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)

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

Caltrans®

Metro

Table of Contents

CHAPTER 1 **INTRODUCTION TO COMMENTS AND RESPONSES 1-1**

1.1 What is in this Document 1-1
1.2 Summary of Public Input 1-1
1.3 Responses to Comments 1-2

CHAPTER 2 **RESPONSES TO COMMENTS FROM FEDERAL AGENCIES..... 2-1**

CHAPTER 3 **RESPONSES TO COMMENTS FROM STATE AGENCIES..... 3-1**

CHAPTER 4 **RESPONSES TO COMMENTS FROM LOCAL AGENCIES AND ORGANIZATIONS..... 4-1**

CHAPTER 5 **RESPONSES TO COMMENTS FROM BUSINESSES 5-1**

CHAPTER 6 **RESPONSES TO WRITTEN COMMENTS FROM THE GENERAL PUBLIC 6-1**

CHAPTER 7 **RESPONSES TO ELECTRONIC COMMENTS RECEIVED FROM THE GENERAL PUBLIC 7-1**

CHAPTER 8 **RESPONSES TO ORAL COMMENTS FROM THE NOVEMBER 5, 2014 PUBLIC HEARING 8-1**

CHAPTER 9 **RESPONSES TO ORAL COMMENTS FROM THE NOVEMBER 6, 2014 PUBLIC HEARING 9-1**

CHAPTER 10 **RESPONSES TO ORAL COMMENTS FROM THE NOVEMBER 12, 2014 PUBLIC HEARING 10-1**

CHAPTER 11 **RESPONSES TO ORAL COMMENTS FROM THE NOVEMBER 13, 2014 PUBLIC HEARING 11-1**

List of Tables

Table 2.1. Summary of Comment Letters Received from Federal Agencies 2-1
Table 3.1. Summary of Comment Letters Received from State Agencies 3-2
Table 4.1. Summary of Comment Letters Received from Local Agencies and Organizations 4-2
Table 5.1. Summary of Comment Letters Received from Businesses 5-1
Table 6.1. Summary of Written Comments Received from the General Public..... 6-1
Table 7.1. Summary of Electronic Comments Received from the General Public 7-1
Table 8.1. Summary of Oral Comments Received at the November 5, 2014 Public Hearing..... 8-1
Table 9.1. Summary of Oral Comments Received at the November 6, 2014 Public Hearing..... 9-1

Table 10.1. Summary of Oral Comments Received at the November 12, 2014 Public Hearing..... 10-1
Table 11.1. Summary of Oral Comments Received at the November 13, 2014 Public Hearing..... 11-1

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.

1

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

2

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

3

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

4

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

5

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

1

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

2

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

3

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.

4

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

1

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

2

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

3

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

4

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

5

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

6

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

7

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

8

- 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

9

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

10

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

11

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

12

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:

13

- 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/

14

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.

Comment Code (Topic)	Response
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.

Comment Code (Topic)	Response
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.

Comment Code (Topic)	Response
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

Comment Code (Topic)	Response
	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

Comment Code (Topic)	Response
	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

Comment Code (Topic)	Response
	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

Comment Code (Topic)	Response
	"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.)

Comment Code (Topic)	Response
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

Comment Code (Topic)	Response
	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

Comment Code (Topic)	Response
	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

Comment Code (Topic)	Response
	(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,

Comment Code (Topic)	Response
(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.

Comment Code (Topic)	Response
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

Comment Code (Topic)	Response
	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

Comment Code (Topic)	Response
	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

Comment Code (Topic)	Response
	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

Comment Code (Topic)	Response
(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

Comment Code (Topic)	Response
	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,

Comment Code (Topic)	Response
	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

Comment Code (Topic)	Response
	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

Comment Code (Topic)	Response
	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,

Comment Code (Topic)	Response
	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.

Comment Code (Topic)	Response
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

Comment Code (Topic)	Response
	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

Comment Code (Topic)	Response
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

-2-

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
Page 3 of 10

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
JOSEPH TAVAGLIONE

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
1120 N STREET, MS-52
SACRAMENTO, CA 95814
P. O. BOX 942873
SACRAMENTO, CA 94273-0001
FAX (916) 653-2134
(916) 654-4245
http://www.catc.ca.gov

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

BOARD MEMBERS

Dan Richard
CHAIR

Thomas Richards
VICE CHAIR

Jim Hartnett
VICE CHAIR

Richard Frank

Patrick W. Henning, Sr.

Katherine Perez-Estolano

Michael Rossi

Lynn Schenk

Thea Selby

Jeff Morales
CHIEF EXECUTIVE OFFICER

EDMUND G. BROWN JR.
GOVERNOR

December 2, 2014

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*.

770 L Street, Suite 620 MS 2, Sacramento, CA 95814 • T: (916) 324-1541 • F: (916) 322-0827 • www.hsr.ca.gov

Mr. Ronald Kosinski
Page 2

December 2, 2014

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

770 L Street, 620 MS 2, Sacramento, CA 95814 • T: (916) 324-1541 • F: (916) 322-0827 • www.hsr.ca.gov

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

770 L Street, 620 MS 2, Sacramento, CA 95814 • T: (916) 324-1541 • F: (916) 322-0827 • www.hsr.ca.gov

Mr. Ronald Kosinski
Page 4

December 2, 2014

Figure 1
Proposed California HSR Statewide System

770 L Street, 620 MS 2, Sacramento, CA 95814 • T: (916) 324-1541 • F: (916) 322-0827 • www.hsr.ca.gov

Mr. Ronald Kosinski
Page 5

December 2, 2014

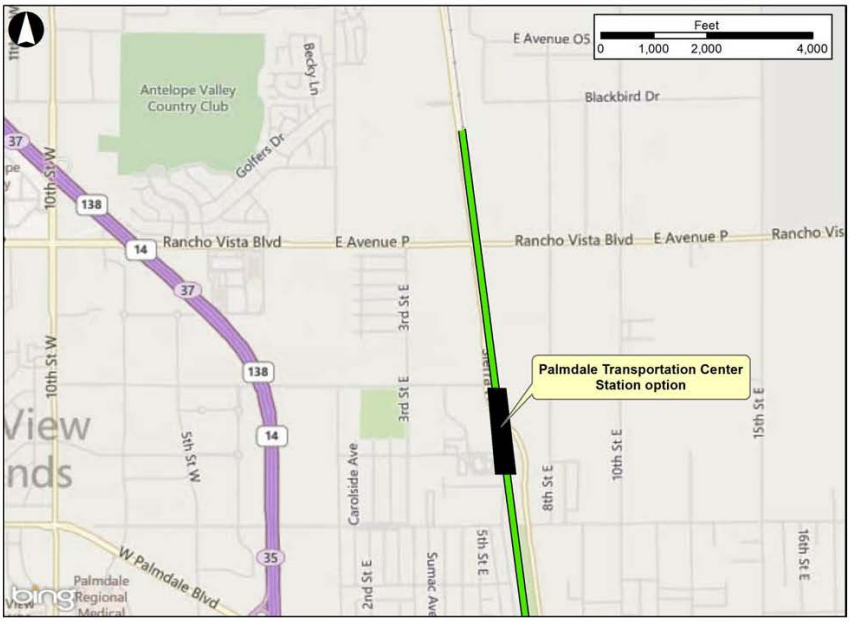
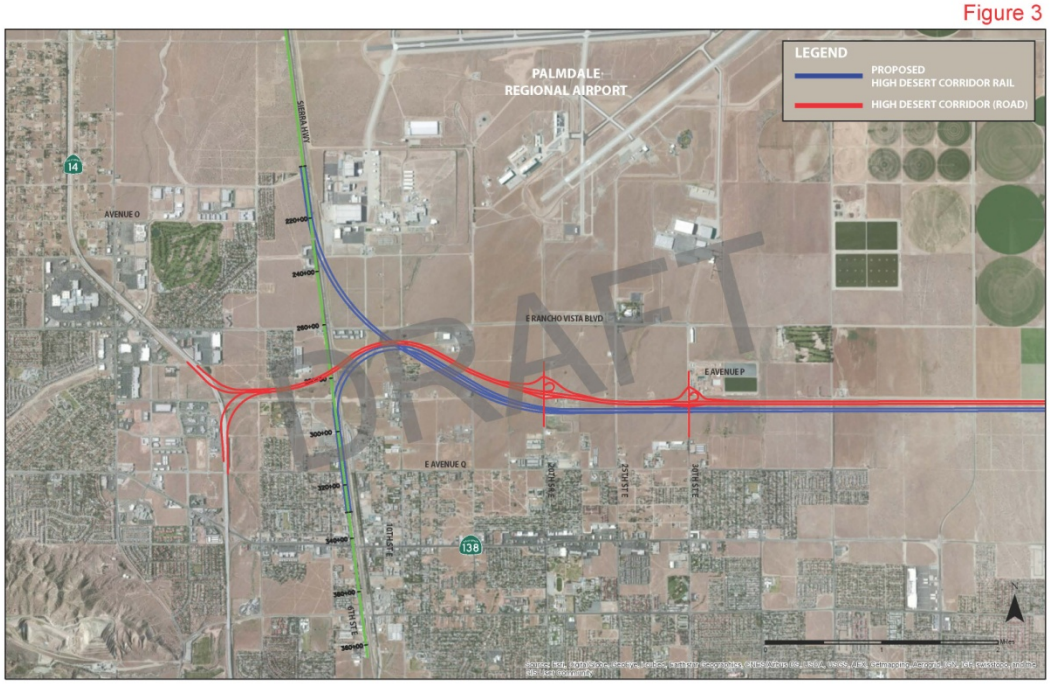


Figure 2
Palmdale Alignment Alternative and Transportation Center Station Option
from May 2014 Supplemental Alternatives Analysis

770 L Street, 620 MS 2, Sacramento, CA 95814 • T: (916) 324-1541 • F: (916) 322-0827 • www.hsr.ca.gov

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
30TH ST E
25TH ST E
20TH 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

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

14440 Civic Drive, Suite 200, Victorville, CA 92392 | www.waterboards.ca.gov/lahontan

Recycled Paper

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)

R:\RB6\RB6V\CEQA Review\HighDesertCorr_DEIR.docx

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.
Mayor

TOM LACKEY
Mayor Pro Tem

MIKE DISPENZA
Councilmember

STEVEN D. HOFBAUER
Councilmember

FREDERICK THOMPSON
Councilmember

38300 Sierra Highway

Palmdale, CA 93550-4798

Tel: 661/267-5100

Fax: 661/267-5122

TDD: 661/267-5167

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

Auxiliary aids provided for communication accessibility upon 72 hours notice and request.

www.cityofpalmdale.org

Ltr. to Mr. Ron Kosinski
RE: COMMENTS - HIGH DESERT CORRIDOR DRAFT EIR/EIS – PROJECT ID #071200035 (EA: 2600U) AND SCH #2010091084
December 1, 2014
Page 2

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
December 1, 2014
Page 3

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
RE: COMMENTS - HIGH DESERT CORRIDOR DRAFT EIR/EIS – PROJECT ID #071200035 (EA: 2600U) AND SCH #2010091084
December 1, 2014
Page 4

