkages fall within the Town's MSHCP/NCCP planning area, and they will be fully addressed by the MSHCP/NCCP.

In addition to containing valuable linkages, the Town is also located in an area that was recently identified by the U.S. Geological Survey as one of ten genetic divergence and diversity hotspots in the West Mojave Desert[1]. These areas, due to the high degree of genetic diversity and divergence among species present, can be considered evolutionary hotspots.

To assist with the preparation of the MSHCP/NCCP, the Town has adopted preliminary environmental guidance for projects being developed prior to the adoption of the

[1] Vandergast, Amy G. et al. "Evolutionary Hotspots in the Mojave Desert." Diversity 5 (2013): 293-319.

MSHCP/NCCP. These guidelines are attached. Care should be taken to ensure that the proposed project complies with the Town's environmental guidelines as well as other Town ordinances and policies.

Granite Mountain Corridor

The eastern terminus of the project will likely have indirect effects on the identified Granite Mountain Corridor, which is bisected by SR-18 in Fifteen Mile Valley to the east (this linkage is briefly referenced in the draft EIR/EIS on page 3-416 and 3-417). The Granite Mountain Corridor is a critical landscape level linkage connecting coastal and desert ecosystems and species, including big horn sheep, American badger, desert woodrat, and Joshua trees.

L-10-2

At present, there are no wildlife crossings provided for wildlife to traverse SR-18 at this location. It is anticipated that the HDC, once built, will result in increased traffic through this important linkage area, increasing impacts to wildlife and possibly reducing or eliminating the use of this corridor by some species. Therefore, the Town requests that the final EIR/EIS fully analyze the impacts of the proposed project on this linkage and provide a crossing that will ensure the continued use of the linkage by all species that currently or potentially could use it. Because big horn sheep use this linkage, one of the crossing options that should be considered is an overcrossing.

Northern Lucerne Wildlife Linkage

If the alternative selected includes a High Speed Rail (HSR), the proposed project may also impact the Northern Lucerne Wildlife Linkage when the proposed HSR feeds into the Xpress West project. Specifically, the MSHCP/NCCP has identified the Northern Lucerne Wildlife Linkage as an important regional linkage for multi-generational wildlife movement within the region, as it includes the only natural wash to cross under I-15 from the Mojave River, near Victorville, to beyond Barstow (a distance of more than 30 miles).

L-10-3

Maintaining the linkage in its present natural state is critical to mitigating the effects of climate change by providing connectivity between the land to the east and west of I-15 (Brisbane and Turtle Valleys).

In order to ensure that the Northern Lucerne Wildlife Linkage is protected and that the crossing remains natural and undisturbed, potential direct, indirect, and cumulative impacts to this linkage should be analyzed in the final EIR/EIS.

It should be noted that at this time not enough information is available for review to determine if the potential impacts from the proposed HSR feeder would be direct or indirect.

General Comments

1. The Town's concern upon review of the draft EIR/EIS is that it may not accurately describe both the baseline conditions and the potential impacts as well as provide adequate mitigation to address the identified impacts. The document appears sparse and the technical reports and appendices were not readily available for a comprehensive review. L-10-4

2. It is impossible to fully provide comment on the biological impacts analyzed within Section 3.3, Biological Environment, and how they will affect the Town's MSHCP/NCCP without the accompanying Natural Environment Study (NES) prepared for the project. The NES provides all the technical information necessary, including maps and studies, to adequately understand the analysis provided in the section. The NES is referenced a minimum of seventeen times within the section yet was bound separately from the draft EIR/EIS and was not made readily available for public review. L-10-5

   The Town's consultants requested the NES on November 25, 2014, and received a copy electronically on December 1, 2014. However, the technical appendices, maps, and figures to the NES were not included in the electronic copy. Therefore, the comment time should not be closed at this time, in order to allow adequate time for the Town to review this document and its appendices, maps, and figures.

3. Common species addressed by both the Town's MSHCP/NCCP and the HDC's draft EIR/EIS are listed in the table below (a complete list of the Town's MSHCP/NCCP preliminary Proposed Covered Species list is attached): L-10-6

Common Name	Scientific Name	State Status	Federal Status (Listing Rule)
	Plants		
Booth's evening primrose	*Camissonia boothii ssp. boothii*	CNPS List 2	
White pygmy-poppy	*Canbya candidta*	S3.2	
	Birds		
Burrowing owl	*Athene cunicularia*	SSC	
Cooper's hawk	*Accipter cooperii*	SSC	
Golden eagle	*Aquila chrysaetos*	Fully Protected	Bald and Golden Eagle Protection Act; Migratory Bird Treaty Act
Le Conte's thrasher	*Toxostoma lecontei*	SSC	
Least Bell's vireo	*Vireo bellii pusillus*	Endangered	Endangered (51 FR 16474 16482)
Loggerhead shrike	*Lanius ludoviciarius*		
Northern harrier	*Circus cyaneus*	SSC	
Prairie falcon	*Falco mexicanus*	SSC	
Southwestern willow flycatcher	*Empidonax traillii extimus*	Endangered	Endangered (60 FR 10693 10715)
Summer tanager	*Piranga rubra*	SSC	

Common Name	Scientific Name	State Status	Federal Status (Listing Rule)
Swainson's hawk	*Buteo swainsoni*	Threatened	
Yellow-breasted chat	*Icteria virens*	SSC	
Yellow warbler	*Dendroica petechia brewsteri*	SSC	
Mammals			
Mohave ground squirrel	*Xerospermophilus mohavensis*	Threatened	
Mohave river vole	*Microtus californicus mohavensis*	SSC	
Reptiles			
Agassiz's desert tortoise	*Gopherus agassizii*	Threatened	Threatened (55 FR 42270 42278)
Coast (San Diego) horned lizard	*Phrynosoma coronatum blainvillii*	SSC	

L-10-6 (con't)

As stated above in comment 3, it is impossible to determine the impacts caused to these species by the proposed project without the maps, figures, and studies referenced in the technical appendices to the draft EIR/EIS and NES.

4. The Town is working collaboratively with San Bernardino County and neighboring jurisdictions to preserve the landscape level linkages, discussed above, that are identified in the Town's MSHCP/NCCP. Maintenance of these linkages is important to the overall health of the region as they will allow natural communities and individual species, both plant and animal, to respond and adjust to natural and unnatural stressors across their range, including adapting to a changing climate. Impacts to the linkages identified by the Town's MSHCP/NCCP by the project should be avoided or fully minimized and mitigated.

   The draft EIR/EIS notes that the project site is "located within a large contiguous open space area of the Mojave Desert… and as such, there are no regional corridors linking two or more non-contiguous areas of natural habitat…" (page 3-416, paragraph 6). As a result of the project being located largely in well-connected desert habitat, the draft EIR/EIS states on page 3-425 (paragaph 9) that permanent impacts may occur to wildlife movement corridors for gray fox, kit fox, coyote, American badger, and bobcat, and that the project has the potential to crate a barrier to wildlife movement locally. Although the draft indicates impacts to wildlife movement corridors for species known to migrate daily and/or seasonally, it does not address impacts caused by largely bisecting connected habitat and disrupting the ability of the natural communities impacted to adapt to changing conditions, including climate change.

L-10-7

5. In Section 3.3, Biological Environment, review of the avoidance, minimization and mitigation measures for each species/affected resource would be easier if the mitigation measure(s) were clearly referenced in the discussion of the impacts. This was done in parts of Section 3.3.4, Animal Species (see silvery legless lizard, page 3-490, paragraph 4, line 4: "Avoidance and minimization measures **BAN-1**

L-10-8

and **BAN-5** should be implemented. [emphasis added]"), but not consistently through the section.

6. Please provide a figure comparing federal and state jurisdictional areas for review in the final EIR/EIS. L-10-9

Specific Comments

7. Riparian Woodland, page 3-424, paragraph 4, lines 2-7: "…the proposed roadway is expected to be spanning the river on a bridge with no footings within the river, no direct impacts to this plant community are expected to occur. There will be a shadowing effect to this community from the bridge and abutment structures. Because of this indirect impact the plant community below is expected to degrade. ***The total 28 acres of this community should be considered a permanent loss as a result*** [emphasis added]."

   Given that the initial statement indicates that the indirect impacts of shading to riparian woodland communities is likely to result in the permanent loss of this habitat type, the analysis provided in the following sections appears inconsistent with this finding. The analysis indicates that impacts will avoided, minimized, and reduced as feasible across the various project alternatives.

   Additionally, BNC-4 (page 3-430) does not adequately minimize or mitigate the loss of this habitat type due to the acknowledged shading affects. While BNC-4 states that riparian woodland will be preserved in place as feasible and impacts will be avoided with the design of a span bridge over the river, the impact associated with the shading does not appear to be addressed. L-10-10

8. Non-native Plants, page 3-428, paragraph 3: A recent study conducted by Heather Schneider and Kristin Berry[2] showed that non-native plant abundance was positively associated with proximity to roads in the Mojave Desert. The study notes that the disturbances associated with roadsides favor the spread of invasive plants. What minimization measures will be implemented to slow the dispersal of non-native plants throughout the region along the proposed project route? L-10-11

9. BNC-1, page 3-429, paragraph 5, line 1: Please replace the word "like plant communities" with "native plants representative of the communities present." L-10-12

[2] Schneider, Heather E. and Kristin H. Berry. (2014, February). "Primary and Secondary Roads as Conduits for the Recent Invasion of *Brassica tournefortii* (Sahara mustard) in the Mojave Desert." Paper presented at the Desert Tortoise Symposium, Ontario, CA.

10. Birds, 3-489, paragraphs 3-4: Text indicating which birds were seen/not seen during project visits and focused surveys conflicts with presence/absence information provided in Table 3.3.4-1: Special-Status Wildlife Species with Potential to Occur in the Biological Study Area (page 3-486).

    Text on page 3-489 indicates that only Cooper's hawk, northern harrier, tricolored blackbird, short-eared owl, and burrowing owl were seen within the project area during site visits and are expected to use the area. Table 3.3.4-1 indicates that Cooper's hawk **was not seen** within the project area and that tricolored blackbird, northern harrier, burrowing owl, short-eared owl, loggerhead shrike, LeConte's thrasher, summer tanager, and yellow warbler **were seen** in the project area during site visits and focused surveys. This inconsistency should be corrected.

    These inconsistencies continue during discussion and analysis of impacts to each species (beginning on page 3-493 and ending on page 3-502) with the following discussions being inconsistent with Table 3.3.4-1:

    - Cooper's hawk (page 3-493) text indicates an individual was observed on site visits and Table 3.3.4-1 indicates no individuals were observed during site visits.
    - Prairie falcon (page 3-494) text indicates that an individual was observed during site visits and Table 3.3.4-1 indicates no individuals were observed during site visits.
    - LeConte's thrasher (page 3-494) text indicates no individuals were noted during site visits and Table 3.3.4-1 indicates that it was observed during focused surveys.
    - Summer tanager (page 3-501) text indicates that no individuals were noted during site visits and Table 3.3.4-1 indicates that it was observed in the Mojave River during site visits.
    - Yellow warbler (page 3-502) text indicates that no individuals were noted during site visits and Table 3.3.4-1 indicates that it was observed in the Mojave River during site visits.

L-10-13

11. Southwestern Willow Flycatcher and Least Bell's Vireo, page 3-527 and 3-528, paragraph 4 and paragraph 1: Variation E has the potential to substantially affect nesting populations of southwestern willow flycatcher and least Bell's vireo within the Mojave River. The section notes that consultation with USFWS is ongoing regarding these species but does not adequately discuss the impacts to the species or possible avoidance, minimization, or mitigation measures. Discussion of impacts should include noise impacts on the species and not just degradation or loss of habitat.

L-10-14

12. Discussion in Section 3.3.4, Animal Species, and 3.3.5, Threatened and Endangered Species, does not clearly identify riparian obligate species that will be impacted by the permanent loss of 28 acres of riparian habitat noted on page 3-424. Text indicates that the following species are riparian obligates: Mohave river vole, yellow warbler, and western yellow billed cuckoo. However, southwestern willow flycatcher, least Bell's vireo, and summer tanager are also riparian obligates and should be noted as such. L-10-15

13. Several Avoidance, Minimization, and Mitigation Measures provided indicate that species habitat will be re-established within "***temporary impact zones between the highway and edge of ROW.***" (See BTE-9, page 3-533 for an example). Please clearly define this area and if it has the potential to be impacted again at a later date due to maintenance activities or by future expansion of the roadway. L-10-16

In closing, the Town looks forward to working with Caltrans and Metro to resolve any issues impacting the Town's resources and will be providing additional comments on the NES when it becomes available in its entirety. The Town also appreciates the opportunity to review the final EIR/EIS when it is available.

Thank you for the opportunity to provide comments. If you would like additional information on Town's MSHCP/NCCP, please contact me at (760) 240-7000, ext. 7204 or email me at llamson@applevalley.org.

Sincerely,

Lori Lamson

Lori Lamson
Assistant Town Manager
Community and Development Services

Response to Comment L-10

Comment Code (Topic)	Response
L-10-1 (Biology)	The Town of Apple Valley's draft Multispecies Habitat Conservation Plan/Natural Communities Conservation Plan (MSHCP/NCCP) was reviewed and a discussion on consistency is included in the Final EIR/EIS. Refer to Section 3.3.1 for this discussion. Caltrans acknowledges these three important wildlife movement linkages and they are specifically addressed in the discussion. The resources identified in the MSHCP/NCCP will be considered during the final design process.
L-10-2 (Biology)	A more detailed discussion of the expected traffic volume leading to SR-18 and the resulting potential impacts to wildlife using Granite Mountain Corridor is included in the Final EIR/EIS. This additional discussion can be viewed in Section 3.3.1 of the Final EIR/EIS.
L-10-3 (Biology)	A more detailed impact analysis is provided for the alternatives that include High-Speed Rail. An alternative that includes high-speed rail has been selected as the Preferred Alternative, so is it possible that impacts to the Northern Lucerne Wildlife Linkage could occur. The current design of the proposed project includes a viaduct over this area to avoid or minimize direct impacts. Additional indirect and cumulative impact analysis is included and can be viewed in Section 3.3.1 of the Final EIR/EIS.
L-10-4 (Biology)	The EIR/EIS has been updated to include additional discussion on existing conditions and analysis of potential impacts in Sections 3.3.1, 3.3.2, 3.3.3, 3.3.5, and 3.3.5. Related mitigation measures are also included and can be viewed in the Final EIR/EIS. All final technical reports and appendices are available for your review on the Caltrans HDC website.
L-10-5 (Biology)	The final technical reports and appendices are available for review at the Caltrans HDC Project website.
L-10-6 (Biology)	Maps, figures, and studies referenced in the technical appendices to the Final EIR/EIS and NES have been made available for review and can be found at the Caltrans HDC Project website. Technical supporting documents and the EIR/EIS have been updated to include information from the Town of Apple Valley and other resources.
L-10-7 (Biology)	A more detailed discussion about wildlife movement corridors, both local and regional, and wildlife travel routes, local and regional, is presented in the Section 3.3.1 of the Final EIR/EIS. This discussion includes a distinction between corridors that connect otherwise separate areas of suitable habitat and travel routes within contiguous habitat. Areas with identified travel routes and corridors in the Town's MSHCP/NCCP have been identified and included in the Final document.
L-10-8 (Biology)	Your comment is noted and revisions have been made in the Final HDC EIR/EIS.

Comment Code (Topic)	Response
L-10-9 (Biology)	The EIR/EIS has been revised per your request. Figures 3.3.2-1 and 3.3.2-3 of the Final EIR/EIS depict federal and state jurisdictional areas located within the project study area.
L-10-10 (Biology)	Because the height and design of the bridge will be approximately 80-100 feet above ground, with spacing between opposing lanes, shading of the water and plants below is expected to be minimal. Please refer to an updated Section 3.3.1 of the Final EIR/EIS which discusses impact analysis to the riparian woodland plant community. In addition, this area is designated as critical habitat for southwestern willow flycatcher, and Caltrans has been coordinating with the U.S. Fish and Wildlife Service (USFWS) concerning evaluation of impacts to this resource. A biological assessment has been prepared and provided for USFWS and a biological opinion has been produced by USFWS. The consultation process is summarized in Chapter 5 of the Final EIR/EIS.
L-10-11 (Biology)	Avoidance and minimization measures that will be implemented to slow the dispersal of non-native plants throughout the project corridor can be found in Section 3.3.6 of the Final EIR/EIS. Areas along road shoulders that commonly have a higher amount of non-native invasive plants are those areas that are regularly maintained. These maintenance areas are included within the permanent impact calculations and mitigation measures have been developed to compensate for the permanent conversion to a habitat with lower biological value.
L-10-12 (Biology)	BNC-1 in Section 3.3.1 of the Final EIR/EIS reflects the proposed edit.
L-10-13 (Biology)	Section 3.3.4 of the Final EIR/EIS has been edited to correct these inconsistencies.
L-10-14 (Biology)	Variation E has been eliminated from the proposed project and is no longer being evaluated. Additional discussion in the impact analysis for these two species is included for each remaining alternative.
L-10-15 (Biology)	Section 3.3.4 of the Final EIR/EIS has been revised to include the following additional riparian obligate species: southwestern willow flycatcher, least Bell's vireo, and summer tanager.
L-10-16 (Biology)	The permanent and temporary impact areas are depicted in Section 3.3.5 in the Final EIR/EIS. Areas that will be maintained are included in the permanent impact calculations. Any future expansion of this highway would occur in the median and the impacts are already considered to be permanent.

Comment L-11

Submitted electronically by California Ocean Outfall Group

L-11-1

Do not do this project. The ecosystem will not be protected. The biological integrity of the area is more important than the highway-

L-11-2

It doesn't take a scientist to know the desert is one of a kind, irreplaceable and precious. No highway.

Response to Comment L-11

Comment Code (Topic)	Response
L-11-1 (Biology)	Your comment against the proposed project is noted. Please refer to Section 3.3 (Biological Environment) for a discussion of potential impacts to biological resources along with the Avoidance, Minimization and Mitigation measures that have been proposed to address them.
L-11-2 (Cumulative)	Your support to the No Build Alternative is acknowledged. Caltrans shares your concern and desire to preserve the desert environment. Wherever possible, we have altered the design of the project to avoid impacts to the environment. We have also added numerous minimization and mitigation measures to lessen the severity of impacts where they cannot be avoided.

Comment L-12

Submitted electronically by California Historic Route 66 Association

L-12-1

As primary guardian and promoter of Route 66 heritage tourism and related economic development along the Route 66 corridor in this state, the California Historic Route 66 Association is extremely interested in the High Desert Corridor Project, proposed for the Victor Valley area.

We greatly appreciate your recent community outreach in Apple Valley regarding the project. Your November 13, 2014 meeting was well presented with many good visuals and quality assistance during and after the program.

As you may know, we are currently working with the Bureau of Land Management (BLM) to produce a Corridor Management Plan for the 153-mile section of Route 66 between Needles and Barstow, which is funded by a grant from the Federal Highway Administration (FHWA). This is an essential step in achieving National Scenic Byway designation. We anticipate beginning the same process for the historic corridor from Barstow to the city of San Bernardino within the next two years, most likely in cooperation with the National Park Service Route 66 Corridor Preservation Program. The eventual goal is designation of the entire 318-mile California corridor of Route 66 as a National Scenic Byway.

Although the proposed High Desert Corridor project (with its high speed rail extension) will cross Route 66 (National Trails Highway) and the Mojave River at a very important historical site for the Victor Valley, and will impact the historic viewscape, our position is not one of opposition. We do ask, however, for the opportunity to meet with your team of specialists to assure that everything that can be done will be done to minimize and/or mitigate the negative impact on tourism and the environment.

Our vision for the High Desert Corridor project is to maintain historic character of the Route 66 corridor while facilitating transportation progress for the next generations.

Glen Duncan, President

California Historic Route 66 Association

Response to Comment L-12

Comment Code (Topic)	Response
L-12-1 (Cultural)	The HDC Project will be designed to respect the existing visual context of the area. Changes to the viewscape will be ameliorated where possible with landscaping in keeping with the natural and historic character of the area. We have analyzed the potential impacts of the project on historic Route 66 and concluded that there will be No Adverse Effect under Section 106 of the National Historic Preservation Act. We will endeavor to preserve the environment in keeping with its natural and historic character to the extent possible. Completion of this project will improve access and allow more tourism to occur, and with greater safety. We will be glad to coordinate closely with the California Historic Route 66 Association to ensure no adverse impacts would occur to Route 66. Caltrans is pleased to meet with a representative of the California Historic Route 66 Association to discuss the project design elements to ensure no negative impacts on tourism and the environment would occur. The meeting should be scheduled prior to the final design phase of the project.

Comment L-13

LUCERNE VALLEY ECONOMIC DEVELOPMENT ASSOCIATION (LVEDA)

To: Ronald J. Kosinki, RK
Division of Env. Planning - Project #80
Caltrans, District 7
100 S. Main St. MS-16A
Los Angeles, CA 90012

From: Chuck Bell, Pres. chuckb@sisp.net 760 964 3118
P. O. Box 193
Lucerne Valley, CA 92356

Date: 12/1/14

RE: HIGH DESERT CORRIDOR – Draft EIS/EIR

Impact of "High Desert Corridor Project" on Lucerne/Johnson/Morongo Valleys.

