



Los Angeles County Department of Regional Planning

Planning for the Challenges Ahead



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April 28, 2020

Attn: Draft EIR/EIS for the Bakersfield to Palmdale Project Section
California High-Speed Rail Authority
770 L Street, Suite 620 MS-1
Sacramento, CA 95814

LOS ANGELES COUNTY DEPARTMENT OF REGIONAL PLANNING COMMENT ON DRAFT EIR/EIS FOR BAKERSFIELD TO PALMDALE SEGMENT

Thank you for the opportunity to comment on the Draft Environmental Impact Report / Environmental Impact Statement "Draft EIR/EIS" for the Bakersfield to Palmdale Segment of the California High Speed Rail Project. This is an exciting project that will hopefully connect different regions of our state. Enclosed are the Department's comments for your review and consideration.

Sincerely,

Amy Bodek
Director of Regional Planning

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BS:MSH:RDM

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General Comments & Concerns

Eminent Domain and Local Impacts

The process of carving parcels for the right-of-way will leave us with a number of undersized parcels that will cause land use development impacts for decades to come. These undersized parcels will cause blight as they will be used for dumping and squatting.

The County has been dealing with a similar issue from the 1970s when the state water authority carved up parcels during the construction of the California Aqueduct through the Antelope Valley.

We suggest that the High Speed Rail Authority work with the County during the eminent domain process to identify these undersized parcels and mitigate the problem by joining undersized parcels with neighboring parcels or leaving them permanently under the control and management of the rail authority. Expanding the Farmland Consolidation Program impact avoidance and minimization feature to include property that is not actively being used for farming would help mitigate the negative impacts that are likely.

Airport Influence Areas or Airport Impacts

There is some local interest in increasing operations at Palmdale airport for commercial flight operations and to support the aerospace industry. There is also value in bringing potential passengers from the train station to the airport there, so safety measures should be taken in into consideration. Please ensure that the alignment, development, and ongoing operations do not pose any interference with height clearances and electronic equipment of aircrafts taking off/landing at the airport.

If possible, reroute tracks or adjust alignment to stay out of runway protection zones, such as those for Palmdale Airport near Sierra Highway.

Socioeconomic Impacts and Community Cohesion

The proposed alignments seem to be contrary to County of Los Angeles Goals and Policies as adopted within the Antelope Valley Area Plan. The various alignments included in the DEIR/EIS cut across the mapped Central Economic Opportunity Area of the Antelope Area. As a result, this bisects an area of the Antelope Valley that was identified for future residential and employment growth. In addition, this would split existing unincorporated communities as well as make travel more difficult along these local roads. This impact is not adequately analyzed in the document.

Alignment or Design

1. In figure 2-52 "Palmdale Station Alternatives" (Located on Page 2-82 of Vol. 1, Ch. 2 (Alternatives)), Palmdale Boulevard is depicted as crossing both the tracks and Sierra Highway via a bridge where it is currently an at grade crossing of both the railroad tracks and Sierra Highway. The visual presented in Figure 3.16-46 (Ch. 3.16 (Aesthetics)), p. 110, seems to be disruptive to the walkable street

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connectivity of the community. Have there been discussions with the City of Palmdale about the design of the crossing?

2. It is preferable that all rail lines through this area (from Avenue H through to Avenue S in Palmdale) should be grade separated in a way that maintains the connectivity of the developed areas as much as possible.
3. For LOS-Related Transportation Mitigation Measures as illustrated in Appendix 3.2-B: Traffic Mitigation Locations (p. 5), please include sidewalks of at least 10' width on either side of the improved street as well as a barrier-protected bicycle track or protected bicycle lanes with lanes at least 5' wide in either direction along the improved street for Avenue Q between 10th Street East and 20th Street East, and for 10th Street East between Avenue R and Avenue S. Also, if widening of 10th Street East between Avenue R and Avenue S occurs, the standard rail crossing there should be grade-separated.

Document Specific Concerns

Section 3.4 Noise and Vibration

Page 3.4-45, third paragraph: This analysis glosses over the permanent nature of the noise impact on habitats adjacent to the proposed project by postulating that train trips are "intermittent". It is inappropriate to suggest that animals will simply move away from the noise of a passing train and then return to resume their normal activities if that noise is repeated several times a day. Repeated loud noises, even if they are individually brief, can be very destabilizing.¹ Repeated "startle" events like this can cause animals to abandon nests or roosts; may result in the permanent abandonment of otherwise suitable habitat; or may result in the creation of ecological sinks whereby costly energetic investments are made in breeding attempts, only to be abandoned later, with a reduction in breeding success and overall fitness for local populations. The analysis should account for how much natural habitat area is within the 100 dBA contour and assume a potential abandonment of that habitat by noise-averse species within that area. This analysis should also be made in the Biological and Aquatic Resources section.