- 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
December 1, 2014
Page 5

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)
Mr. Robert Machuca, Project Manager
Los Angeles County Metropolitan Transportation Authority
1 Gateway Plaza, M/S 99-22-9
Los Angeles, CA 90012

Via e-mail (Karl.Price@dot.ca.gov)
Mr. Karl Price
Environmental Project Manager
California Dept. of Transportation
100 S. Main Street, MS 16A
Los Angeles, CA 90012

Via e-mail (Osama.Megalla@dot.ca.gov)
Mr. Osama Megalla
Project Manager
California Dept. of Transportation
100 S. Main Street, 8th Floor
Los Angeles, CA 90012

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

---

[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

Robert Machuca, et al
December 1, 2014
Page 12

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

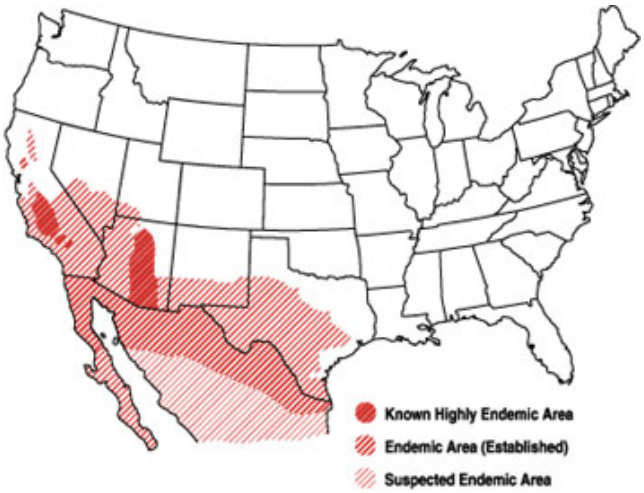
cc: (by e-mail: Ron.Kosinski@dot.ca.gov)
Mr. Ron Kosinski, Chief of Environmental Planning
Caltrans District 7
100 S. Main Street, MS 16A
Los Angeles, CA 90012

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

900 SOUTH FREMONT AVENUE
ALHAMBRA, CALIFORNIA 91803-1331
Telephone: (626) 458-5100
http://dpw.lacounty.gov

ADDRESS ALL CORRESPONDENCE TO:
P.O. BOX 1460
ALHAMBRA, CALIFORNIA 91802-1460

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

Mr. Karl Price
December 1, 2014
Page 2

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.

Mr. Karl Price
December 1, 2014
Page 3

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

Mr. Karl Price
December 1, 2014
Page 4

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
P:\ldpub\SUBPCHECK\Plan\Projects not associated with a TR-PM-CUP-\high desert corridor new sr138\DEIR\2014-11-26. docx

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

FHBP Board of Directors
Jean Watt, President
Mike Wellborn, Vice President
Vikki Swanson, Treasurer
Helen Higgins, Secretary

Denny Bean
Lyndie Bradshaw
Jim Carr
Michelle Claud-Clemente
Jack Eidt
Amy Litton
Tom Maloney
Theresa Sears
Gloria Sefton
Tina Thompson

Supporting Organizations
Amigos de Bolsa Chica
Audubon, Sea & Sage Chapter
Bolsa Chica Conservancy
Caspers Wilderness Park Volunteers
Earth Resource Foundation
Equestrian Coalition of O.C.
Environmental Nature Center
Great Park Environmental Coalition
Huntington Beach Wetlands Conservancy
Laguna Canyon Conservancy
Laguna Canyon Foundation
Laguna Greenbelt, Inc.
Newport Bay Conservancy
Sierra Club, Orange County
Surfrider Foundation, Newport Beach Chapter
Stop Polluting Our Newport
St. Mark Presbyterian Church Ecophilians

Advisory Board
Marian Bergeson
Connie Boardman
Marilyn Brewer
Roy & Ilse Byrnes
Laura Cohen
Debbie Cook
Joe Dunn
Sandy Genis
Tom Harman
Evelyn Hart
Jack Keating
Vic Leipzig
Stephanie Pacheco
Bev Perry
Matt Rayl
Claire Schlotterbeck
Dan Silver, M.D.
Jack Skinner, M.D.
Nancy Skinner
Dick Zembal

Post Office Box 9256
Newport Beach, CA 92653
949-399-3669

www.FHBP.org

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.

December 2, 2014
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

December 2, 2014
High Desert Corridor Project Draft EIR/EIS
Page 3 of 3

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

www.AppleValley.org 14955 Dale Evans Parkway • Apple Valley, California 92307 • 760.240.7000

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 ludoviciarus*		
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

P.O. BOX 9266 Redlands, CA 92375 www.iebike.org 909.800.4322

INLAND EMPIRE
BIKING ALLIANCE

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

P.O. BOX 9266 Redlands, CA 92375 www.iebike.org 909.800.4322

INLAND EMPIRE
BIKING ALLIANCE

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

P.O. BOX 9266 Redlands, CA 92375 www.iebike.org 909.800.4322

INLAND EMPIRE
BIKING ALLIANCE

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

P.O. BOX 9266 Redlands, CA 92375 www.iebike.org 909.800.4322

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
LA/Ontario
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

1 World Way Los Angeles California 90045-5803 Mail P.O. Box 92216 Los Angeles California 90009-2216 Telephone 310 646 5252 Internet www.lawa.aero

Mr. Ronald Kosinski
December 1, 2014
Page No. Two

- 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
Page No. Three

- 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

760-955-5000
FAX 760-245-7243
email: vville@ci.victorville.ca.us
14343 Civic Drive
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

Page 2
High Desert Corridor Project
Draft Environmental Document comments
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

Page 3
High Desert Corridor Project
Draft Environmental Document comments
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
Mailing Address: P.O. Box 4998, Whittier, CA 90607-4998
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,

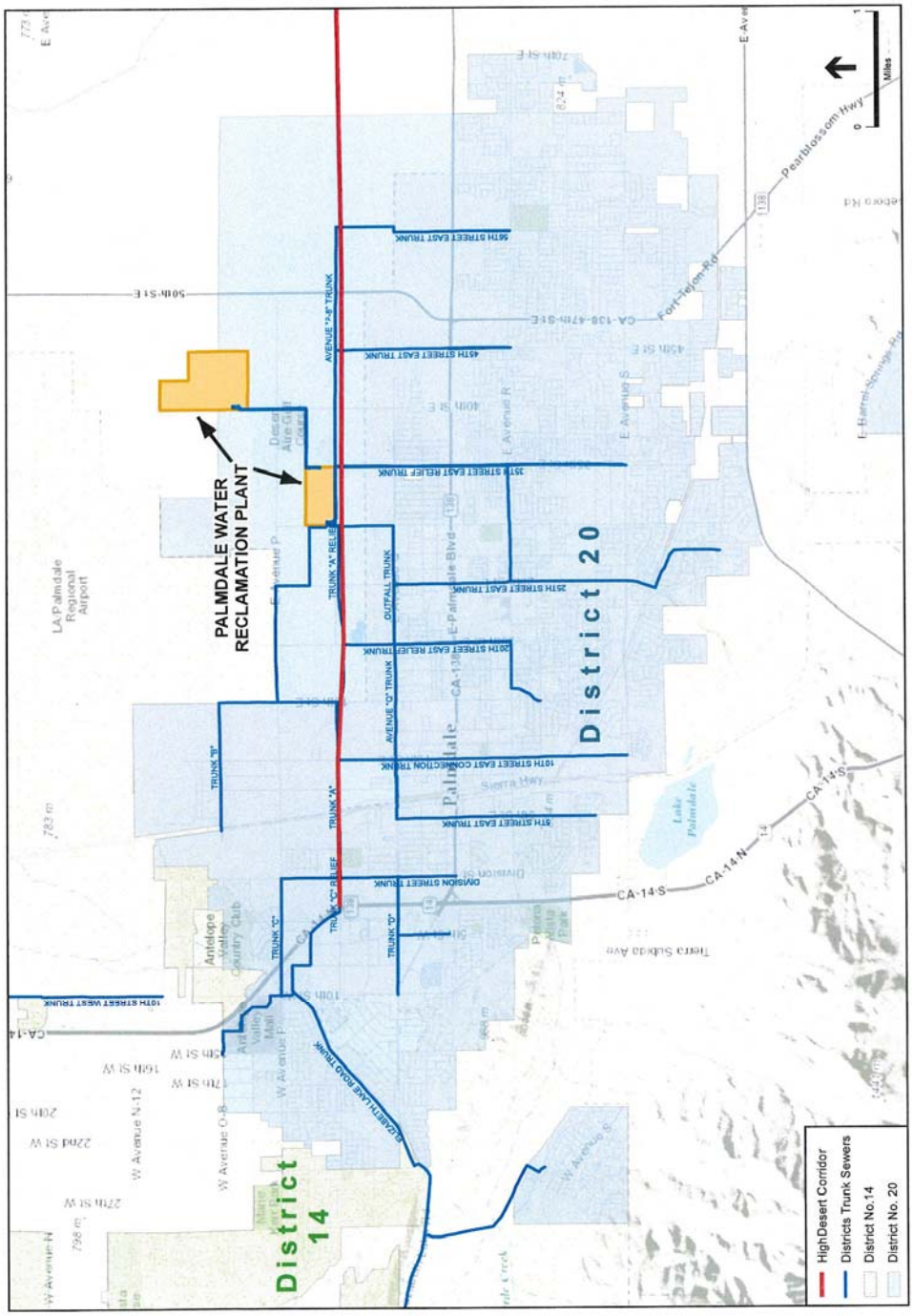
Grace Robinson Hyde

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
Page 2

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
Page 3

- 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

Ronald Kosinski
December 2, 2014
Page 4

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
ron_kosinski@dot.ca.gov

CC: Karl Price, Senior Environmental Planner, Distr. 7, Calif. Dept. Transp.
karl_price@dot.ca.gov 213-897-1839
100 South Main Street, Mail Stop I6A Los Angeles, CA 90012
Osama Megalla, Project Manager, 100 South Main Street, 8th Floor Los Angeles, CA 90012
osama_megalla@dot.ca.gov 213-897-0520

Gloria Molina, LACo Supervisor molina@bos.lacounty.gov
Micheal Antonovich, LACo Supervisor antonovich@bos.lacounty.gov
Norman L. Hickling, Deputy, BOS-A
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.
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.

L-23-8

Draft High Desert Corridor Draft EIR Comments/Requests

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.

Dr. Tom Williams 12/10/2014 6

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

825 East Third Street, San Bernardino, CA 92415-0835 | Phone: 909.387.8109 Fax: 909.387.7897
www.SBCounty.gov

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

BOARD OF SUPERVISORS
Robert A. Lovingood, First District | Janice Rutherford, Chair, Second District | James Ramos, Third District | Gary C. Ovitt, Vice Chair, Fourth District | Josie Gonzales, Fifth District
Gregory C. Devereaux, Chief Executive Officer

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

R. Kosinski, Caltrans District 7
CEQA – Comments re: High Desert Corridor Project
November 20, 2014
Page 5 of 5

- 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.