Under the current project description – which includes the Apple Valley link between I-15 and Hwy. 18 – the Corridor's eastern terminus with its 4 to 6 lanes dumps traffic on 2 lane Hwy 18 (with a significant ADT increase in both directions due to the Corridor's link between I-14 and the I-10) – which will create significant congestion and safety hazards on Hwys. 18, 247 and 62 along the route to the I-10. This is a current 'trade corridor' with increasing truck traffic that will be significantly increased due to this project - that has to be addressed in its entirety. CEQA requires that a project's impacts - even outside a project's boundaries – must be assessed and mitigated. This draft EIR doesn't even reference said obvious impacts – which will make it vulnerable to litigation. The solution would be to incorporate improvements to these eastern segments in the HDC's planning and financing (ie: a minimum of 4 lanes – wider lanes – turn pockets – shoulder improvements – etc.). Without said planning and a financing link to the project, the Corridor EIR's "off-site" analysis for these eastern segments will have to show a "significant adverse environmental impact" that will be impossible to ignore with "findings of overriding consideration". L-13-1

The only good solution is to ELIMINATE THE APPLE VALLEY LINK BETWEEN I-15 AND HWY.18 – not realistic anyway due to cost of bridging the Mojave River, etc, etc. Many agency and AV Town representatives don't even know why it is still included. But as long as it remains – the project is vulnerable to litigation. L-13-2

Response to Comment L-13

Comment Code (Topic)	Response
L-13-1 (Traffic)	The "Route Concept Fact Sheet" for SR-18, prepared by Caltrans District 8, dated March 2002, outlines the route concept requirements for year 2020, operational improvements, and the ultimate transportation corridor. A widened SR-18 is identified as part of the ultimate transportation corridor when traffic volumes and other conditions warrant. The existing level of traffic between Lucerne Valley and the Bear Valley cutoff is 9,400 vehicles per day over the course of the year (Annual Average Daily Traffic). This volume of traffic does not warrant widening of the facility in this segment, other than for passing lanes and/or intersection improvements which may be deemed appropriate upon further investigation. Forecast traffic volumes for 2040, the design year of the HDC freeway/expressway, indicate that daily traffic volumes will more than double compared to existing use. This will occur with or without construction of the HDC. A four lane conventional highway or 4-lane expressway would be an appropriately sized facility to accommodate that level of traffic volume. As highway widening projects take years to develop and finance, requests to consider such a project should be coordinated through SANBAG and Caltrans District 8. Please also see also Response to Comment B-2-1.
L-13-2 (Traffic)	The Mojave River is west of I-15 and will have to be bridged whether the connection to SR-18 is built or not. This connection is included in the Town of Apple Valley's 2009 General Plan, which was adopted by the Town Council in August of that year. In addition, the Town is a member of the HDC Joint Powers Authority and representatives from the Town have been involved in numerous planning discussions concerning the project over the past several years.

Comment L-14

Submitted electronically by Newberry Springs Community Alliance

L-14-1

The Newberry Springs Community Alliance contests the DEIR/EIS being worked on this project at this time.

- The High Desert Corridor is currently a random wish list of components that hold a significant environmental impact depending upon how the components MIGHT or MIGHT NOT be combined.
- Visual/Aesthetics are dependent upon location and design which currently is unknown.
- Therefore, as the precise route and the composition of the proposed corridor is not fully determined, the community, cultural, noise, biological, construction, hydrology, and many other cumulative impacts cannot be accurately analyzed nor known.
- Unfunded, the High Desert Corridor only represents a collage of random ideas. As each component of the proposed corridor is only a possibility, a DEIR/EIS cannot be properly done at this time until a total package is presented for study.
- As the High Desert Corridor planning appears to be taking improper premature steps to circumvent the California Environmental Quality Act, and the National Environmental Policy Act, we reject the project and request a NO BUILD position.
- Pressing for Measure R funds by doing a premature DEIR/EIS before knowledge of what the project will actually consist of is simply faulty planning.

Response to Comment L-14

Comment Code (Topic)	Response
L-14-1 (Design)	As discussed in Section 1.1.2 of the Final EIR/EIS discussed, increasing traffic and safety concerns caused public officials to consider the possibility of adopting a new alignment for SR-138 and the first study was initiated back in 1993. It is a typical part of the planning process to integrate all necessary elements into the project during the project development phase. Therefore, it is not a random wish list of various components as indicated by the commenter. The project alternatives evaluated in the Final EIR/EIS contain adequate design elements to analyze impacts to various environmental resources as a result of the construction and implementation of the Preferred Alternative. It is true that design modification and design details of some project components could occur after the Final EIR/EIS is certified, in which case an environmental re-evaluation would be conducted to comply with the requirements of the California Environmental Quality Act (CEQA) and the National Environmental Policy Act (NEPA). According to the Federal Highway Administration, funding for a large project such as this needs to be identified before approval of the Record of Decision. It does not need to be identified prior to, or during circulation of the Draft EIR/EIS.

Comment L-15

L-15

SOUTHERN CALIFORNIA TIMING ASSOCIATION

Southern California Timing Association

P.O. Box 10
Orosi, CA 93647
office@scta-bni.org

Mr. Karl Price
Senior Environmental Planner
Caltrans - District 7
Division of Environmental Planning 100 South Main Street, MS 16A
Los Angeles, CA 90012

December 2, 2014

Dear Mr. Price:
The Southern California Timing Association operates six Land Speed Racing events at the El Mirage Dry Lake in El Mirage CA. We have been doing this activity since 1937 and we have a worldwide audience that observes what we do at El Mirage and also at our other location the famed Bonneville Salt Flats in Utah.

The point is that we are a well-developed community and we have a vested interest in the preservation of the El Mirage Dry Lake, and its continuation as a place for all off road enthusiasts are able to enjoy their choice of outdoor entertainment.

In the past, developers have not taken into account the importance of mountain run-off that allows for the El Mirage Dry Lake to heal after use by the public. This water run-off is critical to the health of the dry lake bed. This project must consider ways to move the mountain water run-off to reach the El Mirage Dry Lake. The minerals that this run-off contains allow for the lake bed to regain its flat hard surface throughout the year. It is this flat hard surface that attracts so many outdoor users of this land. It is critical to this public land and the HDC must take this into consideration.

The SCTA is requesting information on how this new corridor will address this issue and to give that assurance in writing during the planning of this HDC venture.

Regards,
Scott Andrews
President
SCTA
818.109.8074 Cell

1

Response to Comment L-15

Comment Code (Topic)	Response
L-15 (Hydrology)	Caltrans shares your concern about the preservation of the El Mirage Dry Lake bed. The project team has studied and integrated stormwater runoff management into the design of the project as evidenced by the large number of drainage culverts and bridges (over washes) incorporated into the corridor. These will be used to convey all offsite water through/under the facility. In addition, all onsite water will be treated and then released into the environment via the proposed infiltration basins. With these facilities in place, there should be no adverse effects to the El Mirage Dry Lake.

Comment L-16

Submitted electronically by Inland Empire Biking Alliance

The Inland Empire Biking Alliance would like to share our praise as well as concerns for the HDC as currently proposed. We believe that with a little more effort, a world-class bikeway can be developed that truly suits the intended multimodal nature of the Corridor itself. The attached comments provide a foundation for how such a facility should be designed and the opportunity that it presents for the partners in the project to set an example of a best practice in long-distance bikeway planning and design.

INLAND EMPIRE
BIKING ALLIANCE

Caltrans – District 7
Division of Environmental Planning
100 S. Main St., MS 16A
Los Angeles, CA 90012

Inland Empire Biking Alliance
P.O. Box 9266
Redlands, CA 92375

To Whom It May Concern:

On behalf of the the Inland Empire Biking Alliance, I would like to make the following comments in regards to the Draft Environmental Impact Report/Statement, SCH #2010091084, that has been prepared for the proposed High Desert Corridor ("HDC"). While we are encouraged to see that a freeway proposal is including bike access from the early stages, we still have concerns with several aspects of the project as proposed and the effect it would have on bicyclists. There are several things that can be done to improve on what is proposed and create a multimodal corridor that truly meets the needs of bicyclists, but it must be done properly. The steps and measures necessary for accomplishing this goal are summarized below. L-16-1

The most glaring issue that we have with the proposal is the apparent lack of considering a Class I facility that is of adequate size. In Chapter 2.2.2 Bicycle Access Facility, Figure 2-12 provides an image of what a prototypical bike path configuration would be along the HDC, including the respective minimum and preferred widths of eight and 10 feet. Though these would meet the standards listed in Chapter 1000 of the Caltrans Highway Design Manual, both of those are woefully inadequate to be used on a bikeway that would be the main route across the desert. Both Figures 2-20 and 2-21 show a slight improvement with typical cross-sections that include a 12' Bike Path an unspecified distance from the freeway, but that is still inadequate. L-16-2

As noted in the narrative of 2.2.2 Bicycle Access Facility, bicyclists along the corridors currently face riding conditions that are extremely dangerous. It is not uncommon to see bicyclists clinging to the edge of the strip of asphalt next to an unpaved shoulder that is inches wide, where they must contend with heavy traffic passing in close proximity at high speeds. Additionally, the sight of mothers pushing their children in strollers through the sand of the shoulders is not uncommon either. The obvious safety hazards and equity issues with that are innumerable. It is hoped that by constructing a bikeway as part of the HDC, those instances can be greatly reduced and biking conditions be improved. However, it is L-16-3

irresponsible to not recognize that Class I bikeways are often popular with other users such as walkers, skaters, runners, equestrian riders, and potentially even neighborhood electric vehicles ("NEVs"). In areas such as the High Desert where few other alternatives for non-motorized travel exist, these concerns are heightened by the lack of options. L-16-4

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Therefore, the Department needs to provide a facility that will be able to serve all potential users. Sticking signage on the bikeway stating "NO PEDESTRIANS/EQUESTRIANS/NEVs" does not fulfill that requirement. To allow for all potential users in a manner that reduces conflicts, the bikeway needs to be wide enough to allow four-abreast riding for the bidirectional portions or three-abreast riding for one-directional pathways. Such a bikeway is at least 14' wide in the former situation or 11' wide in the latter. Additionally, a sidewalk and bridle path should also be constructed next to the bikeway to ensure that other prospective non-motorized users do not perceive or cause conflicts with bikes on the bikeway. An added benefit of building a path that is of adequate width is that Caltrans maintenance vehicles can access it without a problem. L-16-4 (cont.)

For the bicycle facilities along the High Desert Segment of the HDC, the best option and one we would be most enthused about is the one identified as "Type 1 – Class I Bike Path at the Bottom of Freeway Embankment" in Chapter 2.2.2. A facility at the bottom of the freeway embankment would mean that there is ample room to include a facility meeting the requirements laid out in the previous section. The option identified as "Type 2 – Class I Bike Path along Freeway Shoulder" would be acceptable, but is much less desirable because it would likely face constraints in building a facility of the adequate widths to meet the requirements for a safe facility and the close proximity to the freeway itself lessens user comfort. The option identified as "Type 3 – Class III Bike Route along Freeway Shoulder" is completely unacceptable because shoulders are often rife with their own hazards to bicyclists that result in extremely unsafe riding conditions. These hazards include but are certainly not limited to rumble strips, pebbles and sand, substandard surface conditions due to lackluster maintenance, and stopped vehicles that then require the bicyclist to negotiate their way into traffic traveling many multiples of their speed. L-16-5

Also, although there is no lighting planned for the freeway through the High Desert Segment of the HDC, lighting should be included for the bikeways. Lights are vital along bikeways to ensure that any surface or edge hazards are visible to users as well as promoting a facility that is socially safe. Current and emerging technologies provide numerous opportunities for the lighting to be done in a way that is energy efficient and tailored specifically to the application. It can also be made dynamic so that it only comes on when users are passing the specific location. L-16-6

For the bicycle facilities along the Victor Valley Segment of the HDC, the proposed Class III Bike Route along the shoulder is an unacceptable treatment. Instead, the option identified for the High Desert Segment as "Type 2 – Class I Bike Path along Freeway Shoulder" is the best solution for this segment. L-16-7
This includes integrating the bikeway into bridge structures of the interchange of the HDC and I-15. Due to the more urban and growing nature of the area, it is imperative that the path be included on **both** sides of the expressway portion of the HDC that goes into Apple Valley so that residents of the area are not cut off. Where that path is present on both sides, the width requirement can be scaled back to 12' per side, though still with sidewalks and a bridle path on at least one side of the freeway. The L-16-8

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reservation of a 300' right-of-way provides more than ample space for the inclusion of a facility of that size. L-16-8 (cont.)

In the Antelope Valley Segment in the west, the proposal to construct frontage roads means that it is reasonable to direct cyclist and other non-motorized users through that area to not have to use the freeway. However, frontage roads are still often extremely hostile places for biking. Yet, due to local connections being severed by the freeway, they remain the most direct route for many bicyclists going around town and also provide a clear continuation of the route for those traveling through. To maintain connectivity and clarity of route in safe, inviting infrastructure, Class IV cycletracks should be included along all frontage roads that are constructed alongside the freeways. Additionally, the intersections should be constructed with appropriate treatments, including bike-specific signals on the bikeway when necessary. L-16-9

We applaud the Department for considering the use of roundabouts at several of the interchanges. The safety benefits they provide are greatly appreciated by the bicycling community, but throwing bikes into the middle of a roundabout is not an ideal treatment. We would like to make sure that all roundabouts include appropriate consideration of the HDC bikeway. Barring some creative tunneling and combination with bridges at the interchanges, the bikeway will necessarily have to follow the contours of the freeway access ramps. We would like to make sure that the plan is not to have the bikeway merge onto and become part of those ramps. Instead, the bikeway needs to continue as a separate facility around the edge of the roundabouts in a manner that provides uninterrupted flow for the rider. We would also like to see the inclusion of refuge islands so that path users can wait between streams of traffic and cross without requiring signaling. L-16-10

At interchanges where a roundabout is not used, the solutions used need to be appropriate for protecting bicyclists while also not unnecessarily impeding them or any other users. Striping a through bike lane to the left of any right turn only lanes or completely dropping the lanes near intersections falls short of meeting that standard. We would point the Department to the 'protected intersection' design shown earlier this year by Alta Planning + Design that incorporates Class IV cycletracks and bicycle signal heads to keep bikes separated in both time and space. L-16-11

We would like the Department to ensure that the geometric design of the included facility is adequate for its users. Too often, Class I bikeways leave much to be desired in that department as well. Though Chapter 1000 recommends a design speed of 20 MPH for a pedal-only facility, many bicyclists can propel themselves in excess of that speed for extended periods of time. The presence of a 'bicycle freeway' nearly 30 miles in length will undoubtedly be popular among bicyclists and bring out many to test their limits of endurance. Additionally, if NEVs will in fact be allowed to use the facility, they can also go faster than 20 MPH for sustained periods of time. In light of that, the bikeway should have a minimum design speed of 35 MPH, but 45 MPH wouldn't be too much, especially on any grades. This is necessary to L-16-12

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ensure that bicyclists are able to safely maneuver past other path users in a safe manner and establish a free flow speed that allows for the most efficient use of the facility. L-16-12 (cont.)

Another point of concern is with any curb that separates the bikeway from any other facilities adjacent to. Standard curbs are generally flat faces several inches high that present extreme danger to bicyclists if they contact them. Where curbing is necessary adjacent a bikeway, we would like to see angled curbs used in this project. Angled curbs allow a bicyclist to use the adjacent facility as a free recovery zone and avoid a far more dangerous encounter with the ground or hazard in the bikeway. L-16-13

A final technical concern is for path surface itself. Class I standards would require that the path be paved. But not all sealed surfaces are created equal and some pavements result in extremely unsatisfactory riding conditions. We would like to see that any expansion joints or gaps in concrete be at most ¼" wide or a gap filler be used to keep the ride smooth. If paved with asphalt, it also needs to be of a quality to provide a riding surface that is not taxing to the rider. Another option to be considered is the emerging applications of solar generating roadway surfacing, which also presents an opportunity to provide power for the bikeway lighting. L-16-14

We at the Alliance hope that the partners working together to develop and build the HDC can produce a facility that meets the needs of **all** users. We are glad to see that the Department has advanced in planning from the "cars first" sentiment of several decades past to one where a bikeway is included as part of the corridor from the beginning. More of these projects are needed to meet the transportation needs that are required for keeping California one of the world's leading economies through the 21st Century and into the 22nd, especially as we look for new solutions to helping control congestion. Please continue to provide the leadership necessary to bring the forward thinking to all future facilities or upgrades to current facilities. L-16-15

Sincerely,

Marven E. Norman, VP

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Response to Comment L-16

Comment Code (Topic)	Response
L-16-1 (Design)	The support for the bike path element of the project is noted and concerns expressed about the design of the bike path are appreciated.
L-16-2 (Design)	Recommendations for the width of the bike path, and the rationale upon which they are based, is appreciated. The preliminary design of the bike path as was presented in the Draft EIR/EIS is based on Caltrans' Highway Design Manual, and is considered to be adequate for its intended purpose. During the detailed design of the bike path, Caltrans will review the widths of the bicycle lanes and adjust them, if warranted, on the basis of this comment and other information available at that time.
L-16-3 (Design)	Caltrans believes that the bike path will improve safety for bicyclists and other non-motorized users. We also believe, however, that bicyclists will make up the vast majority of users, especially in the central, more rural portions of the corridor.
L-16-4 (Design)	Caltrans does not envision that the HDC would accommodate equestrian riders or neighborhood electric vehicles, nor does it envision that the proposed bike path would be heavily used by walkers, runners, or skaters. Caltrans believes that the current proposal is adequate to accommodate the anticipated level of usage of the bike path. However, the width of the path will be re-evaluated and modified, as appropriate, during the final design process based on conditions present at that time.
L-16-5 (Design)	Your preferences among the bike path alternatives along the High Desert segment are noted.
L-16-6 (Design)	Your observations and recommendations about bike path lighting are appreciated. As noted in the comment, Caltrans is not planning to provide lighting for the bike path at this time. Night lighting along portions of the HDC alignment could have substantial environmental effects that would need to be considered before such a feature could be installed. The opportunity to use new renewable energy and other advanced technology to illuminate the bike path will be considered during the final design phase of the project.
L-16-7 (Design)	Your preferences among the bike path alternatives along the Victor Valley segment are noted.
L-16-8 (Design)	Your observations and recommendations about integrating the bikeway into the HDC/I-15 interchange and within Apple Valley are noted. The preliminary design of the bike path that was presented in the Draft EIR/EIS is considered to be adequate for its intended purpose. During detailed design, Caltrans will review the proposed design for these portions of the bike path and make adjustments, if warranted.

Comment Code (Topic)	Response
L-16-9 (Design)	Caltrans will review and consider these recommendations during the final design process.
L-16-10 (Design)	Caltrans will review and consider these recommendations during the final design phase of the project.
L-16-11 (Design)	Your concern about the safety of bicyclists at roundabouts (and everywhere) is noted and shared by Caltrans. While the "protected intersection" concept has promise, it raises issues of intersection capacity, turning requirements for large trucks, interactions between bicyclists and pedestrians, and consistency with Americans with Disabilities Act design requirements for pedestrians. Nevertheless, under Assembly Bill (AB) 1193, signed into law by Governor Brown in 2014, Caltrans is required to develop engineering standards for Class IV bikeways and incorporate these standards into its official design guidelines. The final design of the HDC bikeways will be consistent with the AB 1193 requirements.
L-16-12 (Design)	Caltrans is not considering allowing neighborhood electric vehicles to use the HDC bike path. Caltrans will review and consider the recommendations about the geometric design during the detailed design of the bike path.
L-16-13 (Design)	Caltrans will review and consider the recommendations about the curbs during the detailed design of the bike path.
L-16-14 (Design)	Caltrans will review and consider the recommendations about these design features during the detailed design of the bike path.
L-16-15 (Design)	Caltrans appreciates your statement of support for the proposed project. Caltrans is willing to continue a close coordination with all interested parties during the final design phase of the project. Many factors will contribute to determining how the facility is ultimately designed and built. The continued input and recommendations from organizations such as yours will contribute to the development of this project in the future.

Comment L-17

Los Angeles
World Airports

L-17

December 1, 2014

Mr. Ronald Kosinski
Deputy District Director
Caltrans District 7, Division of Environmental Planning
100 South Main Street, Mail Stop 16A
Los Angeles, CA 90012-3606

LAX
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Van Nuys
City of Los Angeles
Eric Garcetti
Mayor
Board of Airport Commissioners
Sean O. Burton
President
Valeria C. Velasco
Vice President
Gabriel L. Eshaghian
Jackie Goldberg
Beatrice C. Hsu
Matthew M. Johnson
Dr. Cynthia A. Telles
Gina Marie Lindsey
Executive Director

Re: High Desert Corridor – Draft EIR/EIS

Dear Mr. Kosinski:

Thank you for the opportunity to comment on the Draft Environmental Impact Report/Environmental Impact Statement (HDC Draft EIR/EIS) for the proposed High Desert Corridor (HDC) Project. LAWA is a proprietary department of the City of Los Angeles that owns and operates Los Angeles International Airport, LA/Ontario International Airport, Van Nuys Airport, and over 17,000 acres of land in Palmdale within the Antelope Valley. As a major property owner LAWA has a keen interest in the outcome of the development of the proposed HDC.