Section 3.7 Biological and Aquatic Resources:

Page 3.7-11, Table 3.7-1 Regional and Local Policy Consistency Analysis: There does not seem to be a discussion of how this analysis was accomplished, only the assertion in this table that everything is consistent with local policies. Is this analysis available elsewhere in the DEIR? If so, please provide a reference. If not, please provide specifics on the analysis, so that consistency can be substantiated.

Page 3.7-26, Wildlife Movement Corridors: The South Coast Missing Linkages project was valuable for identifying least-cost corridors for connecting particular units of

¹ Effects of Aircraft Noise and Sonic Booms on Domestic Animals and Wildlife (https://www.fs.fed.us/eng/techdev/IM/sound_measure/Manci_et_al_1988.pdf)

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conserved open space, such as National Forest units and military bases, but these aren't the only natural areas within the project region and do not encompass all of the biological diversity that is at risk in the region. The DEIR should include an analysis of habitat connectivity that is more relevant to the entire affected area, including rare plants and Joshua woodlands which are not well represented in the SCML project. The analysis should include spatial models of connectivity within the Antelope Valley portion of the project.

Page 3.7-76, Impact BIO #5: Construction Impacts on Wildlife

Movement/Temporary: The sentence in the second paragraph, "However, these indirect impacts are unlikely to last if wildlife reestablishes movement patterns and habitat use once all temporary construction activities have been completed and all equipment has been removed" is conjectural and not backed up by any analysis or evidence to suggest that it might be an actual result of the project. Is there any reason to suspect that patterns of use will become re-established subsequent to completion of construction? This assumption would rely heavily on factors such as the success of restoration efforts in temporary impact zones, operational noise, introduction of exotic plants and animals along the alignment, and other factors. Please explain the rationale and provide specifics.

Page 3.7-76, Impact BIO #5: Construction Impacts on Wildlife

Movement/Permanent: The sentence "Building structures could also hinder movement depending on their location and size; however, these facilities are generally located within previously developed areas, and wildlife would probably avoid such structures by moving around them" minimizes the real potential for impacts to movement in developed areas.

It may be the case--and often is the case--that bottlenecks to movement within developed areas are crucially important since they are the last possible option for movement within otherwise unusable habitat areas. They aren't unimportant simply because they happen to be located in a developed environment, and should not be assumed so. Discussion is needed to describe the function that highly constrained bottlenecks to movement within the project impact area may provide, and whether the proposed project may further constrain such tenuous opportunities.

Section 3.12 Socioeconomics and Communities:

The DEIR references data for Los Angeles County generally, and includes no data or analysis for the unincorporated communities, such as Antelope Acres, that surround and are primarily impacted by this segment. The largely rural north area of Los Angeles County that is impacted by this segment has a different socioeconomic and community character than the average of the County. The analysis might be understating the impacts to an area of unincorporated Los Angeles County that has higher rates of poverty, housing uncertainty, and access to employment or resources. Please provide more analysis or update the data to more accurately reflect the target area. This comment would likely apply to any unincorporated area of Kern County as well.

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Section 3.19 Cumulative Impacts:

Page 3.19-41, third paragraph: Please provide verification that crossing structures built for the proposed project will be complementary to existing infrastructure and pathways for wildlife movement, and that existing tenuous connections won't be further constrained.

Request for Clarifications

1. Regarding the displacement of Sierra Highway, the Lancaster Sheriff's Station, Iglesia de Cristo, and the University of Antelope Valley in Alternative 5 (p. 100) and the displacement of Grace Resource Center in Alternative 1 (p. 97) as described in Vol. 1, Ch. 2 (Alternatives), and as depicted in Figure 3.11-2 of Ch. 3.11 (Safety and Security), p. 63, why would these displacements be necessary when there appears to be significant space available to the east of the existing railroad track alignment, through the industrial properties along Yucca Avenue? Does this result from the need for a 102' separation between standard railroad tracks and HSR tracks to prevent collision with derailed freight cars, as described in Ch. 3.11 (Security and Safety), p. 58?
2. Pages 80-81 of the Footprint Mapbook does not show the City of Lancaster industrial development north of Avenue H and west of Sierra Highway, including the BYD bus manufacturing plant. The proposed alignment impact area looks like it will include these industrial buildings. Will they have to be relocated?
3. How is this project planned to connect with the proposed High Desert Corridor HSR alignment, and will direct transfers between lines be possible at the Palmdale Transportation Center? Please see Vol. 1, Ch. 2 (Alternatives), p. 72
4. Has there been analysis on the impact of a potential dam failure at Lake Palmdale – which sits on top of the San Andreas Fault – and how that would affect trains on the HSR alignments?