Chapter 5 Responses to Comments from Businesses

This section provides responses to comments received from local businesses on the draft EIR/EIS.

A total of 11 comment letters were received from businesses as summarized below.

Table 5.1. Summary of Comment Letters Received from Businesses

Comment Code	Business	Commenter Name	Date Letter Received	Comment Topic
B-1	Pristine Sun LLC		11/20/2014	Land use, utilities/emergency services, energy, construction impacts
B-2	CVS Pharmacy (sic)		10/1/2014	Water quality
B-3	Clean Waste Technologies, LLC		11/30/2014	Energy
B-4	JVCA Investments, LLC	John Peterson	12/1/2014	Community Impacts
B-5	The Sun Runner Magazine		12/2/2014	Project design and alternatives, community impacts, visual/aesthetics, cultural resources, biological environment
B-6	Christensen Brothers General Engineering, Inc.		12/2/2014	Cumulative impacts
B-7	Granite Construction Company		12/2/2014	General
B-8	Deserae Godfellow		12/2/2014	Project design and alternatives, growth, traffic and transportation, paleontology, noise, cumulative impacts
B-9	Northrop Grumman	Joseph Ahn	12/2/2014	Project design and alternatives, noise, traffic and transportation, cumulative impacts, water quality
B-10	El Mirage Chamber	Bobbie Farquhar	12/2/2014	Project design and alternatives
B-11	Kinder Morgan	P. P. Martin	10/28/2014	Energy

Comment B-1

Submitted electronically by El Mirage Chamber

B-1-1

The parcel APN 321028101 could be equipped (partially or totally) with a ground-mounted solar facility that would be crossed by the future High Desert Corridor, and also an on/off ramp (11. Caughlin Rd).

I need to have more details about the HDC project in this area to assess the impact on the solar project. More specifically, I would need to know what would be the HDC project impact on the zoning of the parcel. The solar facility would require an additional land use permit (utility, probably).

B-1-2

The parcel APN 321028101 could be equipped (partially or totally) with a ground-mounted solar facility that would be crossed by the future High Desert Corridor, and also an on/off ramp (11. Caughlin Rd).

I need to have more details about the HDC project in this area to assess the impact on the solar project. More specifically, I would need to know if new transmission power lines will be installed along the new HDC. What would be the voltage?

B-1-3

The parcel APN 321028101 could be equipped (partially or totally) with a ground-mounted solar facility that would be crossed by the future High Desert Corridor, and also an on/off ramp (11. Caughlin Rd).

I need to have more details about the HDC project in this area to assess the impact on the solar project. More specifically, I would need to know if new transmission power lines will be installed along the new HDC. What would be the voltage?

B-1-4

The parcel APN 321028101 could be equipped (partially or totally) with a ground-mounted solar facility that would be crossed by the future High Desert Corridor, and also an on/off ramp (11. Caughlin Rd).

I need to have more details about the HDC project in this area to assess the impact on the solar project. More specifically, I would need to know the timeframe for the construction of:

- the HDC in the vicinity of the parcel APN 321028101,

- as well as the on/off ramp (11. Caughlin Rd).

- and the transmission lines along the parcel

Also, I would need to know the Right Of Way for the HDC project on this parcel (4 or 6 lanes in each direction? high speed train? how many feet wide in total?), and its footprint on a plot plan, in order to evaluate the impact on the solar module layout.

Response to Comment B-1

Comment Code (Topic)	Response
B-1-1 (Land use)	Section 2.7 of the Final EIR/EIS contains a description and a map of the preferred alternative. Appendix I in Volume 2 of the Final EIR/EIS provides a list of all parcels subject to full or partial acquisition. The extent of an impact on an individual property and any unique situations or any special equipment located on a parcel would be determined once the project is approved and final designs accomplished. Caltrans would negotiate compensation with affected property owners at that time. The fair market value of the property will be determined by an appraisal and an offer of just compensation will be made consistent with the Uniform Relocation Assistance and Real Property Acquisition Policies Act of 1970, as amended. Caltrans, by Legislative Authority, is not a land use planning agency and therefore has no authority over local land use or zoning designations. Zoning re-designations, if required, would become the responsibility of the appropriate local government jurisdiction.
B-1-2 (Utilities)	The HDC is intended to be an energy-neutral facility that operates off the electricity generated by the green energy component of the project. As such, there will need to be a means of transporting electricity from where it is generated to where it is used (i.e., transmission lines). Figure 2-13 shows potential locations where solar power might be generated along the corridor. It is reasonable to assume that there would be some electrical connection running from these locations to the freeway/HSR facility. As an interim measure, to provide electricity to the corridor until the green energy component can be built, Caltrans is looking at two options to power the HDC HSR. Option 1 would use the SCE Victor substation located at 12601 Palmdale Road in Victorville. Option 2 would use the LADWP Victorville substation located at the intersection of Air Expressway and National Trails Hwy. Both options would require a 115-kV line to be constructed. The utility connections, both interim and permanent, will be fully evaluated in a supplemental environmental document.
B-1-3 (Energy)	Please see the response to Comment B-1-2.
B-1-4 (Construction)	A discussion of the potential phased construction of the HDC can be found in Section 3.6, Construction Impacts, of the Final EIR/EIS. In this location (near Caughlin Road), the corridor is proposed to be 500 feet wide with a maximum of three lanes in each direction and an HSR line in the median. Appendix L in Volume 2 of the Final EIR/EIS contains Layout sheets that show the footprint of the HDC relative to local landmarks. Also, please see the response to Comment B-1-1.

Comment B-2

Submitted electronically by Lucerne Valley Market and Hardware

B-2-1

You MUST see how dumping cross-desert traffic on low priority, 2-lane highways like Highways 18 and 247 will be a disaster, especially for Lucerne Valley, Yucca Valley, and the rural communities in between. Those highways are barely adequate for the truck traffic they now receive, and both are dangerous due to impatient drivers getting stuck behind slower trucks and then passing unsafely. Neither highway is designed nor maintained for such traffic as the High Desert Corridor would produce.

YOU SIMPLY MUST NOT JUST END THE CORRIDOR AT A POORLY ENGINEERED AND MAINTAINED HIGHWAY LIKE HWY 18 AND THEN HWY 247!!!!!

Response to Comment B-2

Comment Code (Topic)	Response
B-2-1 (Community)	The SCAG Regional Travel Demand Model was used to forecast traffic volumes on the state and local road network, for both the no build and Build High Desert Corridor alternatives. For the segment of SR-18 between Lucerne Valley and the junction of Bear Valley Road in Apple Valley/Hesperia, the traffic volumes on SR-18 were forecast to be 26,000 to 28,000 vehicles per day in year 2040 under both no build and build conditions. At this level of daily traffic, consideration of widening the two lane conventional highway to four lanes, or upgrading the facility to a four lane expressway appears warranted. Percent time spent following is one measure of performance for a two-lane highway, while another is average travel speed. The average travel speed would be expected to be approximately 40 miles per hour during peak travel periods, when traffic volumes approach 26,000 vehicles per day. Widening SR-18 from two lanes to four lanes should be pursued with SANBAG and Caltrans District 8 as a separate project, independent of the High Desert Corridor proposal.

Comment B-3

Submitted electronically by Clean Waste Technologies, LLC

B-3-1

The comment to the DEIR/EIS for the High Desert Corridor Project relates to our company's intention and forward diligence in the development of renewable energy along the HDC route near the right of way near the Sheep Creek Road intersection in El Mirage.

Our company intends to produce pipeline quality biomethane (renewable natural gas) from the recycling of organic waste through anaerobic digestion and will produce from 1.4 MW to more than 30 MW of equivalent renewable natural gas.

The company believes that the HDC Project may benefit from the renewable energy production on or near the right of way in the El Mirage segment. As such, we fully support the project and feel strongly that the HDC Project can and will be capable of producing sufficient green energy along the corridor to more than cover its energy needs.

Response to Comment B-3

Comment Code (Topic)	Response
B-3-1 (Energy)	We would support Clean Waste Technologies' concept of an anaerobic digester project along the corridor as a potential renewable energy resource. However, the energy produced is not electricity, which would be needed for direct use by the HDC. The potential still exists, though, for the natural gas that you produce to be transported to a location, using the HDC corridor and transmission lines built by you or a third party, where it could be used to generate electricity or provide natural gas for commercial and/or residential use. Either way, this fits the concept of utilizing renewable energy and is a potentially promising use of our "Green Energy Corridor".

Comment B-4

B-4

PETERSON LAW GROUP
PROFESSIONAL CORPORATION
SUITE 290
19800 MACARTHUR BLVD.
IRVINE, CALIFORNIA 92612

TELEPHONE (949) 955-0127
FACSIMILE (949) 955-9007

Via Email and
Priority U.S. Mail

December 1, 2014

Mr. Ronald Kosinki RK
Division of Environmental Planning
100 South Main Street, MS 16A
Los Angeles, CA 90012

Re: Comments to Draft Environmental Impact Report (DEIR) for High Desert Corridor Project

Dear Mr. Kosinki:

This office represents JVCA Investments, LLC ("JVCA"), with respect to the above referenced Project. JVCA is the property owner of APN #0459-461-01-0-000, 0459-461-02-0-000, 0459-461-03-0-000, 0459-461-04-0-000, and 0459-461-66-0-000, commonly known as 17401 Adelanto Road, Adelanto, CA 92301 (the "Property"). The Property consists of approximately 81.62 acres and is leased to various tenants operating industrial businesses.

The proposed Project and Alternatives could negatively affect JVCA's property rights and its tenants businesses, as well as the transportation and circulation in the surrounding areas. We submit these comments and objections to the DEIR. Please provide us with any response at the address above. Also, by this letter we hereby request notice of any hearing or public meeting related to this matter and we request the right to appear and be heard at any such hearing or meeting.

JVCA's parcel APN #0459-461-02-0-000 has been identified in the Draft Environmental Impact Report ("DEIR") as a potentially impacted parcel subject to relocation under Variation E of the Project. *See* Appendix I-22. However, JVCA and its tenants are not mentioned by name in the list of industrial/manufacturing properties that would be affected by the Project under Variation E and require relocation. *See* DEIR 3-96. JVCA and its tenants should be included by name in the DEIR under Variation E. B-4-1

Mr. Ronald Kosinki
Division of Environmental Planning
December 1, 2014
Page 2 of 2

In addition, and pursuant to CEQA, the DEIR is required to take into account the environmental impacts of any potential business relocations. See *Burbank-Glendale-Pasadena Airport Authority v. Hensler* (1991) 233 Cal.App.3d 577, 594-595. The DEIR does not offer any information as to where any of the potentially impacted businesses will be relocated. The DEIR only states that "relocation assistance payments and counseling would be provided to persons and businesses in accordance with the Uniform Relocation Act and Real Property Acquisition Policies Act of 1970...." DEIR 3-96. This is insufficient analysis and renders the DEIR deficient. B-4-2

If Variation E is adopted, JVCA and its tenants, as well as other businesses, will be required to relocate as a result of the Project. The environmental impacts of those relocations - including traffic issues, circulation, land use impacts, emergency access, and fire, life and safety impacts at the potential relocation sites - must be included in the DEIR analysis. Therefore, further study and analysis of the environmental impacts of the potential relocation of these businesses is warranted.