Given LAWA's intent to preserve for the future opportunity to develop Palmdale Regional Airport (PMD), LAWA submits comments on the HDC Draft EIR/EIS to raise questions and concerns about the HDC's potential impacts on LAWA's future ability to maximize utility of its Palmdale property and the potential to develop a future airport. As highlighted in the HDC Draft EIS/EIR, LAWA concurs that the Palmdale Regional Airport has the potential to serve as an aerospace economic development cluster and research and development and/or logistics distribution center. With expected increases in employment, retail sales, and home values, the HDC represents a major infrastructure improvement that would increase access to the Palmdale Airport. L-17-1

LAWA submits the following comments regarding HDC Draft EIR/EIS specific impacts to LAWA property:

- Regardless of the alignment chosen for the HDC, among other impacts, LAWA parcels will be bifurcated. To more efficiently administer the Palmdale property, LAWA is currently processing Final Parcel Map Number 24419 with both the County of Los Angeles Regional Planning and the City of Palmdale and working to secure approval from the Federal Aviation Administration (FAA). Therefore, LAWA respectfully requests that Caltrans bears all costs associated with amending LAWA's proposed Parcel Map. LAWA expects compensation for fair market value of the property taken and reduction in value of property not taken as a result of severance. L-17-2

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Mr. Ronald Kosinski
December 1, 2014
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- The HDC alignment (shown in blue and black on Figure 2-2 of the draft EIR/EIS) would create seven LAWA-owned parcels 1/2-mile long and approximately 950 feet wide south of HDC between 15th Street East and 50th Street East. The southern boundary of the parcels would be LAWA's south property line. The only planned access to these parcels would be from the north/south streets spaced at half-mile intervals. In order to provide appropriate local access to these parcels, this HDC alignment should include a frontage road along the south side of the proposed freeway. L-17-3

- LAWA is exploring options for the future development of renewable energy projects at the Palmdale property. Because a renewable energy project may require interconnectivity between electrical components, the freeway project should include the infrastructure necessary to allow electrical transmission across the freeway/expressway. While there are no current specific proposals for renewable energy project, LAWA requests to work directly with Caltrans to develop HDC plans that will not preclude the development of renewable energy sources on LAWA property. L-17-4

- On Figure 2-20, it is not clear why a wide right-of-way is needed between the proposed bike path and the corridor limit. There is no indication why this property is needed. Please clarify. L-17-5

- In Section 2.4.3 (page 2-32), the draft EIR/EIS states: "*Service interchange locations will be coordinated with the Cities of Palmdale, Adelanto, Victorville, and Apple Valley, and the County of Los Angeles and San Bernardino General Plan Circulation Elements.*" Paragraph 7 of Section III of the existing Cooperative Agreement between the City of Los Angeles and the State of California regarding this project states that "*STATE and CITY reserve the right to reassess the proposed locations of the on-ramps and off-ramps to the [HDC] which provide access to and from the CITY property and will cooperate in determining the most appropriate locations of these ramps toward the best interest of both parties.*" Therefore, LAWA should be included in this list of coordinating agencies. L-17-6

- LAWA is encouraged that the draft EIR/EIS includes proposed interchanges at 20th Street East, 30th Street East and 50th Street East, as indicated on page 2-34. In particular, 20th Street East is the only roadway to the Palmdale Airport terminal and public parking lot. An interchange at 20th Street East is an important element to a future airport's future ground transportation access. L-17-7

- The HDC Infiltration Basin Locations 1 to 12 as proposed in Figure 2-34 would be located on LAWA property. Any LAWA property needed for these infiltration basins is subject to federal law regarding airport revenue diversion and must be acquired at fair market value according to FAA regulation. L-17-8

Mr. Ronald Kosinski
December 1, 2014
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- In Section 2.8 (page 2-69) the draft EIR/EIS states; "*Caltrans and LAWA have negotiated which portion of LAWA-owned land would be the most logical for extending eastward from 15th Street East, the ultimate alignment of the transportation corridor beginning at SR-14 and Avenue P-8. This alignment would generally run east-west along the southern border of LAWA, from 15th Street to 100th Street East.* LAWA respectfully requests that Caltrans meet with LAWA to discuss any deviation from the previously agreed upon alignment. L-17-9

- Request that the HDC Project (Caltrans and/or High Speed Rail) personnel closely coordinate with LAWA and its tenant, the County of Los Angeles Sanitation District No. 20 to avoid, mitigate, and minimize any and all environmental issues to, upon, through and adjacent to City of Los Angeles' property including any exacerbation of any existing contamination, including but not limited to any nitrate plume, as well as indemnify, defend, and hold LAWA harmless from any environmental impacts caused by, resulting from, or otherwise related to the HDC project. L-17-10

It has always been LAWA's sincere pleasure to work the Caltrans District 7 team on important planning initiatives impacting the Antelope Valley. We look forward to working with you as Caltrans moves forward with the planning of the HDC Project. If we can provide any further information or support, please do not hesitate to contact us at (424) 646-5186.

Sincerely,

Lisa Trifiletti
Director
Environmental and Land Use Planning Division

LLT:MV

Response to Comment L-17

Comment Code (Topic)	Response
L-17-1 (Other)	We acknowledge Los Angeles World Airports (LAWA) need and intent to preserve future opportunities to develop Palmdale Regional Airport. It is our intent to facilitate access to the airport and the adjacent City of Palmdale.
L-17-2 (Land use)	Caltrans considers the amendment of LAWA's proposed Parcel Map as a valid project expense and a fair expenditure of project funds. It is Caltrans' policy to appraise properties at their fair market value as part of the ROW process; please refer to response to Comment L-17-8.
L-17-3 (Design)	A frontage road adjacent to the proposed High Desert Corridor (HDC) project between 15th Street East and 50th Street East would be provided. Construction costs for the frontage road would be estimated as part of the HDC Project. While the frontage road would be located within LAWA's ROW, it would be considered a dedicated easement from LAWA. The frontage road would ultimately be relinquished to LAWA for operation and maintenance purposes. A Cooperative Agreement between Caltrans and LAWA would need to be (re)executed after the HDC Project is approved to address this matter.
L-17-4 (Design)	Caltrans will coordinate/consult with LAWA concerning the transmission of green energy across the HDC once the project proceeds to the design phase. As a mitigation/minimization measure, Caltrans will develop an HDC design concept that does not preclude the development of renewable energy sources on LAWA property.
L-17-5 (Design)	Although not clearly shown on Figure 2-20, the HDC will be constructed, in most areas, on an embankment averaging 12 feet above the surrounding ground; a series of cross culverts will be placed under the corridor to allow water to continue flowing from south to north as it does now. The wide space between the bike path and the corridor limit will be used to accommodate drainage facilities such as the longitudinal channels that will convey water into the cross culverts.
L-17-6 (Design)	Your comment is noted. LAWA has been added to the paragraph in Section 2.4.3 of the Final HDC EIR/EIS.
L-17-7 (Design)	Your comment supporting the proposed project interchanges at 20th Street East, 30th Street East, and 50th Street East is noted and will be shared with the Project Development Team.

Comment Code (Topic)	Response
L-17-8 (Community)	With respect to the proposed infiltration basins on LAWA property, thank you for calling attention to the revenue diversion prohibition regulations and policies of the Federal Aviation Administration (FAA), which require that property from airports be acquired at fair market value (49 U.S.C. 47107). Accordingly, this information has been incorporated in the Final EIR/EIS, Section 3.2.1, Hydrology and Floodplain. In fact, this complements the federal Uniform Relocation Assistance and Real Property Acquisition Policies Act, as amended, which also provides that just compensation be provided for any property purchased. Where property is required for a project, an appraisal will be performed to determine its fair market value. ROW determinations and negotiations cannot occur until after the environmental process is completed.
L-17-9 (Design)	Caltrans will be happy to meet with LAWA regarding deviation from the previously agreed upon alignment. The proposed deviation came about as a result of the Value Analysis (VA) study conducted in October 2007; LAWA was a participant in the study. The VA Study determined that the proposed change would reduce the environment footprint of the project by approximately 1,200 linear feet and reduce the project cost by more than $6 million. Mr. Roger Johnson, Deputy Executive Director of LAWA's Facilities and Environmental Planning Department, acknowledged the finding of the VA study in two letters to Caltrans, dated June 10, 2008 and February 20, 2009.
L-17-10 (Other)	Caltrans understands and appreciates LAWA's interest in limitations on liability and not being held responsible for any damage claims for hazardous, toxic or otherwise dangerous substances or conditions discovered or exposed on LAWA property arising out of, or in any way associated with the construction, operation, or maintenance of the proposed HDC transportation facility; Measure HAZ-6 concerning this has been added to Section 3.2.5, Hazardous Waste or Materials, of the Final EIR/EIS. Consistent with your comment, if acquisition of property from LAWA is required, Caltrans ROW staff will contact you and coordinate closely with you any affected tenants, including the County Sanitation District No. 20, throughout the process. However, it is Caltrans' policy to acquire contaminated property only after an adequate site investigation of the property has been conducted and the cost of the remediation has been considered in the approval and acquisition process. Caltrans Legal Counsel develops or reviews all needed agreements, indemnifications, etc. related to contamination and the responsibilities of the parties involved.

Comment L-18

L-18

CITY OF
VICTORVILLE

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P.O. Box 5001
Victorville, California 92393-5001

December 1, 2014

Mr. Ronald Kosinski, Deputy District Director
Caltrans District 7, Division of Environmental Planning
100 South Main Street
Los Angeles, CA 90012

Reference: **High Desert Corridor Project**
Draft Environmental Document comments

Dear Mr. Kosinski:

Thank you for the opportunity to review and comment on the High Desert Corridor Draft Environmental Impact Report / Environmental Impact Statement and Section 4(f) (De Minimis Findings) hereinafter referred to as the "environmental document". The City's comments are discussed below.

Locally Preferred Main Alignment

Victorville's locally preferred alignment is the main alignment as described in the environmental document for the following reasons:

1. Direct access to SCLA uses and the planned intermodal / multimodal facility.
2. Consistency with the SCLA Specific Plan and the General Plan. The Victorville General Plan shows the main freeway alignment.
3. Less impact to occupied residential properties.
4. Smaller overall footprint when considering the HSR.
5. Superior geometry to Variation E.
6. Utilizing City owned right of way and property in SCLA or near SCLA.

L-18-1

Alignment Variation E

The City is strongly opposed to alignment variation E for both the Freeway mainline and the HSR for the following reasons:

1. Inferior, indirect and substandard access to SCLA uses and the planned intermodal / multimodal facility.
2. Inconsistency with the SCLA Specific Plan and the General Plan. The Victorville General Plan does not show Variation E.
3. The HSR crosses at a skew across Rancho Road, an arterial, and would require a long grade separation or undesirable geometry for a realignment of Rancho Road.
4. Additional residential relocation impacts. For the HSR, it appears that there would be more residential impacts than listed in Table 3.1.4-18 on page 3-103. The table lists only one residential relocation but it appears there would be about 18 residential relocations in Victorville after reviewing Map 5, the Adelanto / Victorville segment.
5. Conflict with residential land use south of Ranch Rd and approved tentative tracts.
6. Increased noise impacts to residential land uses.
7. Increased length in the alignment resulting in increased costs and travel time.
8. Undesirable geometry with unnecessary curves added to the alignment.
9. Crossing the City's Industrial Lead Track at a greater skew, resulting in a larger structure and increased costs.
10. Three additional crossings of the LADWP, SCE and Intermountain electrical transmission corridors, necessitating the removal of at least 11 transmission towers and the adjustment of many more.

L-18-2

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December 1, 2014

11. Crossing of the Mojave River at a different location where the river is wider and at a greater skew and a separate crossing for the HSR, resulting in more environmental impacts and increased structure costs. L-18-2 Con't
12. Increased right of way and right of way impacts. Increased costs because reserved SCLA right of way would not be utilized.

Industrial Lead Track

It appears from the ramp footprint of the National Trails Highway interchange, as shown on the aerial of San Bernardino County ramp locations, that there is an encroachment upon the north side of Industrial Lead Track (ILT) in the vicinity of the Sully Miller property. The importance of preserving the utility of the ILT cannot be overemphasized. For years, the ILT was planned in close coordination with a HDC alignment that would run parallel to it on the north side. The ILT was constructed by the City of Victorville for rail access from the BNSF railroad for industrial development. A bridge on National Trails Highway, the grading of the rail bed for three tracks and drainage improvements were constructed by the City. The ILT will provide rail service to approximately 157 acres for industrial uses. The rail bed is designed so that it can be extended to a planned intermodal yard at the Southern California Logistics Airport (SCLA) area. The design needs of the HDC needs to incorporate the following requirements: L-18-3

1. The profile of the HDC mainline, ramps and structures need to provide a minimum vertical clearance of 23.33 ft. (required by BNSF) from top of rail to bottom of soffit for the ILT.
2. Bridges, columns, foundations, structures, drainage structures, channels and improvements etc. need to be located to avoid conflict with the ILT and provide horizontal clearance to meet BNSF standards.
3. The access roads to the ILT rail bed need to be unobstructed by the HDC and National Trails Highway interchange.

Tolling

For the tolling alternative, the City is in agreement with the eastern limit of tolling at US-395. As stated in earlier comments, the City is opposed to tolling east of US-395 for the following reasons: L-18-4

1. Tolling for access to and from SCLA would be an impedance to access and goods movements for the existing and planned industrial uses and good.
2. Tolling between I-15 and US-395 would potentially cause undue traffic intrusion on Victorville's local roads.

Interchanges

The City is requesting the proposed lane configurations and preliminary geometry for the US-395, Phantom West, Phantom East and National Trails Highway Interchanges. Preliminary layouts are requested showing the number of lanes on the bridges, connecting local roads and ramp configurations. The City wants to know if the proposed interchange layouts are consistent with the planned road connections in the Victorville General Plan and sufficient to handle future traffic for year 2020 and year 2040 at acceptable levels of service. During the design phase, the City will need to review the proposed changes to the City's local roads and have an opportunity to provide comments. L-18-5

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High Desert Corridor Project
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December 1, 2014

Gateway Interchange

A future interchange in the Gateway Specific Plan area needs to be environmentally cleared. An interchange will be needed to serve the local circulation within the Gateway Specific Plan area. The interchange would be located between the National Trails Highway Interchange and HDC / I-15 System Interchange. The City is aware of the substandard spacing issue (less than 2 miles from HDC / I-15 system interchange) with the interchange location identified in the Specific Plan; the interchange location will need to be adjusted. A feasible interchange location would be approximately 0.9 miles from the National Trails Highway Interchange and approximately 1.9 miles from the HDC / I-15 system interchange. This would be at approximately Station 2693, a few hundred feet south of the transmission lines that are located along the dirt road identified as "Boulder Road" on environmental document maps. Another interchange is proposed at slightly less than the standard 2 mile spacing from a system interchange: the Chippewa / Choco Road Interchange in Apple Valley appears to be approximately 1.9 miles from the HDC / I-15 system interchange. L-18-6

Rockview Nature Park

The proposed interchange at National Trails Highway (NTH) will result in a loss of parking on land owned by LADWP. The City has enjoyed the use of this property for parking for many years, with LADWP permission. The loss of parking needs to be mitigated by providing an equivalent parking area on the City-owned parcel. Also current access to the driveway to the parking area on the LADWP parcel has a southbound left turn lane and a northbound right turn lane in addition to the through lanes on NTH. To insure safe ingress and egress for the relocated access to the north that will result from the construction of the NTH interchange, NTH will require a southbound left turn lane and a northbound right turn lane with adequate deceleration lengths. During the design phase, the City will need to review the proposed changes to NTH and have an opportunity to provide comments. L-18-7

The City is concerned about certain impacts to Rockview Nature Park, including a significant increase in ambient noise levels which will affect the quiet enjoyment of the nature park, consequential increases in vehicular traffic accessing the HDC adjacent to the nature park, and the potential increase in illegal dumping and vandalism that increasing the traffic in that region will bring. Also, the additional traffic and associated bridge over the area will affect wildlife which utilize the nature park, specifically migratory waterfowl. The Rockview Nature Park is located on the Mojave River at one of the last places where the Mojave runs above ground. L-18-8

If there are any questions, clarifications or additional information regarding these comments you may contact me at 760-955-5155 or Brian Gengler, City Engineer, at 760-955-5156.

Very truly yours,

John A. McGlade

John A. McGlade
Director of Public Works / Water

JAMc:BG:sg

cc: Brian Gengler, City Engineer
Christian Guntert, Director of Community Services
Keith Metzler, Assistant City Manager
Doug Robertson, City Manager

Response to Comment L-18

Comment Code (Topic)	Response
L-18-1 (Design)	The City's preferred corridor alignment has been acknowledged by the Project Development Team.
L-18-2 (Design)	The City's strong opposition of Variation E is acknowledged. For many of the reasons you cite, Variation E has not been selected as part of the Preferred Alternative.
L-18-3 (Design)	The Industrial Lead Track (ILT) was considered in the preliminary engineering design. The profile of the ILT was projected at the existing grade for future build. This projected profile was added into the HDC HSR track profile and a 23'-4" min clearance was verified between the soffit of the HSR bridge and the projected ILT track. We will continue to coordinate with the city throughout future phases of the project.
L-18-4 (Design)	Your comment in support of the eastern limit for the toll segment at US 395 is noted for the record.
L-18-5 (Design)	Detailed engineering drawings will be provided to the City as requested. Caltrans will continue to coordinate closely with City staff regarding potential changes and impacts to the City's local roads.
L-18-6 (Design)	An interchange with the HDC has been identified as part of the Desert Gateway Specific Plan of the City of Victorville. This "Gateway" interchange would be located approximately 1.7 miles west of the HDC/I-15 freeway to freeway system interchange, and approximately 1.1 miles east of a proposed interchange serving National Trails Highway. The Caltrans Highway Design Manual specifies interchange spacing standards of 2.0 miles between system interchanges and adjacent interchanges serving local streets. The design standard for spacing between local service interchanges is 1.0 miles in urban areas. As the spacing standard for freeway system interchange to adjacent local street interchange is not met by the Specific Plan conceptual circulation element, the City of Victorville has proposed shifting the Gateway interchange to the west by approximately 0.2 miles to yield an interchange spacing of 1.9 miles to I-15 and 0.9 miles to National Trails Highway. As neither interchange spacing meets Caltrans design standards, and as there is no active development proposal for lands within the Desert Gateway Specific Plan area (other than the XpressWest HSR station), Caltrans has elected to defer this request until such time that potential funding for a new interchange can be identified. In the meantime, the Desert Gateway Specific Plan area is served by existing interchanges along I-15 at Stoddard Wells Road (South), Stoddard Wells Road (North), and Dale Evans Parkway.

Comment Code (Topic)	Response
L-18-7 (Traffic)	To compensate for the loss of parking due to the acquisition of the Los Angeles Department of Water and Power (LADWP) property, Caltrans proposes to grade/construct additional parking spaces within Rockview Nature Park. The new parking lot would be located in the northern section of the park, roughly adjacent to National Trails Highway, and would be functionally equivalent to the existing parking lot on LADWP's property. Detailed design and construction of the parking lot and access to the park will be further discussed between the Project Team and the City's Community Services Department during the design phase of the project.
L-18-8 (Section 4(f))	Effects of the project from the indirect use of Rockview Nature Park (including accessibility, noise, aesthetics, and air quality) were analyzed and presented in Appendix B -- Section 4(f) Evaluation of the Draft EIR/EIS. The analysis concluded that operation of the proposed project would not adversely affect the activities, features, or attributes qualifying the Rockview Nature Park for protection under Section 4(f). As far as the bridge crossing the Mojave River is concerned, the bridge will be constructed to span over the river to minimize impacts to water resources. Caltrans acknowledges the City's concern about illegal dumping and vandalism. Since the park is open for public use, illegal dumping and vandalism could potentially occur regardless of the existence of the freeway. Any illegal dumping and vandalism activities should be reported to the local law enforcement to undertake appropriate action.

Comment L-19

L-19

COUNTY OF LOS ANGELES
DEPARTMENT OF PARKS AND RECREATION
"Parks Make Life Better!"

Russ Guiney, Director | John Wicker, Chief Deputy Director

November 26, 2014

Sent via email: ron_kosinski@dot.ca.gov

Mr. Ronald Kosinski RK
Deputy District Director
Division of Environmental Planning
Caltrans- District 7
100 South Main Street
Los Angeles, CA 90012

Dear Mr. Kosinski:

HIGH DESERT CORRIDOR (HDC) PROJECT
LOS ANGELES AND SAN BERNARDINO COUNTIES
DRAFT ENVIRONMENTAL IMPACT REPORT (EIR)/ ENVIRONMENTAL IMPACT STATEMENT (EIS) AND SECTION 4(F) (DE MINIMIS FINDING)

The County of Los Angeles Department of Parks and Recreation (LACO-DPR) has reviewed the HDC Project Draft EIR/ EIS for potential impact on the facilities under the jurisdiction of this Department for which we offer the following comments:

Volume 2, Appendix B:

Page B- 49, Portions of Los Angeles County's Planned Trails

- Please revise this section as follows:

  The HDC would intersect with the County of Los Angeles ~~County's~~ Department of Parks and Recreation (LACO-DPR)'s adopted ~~future recreational trails~~ Regional Trail Plan at the following locations: ~~at Avenue Q just east of 110th Street; at Avenue Q12 just east of 140th Street, west of Big Rock Wash; at Avenue Q12 near 225th Street; and north of Avenue R, west of 225th Street (Vineyard Dip)~~ L-19-1

  - Avenue Q, just east of 110th Street;
  - Avenue Q12, just east of 140th Street, west of Big Rock Wash;
  - Avenue Q12, near 225th Street; and
  - North of Avenue R, west of 225th Street (Vineyard Dip)

Planning and Development Agency • 510 South Vermont Ave • Los Angeles, CA 90020-1975 • (213) 351-5198

Mr. Ron Kosinski
November 26, 2014
Page 2

According to the LACO-DPR's Trail Section, the Los Angeles County adopted Regional Trail Plan provides a network of multi-use (equestrian, hiking, and mountain biking) trails for a diverse group of public users throughout Los Angeles County that connect local, state, and federal trail systems and link recreational areas to residential, commercial, institutional, and industrial areas. It also includes adopted proposed trails that do not currently exist but are planned for the future, or trails that exist but are not yet officially designated.

~~Coordination with the Los Angeles County Recreation Department, Trail Division, indicated that these are proposed trails within either Department of Public Works' (DPW) ROW or on private land with no present public ownership or easement.~~

~~The primary function of DPW land is for purposes of transportation. DPW will allow dirt shoulders be used for hiking, biking, and/or equestrian purposes, all considered as a secondary use. Therefore, as specified in FHWA's Policy Paper (Q&A #1A in regard to primary function), the planned trail portions that fall within DPW's land are not considered Section 4(f) properties.~~

The adopted proposed trails, which intersect with the HDC are mostly located on private land. For the portions of the adopted ~~planned~~ proposed trails that may fall on present-day private land, FHWA's Policy Paper (Q&A #25) specifies that when privately held properties formally designate land uses into a Master Plan for future park/recreation development, Section 4(f) is not applicable. They must be publicly owned at present. Accordingly, the provisions of Section 4(f) are not triggered. L-19-1 (con't.)

In addition, please provide GIS shapefiles showing the proposed route and variations of the High Desert Corridor Project for further study the points of intersection with the County adopted proposed trail alignments. L-19-2

Thank you for including this Department in the review of this document. If you have any trail related questions, please contact Olga Ruano at (213) 738-2014 or oruano@parks.lacounty.gov. If we may be of further assistance, please contact Julie Yom at (213) 351-5127 or jyom@parks.lacounty.gov.

Sincerely,

Kathline King

Kathline J. King, Chief
Planning Division

KK:JY/ Response to Caltrans High Desert Corridor Draft EIR/ EIS

c: Parks and Recreation (N. E. Garcia, C. Lau, F. Moreno, J. Yom, O. Ruano)

Planning and Development Agency • 510 South Vermont Ave • Los Angeles, CA 90020-1975 • (213) 351-5099

Response to Comment L-19

Comment Code (Topic)	Response
L-19-1 (Section 4(f))	Your comment has been noted and the suggested revisions were made in Appendix B, Section 4(f) *De Minimis* of the Final HDC EIR/EIS.
L-19-2 (Design)	Copies of the GIS shapefile have been provided to the County of Los Angeles Department of Parks and Recreation Planning and Development Agency (Kathline J King, Olga Ruano, and Julie Yom) for further study.

Comment L-20

COUNTY SANITATION DISTRICTS
OF LOS ANGELES COUNTY

1955 Workman Mill Road, Whittier, CA 90601-1400
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Telephone: (562) 699-7411, FAX: (562) 699-5422
www.lacsd.org

GRACE ROBINSON HYDE
Chief Engineer and General Manager

December 1, 2014

Karl Price
Senior Environmental Planner
California Department of Transportation
100 South Main Street, Mail Stop 16A
Los Angeles, CA 90012

Dear Mr. Price:

Draft Environmental Impact Report/Environmental Impact Statement (DEIR/EIS) for the High Desert Corridor Project

The Sanitation Districts of Los Angeles County (Sanitation Districts) appreciate the opportunity to review and comment on the subject DEIR/EIS dated September 30, 2014, and posted at www.dot.ca.gov. The Sanitation Districts are a public agency consisting of 24 independent special districts that provide for the wastewater and solid waste management needs of about 5.5 million people in 78 cities and unincorporated areas within Los Angeles County. One of these Districts, Sanitation District No. 20 (District 20), operates major sewers and the Palmdale Water Reclamation Plant (Palmdale WRP) in Palmdale.

The alignment of the proposed project in the DEIR/EIS appears to overlap many of District 20's facilities as shown in the attached figure. Alignment along Avenue P-8 is particularly problematic for us because we have major sewers running for miles in this street. Appendix J of the DEIR/EIS identifies some of the potential sewer conflicts, but incorrectly references them as being owned by the City of Palmdale. Potential conflicts with District 20 trunk sewers are summarized in the enclosed Table 1, but this list could vary based on the exact alignment and width of the project alignment. In addition, the Palmdale WRP could be impacted depending on the width of the project alignment. The Palmdale WRP is located at 39300 30th Street East in the City of Palmdale and occupies 286 acres east of the Antelope Valley (SR 14) Freeway. Since the proposed project offers several alignment options with different variations, we request that the California Department of Transportation coordinate with the Sanitation Districts to determine the complete extent of impacted facilities. L-20-1

Please contact me at (562) 908-4288, extension 2770, or at blangpap@lacsd.org with any questions and to more specifically determine project impacts to District 20 facilities.

Very truly yours,

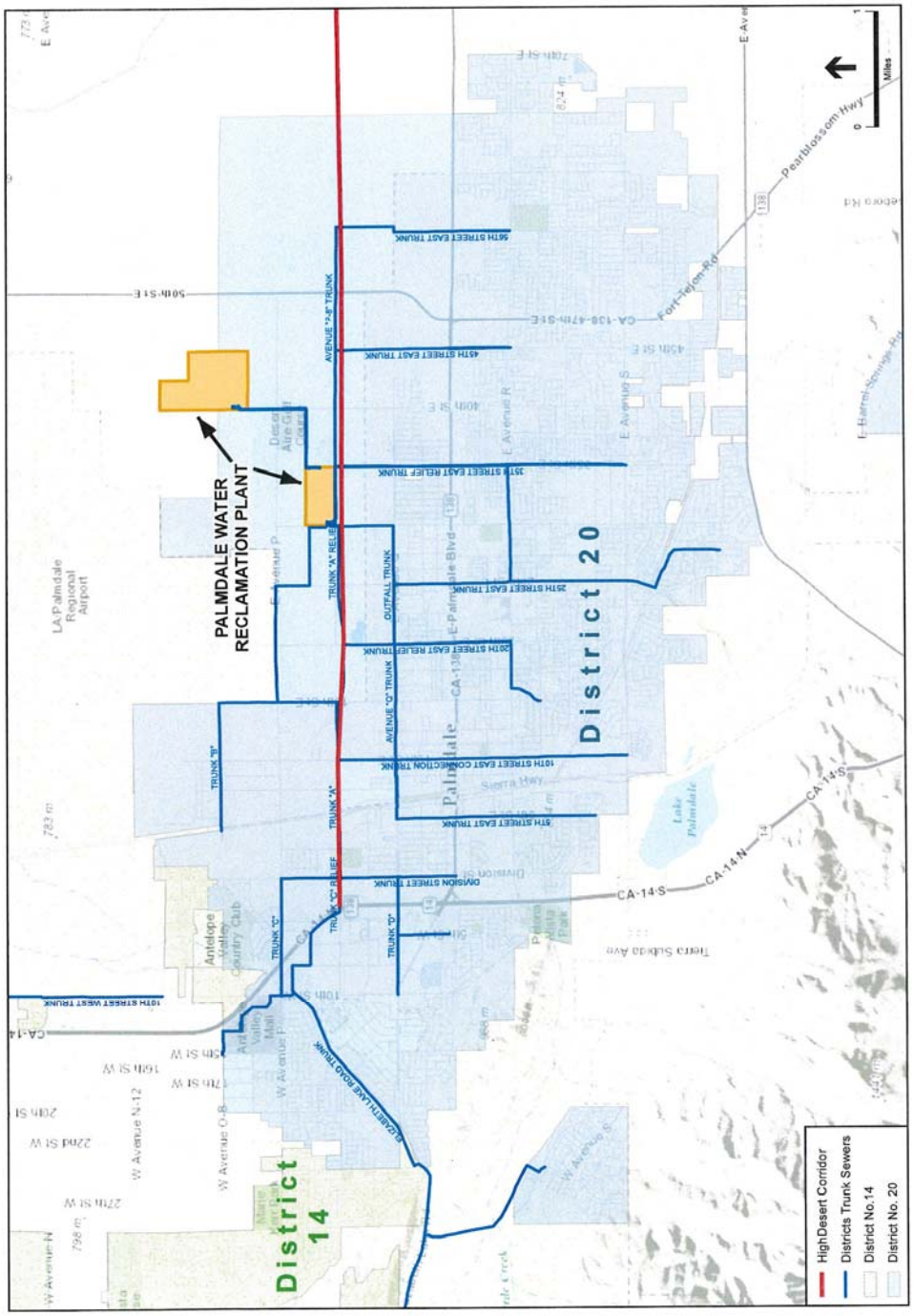
Grace Robinson Hyde

Bryan Langpap
Supervising Engineer
Facilities Planning Section

BL:AW:rvr
Enclosures

DOC # 3144160

Recycled Paper



LACSD Trunk Sewers and the High Desert Corridor Project

DOC #3123313

Table 1: Sanitation District #20 Sewers Potentially Affected by High Desert Corridor Project

Sewer Name	Diameter (in)	Material	Location
TRUNK "D"	12	RCP/NRCP	Division Street
TRUNK "C" RELIEF	33	VCP	Technology Drive/Ave P-8
TRUNK "C"	15	NRCP	Division Street
TRUNK "A" RELIEF	39, 36	VCP	Ave P-8
	42	FRPP	Technology Drive/Ave P-8
	8, 15, 18, 24	VCP	30th Street E - SW Corner of Palmdale WRP
TRUNK "A"	30	RCP	30th Street E
	18	NRCP	Technology Drive/Ave P-8/ 15th Street E
PALMDALE WRP PRIMARY EFFLUENT RELIEF LINE	45	RCP	East side of Palmdale WRP
	30	VCP	East side of Palmdale WRP
PALMDALE WRP POND EFFLUENT RELIEF LINE	30, 24, 18	VCP	East side of Palmdale WRP
PALMDALE WRP POND EFFLUENT LINE	24, 18	NRCP	East side of Palmdale WRP
OUTFALL TRUNK	18, 15	NRCP	30th Street E
DISTRICT #20 W.R.P. INFLUENT SEWER	30	RCP	30th Street E - SW Corner of Palmdale WRP
AVENUE "Q" RELIEF TRUNK	24	VCP	10th Street E
AVENUE "P-8" TRUNK	27, 24, 21	RCP	Ave P-8
	18	NRCP	Ave P-8
56TH STREET EAST TRUNK	15	NRCP	56th Street E
45TH STREET EAST TRUNK	15	NRCP	45th Street E
35TH STREET EAST TRUNK	15	NRCP	35th Street E
35TH STREET EAST RELIEF TRUNK	48	RGRCP-PTL	Ave P-8
	30	VCP	Ave P-8
	27	VCP	35th Street E
20TH STREET EAST TRUNK	15	VCP	20th Street E

RCP = Reinforced concrete pipe
NRCP = Nonreinforced concrete pipe
VCP = Vitrified clay pipe
RGRCP-PTL = Rubber gasket reinforced concrete pipe - light protruding tap
FRPP = Flame retardant phosphonitratic polymer

DOC #3159359

Response to Comment L-20

Comment Code (Topic)	Response
L-20-1 (Utilities)	The information provided by the County Sanitation District has been incorporated into the Utility Conflict Matrix (see Appendix J of the Final EIR/EIS). Caltrans is aware that the proposed project may be in conflict with the Sanitation Districts facilities and will coordinate closely with the Districts to develop measures to address those conflicts.

Comment L-21

L-21

XPRESSWEST
6720 VIA AUSTI PKWY., STE. 200
LAS VEGAS, NEVADA 89119

TELE: 702.739.2020
FAX: 702.739.2005

December 2, 2014

Mr. Ronald Kosinski, Caltrans District 7
Division of Environmental Planning
100 South Main Street, MS 16A
Los Angeles, CA 90012
E-mail: ron.kosinski@dot.ca.gov

RE: High Desert Corridor Draft Environmental Impact Statement/Report (DEIS/R)

Dear Mr. Kosinski,

XpressWest supports the development and implementation of the High Desert Corridor (HDC) as a multi-purpose transportation corridor including the high speed rail link between Victorville and Palmdale. As such, technical compatibility and interoperability of the completed corridor with both the XpressWest system and California High Speed Rail System is paramount. L-21-1

With this in mind, XpressWest attended the public hearings and has reviewed the DEIS/R for the HDC issued by Caltrans and the Los Angeles Metropolitan Transportation Authority (LAMETRO) and formally submits the comments contained herein.

- Given operations, maintenance, cost, right-of-way requirements, and environmental impacts, including the high speed rail alignment on the side of the highway should be more fully considered in the Final EIS as an alternative to the median. XpressWest is available to assist to the extent appropriate in the further evaluation having received a Record of Decision from the lead and cooperating agencies on an EIS for a high speed railroad within an existing freeway corridor that concluded the side running alternative is preferred to the median. L-21-2

- Utility corridors, substations, and autotransformers that would deliver the required power necessary to operate the high speed rail component should be included in the High Speed Rail component description and environmental analysis. L-21-3

- The Palmdale wye connection should be configured to eliminate all tunneling and provide for grade separation with the existing Union Pacific (UP) tracks such that both the HDC freeway and rail alignment are elevated at the same level above the UP tracks. L-21-4

Page 2 of 2

- For the connection of the high speed rail component into the XpressWest Victorville station, an alternative alignment should be considered that reduces the impacts to the Victorville Desert Gateway Specific plan while also maximizing speeds into and out of the station and the HDC alignment. XpressWest also requests that by-pass tracks be considered that would allow high speed trains to travel past the Victorville station without a stop. L-21-5

- The description of XpressWest in Chapter 1 (Page 1-24) Chapter 2 Section 2.8 (page 2-69) should be modified as follows:

  XpressWest (formerly Desert-Xpress). In July 2011, a Record of Decision was issued by the Federal Railroad Administration for a privately funded passenger rail project proposed for the I-15 corridor between the cities of Las Vegas and Victorville. Records of Decision were subsequently issued by the federal cooperating agencies including the Bureau of Land Management, California Federal Highway Administration, Nevada Federal Highway Administration. Additionally, in October 2011, the Surface Transportation Board issued its decision granting XpressWest the authority to construct and operate the interstate railroad. This HSR service would travel at a top speed of ~~150~~ 160 mph, with a one-way trip duration of approximately 1 hour and 20 minutes. The Victorville station site would be located adjacent to the I-15/Dale Evans Parkway interchange. L-21-6

- On Page 3-547 there is reference to XpressWest evaluating use of Diesel Electric Multiple Unit Trains. The reference should be deleted as XpressWest will only use Electric Multiple Unit trains. L-21-7

- The reference to permanent XpressWest jobs on Page 3-582 should be changed from "up to 463" to "approximately 800". L-21-8

Thank you for the opportunity to comment on the HDC DEIS/R and to participate in the process. We look forward to further cooperation and discussion regarding these and previously submitted comments to the DEIS/R with Caltrans, LAMETRO and the HDC Joint Powers Authority in our continued support for the implementation of this important and needed infrastructure project.

Best Regards,

Andrew Mack
Chief Operating Officer
XpressWest

XPRESSWEST.COM

Response to Comment L-21

Comment Code (Topic)	Response
L-21-1 (Design)	Your support for the HDC Project as a multipurpose corridor is noted for the record. Caltrans and Metro fully intend to develop the HSR component of the project to be compatible and interoperable with the proposed XpressWest and California HSR systems.
L-21-2 (Design)	The side-running alternative for California HSR has been considered but not selected for evaluation in the Draft EIR/EIS due to potential environmental impacts. The decision to select a median alignment could be revisited based on refined analyses and consideration of a side-running rail alignment within the HDC footprint evaluated in this EIR/EIS.
L-21-3 (Design)	Text regarding the potential interim use of SCE facilities (i.e., utility corridors, substations, and autotransformers) has been added to the discussion on utility impacts in Section 3.1.5 of the Final EIR/EIS.
L-21-4 (Design)	Caltrans has evaluated both tunneling and elevated options for the Palmdale Wye and has selected Option 1C, which does require tunneling, as the best option for reducing environmental impacts. This decision will likely be re-evaluated following completion of the Station-Area Planning Study being conducted by the City of Palmdale and the CHSRA.
L-21-5 (Design)	Regarding the request to realign the rail connection to the XpressWest station away from the Desert Gateway Specific Plan area: Pg 1-4 of the Specific Plan indicates that all illustrations included in the Specific Plan document are conceptual in nature and are not to be construed as prescribing an identical form or condition. The plan is comprised of neighborhoods and open space corridors (page 3-2) which are in some cases separated by transportation and utility corridors (page 3-3) which form organizing boundaries. This village concept is additionally illustrated on page 4-8 along with the utility/open space corridor described below. An open space corridor is illustrated on the land use plan illustrated on page 4-1. The open space corridor is in fact a transmission line easement, as illustrated on page 5-1. The easement/open space corridor clearly separates the westerly portion of the specific plan development from the easterly portion, the latter running adjacent to and parallel with I-15. Land use policy 4.5.3 Modifications to land use, notes that "modifications to land use may be necessary due to final alignments and designs of future interchanges, streets, haul roads, and other similar reasons..." Mobility policy 5.4.1 Support the High Desert Corridor as a means to more efficiently connect I-15 to the Southern California Logistics Airport and the Ports of Los Angeles and Long Beach, notes that "adequate rights-of-way shall be reserved for the proposed High Desert Corridor upon selection of a final alignment."

Comment Code (Topic)	Response
	Mobility policy 5.6.1 Plan for the Desert-Xpress (since renamed XpressWest) high-speed passenger rail project, states, "The City supports the proposed Desert-Xpress high-speed passenger rail project to link Southern California with Las Vegas via Victorville, and a future extension or connection beyond to the south and west. An approximate, generalized alignment; three potential station sites; and support facility locations are depicted in this Specific Plan. Land shall be reserved for the final, preferred locations of these facilities." The proposed alignment for the HSR connection to the proposed Desert-Xpress (XpressWest) station in Victorville was done consistent with these land use and organizing principals, as set forth in the Desert Gateway Specific Plan. A bypass track, as suggested, has not been recommended at this time. At this stage of design the project team has focused on connecting to the proposed XpressWest Victorville station and placing a lead track into the XpressWest Operations and Maintenance Facility. If a bypass track were deemed to be required at some point in the future, it is likely that a design would be proposed that is similar to the California HSR Palmdale Station where there are 4 tracks in the middle of the station platforms; two northbound and southbound thru tracks and two adjacent station platform tracks. This allows trains to go past the station without stopping, albeit at a slower speed than if a bypass track were used.
L-21-6 (Other)	Your suggested revised text has been incorporated into Chapters 1 and 2 of the Final HDC EIR/EIS.
L-21-7 (Construction)	Your comment concerning exclusive use of Electric Multiple Unit trains is noted and revisions have been made to Section 3.6 (Construction Impacts) of the Final HDC EIR/EIS.
L-21-8 (Cumulative)	Your comment regarding the number of permanent jobs anticipated is noted and a revision has been made to Section 3.7 (Cumulative Impacts) of the Final HDC EIR/EIS.

Comment L-22

L-22

METROLINK

Southern California Regional Rail Autho

December 2, 2014

Ronald Kosinski, Deputy District Director
Caltrans District 7, Division of Environmental Planning
100 S. Main Street
Los Angeles, CA 90012

RE: **DEIR/EIS FOR HIGH DESERT CORRIDOR PROJECT**

Dear Mr. Kosinski:

The Southern California Regional Rail Authority (SCRRA) has received DEIR/EIS for the High Desert Corridor Project. Thank you for the opportunity to comment on key issues relative to SCRRA and operations of the railroad adjacent to the project site. As background information, SCRRA is a five-county Joint Powers Authority (JPA) that operates the regional commuter rail system known as Metrolink. Additionally, SCRRA provides rail engineering, construction, operations and maintenance services to its five JPA member agencies. The JPA consists of the Los Angeles County Metropolitan Transportation Authority (METRO), San Bernardino Associated Governments (SANBAG), Orange County Transportation Authority (OCTA), Riverside County Transportation Commission (RCTC) and Ventura County Transportation Commission (VCTC).

Our review comments will be mainly focused on the Antelope Valley Segment of the High Desert Corridor in the vicinity of the existing freight and commuter rail lines. These rail corridors are owned by UPRR and LA Metro respectively.