Very truly yours,

John S. Peterson

JSP:swt

Response to Comment B-4

Comment Code (Topic)	Response
B-4-1 (Right-of-way)	Your comments and objections to the Draft EIR/EIS are noted. Caltrans works closely with the California Natural Resources Agency, which maintains resources and guidance pertaining to CEQA case law including Burbank-Glendale-Pasadena Airport Authority v. Hensler (August 20, 1991) 233 Cal. App. 3d 577. It is the opinion of the California Department of Transportation that all diligence in terms of CEQA and relocation impacts haven been properly accounted. Interactions with property owners will be 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.). Property owners will be notified in writing of ROW acquisitions once project alternatives and designs are finalized and when project funding is available.
B-4-2 (Right-of-way)	Your opposition and objections to the Draft EIR/EIS are noted. As to request to be notified of any hearing or public meetings, property owners will be personally notified in writing of ROW acquisitions once project alternatives and designs are finalized and when project funding is available. Interactions with property owners will be 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.).

Comment B-5

Comment submitted electronically by the Sun Runner Magazine

B-5-1

I would like to note that this project may create traffic flow implications for the hi-desert (Joshua Tree Gateway Communities), especially the communities along Highway 247. I produce a publication that deals with development issues in the desert and we did not receive notifications regarding this project and it is relatively unknown in this area. If there are ANY projected implications for this area, the period for public comment needs to be extended.

B-5-2

Caltrans projects have significantly and negatively impacted communities like Boron, where local businesses no longer benefit from highway traffic. While traffic flow has been improved, it comes at a price to the communities the highways bypass. There needs to be appropriate access and mitigation measures in place to minimize the negative impacts of this project on local business and communities.

B-5-3

This project will permanently alter the rural desert look and feel of the area it crosses. This, along with access issues, will directly impact tourism and local businesses.

B-5-4

It is essential to not destroy or disturb the section of Route 66 that goes through the Victorville area. Travel along Route 66 needs to be left unimpaired.

B-5-5

This project would appear to create significant implications for any and all wildlife in the area, as well as eliminating wildlife corridors. Nothing should be expected to survive crossing this many lanes of highway and a high speed train corridor. Corridors need to be properly identified and measures need to be taken to not completely cut off north-south movement of wildlife.

Response to Comment B-5

Comment Code (Topic)	Response
B-5-1 (Design)	The traffic volume on SR-18 between the town of Apple Valley and Lucerne Valley is forecast to increase with or without construction of the High Desert Corridor project. While SR-18 does not connect directly to SR-247, traffic volumes may increase on SR-247 as well, largely as a function of land development in the Lucerne Valley. Neither increases in traffic along SR-247, nor impacts to the communities along SR-247, would result from construction of the proposed project. You will be added to our mailing list and will receive a copy of the Final EIR/EIS.
B-5-2 (Community)	Much of the corridor will pass through currently undeveloped land. However, community access and circulation along the corridor in both developed and undeveloped areas have been analyzed and addressed. Local interchanges are proposed at 2 to 5 mile intervals which will provide sufficient access to existing and future businesses. Also, the proposed High Desert Corridor project location is many miles away from the Lucerne Valley and other communities to the east, north and south of there. No change in traffic volume or patterns is forecast to occur in these communities as a result of construction of the proposed project. Therefore, there will be no impacts to local businesses in and around the Lucerne Valley.
B-5-3 (Visual)	Existing vegetation will be preserved to the extent possible. Bridges, viaducts and the HSR line will be kept as low as possible. Bridges and other structures will be designed to fit the context of the local area. Native vegetation that is consistent with the character of the adjacent community will be planted to replace that which is removed or affected by construction activity. Plants will be used to integrate the appearances of bridges, structures and walls while minimizing their scale. It is acknowledged that sparse desert landscapes do not lend themselves to a strategy of hiding a structure behind plants; however, a way to integrate the seemingly opposing goals of honoring the desert landscape while softening structures will be sought in the design of both hard and soft features. Please see Section 3.1.7 of the Final EIR/EIS for Avoidance, Minimization, and/or Mitigation Measures related to visual resources.
B-5-4 (Cultural)	The HDC is proposed to go under Route 66 (National Trails Highway). A local interchange will be constructed, to provide access to and from Route 66, with context-sensitive elements that honor the culturally important qualities of the route.

Comment Code (Topic)	Response
B-5-5 (Biology)	The HDC Project will be designed to include dual-purpose culverts. At some locations, the culverts would function as a crossing for water only, while at other locations they would function as a crossing for water and a passage for wildlife. Fencing would be used to direct wildlife into the culverts. These wildlife crossing culverts are intended to link habitat that would otherwise be separated by the HDC. Those locations selected for the dual-purpose culverts would be modified (i.e., higher and wider culverts) to accommodate wildlife and encourage their use. The locations that will function as dual-purpose culverts were identified in a Wildlife Movement Study (Preliminary Wildlife Corridor Evaluation, September 23, 2011). Typical culverts would consist of either corrugated steel (i.e., elliptical or circular), articulated interlocking concrete blocks, or concrete box-like structures that would be filled with sand and gravel to mimic a natural earthen bottom; some locations may contain concrete ledges for smaller species. Please see Chapter 2 of the Final EIR/EIS (Figures 2-32, 2-33, and 2-34) for locations of wildlife crossings proposed along the HDC.

Comment B-6

Comment submitted electronically by Christensen Brothers General Engineering Inc.

B-6-1

Christensen Brothers General Engineering Inc. a Southern California Pipeline / General Engineering Company has major concerns regarding the location of the proposed road. There are plenty of open lots around us, yet this project is being proposed directly through two business in the immediate area that I am aware. This company employs between 25-40 employees at any given time. If it is constructed as depicted, we will loose a viable property for our business. Christensen requires the ample space for equipment, vehicle, and commercial vehicle storage and future growth. It would prove difficult to find another property that could hold the plant and equipment Christensen has accumulated & necessary between projects, and meet the Town of Apple Valley requirements for this type of business. We have put a lot of effort into our office, on Papago where jobs are bid, and business is conducted. We also have supplemental income directly associated with owning this land. The 6' block wall around our five acres provides our customers an ourselves security, and turn around access for trucking operations. Compensation and replacement value for the variety of operations that our company provides from this location will be hard to replace at a reasonable value, as well as the cost of interrupting business, purchasing alternate land with same advantages & moving this business from this location.

Response to Comment B-6

Comment Code (Topic)	Response
B-6-1 (Right-of-way)	Comments regarding possible impact due to the proposed project are noted. Interactions with property owners will be done 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 61et seq.). Property owners will be notified in writing of ROW acquisitions once project alternatives and designs are finalized and when project funding is available. If the property cannot be avoided, these laws require that fair market value be provided to the property owner. Relocation assistance, if applicable, will aid the displaced business to reestablish and move to a replacement location within 50 miles of the displacement location. Loss of business good will may also be applicable and, as such, aid the business.

Comment B-7

Comment submitted electronically by Granite Construction Company

SUPPORT FOR OUR NATION'S INFRASTRUCTURE

Infrastructure is essential to maintaining the flow of commerce, the interconnection of people and quality of life. Highway projects such as the High Desert Corridor, drive our economy and support our prosperity. Our nation's infrastructure must be maintained and upgraded to improve safety, capacity, and efficiency to serve the current generation, while preparing the next generation for economic growth.

According to the American Society of Civil Engineers, forty-two percent of America's major urban highways remain congested, costing the economy an estimated $101 billion in wasted time and fuel annually. While the conditions have improved in the near term, and federal, state, and local capital investments increased to $91 billion annually, that level of investment is insufficient and still projected to result in a decline in conditions and performance in the long term. Currently, the Federal Highway Administration estimates that $170 billion in capital investment would be needed on an annual basis to significantly improve conditions and performance.

Traditional funding mechanisms are not sufficient to fund the current demand. States are increasingly using a combination of public and private equity funds from infrastructure banks, private investment and proceeds from issuing revenue bonds. The U.S. DOT's continued use of the Transportation Infrastructure Finance and Innovation Act (TIFIA), and on a broader level, MAP-21 provided the well-needed financial support for highway and bridge development projects. Unfortunately, without a long-term Highway Bill that underpins the Highway Trust Fund, large projects in the development phase may continue to slide into later years until a sustainable financing structure is in place.

Granite actively participates in more than 50 industry organizations. Our executive and senior management teams serve in leadership and advocacy roles as board members, committee chairs, and members of many standing committees. Our corporate, state, and local governmental affairs efforts are directed to educate and inform legislative delegations about issues facing the construction industry.

Together, we all play a part in promoting projects such as the High Desert Corridor, to safely and efficiently move goods and people.

GRANITE
graniteconstruction.com

Granite Construction, Inc. (NYSE:GVA), is a full-service general contractor, construction management firm, and construction materials producer. Recognized as one of the top 25 largest construction companies in the U.S., Granite specializes in complex infrastructure projects, including transportation, industrial and federal contracting.

Response to Comment B-7

Comment Code (Topic)	Response
B-7 (Other)	Your support of the project is noted.

Comment B-8

Comment submitted electronically by Deserae Godfellow

B-8-1

There has to be a better alternative than Happy Trails. Get out of Apple Valley and Victorville. Thank you.

B-8-2

Stop what's already out of hand.

B-8-3

too much for a small HIGH Desert and too much congestion!

B-8-4

Get out

B-8-5

More noise for quiet folk that have deservingly retired.

B-8-6

The costs burdened by already low paying jobs up here, by proposing 5 points of toll roads to concoct your scheme that's been in the forethought, of selfish, self-serving people of local government all the way to L.A. metro.

Keep your backyard cleaned up and stop bringing your trash here. This is a beautiful desert and not an insignificant area or "troubled" as one of your cronies suggested. There are many retired people here and we came here to retire. What a concept, not congestion, noise, more radiation to install the electric grid, pollution, dust and noise from a highway in our desert. You will further bring a curse to this area if you cut into the sacred area by Stoddard Wells Road, and Hwy. 18. Go somewhere else, especially sense you want to put a high speed train in here. Get out you dirty, scoundrels.

Response to Comment B-8

Comment Code (Topic)	Response
B-8-1 (Design)	The proposed highway would connect to the Happy Trails Highway (Route 18) near Bear Valley Road on the eastern side of Apple Valley. Your objection to the project is noted.
B-8-2 (Growth)	Please see Section 1.1.2 of the Final EIR/EIS; this information provides the planning background and explains why the project is needed. The purpose of the proposed project is to improve east-west mobility through the High Desert region of southern California. This can be achieved by addressing present and future travel demand and mobility needs within the Antelope and Victor valleys. The proposed project is intended to achieve the following objectives: • Increase capacity of east-west transportation facilities to accommodate existing and future transportation demand • Improve travel safety and reliability within the High Desert region • Improve the regional goods movement network • Provide improved access and connectivity to regional transportation facilities, including airports and existing and future passenger rail systems (which include the proposed California HSR system and the proposed XpressWest HSR system) • Contribute to state greenhouse gas (GHG) emissions reduction goals by supporting future plans for green energy features along the corridor Note also that this project is planned and developed to accommodate anticipated and planned growth, and it will not directly induce growth, although a shifting of growth to the proposed interchange locations along the corridor could be anticipated.
B-8-3 (Traffic)	The comment is not clear enough to be responded to. Please see the response to Comment B-8-2, which explains the objectives and planning background of the project.
B-8-4 (Paleontology)	Your comment opposing the proposed project is noted.
B-8-5 (Noise)	It is true that the proposed project would increase noise levels in some areas. However, the project will comply with all state and federal noise standards. A Noise Study Report and High Speed Rail Vibration Impact Assessment was prepared that identifies the existing conditions and potential noise impacts resulting from the project. Noise abatement recommendations were made for those areas where future noise levels would exceed noise standards. Please refer to Section 3.2.7 of the Final EIR/EIS for a summary of the results of this study.
B-8-6 (Cumulative)	Your opposition of the proposed HDC Project is clearly noted.

Comment B-9

B-9

NORTHROP GRUMMAN

December 2, 2014

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

Subject: Draft Environmental Impact Report/Environmental Impact Statement and Section 4(f) (De Minimis Findings) on the High Desert Corridor Project, Project ID # 071200035 (EA: 2600U) SCH #2010091084

Dear Mr. Price:

Northrop Grumman appreciates the opportunity to provide comments on the California Department of Transportation's High Desert Corridor Project's Draft Environmental Impact Report and Environmental Impact Statement.

Northrop Grumman operations in Southern California's Antelope Valley region include the Palmdale Aircraft Integration Center of Excellence at Air Force Plant 42, flight test support at Edwards Air Force Base and Scaled Composites in Mojave. Northrop Grumman has operated in the Antelope Valley since the 1940s, when it supported flight testing at Muroc Army Air Field (now Edwards AFB). In 1986, Northrop Grumman moved into Plant 42's Site 4, which was built for production of the Air Force's B-2 Spirit stealth bomber.

Today, Northrop Grumman has about 3,500 employees working in the region, most of them in Palmdale. In Palmdale Northrop Grumman assembles the center fuselage of the F-35 Lightning II multirole fighter for Lockheed Martin, the prime contractor. Other activities include final assembly of the Air Force RQ-4 Global Hawk and Navy Triton unmanned reconnaissance systems. In the Antelope Valley the company also built two X-47B air vehicles for the Navy Unmanned Combat Air System (UCAS) demonstration program.

The Palmdale Aircraft Integration Center of Excellence also serves as headquarters for Northrop Grumman's work on the B-2 bomber. The plant was the site of the B-2's rollout in 1988 and its first flight the next year. Every B-2 was assembled there, and the aircraft return to Palmdale from Whiteman Air Force Base in Missouri for regular airframe maintenance. In addition, as the B-2 prime contractor, Northrop Grumman is working on a series of upgrades to improve the B-2's capabilities.

1

In 2007, Northrop Grumman acquired Scaled Composites in Mojave. Its world-class capabilities in innovative design, rapid prototyping and flight test complement Northrop Grumman's own expertise in these areas. Scaled Composites continues to operate as a small, agile resource for advanced research and development.

All of the programs mentioned in this letter have a direct link to the research and development and manufacturing operations at Northrop Grumman's Palmdale Plant 42 site. Northrop Grumman would like to respectfully request that the environmental impact analysis take into consideration sensitive military operations at Plant 42, ascertain adverse impacts to military and aerospace programs, and mitigate project hazards and incompatible uses with existing parties operating out of Plant 42 and the Antelope Valley. B-9-1

The recommendations in this letter are not a complete list of potential impacts to Northrop Grumman or Air Force Plant 42, but the Draft EIR/EIS defined in the project scope as well as alternatives should take into consideration the observations we have provided below.

With respect to the Draft EIR/EIS, Chapter 3-Affected Environment, Environmental Consequences, and Avoidance, Minimization, and/or Mitigation Measures, Sub-Sections 3.1.1.1 Existing and Future Land Use, and 3.7 Cumulative Impacts; 3.1.1.2 Consistency with State, Regional, and Local Plans:

- We would recommend restricted encroachment to the lateral confines of the Class D airspace, which is a 4.3 mile radius around the Air Force Plant 42, to the maximum extent possible to allow sensitive testing without interference from the transportation project. This is to reduce the exposure to developmental aircraft operating in the local traffic pattern. B-9-2
- Furthermore, we would recommend project managers analyze potential effect of the development within Runway 04 Approach APZ II. B-9-3

In Sub-Section-3.2 Physical Environment; 3.2.7 Noise and 3.6 Construction Impacts:

- Determine noise and vibrations emanating during the construction phases of the project, and long term ongoing impacts to site military operations and aerospace development projects and programs. B-9-4
- Potential freeway on/off-ramp locations in vicinity of AFP 42. B-9-5

In Sub-Section-3.1.7 Visual/Aesthetics; 3.2.6 Air Quality:

- The project supports renewable energy projects to offset the green houses gases and carbon emissions, but potential flight operation issues should be studied in more detail related to renewable projects on the entire length of the project corridor and alternatives to the project. The potential glint/glare of any solar power generating systems requires additional considerations. B-9-6

2

In Sub-Section-3.7 Cumulative Impacts; 3.2.8 Energy

- The project should take into consideration and mitigate any potential electromagnetic interference of any electric-based rail system to Plant 42 operations.
- Identify potential routes of electric-based rail systems encroaching onto AFP 42 and/or defense contractor properties.

B-9-7

In Sub-Section-3.2.2 Water Quality and Storm Water Runoff

- The nexus between storm water retention basin locations and military base should be closely coordinated with AF Plant 42 to ensure there are no disruptions to the environment and ongoing military operations.

B-9-8

Northrop Grumman looks forward to working with you and the County of Los Angeles, LA Metro, and City of Palmdale to develop a sensible transportation project plan that allows the Antelope Valley to remain an aerospace gem of California and the nation.

If you have any questions, please feel free to contact me.

Sincerely,

Joseph M. Ahn

Joe Ahn
Division Manager
Government Relations and Public Affairs
Aerospace Systems Sector

3

Response to Comment B-9

Comment Code (Topic)	Response
B-9-1 (Other)	The project team met with the U.S. Air Force and tenants of Plant 42 throughout the preparation of the Draft EIR/EIS and is aware of the sensitive nature of the activities that take place there. We will continue coordination and planning efforts to minimize our impacts to the operations of Plant 42 and its tenants.
B-9-2 (Design)	The limit of the proposed highway corridor is located less than one mile from the southern boundary of Plant 42 in an area that has already seen substantial development. The proposed HSR connection to the Palmdale Transportation Center is even closer. Although encroachment into the Class D airspace cannot be avoided, the project team will continue to work with the U.S. Air Force and Plant 42 tenants to ensure that the project is designed in a way that does not interfere with Plant 42 operations or subject users of the HDC to undue risk.
B-9-3 (Design)	Plant 42 runway 4/22 clear zones were analyzed to make sure that proposed HSR structures would be within the allowable height restrictions. It was determined that the proposed structures for the preferred alternative do meet the maximum height requirement. The project team will be happy to work in close coordination with Northrop Grumman and other Plant 42 tenants throughout future phases of the project to ensure that impacts to Plant 42 operations are avoided or minimized.
B-9-4 (Noise)	As part of the analysis for the Draft EIR/EIS, Caltrans prepared a Noise Study Report (NSR) and HSR Vibration Assessment. This report was revised and updated for the Final EIR/EIS. It was determined that the closest the HSR centerline tracks would be to the nearest building or facility was approximately 430 feet. At this distance and with the operating parameters of the project, the RMS vibration velocity level would be approximately 59 VdB. Note that Plant 42 was classified as Category 3 in the Draft EIR/EIS according to Federal Railroad Administration guidelines. Category 3 sensitivity is 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, and 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 Plant 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

Comment Code (Topic)	Response
	utilized a lower impact threshold. The results have been incorporated into the Final EIR/EIS. The project team will continue to work with the U.S. Air Force and Plant 42 tenants to ensure that their concerns are addressed.
B-9-5 (Traffic)	On SR-14, the project proposes to close the partial interchange on-ramp at Rancho Vista and add a new complete interchange (with both on- and off-ramps) at 10th Street West. On the HDC, the closest interchange to Plant 42 would be at 20th Street East. The traffic noise impacts resulting from implementation of the various project alternatives have been studied and the results are presented in the Final EIR/EIS. The study has accounted for all interchanges and on/off ramps along the entire corridor.
B-9-6 (Design)	Glare issues from solar generating systems, specifically photovoltaic panels, have been virtually eliminated in recent technology through the use of dark panels and anti-glare coatings. Since the specific renewable energy components proposed for this project are subject to change based on constantly evolving technology, they will not be finalized until the final engineering design phase. However, Caltrans will work in close coordination with Plant 42 during the final design phase to ensure that no impact to flight operations will occur.
B-9-7 (Cumulative)	Electromagnetic interference (EMI) is a disturbance that interrupts, obstructs, or otherwise degrades or limits the effective performance of an electrical circuit, device, or transmission due to electromagnetic radiation from an external source. An Electromagnetic Radiation (EMR) study has been completed for this project and it was concluded that the proposed project would not impact AFP-42 ground or flight operations through EMI. Please see Section 3.1.9 of the Final EIR/EIS for additional information. Rail Option 1C has been selected as part of the preferred alternative; therefore, there will be no encroachment of an electric-based rail system onto AFP 42 or in any area used by defense contractor.
B-9-8 (Water quality)	Locations for storm water retention basins with respect to the military base will be closely coordinated with Plant 42 to ensure there are no disruptions to the environment and ongoing military operations.

Comment B-10

Metro

Caltrans

High Desert Corridor
Draft EIS/EIR

Comment Sheet

Name: Bobbie Farquhar

Affiliation (i.e. organization, resident, business): El Mirage Chamber

Address: 2777 Venus El Mirae CA

Phone/Cell: 760 793 1216

Email: BCRESCUE@AOL.COM

Thank you for your interest in the High Desert Corridor project. We welcome your comments.

To benefit our community and the least costly Route to build in our community for you would be B1.
Thank you for your consideration to All of the residents of El Mirage

PUBLIC COMMENT PERIOD: The Draft Environmental Impact Statement/Report (Draft EIS/EIR) for the High Desert Corridor is available through December 2 at 5pm. The Draft EIS/EIR is available for review at dot.ca.gov/dist07/HDC and metro.net/hdc.

WRITTEN COMMENTS: Comments may also be mailed to: Ronald Kosinski, Caltrans District 7, Division of Environmental Planning, 100 South Main Street, MS 16A, Los Angeles, CA 90012.