Below is a list of general comments for your consideration. Please note that these are initial general comments submitted to meet the public comment period. SCRRA may follow up with more specific comments for consideration if further analysis deems it necessary. Comments are as follows:

GENERAL

1. Metrolink currently operates 30 passenger trains and UPRR operates 5 or more freight trains daily through this area. These statistics should be noted correctly in Chapter 1 under the section entitled "Independent Utility". Trains can run 24 hours a day seven days a week and the frequency of trains is expected to increase in the future with planned developments in the area. L-22-1

One Gateway Plaza, Floor 12 Los Angeles, CA 90012 T (213) 452.0200 metrolinktrains.com

Ronald Kosinski
December 2, 2014
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2. The Freeway/Tollway Alternative (without HSR Feeder/Connector Service) would involve grade separated overhead structures over the existing rail lines in Palmdale. Close coordination with Metrolink and Metro is encouraged for adherence to our requirements and standards. L-22-2
3. For the Freeway/Expressway Alternative with HSR Feeder/Connector Service in partnership with HSR we are encouraged to see that all at-grade crossings in the Palmdale area would be grade separated. Further planning should also consider realignment of Sierra Highway with grade separation of the existing at-grade crossing for optimal safe access to the future transportation center. L-22-3
4. Metrolink is currently planning in the next 5 years on constructing a rail siding immediately north of the Palmdale Transportation Center. Future planning documents should take this into consideration as well as preserve right of way for a future second Metrolink main line track through the station. L-22-4
5. In Section 2.4.14 Railroad Crossings, a clarification should be noted with respect to ownership of the rail corridors in the Victorville and Palmdale areas. The fourth sentence starting with "The railroad lines are owned……" should be clarified to read "*The railroad lines are owned by UPRR and LA Metro in the north-south rail corridor in the Palmdale segment and owned by BNSF in the Victorville area.*". Railroad notifications and agreements would be required by SCRRA for the Metro owned rail corridor operated and maintained by SCRRA for the Metrolink commuter rail service. Any temporary or permanent easements would also be required of LA Metro. L-22-5
6. Under Section 2.9 Permits and Approvals Needed in Chapter 2, you should also include SCRRA/Metrolink for temporary Rights of Entry agreements for access to the rail right of way for construction purposes as well as Design Service Agreements or Memorandum of Understanding (MOU) for plan reviews an approvals and Construction & Maintenance Agreements for the future grade separations. These requirements can be found on the Metrolink website at http://www.metrolinktrains.com, go to "About Us" and then the Engineering & Construction section. L-22-6
7. In Chapter 2, Project Alternatives on page 2-8 under "Variation A" I believe the first sentence should read that *"This variation would place the HDC and Metrolink station platforms on the west side of **Sierra Highway** inside the Union Pacific Railroad (UPRR) ROW."* Your report places this station west of SR-14 which is not adjacent to the existing rail corridor. L-22-7
8. Metrolink is currently implementing Positive Train Control (PTC) on our regional system and potential compatibility and infrastructure issues need to be studied within the future shared corridors with HSR. PTC should obviously be considered when planning the integration of the systems. L-22-8
9. In Chapter 7 Distribution List, please remove previous SCRRA/Metrolink contacts and addresses. We are no longer at the 700 S. Flower Street address. Please add the following contacts in that section under Rail Agencies: L-22-9

Ronald Kosinski
December 2, 2014
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- Roderick Diaz
  Planning & Development
  One Gateway Plaza, Suite 2600
  Los Angeles, CA 90017

- Ron Mathieu
  Planning & Development
  One Gateway Plaza, Suite 2600
  Los Angeles, CA 90017

L-22-9 (con't.)

COMMENTS ON PROJECT ALTERNATIVES (CHAPTER 2)

1. We understand that for the build alternative with HSR feeder, a HSR station is proposed to be combined with the existing train station in Palmdale with two rail connection approaches being considered (Option 1 and Option 7). Each of these options will also have 3 variations (Variation A, Variation B and Variation C). We would request for any future option considerations do not preclude the potential of development of commuter rail service along the same HSR and highway corridor to Victorville. Such provision could involve additional right of way for parallel tracks or the provision to share tracks and additional right of way for potential station platforms. This would offer more options for increased mobility and transit accessibility for potential future development in the high desert region. L-22-10

2. Rail Options 1 & 7 Variation A:
   a. This variation keeps the Metrolink, UPRR and HSR lines within close proximity. Proper separations and barriers between HSR and conventional rail lines should be considered for safety of the systems.
   b. This option keeps the Metrolink station within close proximity of the proposed parking facility and within the footprint of the existing Palmdale Transportation Center. However, since the platform and parking will be separated by the HSR lines we would need to see pedestrian grade separated crossings for the Metrolink commuter passenger access to and from these locations. L-22-11

3. Rail Options 1 & 7 Variation B:
   a. This variation also keeps the Metrolink, UPRR and HSR lines within close proximity of each other. Proper separations and barriers between HSR and conventional rail lines should be considered for safety of the systems.
   b. Under this option, the Metrolink platform is relocated south and would present longer walking distances for patrons wanting to get to the parking lot and Transportation Center. Plans should incorporate either relocation of parking facilities or improvements to the pedestrian infrastructure. L-22-12

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4. Rail Options 1 & 7 Variation C:
    a. This variation shifts the Metrolink tracks within a new alignment west of the existing tracks and within the same corridor as the potential future HSR north-south alignment through Palmdale. There would be right of way dedication considerations for this variation under each option.
    b. The placement of the proposed Metrolink station platform under this variation is south of East Avenue Q and this would present a much greater walking distance from the parking facilities to our platform and not a preferred option for us. If this is the selected option then we would expect to see relocation of the parking facilities or improvements to the pedestrian infrastructure. L-22-13

Caltrans shall provide timely notice, in accordance with Public Resources Code Section 21092.5 and State CEQA Guideline Section 15088, of the written proposed responses to our comments on this environmental document and the time and place of any scheduled public meetings or public hearings by the agency decision makers at least 10 days prior to such a meeting. L-22-14

Thank you again for cooperating with SCRRA to help ensure the development of a successful project. If you have any questions regarding these comments please contact Ron Mathieu at (213) 452-0456 or via e-mail at mathieur@scrra.net.

Sincerely,

Roderick Diaz
Interim Chief Planning and Project Delivery Officer

Cc: Ron Mathieu, SCRRA
Jennifer Cohen, SCRRA
Scott Johnson, SCRRA
Don Sepulveda, Metro
Lupe Valdez, UPRR

Response to Comment L-22

Comment Code (Topic)	Response
L-22-1 (Other)	Your comment is noted and revisions have been made in the Dependent Utilities subsection of Chapter 1 of the Final HDC EIR/EIS.
L-22-2 (Design)	The vertical alignment of the Freeway/Expressway and Freeway/Tollway Alternatives (without HSR Feeder/Connector Service) will meet all Federal Highway Administration (FHWA), Federal Railroad Administration (FRA), Union Pacific Railroad (UPRR) and passenger rail clearance requirements for double stack containers and future electrification of the passenger rail service. All vertical supports will meet horizontal clearance standards and will be crash wall protected. The final design of the HDC freeway will be closely coordinated with Metrolink, Metro, UPRR, and the CHSRA.
L-22-3 (Design)	Grade separation of Sierra Highway will be designed and constructed by the California HSR project. Preliminary engineering plans show that Sierra Highway will be grade separated to pass below all HSR as well as all conventional passenger and freight tracks. However, this is preliminary and subject to change once the CHSRA finalizes design of their mainline track alignment.
L-22-4 (Design)	The HDC HSR tracks are being designed to accommodate two Metrolink mainline tracks and two freight tracks.
L-22-5 (Design)	The comment is noted. The text under Section 2.4.14 of the Final EIR/EIS has been revised as suggested.
L-22-6 (Other)	The comment is noted and Table 2.7 (Chapter 2) has been revised to include Southern California Regional Rail Authority (SCRRA)/Metrolink temporary Rights of Entry agreements, Design Service Agreements or Memorandums of Understandings, and Construction & Maintenance Agreements.
L-22-7 (Design)	The comment is correct (Sierra highway instead of SR-14) and the text at the location cited has been revised accordingly.
L-22-8 (Design)	The comment is noted. The compatibility between rail systems will be a critical element in the future design of the HDC HSR.
L-22-9 (Distribution)	The text has been revised to indicate the appropriate SCRRA/Metrolink contact information.

Comment Code (Topic)	Response
L-22-10 (Design)	Your input is well acknowledged. The CHSRA and the City of Palmdale have entered into an agreement to conduct a Station-Area Plan assessment with the objective of enhancing local and regional multi-modal transportation options. Caltrans will closely coordinate with the CHSRA, the City of Palmdale, and their consultants to provide input related to the station connection. Caltrans encourages Metrolink to actively participate with the CHSRA and the City of Palmdale in the Station-Area Plan development.
L-22-11 (Design)	Neither rail Option 1A nor 7A was selected as part of the preferred alternative; therefore, the issues raised by Metrolink no longer apply and will not be addressed.
L-22-12 (Design)	Neither rail Option 1B nor 7B was selected as part of the preferred alternative; therefore, the issues raised by Metrolink no longer apply and will not be addressed.
L-22-13 (Design)	It is noted that ROW dedication for Metrolink tracks would be required. A very important design consideration was to locate Metrolink platforms as close as possible to HSR platforms to enable pedestrian access among the rail lines. The City of Palmdale has received a grant from the CHSRA to prepare the Multimodal HSR Station Area Plan. This planning effort shall guide the ultimate design of the station and station area as well as enable the City to promote economic development, encourage station area development, and enhance multimodal connections to the future station.
L-2-14 (Coordination)	Caltrans will provide timely notice in accordance with Public Resources Code Section 21092.5 and California Environmental Quality Act Guidelines Section 15088.

Comment L-23

L-23

Draft High Desert Corridor Draft EIR Comments/Requests

TRANSMITTAL
DATE: Dec. 2, 2014

TO: Ronald Kosinski, Deputy District Director
District 7 Division of Environmental Planning
California Deparlment of Transportation NEPA/CEQA Lead Agency
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Sierra Club, Angeles Chapter, Transportation Committee
CCFAC Executive Director
SupervisorLovingood@sbcounty.gov

FROM: **Dr. Tom Williams,**
Sierra Club, Angeles Chapter, Transportation Committee
Citizens Coalition For A Community
4117 Barrett Road, Los Angeles, CA 90032-1712
ctwilliams2012@yahoo.com, 323-528-9682

SUBJECT: **High Desert Corridor Draft Environmental Impact Report**
/Environmental Impact Statement and Section 4(f) (De Minimis Findings)
SCH No. 2010091084 Project ID No. 071200035 (EA:2600U)

RE: **COMMENTS for** High Desert Corridor (HDC, New State Route-138/E-200) **DEIR/DEIS**
Caltrans District 7 – LA-14 – PM 57.8-64.1 and District 8 – SBD – SR-18 PM 84.3

Thank you for the opportunities to comment on the Draft Environmental Impact Report/Environmental Impact Statement and associated documents related to the proposed High Desert Corridor Project. Also thank you for the extension of the deadline for such comments; I believe it was very helpful for our commenters.

I could have continued for many more pages but I have been exhausted by the lack of real effort on the part of the preparers to make the DEIR/DEIS for HDC (Program) Project meaningful, adequate, and complete and initially assess its secondary and tertiary impacts for knowledgeable public reviewers. Unfortunately the current DEIR/DEIS and supporting documents appears to be an initial version of the vague program that has been developed by others, rather than a project or even program level DEIR preparation and is in need of major technical additions, editing, technical, and other revisions. If you need further clarifications and many more comments, I am available for discussions or correspondence with your staff. L-23-1

Dr. TW: Background: 40+ years with Worldwide/California logistics and transportation resources, management plans and systems, and remote resources development, with preparation, review, and commenting for 300+ EIRs/EISs/EAs (1972 to Date) and with 30+ years in Parsons and URS Corporations, 12+ years with Dubai Govt./Dubai World, and 6+years with Sierra Club Angeles Chapter, Transportation Comte., and Citizens Coalition for a Safe Community.

Thank you for the opportunity to review and comment. Our comments are largely general at this time within the time frame available. Additional comments will be submitted during the remainder of this week.

Dr. Tom Williams
323-528-9682

Dr. Tom Williams 12/10/2014 1

GENERAL COMMENTS

1. SEGMENTED PROJECT

The High Desert Corridor Project (HDC) is a segmented logistics and land use program focused on freight and truck transportation in the High Desert area. As indicated in several places some current industrial, commercial, and logistic land use will be connected by the proposed Project but the success of such a project depends on the current freight logisitcs process.

Freight transport to the various existing and future logistics developments requires various specific situations to occur which originate from the San Pedro Ports but require continuing requirements for transfers/transloading of 40ft containers (40Us) to US standard 53ft containers (53Us) and of aggregated container contents to destination contents for final delivery. Such processes are rapidly declining now and will be left in the same situation as 20ft container (TEUs) was 20 years ago. Shipping companies are refitting their ships of existing 40ft (40Us) standards to accommodate 53ft containers (53Us)from their western Pacific manufacturers. Similarly aggregated sea-freight is being replaced by single jobber destinations for containerized materials for cross-Pacific shipping.

The Project is closely related to the freight movement arriving in the San Pedro Ports and being directed to the HDC from Palmdale to Victorville and their associated airports rather than the Inland Empire-South logistics center at Colton and Ontario Airport. All freight functions currently required in southern County of Los Angeles (LACo), Hobart/Bandini/Piggy Back Yards, and in eastern San Gabriel Valley, Colton, will double to triple, and the Project assumes that space and technology cannot accommodate the growth at current areas, and more land will be required outside the current logistic areas and centers. L-23-2

The entire DEIR/DEIS represents only one poorly described and assessed component in a much larger program centered in the High Desert/northern district/portion of the County of Los Angeles but is fronted by the Joint Powers Authority, Metro, Caltrans, and representatives on various councils, boards, committees, and SCAG and requires and is a part of a larger program for freight from the ports through and beyond the Counties of Los Angeles (LACo), Riverside (RSCo), and San Bernardino (SBCo).

The entire document requires massive revisions to represent the directly and logistics process related setting, assessment, alternatives, and mitigations required for a full disclosure, adequate, and complete assessment of the HDC and its many un-discussed connections to the rest of southern California.

2. FREIGHT MODELING

Freight modeling suffers from lack of integrated data bases and timeframes (e.g., 2010 census and land uses), and of three or more different models and input formats and sources: SPP/PoLA-PoLB, CFMP, SCAG 2008-10, SCAG 2012, and MTA-STREAM

Some models project based on dollar value, while others tonnage, and others on 20ft containers (TEUs) without consideration of any equivalence and integration into that for the Project.

No mention is made of the current California Freight Mobility Plan and the stakeholders groups participating in the CFMP during 2014 and its modeling efforts. L-23-3

A fully coordinated and integrated Freight Model must be provided in order to justify the E-W transportation requirements/needs for an inland "port" north of the I-210. All traffic taken to HDC will have direct effects on the San Gabriel Valley land use and roads development and traffic for both benefits and adverse impacts. The HDC DEIR/DEIS appears to be a marketing document for the Joint Power Authority in order to compete with the Colton/Riverside-Inland Empire Logistics Corridor/Center.

Many models and documents appear to be based on 2000 census and updates to 2008 but without clear designation of the basis of the basic documents.

The model must include all pertinent parameters and values from the most recent census and related logisitics counts along with a quantitative the entire logistics process within the California area:

Factories <> Onshore Transport <> Source Port <> Shipping <> Receiving Ports <> Onshore Transport <> Warehouse/Sales

Shipping is evolving from 40ft to 53ft sea-containers and will be completed within 5-10 years.

Onshore Transport depends on the systems within the port and whether systems are effcient in handling transfers of empty and loaded containers to/from ships to the port vehicles and whether port/berth side vehicles require additional handling before delivery to warehouses.

Inland Ports, Freight Transfer, and Freight Transloading depend on multiple handling and many additional costs and schedule issues. L-23-3 (Con't.)
Simplest is direct transfer between ship and vehicle and container conveyance between berths and warehouses for endusers.

A single integrated freight model must be provided which incorporates other currently underway modeling and planning elements based on 2010 census and updated for 2015 with projections to 2040. The validated/integrated model then must be applied to all alternatives including those proposed herein these comments. Model must also clearly identify transport of empty freight containers and their storage within the Project and elsewhere.

3. CONFUSION AND CONFUSING

Plans and programs are suppose to provide a framework for organizing efforts and resources to achieve a clearly stated set of Goals, Purposes, and Needs which follows with clearly stated quantified and scheduled objectives. DEIR/DEISs are supposed to be written for public review and understanding, but undefined and inconsistently used terms, areas, and processes greatly confound and confuse the public readers and drive them only to the gross generalities of the executive summary which does not provide a full disclosure, adequate, and complete assessment of the Project. Program, plan, and report clarity and organization is required to convey such to decision makers, stakeholders, and the Public. However this and other freight related planning effort appear to be based on the approach of: "If in doubt, confuse".

Many terms are not clearly defined or referenced for industry-based definitions and authorities: Mobility, Transportation, Traffic, Shipping, "Freight", "Goods", "Cargo", "Commodities", and "Trade". These are used almost interchangeable even within the same paragraph, but they are not the same in detail. Although the terms are used throughout without definitions and virtually interchangeably, they are different for different writers and readers

Similarly, containers and TEUs are used in the DEIR/DEIS and Traffic Study but without clear definitions and L-23-4
conversions; use of 20-foot equivalent units is ancient history in the industry and confusion is both introduced or maintained when freight units are transferred from 20 to 40 to 53-foot containers (TEUs>40Us>53Us) and then used in other related projections which may be based on tonnage, dollar-values, or trucks. Similarly when port projections in TEUs are converted to gantry-lifts and then to trucks or rail-cars, many undefined and unquantified ratios are apparent but no clear conversion has been provided and included in modeling. Then further substantive confusion is introduced when dealing with empty and loaded containers for ships, ports, railcars and trucks.

The Project description, DEIR/DEIS and Traffic Study are for logistics facilities and not for the related destinations/origins of the facilities to be used and the modes to be used on such facilities between the modes' origins and destinations. Logistics studies are related to transportation but the DEIR/DEIS is combined with logistics, transportation, land uses, and competitive positioning between shipping and logistics centers. Standard units of traffic and transportation measures appear to be purposefully confused as to medium-heavy trucks vs light trucks and passenger cars, while freight to be moved is not directly related to the trucks and passenger car equivalents. Uses of "vehicles" and "trips" require quantified definitions and conversions from trucks and cars to vehicles and trips. Similarly no conversion is described nor quantified for equivalence of truck or car vehicles and trips. Although other reports have indicated that heavy duty truck have a weighted equivalence of 2.3-2.5 passenger car equivalence when assigning vehicles or trips per day (e.g., 10,000 trucks/lane/day = 23-25,000 passenger car vehicles or trips per day per lane).

The DEIR/DEIS requires a thorough revision and recirculation regarding the relationship of TEUs conversions to 53ft units (=containers, 53Us) for numerical projections and modeling, for the freight and logistics industries and massive changes expected in the near future, and for competition between the inland Empire and High Desert logistics centers and their market shares through 2040. Clear definitions and numerical statements as to vehicles, cars, and trucks involved in any projection are required throughout the DEIR/DEIS and the Traffic Study.

The Project description and DEIR/DEIS introduce additional confusion regarding areas and their "names": High Desert, Inland Empire, and LA basin, similarly screen-lines (without definition and usage) between LACo and both RSCo and SBCo can be confused as two are north-south and the other is east-west. No clear definitions and delineations are provided in the DEIR/DEIS and throughout the documents and their relationship to those of the Traffic Study. Similar, areal units of Project Site, Project Area, Project region, and Project vicinity are mentioned without delineation nor referral to existing maps or delineations. Likewise, the HDC-Joint Powers Authority boundaries, jurisdiction, and authorities are not provided in a public accessible form related to the DEIR/DEIS and the Traffic Study. L-23-4 (cont.)

The DEIR/DEIS and Traffic Study must be revised and recirculated with well defined/delineated and consistent usage for any technical, logistic, or freight terms, no matter how boring it may become. As transportation and logistic models are numerical and geographically based, all terms must be consistent between the models used for these documents and related to other related documents of the SPP, CFMG, and LRTPs. All jurisdictional boundaries must be provided and coordinated for all local agencies, including any assignment of properties to any incremental property tax revenues district.

4. LOGISTICS

As seen in the modeling for the "Project" and discussions in the DEIR/DEIS and TS, preparers do not clearly recognize the logistics process and changes underway. Simple example is related to container sizes where container maritime shipping are now including a very few 20ft, mostly 40ft (40U), and increasing numbers of 53ft units (53U) and a similar state occurred when TEUs were largely replaced by 40Us. Such changes have not been incorporated into the DEIR/DEIS nor the TS. If the international maritime transporters converted to 53Us for Pacific freight logistics, most needs for transfers/transloading in southern California would be eliminated and therefore the port and port related transportation of 53Us would be entirely different from what is considered and the needs and purposes of the HDC and much of Colton truck traffic would be greatly reduced and redirected, perhaps to Rail-On-Dock and Truck-To-Rail. L-23-5

Basic premises of the HDC DEIR/DEIS and TS are not well-founded and supported and appear to be proposed without consideration of the current container transformation for at least the Pacific freight trade.

An additional "Build Alternative" must be developed and included for general use of only 53Us without significant (<2%)need for transferring loads from 40Us to 53Us and for greater direct or local port loading of containers to rail for transport to beyond the Inland Empire and the High Desert.

Similarly an additional Build Alternative must be developed and included for Truck-To-Rail facilities south of the SR-60 or the I-210 or I-10 and the southern Inland Empire for most/95% of all freight activities without any significant/<5%, freight activities north of I-210.

5. COMPETITORS

The proposed Project does not exist in isolation from the rest of the logistic system of the Pacific basin and the US markets. Forecasted SPP logistics demands depend on the SPP successful competition with other US-related transportation systems, including:

1) Pacific coast ports in Mexico with their related rail networks connected to the south-central US and further by Class 1 rail networks;
2) Panama Canal Marine traffic to Gulf of Mexico Ports (Texas to Florida)with Class 1 rail network connections; and L-23-6
3) Panama Canal Marine traffic to some southeastern US/Atlantic coast ports (Florida to Carolinas)

Survival of freight transshiping through southern California depends on SPP's successful competing with these other ports and their landward logistic networks. In order to compete, productivity and efficiencies must

be greatly increased (e.g., currently 75,000 TEUs/year/Terminal of one or more than one berths to equal more international capacities of 150,000 - 300,000 TEUs/berth or even greater, maximum known was in early 1990s of 1M TEUs on one Maersk/Sealand Berth in HongKong).