RK

Response to Comment B-10

Comment Code (Topic)	Response
B-10-1 (Design)	Your support for Variation B1 is noted.

Comment B-11

KINDER MORGAN
ENERGY PARTNERS, L.P.
SFPP, L.P.

SFPP, L.P.
Operating Partnership

October 28, 2014

ENG 4-2-1 (44.1 to 46.1 - ML 001)
(30.9 to 32.6 - ML1001)
(0.0 to 3.6 - ED 001)
(0.0 to 0.3 - ML 4A)
(0.0 to 0.1 - RY 001) OOS
File Reference #14-819-1

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

Re: NOP Hearings and Availability of Environmental Impact Report / Statement for High Desert Corridor Environmental Impact Report (EIR) - Realignment/Construction of 63 Mile Study between State Route 14 in Los Angeles County and State Route 18 in San Bernardino County.
07-08 LA & SBD Co.; SCH 2010091084; HDC Corridor Project

Dear Mr. Kosiniski:

This is in reply to your letter dated September 30, 2014, concerning the above referenced project in Los Angeles and San Bernardino Counties, California.

Enclosed is a copy of drawing ML-001, 487014COLV, sheets 65 through 67; ML-1001, 487008COLV, sheets 65 through 67; ED-001, 487006GEED, sheets 1 through 4; and ML4A, 487000ML4A, sheets 1 and 2; which respectively depict the general alignment of Kinder Morgan's (KM) 14-inch, 8-inch, 6-inch and 4-inch high pressure refined petroleum products pipeline. Drawing RY001, sheet 1, depicts KM's out-of-service 3-inch pipeline.

In the interest of public safety and for pipeline protection, the following provisions must be considered in the design and subsequent construction of improvements near KM pipelines.

1. Adherence to applicable provisions enumerated in the enclosed copy of (a) L-OM200-29 "Guidelines for Design and Construction" relating to proposed projects affecting KM pipelines and (b) copy of Information Bulletin #03-001, issued from the Office of the State Fire Marshal concerning encroachments within and adjacent to pipeline easements.

1100 Town & Country Road Orange, California 92868 714/560-4400 714/560-4601 Fax

State of California
Department of Transportation
Caltrans District 7
October 28, 2014
Page 2 of 2

2. Exact pipeline location can only be determined by pothole at maximum 50 feet intervals (or as required by the on-site KM representative). The pothole work must be performed by hand excavation and in the presence of a pipeline representative.

3. Notify Sr. ROW Specialist, Thom Larkin (909) 873-5162, at least two weeks prior to commencement of work. Mr. Larkin will arrange for a pipeline representative to be present during work near the pipeline.

To avoid delays in response to future correspondence, please refer to File Reference #14-819.

Sincerely,

PPMartin

P. P. Martin
Manager - Pipeline Engineering

T: Quinn/letters/ENG4-2-1/14-819-1/bn

Enclosures

cc: T. E. Larkin w/copy of inquiry

California State Fire Marshal Pipeline Safety Division

INFORMATION BULLETIN
#03-001

Date Issued: June 20, 2003

SUBJECT: ENCROACHMENTS INTO OR ON PIPELINE EASEMENTS

The purpose of this informational bulletin is to delineate the position of the State Fire Marshal regarding encroachments onto the pipeline easements.

Section 51014.6 of the California Government Code states, " (a) Effective January 1, 1987, no person, other than the pipeline operator, shall do any of the following with respect to any pipeline easement: (1) Build, erect, or create a structure or improvement within the pipeline easement or permit the building, erection, or creation thereof. (2) Build, erect, or create a structure, fence, wall, or obstruction adjacent to any pipeline easement which would prevent complete and unimpaired surface access to the easement, or permit the building, erection, or creation thereof. (b) No shrubbery or shielding shall be installed on the pipeline easement which would impair aerial observation of the pipeline easement. This subdivision does not prevent the revegetation of any landscape disturbed within a pipeline easement as a result of construction the pipeline and does not prevent the holder of the underlying fee interest or the holder's tenant from planting and harvesting seasonal agricultural crops on a pipeline easement. (c) This section does not prohibit a pipeline operator from performing any necessary activities within a pipeline easement, including, but not limited to, the construction, replacement, relocation, repair, or operation of the pipeline.

It is the position of the State Fire Marshal that nothing shall encroach into or upon the pipeline easement, which would impede the pipeline operator from complete and unobstructed surface access along the pipeline right of way. Nor shall there be any obstructions, which would shield the pipeline right of way from observation. In the interest of public safety and the protection of the environment, it is imperative that the pipeline operator visually assesses the conditions along the easement to ensure the integrity of the pipeline.

It is the responsibility of the pipeline operator to ensure they have unimpeded surface access and to be able to physically observe all portions of their pipeline rights of way. In cases where this is not possible, the pipeline operator shall inform the State Fire Marshal. The State Fire Marshal shall in conjunction with the pipeline operator resolve the issue.

Questions regarding the issue of pipeline encroachment can be addressed to:

Bob Gorham, Chief
Cal Fire/State Fire Marshal
Pipeline Safety Division
3950 Paramount Blvd. Suite 210
Lakewood, CA 90712

(562) 497-9100
(562) 497-9104 (fax)
bob.gorham@fire.ca.gov

KINDER MORGAN

Guidelines for Design and Construction near Kinder Morgan Hazardous Liquid Operated Facilities

Name of Company: _____

The list of design, construction and contractor requirements, including but not limited to the following, for the design and installation of foreign utilities or improvements on KM right-of-way (ROW) are not intended nor do they waive or modify any rights KM may have under existing easements or ROW agreements. Reference existing easements and amendments for additional requirements. This list of requirements is applicable for KM facilities on easements only. Encroachments on fee property should be referred to the ROW Department.

Design

- KM shall be provided sufficient prior notice of planned activities involving excavation, blasting, or any type of construction on KM's ROW to determine and resolve any location, grade or encroachment problems and provide protection of our facilities and the public **before** the actual work is to take place.
- Encroaching entity shall provide KM with a set of drawings for review and a set of final construction drawings showing all aspects of the proposed facilities in the vicinity of KM's ROW. The encroaching entity shall also provide a set of as-built drawings showing the proposed facilities in the vicinity of KM's ROW.
- Only facilities shown on drawings reviewed by (Company) will be approved for installation on KM's ROW. All drawing revisions that effect facilities proposed to be placed on KM's ROW must be approved by KM in writing.
- KM shall approve the design of all permanent road crossings.
- Any repair to surface facilities following future pipeline maintenance or repair work by KM will be at the expense of the developer or landowner.
- The depth of cover over the KM pipelines shall not be reduced nor drainage altered without KM's written approval.
- Construction of any permanent structure, building(s) or obstructions within KM pipeline easement is **not** permitted.
- Planting of shrubs and trees is not permitted on KM pipeline easement.
- Irrigation equipment i.e. backflow prevent devices, meters, valves, valve boxes, etc. shall not be located on KM easement.
- Foreign line, gas, water, electric and sewer lines, etc., may cross perpendicular to KM's pipeline within the ROW, provided that a minimum of two (2) feet of vertical clearance is maintained between KM pipeline(s) and the foreign pipeline. Constant line elevations must be maintained across KM's entire ROW width, gravity drain lines are the only exception. Foreign line crossings below the KM pipeline must be evaluated by KM to ensure that a significant length of the KM line is not exposed and unsupported during construction. When installing underground utilities, the last line should be placed beneath all existing lines unless it is impractical or unreasonable to do so. Foreign line crossings above the KM pipeline with less than 2 feet of clearance must be evaluated by KM to ensure that additional support is not necessary to prevent settling on top of the KM hazardous liquids pipeline.
- A foreign pipeline shall cross KM facilities at as near a ninety-degree angle as possible. A foreign pipeline shall not run parallel to KM pipeline within KM easement without written permission of KM.
- The foreign utility should be advised that KM maintains cathodic protection on their pipelines. The foreign utility must coordinate their cathodic protection system with KM's. At the request of KM, foreign utilities shall install (or allow to be installed) cathodic protection test leads at all crossings for the purposes of monitoring cathodic protection. The KM Cathodic Protection (CP) technician and the foreign utility CP technician shall perform post construction CP interference testing. Interference issues shall be resolved by mutual agreement between foreign utility and KM. All costs associated with the correction of cathodic protection problems on KM pipeline as a result of the foreign utility crossing shall be borne by the foreign utility for a period of one year from date the foreign utility is put in service.
- The metallic foreign line shall be coated with a suitable pipe coating for a distance of at least 10 feet on either side of the crossing unless otherwise requested by the KM CP Technician.

Reference: L-O&M Procedure 204
Distribution: Local Files
Engineering

Page 1 of 3

L-OM200-29
11/07

KINDER MORGAN

Guidelines for Design and Construction near Kinder Morgan Hazardous Liquid Operated Facilities

- AC Electrical lines must be installed in conduit and properly insulated.
- DOT approved pipeline markers shall be installed so as to indicate the route of the foreign pipeline across the KM ROW.
- No power poles, light standards, etc. shall be installed on KM easement
- No pipeline may be located within 50 feet (15 meters) of any private dwelling, or any industrial building or place of public assembly in which persons work, congregate, or assemble.

Construction

- Contractors shall be advised of KM's requirements and be contractually obligated to comply.
- The continued integrity of KM's pipelines and the safety of all individuals in the area of proposed work near KM's facilities are of the utmost importance. Therefore, contractor must meet with KM representatives prior to construction to provide and receive notification listings for appropriate area operations and emergency personnel. **KM's on-site representative will require discontinuation of any work that, in his opinion, endangers the operations or safety of personnel, pipelines or facilities.**
- The Contractor must expose all KM pipelines prior to crossing to determine the exact alignment and depth of the lines. A KM representative must be present. In the event of parallel lines, only one pipeline can be exposed at a time.
- KM will not allow pipelines to remain exposed overnight without consent of KM designated representative. Contractor may be required to backfill pipelines at the end of each day.
- A KM representative shall do all line locating. A KM representative shall be present for hydraulic excavation. The use of probing rods for pipeline locating shall be performed by KM representatives only, to prevent unnecessary damage to the pipeline coating.
- Notification shall be given to KM at least 72 hours before start of construction. A schedule of activities for the duration of the project must be made available at that time to facilitate the scheduling of Kinder Morgan, Inc.'s work site representative. Any Contractor schedule changes shall be provided to Kinder Morgan, Inc. immediately.
- Heavy equipment will not be allowed to operate directly over KM pipelines or in KM ROW unless written approval is obtained from (Company). Heavy equipment shall only be allowed to cross KM pipelines at locations designated by Kinder Morgan, Inc. Contractor shall comply with all precautionary measures required by KM to protect its pipelines. When inclement weather exists, provisions must be made to compensate for soil displacement due to subsidence of tires. Equipment excavating within ten (10) feet of KM Pipelines will have a plate guard installed over the teeth to protect the pipeline.
- Excavating or grading which might result in erosion or which could render the KM ROW inaccessible shall not be permitted unless the contractor/developer/owner agrees to restore the area to its original condition and provide protection to KM's facility.
- A KM representative shall be on-site to observe any construction activities within ten (10) feet of a KM pipeline or aboveground appurtenance. The contractor **shall not** work within this distance without a KM representative being on site. Only hand excavation shall be permitted within two (2) feet of KM pipelines, valves and fittings unless State requirements are more stringent. However, proceed with extreme caution when within three (3) feet of the pipe.
- A KM representative will monitor construction activity within 25 feet of KM facilities during and after the activities to verify the integrity of the pipeline and to ensure the scope and conditions agreed to have not changed. Monitoring means to conduct site inspections on a pre-determined frequency based on items such as: scope of work, duration of expected excavator work, type of equipment, potential impact on pipeline, complexity of work and/or number of excavators involved.
- Ripping is only allowed when the position of the pipe is known and not within ten (10) feet of KM facility unless company representative is present.
- Temporary support of any exposed KM pipeline by Contractor may be necessary if required by KM's on-site representative. Backfill below the exposed lines and 12" above the lines shall be replaced with sand or other selected material as approved by KM's on-site representative and thoroughly compacted in 12" lifts to 95% of standard proctor dry density minimum or as approved by KM's on-site representative. This is to adequately protect against stresses that may be caused by the settling of the pipeline.