Within Southern California, three-five major non-port facilities have significant freight throughput capacity, excluding the proposed Project: UPRR-ICTF, BNSF-SCIG, Hobart/Bandini/Piggy-Back, and eastern San Gabriel Valley/Inland Empire Logistics centered around Colton and the railroad facilities therein. For the proposed Project to achieve any significant freight flow, sea freight from SPP must pass through and by these existing and upgradable facilities before freight exits southern California to the north, NE, east, and even south.

The proposed Project description, the DEIR/DEIS, and the Traffic Studies have not provided a factual basis and modeling to demonstrate that the SPP, existing/underway logistics projects, and proposed Project can successful compete in the highly competitive market and with established most efficient shipping and port facilities. L-23-6 (cont.)

The proposed Project involves a forecasted almost tripling (285% increase of 14M to 40+mTEUs) of the container flow through the San Pedro Bay Ports (SPP:Ports of Los Angeles, PoLA, and Long Beach, PoLB. From this basic volume, tripling of direct/indirect port truck volumes may be expected and the proposed Project involves a splitting of volumes between the southern LACo logistics center (Hobart-Bandini-PiggyBack Yards), the Inland Empire Logistics center in and around Colton (central Riverside County, RSCo/eastern San Gabriel Valley), and as proposed the southern High Desert of LACo and northwestern San Bernardino County (SBCo). Assuming a simple conversion of TEUs to 40Us and to 53ft containers, the buildout throughput could be divided equally between the three logistic areas for 5.2M 53Us per year (40M TEUs = 15.6M - 53Us) and average annualized flow of 14,300 53Us or truck trips per day to the HDC and its related facilities.

The proposed Project description, the DEIR/DEIS, and the Traffic Studies must provide a revised and upgraded model data bases for post-2010 census information factual basis and modeling to demonstrate that the SPP, existing/underway logistics projects, and proposed Project can successful compete in the highly competitive market and best available management, shipping, and port processing system.

6. HIGHWAY DESIGN AND DEVELOPMENT

Right-of-Ways (ROWs) and Maximum Lanes are not clearly identified as to current adaptation of existing ROWs to ever increasing lanes for HOV and HOT lanes and variances for drainage ways and inlets in travel lanes.
No maximum facilities allocations have been given to the typical or assumed designed ROW.
Provision of a central expanded railroad ROW must be forever preserved and not allowed to be used for additional pavement unless considered in the DEIR/DEIS as part of the Project Alternative.
Similarly interchanges and ramps are confusingly merged although ramps can be provided at every "paper" road crossed by the Project. Similarly the Project's interactive map shows "ramps" but when looked at in detail ramps could easily be changed to include apparent over-crossings. Similarly, it is common to change ramps into interchanges if adjacent properties can be acquired for improved access to such properties. L-23-7

The DEIR/DEIS and TS must be revised to incorporate at least as an Alternative a complete interchange conversion of all ramps and any stub-ends for major arterials based on ROW widths throughout the Project route.

7. LAND USES / RAMPS / ROW / CORRIDOR

As indicated elsewhere the proposed Project is directly related to not only the existing logistics centers along the route indicated in the Project description but also all properties within one mile from the existing proposed ROW. Similarly land use impacts and related environmental impacts of such an alternative must assumed at least with full conversion of existing vacant lands to logistic uses of warehouses and parking areas. L-23-8
An Build Alternative must be developed and assessed regarding the full logistics development of all lands within one mile either side of the entire route (60+miles) with appropriate ramps and interchanges at 1-2 mile intervals, 30+15 rather than <20 ramps/interchanges.

DEIR/DEIS ES-22/1 Truck Traffic The importance of truck traffic as part of the overall freight moving system in Southern California cannot be overstated. This report examined existing truck traffic conditions in the Los Angeles/Inland Empire region, essentially defined as San Bernardino and Riverside Counties.
ES-22/4 TRUCK VOLUMES Relative to other state highway facilities in the Inland Empire region, truck volumes on east–west highways between I-5 and I-15 in the High Desert region are very low. Figure 10...The 2009 Caltrans truck count report shows an average daily volume of...
As a new transportation link, current traffic loads are largely irrelevant, especially when doubling-tripling the volumes for the buildout.

Adequate/complete model of truck traffic must be provided from the Ports to ultimate destination (California Origin-Destination) to demonstrate the importance of the Project to the current and future overall freight picture.

Similarly no truck traffic has been directly related to the current and expected future containers situations (international/Pacific changeover to 53Us). All truck traffic assessment must be provided related to the proposed Project and the existing mentioned conditions in Los Angeles, San Bernardino, and Riverside counties and how the Project and future without project would operate throughout all counties.

Do-Nothing/Future without Project Alternative must be included and assessed. Such an alternative must include change over to 53Us and phase out of existing transfer/transloading facilities and major conversion to At-Berth/On-Dock train and truck loading, say 50/50 ratio.

ES-22/2 ROUTE CHOICE TO ACCESS THE HIGH DESERT CORRIDOR Truckers predominately choose SR 58 (Tehachapi) or I-5 (the Grapevine) to access Los Angeles and San Bernardino counties from Kern County and points north.

Documentation must be provided for support of statement of their choices and especially in relationship to the grade-fuel-time issues of the two routes and percentages from SPP (Ports of LA/LB) to San Joaquin Valley. L-23-8 Con't

Such documentation and analyses must be provided and its importance to the Project achievement of purposes and needs.

ES-26 *Source:* Caltrans, **2009** Traffic Volumes on the State Highway System, Truck Data
Figure 10: Medium–Heavy (4-Axle) and Heavy–Heavy (5- and 6-Axle) Truck Volumes in the High Desert Corridor
28/4 Traffic Volume Forecasts
The traffic forecasts contained in this document were produced using the Southern California Association of Governments (SCAG) **2008** RTP Regional Transportation Model. The model is calibrated to year **2000 travel behavior** and validated to year 2003 travel statistics. A complete description of the model is provided in a January 2008 report entitled ***2003*** *Model Validation and Summary*...
ES-30/1 For the High Desert Corridor Traffic Study, the following **user-defined modifications** were made to the SCAG model. Truck trip characteristics for major distribution centers.
ES-30/5 **Traffic Volume Forecast Comparison**
...subregional traffic studies have been conducted in the Victor Valley portion of the study area within the past five years...*High Desert Corridor SR-18 Realignment Traffic Analysis Report*, was prepared...and was finalized in **March 2010**. The *Victor Valley Area Transportation Study* subregional transportation forecast model was applied to develop the traffic forecasts, taking into account two modifications. In order to account for trucking activity at the Southern California Logistics Airport, **25,300 additional truck trips** were added to the Victor Valley Area Transportation Study truck trip tables, into and out of the Southern California Logistics Airport each weekday, representing full buildout of the Southern California Logistics Airport, as documented in the *Southern California Logistics Airport AM and PM Peak Hour Intersection Analysis* traffic impact report...additionally added trips associated with the full buildout of the *Desert Gateway Specific Plan* to the *Victor Valley Area Transportation Study* traffic model. Full buildout of the *Desert Gateway Specific Plan* area would provide for 26,100 residential units, housing a population of 82,900, and some 22,590,000 square feet of office, commercial and industrial uses.

Like the Interactive Maps based on 2000 census information, volumes are based on counts during a greatly depressed economic situations and have little relevance to the current conditions and those forecasting for the next 25 years. They may have also been based on floor/ground area without consideration as to SPP, Riverside-Inland Empire, I-710/SR-60/I-15/215, SR-710/I-210/I-5/SR-14, and California

New counts or updated modeling is required for a revised DEIR/DEIS and TS.

Response to Comment L-23

Comment Code (Topic)	Response
L-23-1 (Other)	Thank you for providing comments on the HDC Draft EIR/EIS. The comments you expressed concerning the quality of the EIR/EIS are general in nature and specific examples are not provided to support the concerns. Every effort has been made to address the full range of anticipated environmental impacts along the 63-mile High Desert Corridor by following the policies, procedures, and methodological approaches associated with the various disciplines as identified in the Caltrans Standard Environmental Reference so that the EIR/EIS complies with the requirements of the National Environmental Policy Act (NEPA) and the California Environmental Quality Act (CEQA). The Draft EIR/EIS was publicly circulated with a total of four build alternatives that met the purpose and need of the project, along with the No Build alternative. The purpose of this document is to provide the relevant information from the various technical and background studies conducted along the corridor to the public and decision makers so that informed decisions may be made regarding the proposed transportation project. The document provides information on environmental impacts the project alternatives may have, common project features and potential community enhancements. Proposed impact avoidance and minimization strategies have also been incorporated into the project as mitigation, which become mandatory commitments on the part of Caltrans upon the final record of decision being issued.
L-23-2 (Traffic)	The commenter is directed to the following sections of the HDC Traffic Study technical report, where assumptions regarding the utilization of the HDC for trucking activity are described in length. Specifically, Section 2.5 pages 2-98 through 2-107, describe the existing corridor as not being attractive to truck movements between SR-14 and I-15, or connecting regional roadways. Section 3.1.1, dealing with the modifications to the Southern California Association of Governments (SCAG) Regional Travel Forecast Model, indicates on page 3-10 under item 7 that only minor changes were made to the model to reroute a portion of the I-15 truck travel to/from the north via the HDC to the Southern California Logistics Airport (SCLA), as well as other distribution centers in Victorville. Page 3-11 indicates that "other light, medium and heavy truck trip distribution patterns produced by the SCAG model were left unchanged." As a result, most of the truck movements utilizing the HDC are internal to the HDC, traveling between Antelope Valley and Victor Valley origins and destinations. Truck trips using the HDC to travel to or from the San Pedro ports are very few in number. The prospects for the proposed Antelope Valley Inland Port serving as a satellite intermodal facility for the San Pedro ports are discussed on page 3-16 in Section 3.2, Land Use Assumptions. The document states, "Given the concentrations of distribution centers in the Los Angeles region, south of the San Gabriel Mountain range, inland ports located in the High Desert were not ideally located to support this satellite marine terminal concept." On page 3-19, of this same section 3.2 dealing

Comment Code (Topic)	Response
	with land use assumptions, the employment assumptions, and therefore truck activity assumptions of the SCLA are described. Approximately one-half of the build out land use is assumed for the 2040 design year. Please see footnote 30 on page 3-27 for additional details. Also, please see Section 4.13.2 beginning on page 4-282 regarding the land use sensitivity test, conducted to address the future potential development of the Antelope Valley Inland Port. The text states on page 4-283, "For the purpose of analyzing the potential impacts of an Antelope Valley inland port development on the High Desert Corridor freeway/expressway project, the Antelope Valley inland port is defined as an expansion of the existing Antelope Valley aerospace economic development cluster." The above, and the Traffic Study in general, describe typical weekday conditions. One of the additional attributes of the proposed project is that it would provide an alternative route opportunity in case of an incident affecting the mountain passes which carry I-5 and I-15.
L-23-3 (Traffic)	Please see response to Comment L-23-2. The preparation of a single integrated freight model for the purpose of the HDC environmental documents is not necessary. The comment implies that the HDC is intended to compete with the east-west logistical corridors located south of the San Gabriel Mountains, which as described in the response to Comment L-23-2, it is not. The concentration of distribution centers along the HDC is clearly lacking, compared with the Los Angeles basin. Also, the location and elevation of the HDC is clearly an impediment to transloading freight originating from or destined to the San Pedro ports. The HDC will provide a valuable east-west linkage for the Antelope Valley and Victor Valley metropolitan areas, and the connecting roadways. Additionally, the HDC Freeway/Tollway will provide a valuable alternative route in the case of an incident affecting the limited number of mountain passes crossing the San Gabriel Mountain range.
L-23-4 (Traffic)	While the commenter contends that the HDC is first and foremost a freight corridor, with the accommodation of truck movements being the key element of the overall project, a review of the Project Description in the Draft EIR/EIS indicates that improving the regional goods movement network is just one of five objectives of the project, and the words "goods movement" do not occur in the text until page 1-9 of the document. The second mention of implied logistics capacity needs occurs on page 1-15 where the text states, "Meanwhile, the High Desert region's vast tracts of available undeveloped industrial land, combined with a new and growing pool of workers, suggests that southern California's production and distribution firms will ultimately be attracted to the area." The word "truck" is mentioned for the first time on page 1-16, within the following context: "These non-recurring incidents can create safety hazards and delays for miles, affecting commuters, trucks, and other motorists." Trucks are again mentioned once on page 1-18 within the context of highway closure due to flooding, natural disaster, or other emergency. "Commuters, trucks, and other commercial vehicles traveling between the High Desert and the Los

Comment Code (Topic)	Response
	Angeles Basin on a regular basis would be significantly delayed by a closed facility." The 2007 I-5 Truck Tunnel Fire is mentioned on page 1-19 as an example of a recent highway closure. The most extensive discussion of goods/freight movement occurs on pages 1-20 through 1-22, with most of the discussion focused on the SCLA, which enplaned 227 metric tons of cargo in fiscal year 2009, compared with 1.95 million metric tons being shipped in total from airports in the Los Angeles region. The Draft EIR/EIS is nevertheless supportive of enhancing mobility for goods movement through both SCLA and the Palmdale Regional Airport, should an aerospace economic development cluster, and research and development and/or logistics distribution center be forthcoming at a future date (page 1-23). The Traffic Study is internally consistent. The Draft EIR/EIS is also consistent with the Traffic Study, but considers a broader area. Within the High Desert region of Los Angeles and San Bernardino Counties, only one "screenline" is mentioned in the Traffic Study, that being the Los Angeles/ San Bernardino County line, which generally runs in a north-south direction within the High Desert region. The commenter makes other general statements which do not affect the relevancy of the environmental and traffic study findings.
L-23-5 (Traffic)	The comment appears to be directed toward the SCAG Regional Travel Model and its truck activity sub model. The contention is that the SCAG model does not adequately reflect the utilization of higher capacity trucks. This contention is based on the belief that use of the common international measure of cargo, that being the smallest size box (20-foot equivalent unit or 20-foot-long cargo container), is obsolete as the size of cargo containers range from 20 feet to over 50 feet in length. The commenter is directed to the San Pedro ports web sites, or virtually any port web site, which commonly report containerized cargo in terms of twenty-foot equivalent units (TEU). No additional alternatives will be developed or analyzed to reflect 53 TEUs or the need for transferring loads or for greater direct or local port loading of containers to rail or for additional truck-to-rail facilities south of SR-60 or I-210 or I-10 as all of these issues have virtually nothing to do with the design of the HDC freeway or tollway facilities.
L-23-6 (Traffic)	Your comments are noted. The comments have little relevance to the design or environmental impacts of the HDC Freeway and Tollway build alternatives. Insofar as logistics, the proposed project primarily serves the metropolitan areas of Antelope Valley and Victor Valley, which are forecast to have a combined population of over 1.3 million residents by 2040. This level of development requires local deliveries and pickup of goods consumed or produced by this sizable population. Competition among Pacific coast ports, the Panama Canal, the number of berths available in the San Pedro ports, all have little to do with the need for HDC residents to consume or produce goods. The proposed project description, Draft EIR/EIS, and the Traffic Study will not be revised in response to this comment.

Comment Code (Topic)	Response
L-23-7 (Design)	The proposed ROW is clearly illustrated on page S-6 of the Draft EIR/EIS in Figure S-3 as being 300 feet to 500 feet. A 100-foot envelope for the HSR Feeder/Connector service is identified in the center of the overall facility ROW. Four traffic lanes per direction are illustrated on the graphic, with a median of sufficient width to accommodate an additional traffic lane if needed. Further description of the facility is provided in Chapter 2 of the Draft EIR/EIS, in section 2.4. The locations of interchanges are listed on page 2-34 and illustrated on Figure 2-23, along with grade separations which do not provide access to the freeway/tollway. A typical intersection configuration is illustrated by Figure 2-22. Several interchanges provide the opportunity for ramp terminal intersection control utilizing roundabouts, as illustrated in Figure 2-24.
L-23-8 (Traffic)	The potential for development of warehouse or logistical centers within the HDC region is confined to the metropolitan areas of Antelope Valley and Victor Valley. The development of these facilities will be in response to local population growth. The recommendation for testing a corridor reflecting build-out of available corridor lands for logistics support is inconsistent with adopted general plan land use designations. Regarding the quoted passages from the Draft EIR/EIS and Traffic Study, many of the passages are quoted without context. New counts or updated modeling will not be performed for the Draft EIR/EIS or the Traffic Study. Documentation and logic is provided to support trucker route choice to access the HDC. An adequate modeling of truck traffic has been undertaken. Furthermore, the volume of trucks forecast to be utilizing the HDC represents less than 10 percent of the overall traffic volume. The suggested re-study to address issues which are not relevant to the assessment of environmental impacts or project design requirements is not warranted.

Comment L-24

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SAN BERNARDINO COUNTY

Department of Public Works
• Environmental & Construction • Flood Control
• Operations • Solid Waste Management
• Surveyor • Transportation

Gerry Newcombe
Director

November 20, 2014

File: 10(ENV)-4.01

Ronald Kosinski, Deputy District Director RK
Caltrans District 7, Division of Environmental Planning
100 South Main Street
Los Angeles, CA. 90012

RE: CEQA – NOTICE OF AVAILABILITY OF A DRAFT ENVIRONMENTAL IMPACT REPORT FOR THE HIGH DESERT CORRIDOR PROJECT FOR CALTRANS

Dear Mr. Kosinski:

Thank you for giving the San Bernardino County Department of Public Works the opportunity to comment on the above-referenced project. **We received this request on October 7, 2014,** and pursuant to our review, the following comments are provided:

Environmental Management Division (Brandy Wood, Ecological Resource Specialist, 909-387-7971):

1. Page 3-418, third paragraph, first sentence is not clear. The first sentence states "Assuming the loss of estimated acreage for each of the plant communities, these are relatively low amount when considering the amount of undisturbed habitat within the region and especially within the overall Mojave Desert, with the possible exception of creosote bush scrub." Furthermore, we are concerned that the project proponent is indicating that since the Mojave Desert is relatively undeveloped with undisturbed habitat, the project impacts are not significant. This is neither a proper justification nor mitigation for the removal of native vegetation. We also disagree regarding the revegetation of the slopes after construction. Revegetation of the slopes to the roadway development would only invite wildlife and possibly increase the number of wildlife road kill. L-24-1

2. The assumption that impacts to creosote bush scrub can be mitigated by revegetation is questionable. Creosote bush rings in the Mojave can be as much as 12,000 years old; please see "Vasek, F.C. 1980. *Early successional stages in Mojave Desert scrub vegetation*. Israel Journal of Botany 28:133-142". A hydroseed spray does not mitigate the impact to a vegetation community which has the potential to be thousands of years old. L-24-2

3. Townsend's big eared bat, a candidate for protection as an endangered species under the State of California Endangered Species Act, is not addressed in this document. L-24-3

4. Page 3-498 states "It is expected that because burrowing owl are known to migrate and occupancy of any particular area can change from time to time for several reasons, additional surveys will be required within 1 year prior to construction. The purpose of the L-24-4

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survey would be to determine the number of pairs or individuals within the impact limits for mitigation calculation." Surveys for burrowing owl should be conducted according to the 2012 guidance issued by the California Department of Fish and Wildlife. L-24-4 (con't)

5. Page 3-515 begins the Avoidance, Minimization and/or Mitigation Measures. We have several concerns regarding this section.

   a. BAN-1 states Impacts to silvery legless lizard, coast horned lizard, San Diego woodrat, and American badger can be minimized by requiring a biological monitor to be present onsite during initial clearing and grubbing activity to capture and relocate any individuals. We are concerned that the capturing and relocation of an American badger is not feasible by a biological monitor. Quite a bit more of an effort would be needed to capture and relocate this species. L-24-5

   b. BAN-2 states "If birds are observed nesting, construction will stop until it is determined that the fledglings have left their nests. If this is not possible, coordination with a qualified biologist should take place to minimize the risk of violating the MBTA, and the following minimization measure put in place: an ESA fencing buffer of 150 feet for songbirds and 500 feet for raptors, which must be maintained during all phases of construction." We are concerned with this section. It is not clear what sort of buffer will be established during the initial observation of a nest. Will construction stop throughout the project? Furthermore, according to the 2012 burrowing owl guidance issued by CDFW establishes recommended restricted activity dates and setback distances by level of disturbance. L-24-6

Recommended restricted activity dates and setback distances by level of disturbance for burrowing owls (Scobie and Faminow 2000).