Reference: L-O&M Procedure 204
Distribution: Local Files
Engineering

Page 2 of 3

L-OM200-29
11/07

KINDER MORGAN

Guidelines for Design and Construction near Kinder Morgan Hazardous Liquid Operated Facilities

- No blasting shall be allowed within 1000 feet of KM's facilities unless blasting notification is given to KM including complete Blasting Plan Data. A pre-blast meeting shall be conducted by the organization responsible for blasting.
  KM shall be indemnified and held harmless from any loss, cost of liability for personal injuries received, death caused or property damage suffered or sustained by any person resulting from any blasting operations undertaken within 500 feet of its facilities. The organization responsible for blasting shall be liable for any and all damages caused to KM's facilities as a result of their activities whether or not KM representatives are present. KM shall have a signed and executed Blasting Indemnification Agreement before authorized permission to blast can be given.

  No blasting shall be allowed within 300 feet of KM's facilities unless blasting notification is given to KM a minimum of one week before blasting. *(note: covered above)* KM shall review and analyze the blasting methods. A written blasting plan shall be provided by the organization responsible for blasting and agreed to in writing by KM in addition to meeting requirements for 500' and 1000' being met above. A written emergency plan shall be provided by the organization responsible for blasting. *(note: covered above)*

- **Any** contact with any KM facility, pipeline, valve set, etc. shall be reported immediately to KM. If repairs to the pipe are necessary, they will be made and inspected before the section is re-coated and the line is back-filled.

- KM personnel shall install all test leads on KM facilities.

- Burning of trash, brush, etc. is not permitted within the KM ROW.

Insurance Requirements

- All contractors, and their subcontractors, working on Company easements shall maintain the following types of insurance policies and minimum limits of coverage. All insurance certificates carried by Contractor and Grantee shall include the following statement: "Kinder Morgan and its affiliated or subsidiary companies are named as additional insured on all above policies (except Worker's Compensation) and waiver of subrogation in favor of Kinder Morgan and its affiliated or subsidiary companies, their respective directors, officers, agents and employees applies as required by written contract." **Contractor shall furnish Certificates of Insurance evidencing insurance coverage prior to commencement of work and shall provide thirty (30) days notice prior to the termination or cancellation of any policy.**

1. Statutory Coverage Workers' Compensation Insurance in accordance with the laws of the states where the work is to be performed. If Contractor performs work on the adjacent on navigable waterways Contractor shall furnish a certificate of insurance showing compliance with the provisions of the Federal Longshoreman's and Harbor Workers' Compensation Law.
2. Employer's Liability Insurance, with limits of not less than **$1,000,000** per occurrence and **$1,000,000** disease each employee.
3. Commercial General Liability Insurance with a combined single limit of not less than **$2,000,000** per occurrence and in the aggregate. All policies shall include coverage for blanket contractual liability assumed.
4. Comprehensive Automobile Liability Insurance with a combined single limit of not less than **$1,000,000.** If necessary, the policy shall be endorsed to provide contractual liability coverage.
5. If necessary Comprehensive Aircraft Liability Insurance with combined bodily injury, including passengers, and property damage liability single limits of not less than **$5,000,000** each occurrence.
6. Contractor's Pollution Liability Insurance this coverage shall be maintained in force for the full period of this agreement with available limits of not less then **$2,000,000** per occurrence.
7. Pollution Legal Liability Insurance this coverage must be maintained in a minimum amount of **$5,000,000** per occurrence.

Reference: L-O&M Procedure 204
Distribution: Local Files
Engineering

Page 3 of 3

L-OM200-29
11/07

Response to Comment B-11

Comment Code (Topic)	Response
B-11-1 (Energy)	Caltrans acknowledges the guidelines provided by Kinder Morgan and will follow the guidelines during the design and construction stages. It is the standard practice of Caltrans to coordinate with all utility service providers within the project area prior to any construction within the project area. Please note that the drawings indicated in the letter were not attached. However, Caltrans will coordinate with Kinder Morgan during the project design phase to obtain necessary engineering information for your facilities to ensure impacts or disruption of your services is avoided.

Chapter 6 Responses to Written Comments from the General Public

Throughout the 60-day comment period, a total of 41 members of the public submitted written comments related to the project. A copy of each written comment and the response to each question/comment are presented in this chapter. When the comment letters from the same individual are duplicated (sent in more than one copy), response to only one letter is provided.

Table 6.1. Summary of Written Comments Received from the General Public

Comment Code	Commenter Name	Date Received	Comment Topic
G-1	Ingrid Van Der Hope	11/5/2014	Project design and alternatives
G-2	Jim Alexander	11/5/2014	Project design and alternatives, traffic and transportation
G-3	Maury van Der Hope	11/5/2014	Project design and alternatives
G-4	Bruce Burch	11/5/2014	Project design and alternatives
G-5	Mary Jill Sofi	11/17/2014	General
G-6	Rich Poston	11/12/2014	General
G-7	Mary Borden	11/13/2014	General
G-8	Mildred Bolam	11/13/2014	General
G-9	John Tomko	11/13/2014	General
G-10	Ted Ho	11/13/2014	Project design and alternative
G-11	Laura Quigley	11/13/2014	General
G-12	Andy Mandegary	11/2/2014	General
G-13	QW PARKER LLC	11/14/2014	General
G-14	Marina Raicevic	11/14/2014	General
G-15	Richard Myhro	11/14/2014	General
G-16	Carlos Perez. Jr.	11/14/2014	General
G-17	James Robertson	11/14/2014	General
G-18	Carol Field	11/20/2014	General
G-19	Mohamad Elasaad	11/17/2014	General
G-20	Mike Anderson	12/2/2014	Project design and alternatives
G-21	George Calloway	12/2/2014	Project design and alternatives
G-22	James Farquhar	12/2/2014	Project design and alternatives
G-23	Jim Hill, Jr.	12/2/2014	Project design and alternatives

Comment Code	Commenter Name	Date Received	Comment Topic
G-24	Sera Gramham Hill	12/2/2014	Project design and alternatives
G-25	Ralph Jena Anonymous	11/17/2014	General
G-26	Aida Bernardo	11/18/2014	General
G-27	Roger Duvernay	11/19/2014	General
G-28	Carol Wiley	12/2/2014	Project design and alternatives, traffic and transportation, community impacts
G-29	Darlene Hastings	12/1/2014	General
G-30	Richard Baltzley	11/17/2014	Project design and alternatives
G-31	Harold Wright	12/2/2014	Project design and alternatives
G-32	Charlotte Wright	12/2/2014	General
G-33	Marina Katarina Raicevic	12/2/2014	Project design and alternatives
G-34	Gail Culbertson	12/2/2014	Biological environment, general
G-35	Roger and Sharon Andrews	12/2/2014	General
G-36	Raymond Borough	11/20/14	Traffic and Transportation
G-37	James Grinstead	11/10/2014	General
G-38	Deborah Masterson	11/10/2014	General
G-49	Jennifer Silvernail	11/10/2014	General
G-40	Gabriel Adler	11/10/2014	General
G-41	Mae Suarpha	11/4/2014	General
G-42	Bradford Berger	11/22/14	Traffic, growth, cumulative impacts
G-43	Brenda Avadian	12/2/14	Energy, general

Comment G-1

LAKE LA 11/5

Metro

Caltrans

High Desert Corridor
Draft EIS/EIR

Comment Sheet

Name: Ingrid Van Der Hope

Affiliation (i.e. organization, resident, business):

Address: 14760 Big Sky Drive
Pearblossom Ca 93553.

Phone/Cell:

Email:

Thank you for your interest in the High Desert Corridor project. We welcome your comments.

FIRST: NO BUILD ALTERNATIVE !

AREA MUCH TOO WINDY FOR BIKE RIDERS —

NO TOLL FOR PUBLIC (FREEWAY)

MOVE P.T.C ? !

THERE'S ALREADY AN EAST-WEST ROAD FROM PALMDALE TO VICTORVILLE

PUBLIC COMMENT PERIOD: The Draft Environmental Impact Statement/Report (Draft EIS/EIR) for the High Desert Corridor is available through December 2 at 5pm. The Draft EIS/EIR is available for review at *dot.ca.gov/dist07/HDC* and *metro.net/hdc.*

WRITTEN COMMENTS: Comments may also be mailed to: Ronald Kosinski, Caltrans District 7, Division of Environmental Planning, 100 South Main Street, MS 16A, Los Angeles, CA 90012.

Response to Comment G-1

Comment Code (Topic)	Response
G-1 (Design)	• Your comments in support of the No Build Alternative and against the toll component of the HDC are noted. • There has been substantial community support for a bike path that would connect bike lanes in the various High Desert cities. • Relocating the Palmdale Transportation Center (PTC) may be needed to allow for an appropriate rail connection from both the HSR feeder system and the California HSR tracks. • The need for an additional east-west road is described in Chapter 1. Supporting traffic data are included in Chapter 3.1.6

Comment G-2

LAKE LA 11/5

Metro

Caltrans

High Desert Corridor
Draft EIS/EIR

Comment Sheet

Name: Jim Alexander

Affiliation (i.e. organization, resident, business):

Address: 38227-230th St. East

Phone/Cell:

Email: Formi1216@yahoo.com

Thank you for your interest in the High Desert Corridor project. We welcome your comments.

I am a life long resident of the A.V. and my current residence. The HDC will be the nail in the coffin for my life and the environment in the rural areas of the Southern Antelope Valley. Nothing that I have read in the report supports the need or the viability of the HDC. Do not build it, stop wasting taxpayer money. Repair and maintain the current freeway system in L.A. and stop spreading people out farther away from the primary population centers. Fuel prices will continue to rise, commuting is wasteful. Keep people and industry in L.A, keep the desert clean.