Location	Time of Year	Level of Disturbance		
		Low	Med	High
Nesting sites	April 1-Aug 15	200 m*	500 m	500 m
Nesting sites	Aug 16-Oct 15	200 m	200 m	500 m
Nesting sites	Oct 16-Mar 31	50 m	100 m	500 m

* meters (m)

   c. BAN-3 states "Clearing and grubbing of vegetation will be conducted outside of the bat maternity season. If clearing and grubbing of vegetation needs to be conducted during bat maternity season (March 1 to October 15), a qualified biologist will need to monitor construction during clearing, grading and/or trenching activities for any occurrence of the species breeding." Bats are very sensitive during the maternity season and may abandon their young if they are disturbed. We are concerned and question whether a biological monitor will be effective or have an effect at all on the maternity roost if construction proceeds during maternity season. We recommend avoidance and a mandatory buffer if a bat roost is found during the maternity season. L-24-7

   d. BAN 4 states "a biological monitor will be present a minimum of 1 week prior to clearing and grubbing activities to walk the proposed areas to be cleared and grubbed and dispel animals that have the ability to flee." This minimization measure L-24-8

does nothing to minimize project impacts. Other than a bird, no species of wildlife will flee out of the project site due to a biologist walking by it. A wildlife species may run from the biologist to its next hiding spot, probably within a short distance of its home range. L-24-8 (con't)

e. BAN 5 states "A qualified biologist will survey for, trap/capture species present, and relocate to a designated area approved by USFWS or CDFW. In regards to desert tortoise, this species is protected both by the United States of America and the State of California. To relocate desert tortoise would take coordination and approval by both agencies. Furthermore, relocation of desert tortoise has proven to be more detrimental to the species than just the take of an individual. We recommend reevaluating this minimization measure to appropriately minimize and mitigate the projects impacts to this species. L-24-9

6. Page 3-520 indicates Mojave ground squirrel several times. The correct spelling is Mohave ground squirrel (MGS). L-24-10

7. Table 3.3.5-1 states MGS was not observed during investigative surveys. Were these "investigative surveys" completed during the appropriate season? Did protocol MGS trapping occur? We are concerned with the conclusion of "low potential" for MGS to occur with the determination of the next sentence that there is "potential suitable habitat present". L-24-11

8. Page 3-522 states "Suitable habitat is present within the BSA for Swainson's hawk, western yellow-billed cuckoo, and Mohave ground squirrel, but none were observed during focused surveys." Were these focused surveys for Swainson's hawk, western yellow-billed cuckoo, and Mohave ground squirrel or is the document stating that these species were not observed incidentally during focused surveys for desert tortoise, southwestern willow flycatcher and least Bell's vireo (stated on page 3-521). If focused surveys for Swainson's hawk, western yellow-billed cuckoo, and Mohave ground squirrel were not completed, this sentence is misleading. L-24-12

9. Page 3-528 states for Mohave ground squirrel "Potential suitable habitat for this species is present within the BSA; however, none were observed during focused surveys and impacts are expected to be low." Accepted protocol requires trapping to determine presence/absence of Mohave ground squirrel. As trapping did not occur, this determination is not supported. L-24-13

10. Page 3-478 of the document indicates Slender-horned spineflower (*Dodecahema leptoceras)* as having potentially occurring. "Suitable habitat occurs within the BSA, but the species was not observed during focused surveys." We believe this a "cut and paste" error. Slender-horned spineflower is listed as endangered under both federal and state Endangered Species Acts and is on the CNPS List 1B. It occurs in Los Angeles, Riverside, and San Bernardino counties. Known locations include Soledad Canyon, Big Tujunga Canyon, the Santa Ana River Wash near Redlands, the San Jacinto River floodplain near Hemet, the Vail Lake area east of Temecula, and Temescal Canyon near Lake Elsinore. It occurs between about 700 and 2,500 feet elevation. The tables should be reviewed for accuracy prior to circulation. L-24-14

Water Resources Division (Mary Lou Mermilliod, PWE III, 909-387-8213):

1. In general, it appears that the DEIR has addressed the major concerns of the Flood Control District (District). However, the District's recommendations are most often made for site specific conditions. Consequently, the recommendations made here are general in nature until such time as more detailed plans become available. L-24-15

2. If encroachment onto District right-of-way is anticipated, a permit shall be obtained from the District. Other on-site or off-site improvements may be required which cannot be determined at this time. L-24-16

Environmental Management Division (Nancy Sansonetti, Senior Planner, 909-387-1866):

1. As a global comment, the spelling, formatting and QC of the entire document needs to be refreshed. For example, the table of contents contains formatting and content errors and Page 3-566 contains a floating sentence portion above the Air Quality mitigation list. These should be corrected. L-24-17

2. Various acreages of disturbance (including those quantified for biological impacts) are listed throughout the document; however, it is unclear whether those acreages are inclusive of construction impact areas, equipment staging areas for each segment, multi use turnouts, diamond interchanges, roundabouts, pullouts, multimodal use stations, or whether just the alignment corridor was calculated. Please clarify. L-24-18

3. Specific impacts from potential road realignments (i.e. Apple Valley Road realignment) do not appear to have been quantified nor mitigated. L-24-19

4. The document determines there are unavoidable and significant environmental impacts in the following areas:

   - Agriculture: loss of 252 acres of Important Farmland to nonagricultural use; however, the Loss of 2315 acres of designated grazing land was determined to be not significant based on other vacant land available; however the impacts of relocating grazing animals to those locations and the grazing right availability has not been analyzed sufficiently to warrant a finding of non significance. L-24-20

   - The aesthetics discussion does not adequately analyze the potential visual impacts from proposed sound walls, retaining walls, and a 63 mile linear man made feature. L-24-21

   - Biological Resources: the loss of 6900 acres(+/- depending on answer to comment 2) of natural communities and wildlife habitat and creation of a barrier to wildlife movement has not been fully analyzed. Proposed mitigation measures are contradictory in nature (eg. Measure BTE-9 states that habitat restoration for the tortoise will occur between the highway and the edge of ROW, but Measure BTE-6 states that the boundaries of ROW will be fenced to keep wildlife out). L-24-22

- It would be helpful to have a list of all mitigation measures in one comprehensive place for review in addition to having them listed in appropriate discussion locations. L-24-23
- No replacement and preservation of suitable Desert Tortoise habitat is proposed as mitigation for the full take of land for the development footprint. This should be added. L-24-24
- Night lighting impacts to wildlife from construction appear to have been addressed; however, it is unclear if on-going headlight lighting from use of the corridor has been analyzed for wildlife impacts. L-24-25
- A full analysis of impacts to wildlife population (and safety to motorists) from animal/vehicle impact does not appear to have been provided. L-24-26
- Land Use and Planning: Growth inducing impacts; Cumulative and far reaching impacts from conversion of vacant and rural land use to traffic corridor with resulting development along the corridor has not been fully analyzed for its departure from existing uses and viewsheds. L-24-27
- The document states that the ultimate number of lanes will be based on the traffic analysis for ROW purchase. Is this a study that has not occurred yet? Is disturbance area based on the ultimate ROW for the largest number of lanes possible? Please clarify. L-24-28
- Document states 3216 acres will be converted to transportation use, 6900 acres of natural plant communities will be lost. Please do a table showing acreage areas of disturbance and what they are being used for. L-24-29
- Did the Air Quality analysis take into account the additional vehicle miles that would have to be traveled by vehicles upon the severing of north/south road routes? Will this divide established communities? Please ensure that those potential impacts have been fully analyzed. L-24-30

If you have any questions, please contact the individuals who provided the specific comment, as listed above.

Sincerely,

NIDHAM ARAM ALRAYES, MSCE, P.E., QSD/P
Public Works Engineer III
Environmental Management

NAA:PE:nh/CEQAComments_CaltransD7_HighDesertCorridorProject_112014

Response to Comment L-24

Comment Code (Topic)	Response
L-24-1 (Biology)	Caltrans thanks you for participating in the environmental process for the HDC Project. One measure used to evaluate the level of impact to a specific resource is relative abundance. The level of impact to one acre of a special-status plant community with few acres occurring within the region is certainly higher than the impact to one acre of a relatively common plant community with millions of acres occurring within the region of the proposed project. Another measure used is the quality of the habitat. Although it may be determined that the level of impact to a specific plant community is less than significant for the plant community itself, it could be determined that the impact to that same area is significant when it is analyzed as foraging habitat for a special-status species. Sections discussing impacts to plant communities and special-status species have been amended and clarified; they can be viewed in Sections 3.3.1 and 3.3.5 of the Final EIR/EIS.
L-24-2 (Biology)	Revegetation of temporarily impacted areas is only one method proposed to offset impacts to a specific plant community. Additional measures include avoidance, and purchase, restoration and preservation of a similar community. Mitigation measures for this topic were amended and can be viewed in Section 3.3.1 in the Final EIR/EIS.
L-24-3 (Biology)	Section 3.3.4 of the EIR/EIS has been revised to now address Townsend's big eared bat.
L-24-4 (Biology)	Section 3.3.4 has been revisited and edited based on your comment with the corrections now incorporated into the Final EIR/EIS.
L-24-5 (Biology)	You are correct that the American badger is a difficult species to work with. However, capture and relocation is feasible with the proper equipment and qualified personnel.
L-24-6 (Biology)	If an active nest is discovered, all construction related activities will cease in that area and Environmentally Sensitive Area (ESA) fencing will be installed in a radius around the nest (150 feet for songbirds, and 500 feet for raptors). A qualified biologist will regularly monitor this nest and if construction activities outside the buffer zone continue to impact the nest, a greater buffer will be established. As for burrowing owls, the appropriate setback distances recommended by the CDFW will be adhered to.
L-24-7 (Biology)	The use of a qualified biological monitor will allow for detection of bat species within the proposed project impact area. If roosting bats are found, appropriate buffers will be established to reduce the potential for impact. Caltrans has successfully used this approach on other projects. Section 3.3.4 of the Final EIR/EIS was amended to clarify the need for a buffer zone.

Comment Code (Topic)	Response
L-24-8 (Biology)	There are several benefits to having a pre-construction survey conducted. The primary benefit is to have the most current information about wildlife occurring within the impact zone so that if needed, avoidance measures can be implemented or adjusted. Although it is acknowledged that little can be done to cause some wildlife such as small mammals and reptiles to flee from harm's way, avoidance measures can be implemented should a special-status animal be detected. This measure in conjunction with focused surveys and continual monitoring during construction will reduce impacts to individual animals.
L-24-9 (Biology)	Because desert tortoise was detected within the proposed project limits during focused surveys, and because this species is listed as threatened under the federal Endangered Species Act, Caltrans prepared a Biological Assessment (BA) and received a Biological Opinion (BO) from the U.S. Fish and Wildlife Service (USFWS). This is one measure included in the BO. All measures described in the BO are included in Section 3.3.5 of the Final EIR/EIS.
L-24-10 (Biology)	Your comment about the misspelling of the Mohave ground squirrel (MGS) has been noted and revisions have been made in the Final HDC EIR/EIS.
L-24-11 (Biology)	Caltrans has conducted protocol level surveys to determine presence/absence of Mohave ground squirrel within high to moderate suitable areas within the proposed project limits. However, because these surveys are valid for one year, protocol level surveys are to be conducted again within one year prior to initiation of construction of the proposed project. Because construction is not expected to occur within the next year, these protocol level surveys will be conducted again. They were termed investigative for the purposes of the EIR/EIS because these surveys will be conducted again. Section 3.3.5 of the Final EIR/EIS was amended to clarify this distinction
L-24-12 (Biology)	Section 3.3.5 has been edited within the Final EIR/EIS to clarify. Focused surveys for Mohave ground squirrel, Swainson's hawk, and yellow-billed cuckoo have been conducted and specific survey results can be reviewed within the technical documents (available at the Caltrans HDC Project website) and summarized in the related sections of the Final EIR/EIS.
L-24-13 (Biology)	All Mohave ground squirrel focused surveys have yielded negative results and this supports the conclusion that this species is absent within the project limits. However, because this species has the ability to migrate, and suitable habitat for this species occurs within the Biological Study Area (BSA), there is still potential for this species to occur in the future. Therefore, pre-construction surveys will be conducted to fully determine presence/absence of this species within the limits of the proposed project.

Comment Code (Topic)	Response
L-24-14 (Biology)	Section 3.3.3 has been revisited and edited based on your comment and are reflected in the Final EIR/EIS.
L-24-15 (Hydrology)	Your comment has been noted. Caltrans will coordinate with your office when more detailed plans are available.
L-24-16 (Hydrology)	Your comment is noted. A permit for any encroachment into the County's ROW would be obtained prior to any construction activities.
L-24-17 (Other)	Your comment is noted and revisions have been made in the Final HDC EIR/EIS.
L-24-18 (Other)	The acreage of the disturbance presented in the Draft EIR/EIS was calculated based on the area within the resources study area that would be impacted by the roadway construction activities. The disturbed area was also broken down to the temporary and permanent impact categories.
L-24-19 (Community)	The extension of Apple Valley Road, north to "Quarry Road" is noted on the layout plans as "Apple Valley Rd Extension Future Project By Others." Similarly, the following are all noted on the design layout plans as "Future Project by Others:" • Proposed Outer Highway 15 • Proposed Papago Road • Falchion Road (Realigned) connects to the proposed Outer Highway 15. The proposed Frontage Road on the south side of HDC is part of the project, as is the proposed Frontage Road along the north side of the HDC. This area is included in the project study area and the impacts on various environmental resources were assessed as part of the project.
L-24-20 (Farmland)	As Section 3.1.3, Farmland/Grazing Land states, impacts to grazing land represent about 0.1% and 0.3% of the total grazing lands for Los Angeles and San Bernardino counties, respectively. While there are no regulatory requirements to provide replacement grazing lands when the new land uses are for public purposes, pursuant to 43 CFR 4100, the livestock owner is given two years prior notice before the lease agreement is modified so that alternate livestock management adjustments can be made, including relocating animals and improvements located in the project footprint. Upon approval of the project, and when sufficient design details are known, Caltrans ROW staff will contact any potentially affected livestock owner to discuss how the HDC Project may affect grazing operations and to address compensation strategies as part of the Relocation Assistance Program. Given the small percentage amount of total grazing land acreage involved, however, the impacts are not considered to represent a significant adverse impact to foraging opportunities. In addition, Caltrans and Metro have developed a mitigation measure (AG-3) that will compensate landowners who voluntarily place a permanent conservation easement on a 1:1 basis for every acre converted from grazing land as a result of the project. Caltrans

Comment Code (Topic)	Response
	will also coordinate with the U.S. Bureau of Land Management, the federal agency responsible for managing livestock grazing on federal desert lands, and the California Wildlife Conservation Board, which is designated by the California Legislature to protect the grazing lands by promoting the use of conservation easements, to help identify suitable lands. The text in the Final EIR/EIS has been modified to provide the additional clarification.
L-24-21 Visual	The method for assessing visual impact follows the guidance outlined in the publication *Visual Impact Assessment for Highway Projects* published by the Federal Highway Administration (FHWA) (March 1981). This method is used to analyze existing visual resources, changes to the visual resources and viewer responses to those changes. Visual impacts of the project are assessed based on that analysis.
L-24-22 (Biology)	Wildlife restrictive fencing will be placed at the boundary between temporary and permanent impacts, which could be the same as the ROW boundary in certain locations. Wildlife crossing locations are depicted in Figures 2-32, 2-33, and 2-34 of the Final EIR/EIS. Caltrans prepared a BA and received a BO from the USFWS for impacts related to desert tortoise. Mitigation measures described in the BO are included in Section 3.3.5 of the Final EIR/EIS. Appropriate fencing, as described in the BO and respective sections of the Final EIR/EIS, in conjunction with wildlife crossings will reduce the potential for the constructed facility to act as a barrier to wildlife movement. Those areas considered not suitable for desert tortoise habitat restoration are not included in the calculations of mitigation.
L-24-23 (Other)	A consolidated list of all standard conditions, minimization measures, and mitigation measures can be found in Appendix F, Environmental Commitments Record.
L-24-24 (Biology)	Focused surveys for desert tortoise were conducted and they were observed within the impact limits of the proposed project. A BA was prepared and submitted to the USFWS and a BO was issued. Mitigation measures are presented in the BO and are included in Section 3.3.5 of the Final EIR/EIS. Purchase and preservation of desert tortoise habitat is one mitigation measure. The Final EIR/EIS was amended to include this measure.
L-24-25 (Biology)	The effects of headlights from construction vehicles and use of the transportation facility have been evaluated and are presented in Section 3.3.1 of the Final EIR/EIS.
L-24-26 (Biology)	A discussion of wildlife collision and the effects to wildlife populations and motorist safety is included in Section 3.3.1 of the Final EIR/EIS. It is common for wildlife to occur on highways where no fencing exists and less common where there is fencing. In an effort to reduce wildlife/vehicle collisions, fencing and wildlife crossings are included as part of the design of this proposed project.

Comment Code (Topic)	Response
L-24-27 (Land use)	Section 3.1.2, Growth, provides a detailed and comprehensive discussion of the potential for the proposed project to induce growth in the Antelope and Victor Valleys. The Antelope Valley currently has about 500,000 residents. Victorville, Adelanto, and to a lesser extent Palmdale, are among the fastest growing cities in California. With a strong base of aerospace industries and manufacturing, a mild climate, low housing prices, college and university campuses, and convenient access to the Los Angeles Basin, this area is and will remain an attractive area for new businesses and residential development. The Draft EIR/EIS determined that while the HDC Project is not expected to attract new growth to the area beyond that now forecast and planned for, it will induce some new development to shift from other locations to the new interchanges created by the HDC. The Draft EIR/EIS also found that the HSR alternatives would foster higher density development around the Palmdale and Victorville stations, again inducing new development to shift from other areas to the areas around the stations. Finally, the Draft EIR/EIS determined that the proposed California HSR (cumulative development) would have a substantial growth-inducing effect in the Antelope Valley by providing easy access to the Los Angeles Basin for commuters.
L-24-28 (Land use)	The traffic study has been completed, and the number of lanes needed in various corridor segments has been determined. The ROW throughout the corridor has been identified as stated in the Draft EIR/EIS. The corridor from SR-14 to US 395 would be 500 feet wide and from US 395 to SR-18 would be 300 feet wide. No additional ROW acquisition is anticipated, except for the HSR connectors to the Palmdale and Victorville stations, and freeway-to-freeway interchange connections with SR-14 and I-15.
L-24-29 (Land use)	A detailed table presenting impacts to specific plant communities as a result of the implementation of the proposed project is included in the Final EIR/EIS as Tables 3.3.1-2 and 3.3.1-3 in Section 3.3.1.
L-24-30 (Air quality)	The air quality analysis for mobile sources was based on the traffic study for the HDC Project, which did take into account the additional vehicle miles traveled due to the severing of some north-south roads. The *High Desert Corridor Traffic Study* measured vehicle miles of travel for all roadways included in the Southern California Association of Governments (SCAG) 2008 Regional Transportation (Travel Forecasting) Model. Within the High Desert Region, all roadways classified as an arterial street or higher were included in the network. Major collectors and some minor collectors were also included in the network. Table 3-7 of the High Desert Corridor Traffic Study (Volume I) provides a breakdown of the number of links, volumes, Vehicle Miles Traveled, and Vehicle Hours Traveled by facility type, for the High Desert portion of the SCAG model used for travel demand forecasting. The locations of proposed interchanges, grade separations, and at-grade intersections are illustrated on Figure 4-44 of the Traffic Study (Volume I) and are listed on Table 4-55 along with interchange spacing. Interchanges are spaced two to five miles apart within

Comment Code (Topic)	Response
	the San Bernardino County portion of the project. Potential grade separations which do not provide access to the HDC Freeway/Tollway are specifically identified in Table 4-55, and would increase the connectivity of neighborhoods north and south of the proposed facility. It should be noted that many of the streets in the High Desert portion of the corridor are planned roads that exist on paper only in anticipation of future development. New north-south roads, possibly requiring overpasses or underpasses of the HDC, would be added to the existing road network when and if traffic studies demonstrated a need for them.

Comment L-25

MBCA

morongo basin conservation association

To: Ronald J. Kosinki,
Division of Env. Planning - Project #80
Caltrans, District 7
100 S. Main St. MS-16A
Los Angeles, CA 90012

From: Marina D. West, Sec. wells.out.west@gmail.com 760 910-3264
P.O.Box 24
Joshua Tree, CA 92252

Date: 12/1/14

RE: HIGH DESERT CORRIDOR – Draft EIS/EIR

Impact of "High Desert Corridor Project" on Lucerne/Johnson/Morongo Valleys

Mr. Kosinki,

The Project as described includes the Variation E: "between US 395 and east of Federal Prison. This east side of the project terminates the project onto a 2 lane Hwy 247 which leads through the Lucerne Valley, Johnson Valley, Homestead Valley, Yucca Valley and Morongo Valley rural communities prior to linking with the I-10 near Palm Springs. L-25-1

The project has an obvious industrial trade-corridor transportation link between its western beginning at the I-14 and the eastern end within miles of the Hwy 18 Junction with Hwy 247. This will create significantly increased congestion and safety hazards which must be addressed in its entirety through the EIR/EIS process. CEQA requires that a project's impacts - even outside a project's boundaries – must be assessed and mitigated. This draft EIR doesn't even reference said obvious impacts – which will make it vulnerable to litigation. The solution would be to incorporate improvements to these eastern segments in the HDC's planning and financing (ie: a minimum of 4 lanes – wider lanes – turn pockets – shoulder improvements – etc.). Without said planning and a financing link to the project, the Corridor EIR's "off-site" analysis for these eastern segments will have to show a "significant adverse environmental impact" that will be impossible to ignore with "findings of overriding consideration". L-25-2

Sincerely,

Marina D. West, PG
Secretary MBCA

POST OFFICE BOX 24 JOSHUA TREE, CALIFORNIA 92252

INFO@MBCONSERVATION.ORG

Response to Comment L-25

Comment Code (Topic)	Response
L-25-1 (Traffic)	The easterly end of the project is located near the Bear Valley Road cutoff, approximately 10 miles west of the SR-18/Old Woman Springs Road intersection, which connects to SR-247.
L-25-2 (Design)	The HDC Project was proposed based upon detailed traffic studies that indicated a long-term need for substantially increased east-west motor vehicle capacity in the Antelope and Victor Valleys. When and if future traffic studies identify a substantial need for increased capacity or other improvements to SR-247, those improvements will be considered by regional and state transportation agencies.

Comment L-26

Los Angeles County
Department of Regional Planning

Planning for the Challenges Ahead

Richard J. Bruckner
Director

November 25, 2014

Mr. Ronald Kosinski, Deputy District Director RK
Caltrans District 7, Division of Environmental Planning
100 South Main Street
Los Angeles, CA 90012

Dear Mr. Kosinski:

COMMENTS ON THE HIGH DESERT CORRIDOR ENVIRONMENTAL IMPACT REPORT/ENVIRONMENTAL IMPACT STATEMENT

The Department of Regional Planning (Department) appreciates the opportunity to provide written comments on the Draft Environmental Impact Report/Environmental Impact Statement (EIR/EIS) for the High Desert Corridor Project (HDC). The Department recognizes the importance of this project and the numerous benefits it will provide to residents of Los Angeles County and is in full support of the development of the HDC.

In order to ensure that environmental impacts of the HDC are adequately addressed, the Department is providing comments, organized by chapter, which are attached to this letter.

If you have any questions regarding these comments, please contact Patricia Hachiya of the Impact Analysis Section at (213) 974-6461, or by e-mail at phachiya@planning.lacounty.gov. Thank you for the opportunity to provide our comments. Our office hours are Monday through Thursday, 7:00 a.m. to 6:00 p.m.

Sincerely,

M. Glaser

Mitch Glaser, Assistant Administrator
Current Planning Division

MG:PH:CN:JD:lm

Attachment

CP_112514_RONALD_KOSINSKI_DRP_COMMENTS_HDC_EIR_EIS

DRP Comments on HDC EIR/EIS – Page 1

Chapter 1: Proposed Project

- Based on the description provided on page 1-27, the EIR analysis was conducted using the 2011 Preliminary Draft "Town and Country" Antelope Valley Area Plan Update (Area Plan Update). Since that time, the Area Plan Update has been revised. On November 12, 2014, the Board of Supervisors indicated its intent to adopt this revised version with additional required changes. Final adoption is expected to occur sometime in March or April of 2015. The revised Area Plan Update can be found on the Internet at: http://planning.lacounty.gov/tnc/documents/. You may contact Carl Nadela of DRP's Community Studies North Section at (213) 974-6476 for more information and coordination. L-26-1

Chapter 3: Land Use

- Throughout this Chapter, some of the Land Use designations cited for Lake Los Angeles and other unincorporated Los Angeles County areas are from the adopted 1986 Antelope Valley Area Plan while some are from the Area Plan Update. The new Land Use designations in the Area Plan Update should be used consistently throughout the whole document. L-26-2
- On page 3-9, the document cites Land Use Policies LU 1.1 and 1.2, which directs future growth to occur within Palmdale and Lancaster. There has been a substantial shift in Los Angeles County's policy direction since 2011. The Area Plan Update now directs growth to three Economic Opportunity Areas (EOAs). The High Desert Corridor plays a key role in the East EOA and a minor role in the Central EOA. The latest version of the Area Plan Update should be used for analysis, as indicated above. L-26-3
- On page 3-27, Mitigation Measure LU-3 may no longer be necessary because the Area Plan Update no longer calls for a "comprehensive review of the Antelope Valley Area Plan" after a preferred alignment is chosen for the HDC. L-26-4
- On page 3-30, under Policies COS 4.5 and 4.6, revise the second sentence to indicate that appropriate corridor dimensions and design will also be determined in consultation with resource agencies, not just the location of the wildlife crossings. L-26-5
- On page 3-31, the Draft EIR indicated consistency with Policy COS 18.1, which would encourage the acquisition of land in ecologically sensitive areas and preserve it as permanent open space. In order for the HDC to be consistent with this land use policy, DRP recommends that a mitigation measure be included to ensure that the HDC will acquire land to address any impacts in sensitive areas. L-26-6

Chapter 3: Air Quality

- On page 3-379, the "standard conditions to minimize short-term air quality impacts, including MSAT" could not be found in Section 3.6 (Construction Impacts), as indicated. L-26-7

DRP Comments on HDC EIR/EIS – Page 2

Chapter 3: Biological Environment

Not in the biology section, but mentioned earlier in the Draft EIR, is an assertion that the project does not run through any designated Mineral Resource Areas.

L-26-8

- (MRAs). This is not accurate, as MRAs designated by the State of California are associated with Little Rock Wash and Big Rock Wash, both of which are crossed by the proposed HDC alignment.
- The proposed project's impacts to the Los Angeles County-designated Antelope Valley Significant Ecological Area (SEA) are not acknowledged anywhere in the section. This SEA was designated to emphasize the importance of the Little Rock Wash and Big Rock Wash watersheds to the surface and subsurface hydrology of the Antelope Valley, and thereby to Rosamond Dry Lake and adjacent Piute Ponds, Buckhorn Lake, and Rogers Lake. These lakes and ponds are often flooded during the rainy winter-spring seasons, and are the principal resting areas in the region on the Pacific Flyway.

  The SEA also contains the following characteristics that led to its designation:
  a. The habitat of core populations of endangered and threatened plant and animal species;
  b. Biotic communities, vegetative associations, and habitat of plant and animal species that are either unique or are restricted in distribution in Los Angeles County and regionally;
  c. Concentrated breeding, feeding, resting, or migrating grounds, which are limited in availability in Los Angeles County;
  d. Populations of scientific interest at the edge of their range including the desert tortoise, the mesquite bosque, and the Mojave ground squirrel; and
  e. Areas that provide for the preservation of relatively undisturbed examples of original natural biotic communities in Los Angeles County.

L-26-9

  The SEA includes several major buttes and numerous minor ones, which have highly diverse biota along with diverse desert habitats, which range from sand dunes formed from the wind-blown dust that the buttes collect, to rocky crags, which are home to various raptors.

  The SEA traverses the Antelope Valley from the foothills of the San Gabriel Mountains, to the low elevations of the dry lake basins, and its expanse and considerable topographical relief is reflected in its relatively high floral and faunal diversity. The SEA includes playa lake, alkali marsh, alluvial fan scrub, a mosaic of xeric desert scrubs, Joshua tree woodland, desert riparian woodlands, juniper scrub, pinyon pine, chaparral and mixed conifer, oak, and riparian communities of higher elevations. Transitional zones between these communities often contain unusual species compositions, such as mixed pinyon pine-juniper-Joshua trees woodlands, or Joshua trees adjacent to cottonwood forest. The

geographical features of the SEA serve as a major habitat linkage and movement corridor for all wildlife species, and many of the plant species, within its vicinity.

- The graphics are too small and are illegible in most cases, and many of them lack meaningful labels. Each map should be afforded an entire 8.5" X 11" or 11" X 17" page. L-26-10
- There is no explicit determination of significance for many of the impacts discussed, nor is there a statement of residual severity of impacts subsequent to implementation of mitigation. L-26-11
- The "Affected Environment" section, beginning on page 3-415, is a summary of biological resources affected by the project. As such, it should summarize known and potential special-status species occurrences within the study area, as well as the Los Angeles County-designated SEA. L-26-12
- On page 3-418, the third paragraph appears to imply that the proportional loss of habitats is low, though this is unclear, given the sentence structure and wording used. This paragraph should reference Table 3.3.1-2 since that is where the relevant data are presented. However, these data are not provided in context with the total acreages of each vegetation type. Total acreages are presented separately in the paragraphs discussing each build variation, but cross referencing between the table and the paragraphs is cumbersome. To facilitate readability, all of the relevant data should be presented in tables, and interpreted and discussed in the text. L-26-13
- On page 3-418, the last paragraph mentions "above avoidance and minimization measures" but no such measures are given above this paragraph. What does this statement refer to? The same error occurs repeatedly on pages 3-423 to 3-425. L-26-14
- Rail Option 1 and Rail Option 7 do not seem to be included on Figure 3.3-1. Is there a figure that depicts these options? L-26-15
- On page 3-426, the "edge effect" is incorrectly defined—not all of the subsequent factors to which the statement refers constitute edge effects. For example, Growth Inducement is not an edge effect on biological resources. L-26-16
- On page 3-426, the concluding statement under "Light and Glare" does not appear to be supported by any analysis or discussion of the attributes of the differing alternatives. L-26-17
- In the discussion of noise impacts on page 3-427, it is incorrect to assert that operation of the HSR would result in only temporary noise-related impacts due to the infrequent timing of passing trains. If noise produced by passing trains ever exceeds the tolerance of nesting birds or other sensitive wildlife, resulting in abandonment of nests or other harmful behavior, and if this noise is repeatable for the life of the project (i.e., resulting in adverse impacts to many successive generations of wildlife) then this is a permanent impact and should be analyzed as such. This comment is applicable to vibration-related impacts as well. L-26-18
- With regards to BNC-3: Joshua tree woodland is not a species (as is implied in the second sentence). Transplanting of Joshua trees is not likely to adequately mitigate for the removal of more than 3,300 trees since many may be too large or L-26-19

senescent to be moved with any likelihood of success. Additionally, no performance standards to determine success of mitigation efforts are proposed for this or other revegetation-related measures. L-26-19 con't

- Figure 3.3.2-1 includes a legend item for Bell Mountain Wash, which doesn't seem to appear in the map itself. However, this might be a problem related to the graphics issues mentioned earlier. Also, the alternative alignments aren't labeled and should be, or should be explained in the legend. L-26-20
- There is no legend for Figure 3.3.2-3. The alignments also need labeling or legend items. L-26-21
- On pag 3-445, under Freeway/Expressway and Freeway/Tollway Alternatives, please revise the sentence because its meaning is unclear. L-26-22
- Provide a figure or figures for CDFW jurisdictional areas. L-26-23
- With regards to BWL-1 and BWL-4: without standards or guidelines on how siting will be accomplished, and without specifying the measures alluded to, this is deferred analysis and cannot count as avoidance, minimization, or mitigation. L-26-24
- Regarding the special-status plants analysis:
  a. Several names given in Table 3.3.3-1 are misspelled or obsolete. All nomenclature should be reviewed and updated to be consistent with the Jepson Manual, 2nd Edition. L-26-25
  b. Table 3.3.3-1 correctly acknowledges the potential of several undetected species to be present despite negative survey results. However, the text of the section incorrectly states that because certain species were not detected within project impact areas, there will be no impacts to those species. If a species may potentially be present, it is incorrect to state impacts will not occur. The impact may be small or less than significant, but a potential impact should be recognized. L-26-26
  c. Mitigation measures should include consideration of possible additional requirements should FESA or CESA-listed species be detected during surveys described in BPL-1. L-26-27
  d. Regarding BPL-3: collection of bulbs is appropriate only for species with bulbs. For the suite of species possibly affected by the project, this would only include alkali mariposa lily and crowned muilla. L-26-28
  e. Regarding BPL-4: Translocation of individual plants is generally not a viable mitigation measure for any annual plant species, and is not recommended for several perennials listed in the section. L-26-29
  f. There is not enough information provided to substantiate the presumed success of any of the rare plant mitigation measures. Mitigation as proposed relies entirely on relocation (bulbs or whole plants). However, relocation of any sort, whether of whole plants, propagules, or seeds, is experimental and should be attempted only in concert with a thorough evaluation of relocation sites and enforceable performance standards, none of which is proposed in the measures presented. L-26-30
- Regarding the special-status animals analysis:

c. The types of performance standards to be included in the restoration plans should be indicated, such as percent survival of plantings, relative cover by relevant species (native, non-native, special-status, etc), and associated timing for attainment of standards. L-26-31

d. Requirements for monitoring, reportage, and adaptive management should be indicated. L-26-32

- Threatened and Endangered Species: The section should include discussion of any Threatened and Endangered plant species indicated earlier in the document as having potential to occur. Golden eagle should be omitted from this section and discussed along with other non-listed special-status animal species since it is not listed as Threatened or Endangered by either the state or federal government. L-26-33
- Regarding BTE-1: Impacts to Swainson's hawk may require a take permit from CFDW. Simple avoidance of active nests during construction is insufficient as mitigation for impacts to listed bird species; habitat mitigation is also needed if significant impacts to foraging habitat are likely or expected. CDFW has prepared guidance on mitigation for impacts to Swainson's hawk habitat, and this should be followed. Habitat impacts related to western yellow-billed cuckoo should also be mitigated per CDFW guidance. L-26-34
- Regarding BTE-2, BTE-3, and BTE-8: See above comments regarding pre-construction surveys and ensure that all such mitigation measures are consistent. Any pre-construction surveys for listed species should follow state or federal agency-approved protocols. L-26-35
- Regarding BTE-4 and BTE-9: See above comments regarding restoration plans and soil compaction. Mitigation for permanent impacts is also necessary. L-26-36
- Regarding BIN-1: Provide details of what inspection and cleaning may entail. If equipment is to be washed prior to use on site, proper containment and disposal of wash residue will be necessary. L-26-37
- Regarding BIN-2: This measure does not provide any enforceable mitigation action and reads as policy. Concrete steps that will accomplish the goal of minimizing soil and vegetation disturbance are needed to substantiate that the impact will actually be reduced. L-26-38
- Regarding BIN-3 and BIN-4: Watering of the construction site is typically a dust-control measure, not a weed reduction measure. Seeds are not likely to emigrate from the construction site subsequent to vegetation removal, but they may be blown on to the site, where additional water may stimulate their germination and growth. Weed control is best done on an as needed basis in combination with monitoring. L-26-39
- Regarding BIN-5 and BIN-6: A requirement of verification that soil/gravel/rock/straw/mulch/etc. is certified weed-free should be added to the measures. L-26-40
- Regarding BIN-7: See earlier comments regarding restoration and plant sourcing. L-26-41

DRP Comments on HDC EIR/EIS – Page 7

- Regarding BIN-9 and BIN-10: these measures are broadly applicable to all restoration-related mitigation proposed earlier and should be included as components of those measures. L-26-41
- Short-term impact discussions relevant to biological resources (pages 560 to 561 and 569) should also be reviewed for consistency with any changes made in response to the above comments. L-26-42

Chapter 3: Construction Impacts

- On page 3-557, suggested preventative and precautionary measures to reduce exposure to Valley Fever were not found amongst the mitigation measures recommended under the air quality mitigations on pages 566 to 567. L-26-43

Chapter 5: Comments and Coordination

- On page 5-5, Los Angeles County Department of Regional Planning contact information needs to be updated to list Patricia Hachiya, Supervising Regional Planner, Impact Analysis Section. L-26-44

Response to Comment L-26

Comment Code (Topic)	Response
L-26-1 General	Chapter 1 has been updated per the adopted Antelope Valley Area Plan (June 2015).
L-26-2 (Land Use)	The land use section has been revised to be consistent with the Antelope Valley Area Plan.
L-26-3 (Land Use)	The land use section has been revised to be consistent with the Antelope Valley Area Plan.
L-26-4 (Land Use)	Measure LU-3 deleted.
L-26-5 (Land Use)	Text has been revised per your comment.
L-26-6 (Land Use)	Avoidance, Minimization and Mitigation measure LU-7 has been added to Section 3.1.1 Land Use, to maintain consistency with Policy COS 18.1.
L-26-7 (Air Quality)	The conditions you refer to have been added as measures CI-AQ-1 to CI-AQ-8 in Chapter 3.7 of the Final EIR/EIS.
L-26-8 (Geology)	The mention of mineral resources in the introductory part of Chapter 3 has been removed. Impacts to mineral resources from the proposed project have been addressed in the Geology section of the Final EIR/EIS. Information pertaining to MRZ elsewhere in the Draft EIR/EIS has been corrected in the Final EIR/EIS.
L-26-9 (Biology)	The Los Angeles County-designated Antelope Valley SEA is acknowledged and discussed in Section 3.3.1 Natural Communities of the Final EIR/EIS.
L-26-10 (Biology)	Graphics have been modified or added to improve clarity. Also, more detailed graphics can be viewed in the focused technical reports.
L-26-11 (Biology)	NEPA significance determinations can be reviewed in each section of Chapter 3, following the impact evaluation. CEQA significance is identified in Chapter 4. Significance after the implementation of mitigation measures is shown in the Environmental Commitments Record in Appendix F.
L-26-12 (Biology)	Special-status species affected by the project, including known occurrences within the project envelop and the Los Angeles County-designated SEA Antelope Valley, are presented and discussed in Sections 3.3.1 through 3.3.6.
L-26-13 (Biology)	Jeff (CT) Andrea/Jennifer

Comment Code (Topic)	Response
L-26-14 (Biology)	The text was rewritten to include appropriate avoidance and minimization measures with accurate referencing.
L-26-15 (Biology)	Figure 3.3-1 has been modified to include Rail options 1 and 7; the text has been revised for legibility.
L-26-16 (Biology)	The text has been modified and the term "edge effect" has been removed.
L-26-17 (Biology)	The discussion of potential impacts resulting from light and glare improved per your comment.
L-26-18 (Biology)	The potential for impacts related to HSR noise and vibration has been reevaluated and a discussion is included in the Indirect Impacts section of Section 3.3.1
L-26-19 (Biology)	The text was modified to reflect that Joshua tree woodland is a plant community. Although it is true that some individual Joshua trees cannot be translocated with a high degree of success, many can. Translocation and habitat enhancement success standards will be determined in cooperation with the Department of Fish and Wildlife and documented in a Habitat Mitigation and Monitoring Plan.
L-26-20 (Biology)	The clarity of the figure, which is now 3.3.2-2 in the final EIR/EIS has been improved.
L-26-21 (Biology)	The figure you reference is now 3.3.2-1 in the final EIR/EIS. A legend has been added.
L-26-22 (Biology)	The text has been revised for clarity.
L-26-23 (Biology)	Figures and tables identifying CDFW jurisdictional areas are contained in the technical report "State Jurisdictional Delineation" (November 2015), which was prepared in support of this final EIR/EIS. It is available on the Caltrans website at http://www.dot.ca.gov/d7/env-docs/.
L-26-24 (Biology)	Caltrans has identified a mitigation strategy based on our current preliminary designs. It is standard practice to refine the project design in ways that improve project function and reduce impacts as the project progresses. It is also true that final mitigation ratios and areas cannot be known until the design is finalized and resource agency permits are obtained.
L-26-25 (Biology)	Table 3.3.3-1 has been updated to address your comment.

Comment Code (Topic)	Response
L-26-26 (Biology)	If focused surveys that are consistent with resource agency adopted guidelines are conducted and no individuals or their sign are noted during those surveys, then it shall be determined, that for the purposes of evaluation under CEQA, that no impacts to that species are expected. It should be noted that many species of wildlife have the potential to inhabit the site in the future; therefore, focused surveys for any federal or state listed species will be conducted immediately prior to clearing and grubbing to avoid violation of the Endangered Species Act and the California Endangered Species Act.
L-26-27 (Biology)	Your comment is noted. If focused surveys that are consistent with resource agency adopted guidelines are conducted and no individuals or their sign are noted during those surveys, then it shall be determined that, for the purposes of evaluation under CEQA, no impacts to that species are expected and no further mitigation measures are necessary. Should the species be detected in the future during additional surveys after the CEQA process is completed, appropriate mitigation measures will be developed as part of the permitting process required under the appropriate law (the Endangered Species Act (ESA) or California Endangered Species Act (CESA)) and described in their respective permit.
L-26-28 (Biology)	Your comment is noted. This measure only applies to those plant species with bulbs. Additional measures have been developed that apply to those species without bulbs.
L-26-29 (Biology)	Translocation of individual perennial plant species is only one of the measures used to reduce the impacts to this type of plant. Success criteria and appropriate protocol for plant translocations will be described in the Habitat Mitigation and Monitoring Plan.
L-26-30 (Biology)	Success Criteria will be described in detail in the Habitat Mitigation and Monitoring Plan and will be developed in cooperation with California Department of Fish and Wildlife.
L-26-31 (Biology)	See response to Comment L-26-30.
L-26-32 (Biology)	Requirements for monitoring, reporting and adaptive management will be described in detail in the Habitat Mitigation and Monitoring Plan and will be developed in cooperation with California Department of Fish and Wildlife.
L-26-33 (Biology)	Due to the golden eagle's designation as fully protected by CDFW and warranting like protection comparable to threatened and endangered species, the discussion will remain in the T&E section.
L-26-34 (Biology)	Additional text was added to the discussion section of Swainson's hawk. Impacts to Swainson's hawk individuals and foraging habitat will be appropriately mitigated for per CDFW's guidance.

Comment Code (Topic)	Response
L-26-35 (Biology)	Pre-construction surveys for listed species will follow the most current state and federal agency-approved protocols.
L-26-36 (Biology)	Your comment is noted. Mitigation will be required for any permanent impacts.
L-26-37 (Biology)	Additional details regarding site inspection and washing of equipment will be discussed in the Habitat Mitigation and Monitoring Plan.
L-26-38 (Biology)	Additional details regarding minimization of soil and vegetation disturbance will be discussed in the Habitat Mitigation and Monitoring Plan.
L-26-39 (Biology)	Your comment is noted. Caltrans agrees that watering of the construction site is typically a dust control measure; however this measure also aids in lowering seed dispersal.
L-26-40 (Biology)	An avoidance measure will be added in the Habitat Mitigation and Monitoring Plan that verifies installation of any soil, gravel, rock, straw and mulch to be weed free.
L-26-41 (Biology)	Measures BIN-9 and BIN-10 are distinct enough to warrant identification as separate measures.
L-26-42 (Biology)	Impact discussions relevant to biological resources have been reviewed for consistency.
L-26-43 (Construction)	Avoidance, Minimization and Mitigation measures CI-AQ-4 to CI-AQ-8 have been added to Chapter 3.7 of the Final EIR/EIS.
L-26-44 (Coordination)	The contact information has been updated as requested.