PUBLIC COMMENT PERIOD: The Draft Environmental Impact Statement/Report (Draft EIS/EIR) for the High Desert Corridor is available through December 2 at 5pm. The Draft EIS/EIR is available for review at *dot.ca.gov/dist07/HDC* and *metro.net/hdc.*

WRITTEN COMMENTS: Comments may also be mailed to: Ronald Kosinski, Caltrans District 7, Division of Environmental Planning, 100 South Main Street, MS 16A, Los Angeles, CA 90012.

Response to Comment G-2

Comment Code (Topic)	Response
G-2 (Other)	Your opposition to the HDC Project and support for the No Build Alternative are noted.

Comment G-3

LAKE LA 11/5

Metro

Caltrans

High Desert Corridor
Draft EIS/EIR

Comment Sheet

Name: MAURY VAN DER HOPT

Affiliation (i.e. organization, resident, business): RESIDENT

Address: 14760 BIG-SKY DRIVE PEARBLOSSOM

Phone/Cell: 661. 944-5181

Email: maury and ingrid@gmail.com

Thank you for your interest in the High Desert Corridor project. We welcome your comments.

I AM DEFINITELY FOR "NO ~~NEED~~ BUILD"

- I BELIEVE THAT THE ECONOMICS OF THE CORRIDOR ARE TOO INDEFINITE.

- HOW CAN PROJECT BE STARTED WITHOUT DETAILS THAT ARE CLEAR ENOUGH?

I BELIEVE THE PRESENTATION TONIGHT TRIED TO SELL "THE SIZZLE IN THE STEAK" WITH UNCERTAINTY FOR FINAL OUTCOME.

PUBLIC COMMENT PERIOD: The Draft Environmental Impact Statement/Report (Draft EIS/EIR) for the High Desert Corridor is available through December 2 at 5pm. The Draft EIS/EIR is available for review at *dot.ca.gov/dist07/HDC* and *metro.net/hdc.*

WRITTEN COMMENTS: Comments may also be mailed to: Ronald Kosinski, Caltrans District 7, Division of Environmental Planning, 100 South Main Street, MS 16A, Los Angeles, CA 90012.

Response to Comment G-3

Comment Code (Topic)	Response
G-3 (Design)	Your comment in support of the No Build Alternative is noted. It is true that a source of funding for construction has not yet been identified. However, completing the preliminary engineering and having an approved environmental document will provide sufficient project details regarding scope and cost to potentially attract public and/or private money for future phases of the project (final design, right-of-way acquisition and construction).

Comment G-4

LAKE LA 93543

Metro

Caltrans

High Desert Corridor
Draft EIS/EIR

Comment Sheet

Name: Bance Bunch

Affiliation (i.e. organization, resident, business):

Address: 20538 E. AVE Q12

Phone/Cell: 661-547-9163

Email: drwho7@QNET.COM

Thank you for your interest in the High Desert Corridor project. We welcome your comments.

According to the Draft EIR, choosing Variation D will drastically reduce the domiciles affected/displaced by this project, including mine. I urge you to choose variation D. Our property is unique including ~~the~~ 12.5 acres we are including our primary residence and commercial business. ~~We also~~ We have a commercial vineyard, a lavender farm, and the corporate headquarters for our licensed bonded winery. The intangibles in changing our licensed location cannot be estimated in the value of our property. ~~Should our property be lost to the eminent domain~~. Should our property be condemned for this project we will fight with all legal methods available. Should we lose this contest we will seek equitable compensation with the true value of ~~our~~ our property. There are no comparables. We urge you to choose VARIATION D

PUBLIC COMMENT PERIOD: The Draft Environmental Impact Statement/Report (Draft EIS/EIR) for the High Desert Corridor is available through December 2 at 5pm. The Draft EIS/EIR is available for review at *dot.ca.gov/dist07/HDC* and *metro.net/hdc.*

WRITTEN COMMENTS: Comments may also be mailed to: Ronald Kosinski, Caltrans District 7, Division of Environmental Planning, 100 South Main Street, MS 16A, Los Angeles, CA 90012.

Response to Comment G-4

Comment Code (Topic)	Response
G-4 (Design)	Your support for Variation D is noted.

Comment G-5

Lan, Christine@DOT

From: Wang, Robert J@DOT
Sent: Wednesday, December 03, 2014 3:41 PM
To: Lan, Christine@DOT
Subject: FW: Apple Valley

FYI.....

From: Jill Sofi [mailto:mjsofi@msn.com]
Sent: Monday, November 17, 2014 3:07 PM
To: Wang, Robert J@DOT
Subject: Apple Valley

Hello... just wondered if you were able to pull up the stats on our home in Apple Valley that will be close to the new corridor?

Thanks so much,
Mary Jill Sofi
16165 Pauhaska Rd.
Apple Valley, CA 92307

Also my son in law:
Dan Quaid
23690 Cahuilla Rd.
Apple Valley, CA 92307

Response to Comment G-5

Comment Code (Topic)	Response
G-5 (Other)	A map was generated and sent to requester showing the location of the parcel relative to the project footprint.

Comment G-6

Palmdale 11/12

Metro

Caltrans

High Desert Corridor
Draft EIS/EIR

Comment Sheet

Name: Rich Poston

Affiliation (i.e. organization, resident, business):

Address: 40318 Castaway Lane

Phone/Cell: ~~Pat~~ 818-359-0949

Email: richposton13@gmail.com

Thank you for your interest in the High Desert Corridor project. We welcome your comments.

Consider moving the
solar Panels over the
bike trail to shelter
and be more architectably
Pleasing.

PUBLIC COMMENT PERIOD: The Draft Environmental Impact Statement/Report (Draft EIS/EIR) for the High Desert Corridor is available through December 2 at 5pm. The Draft EIS/EIR is available for review at *dot.ca.gov/dist07/HDC* and *metro.net/hdc.*

WRITTEN COMMENTS: Comments may also be mailed to: Ronald Kosinski, Caltrans District 7, Division of Environmental Planning, 100 South Main Street, MS 16A, Los Angeles, CA 90012.

Response to Comment G-6

Comment Code (Topic)	Response
G-6 (Other)	The renewable energy technologies and the installation locations will be finalized during the final design phase of the project. Input from the public and interested parties will be considered and incorporated.

Comment G-7

Comment card

(10)

Speaker Card
High Desert Corridor
Apple Valley Conference Center
November 13, 2014, 6:00pm – 8:30 pm

If you would like to speak and provide comments, please fill out his card and drop it off at the Registration table.

Speakers will have two minutes to make their comments.

Name: Mary Borden

Organization (if any): O

Address: Apple Valley

Business people have no
business taking people of
the High Desert (the disturbed
area as one of you stated)
and then to not have the
average citizen be able
to use the highway and
or speed-rail.
Toll Roads — Blights
electric cars —
the environment - cement trucks dust
a charge system
that Radiation emits
to the living being.
Human-being.

Most of you business
"nondisturbed" attackers
do not live here!
and no you're not.
consistent.

Response to Comment G-7

Comment Code (Topic)	Response
G-7 (Other)	Your comment in opposition to the proposed project is noted. Please refer to Chapter 2, Project Alternatives, to view the anticipated project cost associated with each of the alternatives discussed. However, the sources of funds for construction are not known at this time. It is likely that funding of construction and property acquisition will be from a combination of state, federal and private sources.

Comment G-8

Comment

Speaker Card
High Desert Corridor
Apple Valley Conference Center
November 13, 2014, 6:00pm – 8:30 pm

If you would like to speak and provide comments, please fill out his card and drop it off at the Registration table.

Speakers will have two minutes to make their comments.

Name: Mildred Bolam

Organization (if any): AV Resident - What is Logical Termini, ~~Cost~~ Estimated Date of Completion from Hwy-18 Dale Evans Pkwy.

~~Address~~: ~~1~~ Independent Utility?

~~Address~~: 16737 Pauhaska Rd
Apple Valley, Ca. 92307

Response to Comment G-8

Comment Code (Topic)	Response
G-8 (Other)	Logical termini and independent utility are defined in Chapter 1.2.3. Logical termini means that the project has logical limits and is long enough that the environmental analysis has a sufficiently broad scope. Independent utility means that the project is usable and a reasonable use of funds even if no additional transportation improvements in the area are made. Please refer to Chapter 2.5 for potential construction phasing scenarios that include time limes for constructing various segments of the corridor.

Comment G-9

Apple Valley 11/13

Metro

Caltrans

High Desert Corridor
Draft EIS/EIR

Comment Sheet

Name: John Tomko

Affiliation (i.e. organization, resident, business): Resident

Address: 16371 Joshua rd A.V. Ca. 92307

Phone/Cell: 760-995-7992

Email:

Thank you for your interest in the High Desert Corridor project. We welcome your comments.

Who is going to use this road. No One From Lucerne Valley, or Joshua Tree work in palmdale. Very Few in the Victor Valley work there.
This project is a waste of Money and un-Needed by the people of the high desert.

PUBLIC COMMENT PERIOD: The Draft Environmental Impact Statement/Report (Draft EIS/EIR) for the High Desert Corridor is available through December 2. The Draft EIS/EIR is available for review at *dot.ca.gov/dist07/HDC* and *metro.net/hdc.*

WRITTEN COMMENTS: Comments may also be mailed to: Ronald Kosinski, Caltrans District 7, Division of Environmental Planning, 100 South Main Street, MS 16A, Los Angeles, CA 90012.

Response to Comment G-9

Comment Code (Topic)	Response
G-9 (Other)	Your opposition to the project is noted. However, please refer to Chapter 1 for a discussion of the need for the project and Chapter 3.1.6 for a discussion of existing and future traffic conditions which support the stated need.

Comment G-10

Apple Valley 11/13

Metro

Caltrans

High Desert Corridor
Draft EIS/EIR

Comment Sheet

Name: Ted Ho

Affiliation (i.e. organization, resident, business):

Address: 12835 Lakota Rd., Apple Valley, CA. 92308

Phone/Cell: (760) 247-7460

Email: auto_aficionado@yahoo.com

Thank you for your interest in the High Desert Corridor project. We welcome your comments.

I fully support this FWY project w/ my tax dollars. However, I'd prefer no tolls on the corridor. I live in Apple Valley and travel to Lancaster every 2 weeks. I hope the FWY will be built soon!

PUBLIC COMMENT PERIOD: The Draft Environmental Impact Statement/Report (Draft EIS/EIR) for the High Desert Corridor is available through December 2 at 5pm. The Draft EIS/EIR is available for review at *dot.ca.gov/dist07/HDC* and *metro.net/hdc.*

WRITTEN COMMENTS: Comments may also be mailed to: Ronald Kosinski, Caltrans District 7, Division of Environmental Planning, 100 South Main Street, MS 16A, Los Angeles, CA 90012.

Response to Comment G-10

Comment Code (Topic)	Response
G-10 (Design)	Your comment in support of the HDC Project and opposition to the Toll element are noted.

Comment G-11

Apple Valley 11/13

Metro

Caltrans

High Desert Corridor
Draft EIS/EIR

Comment Sheet

Name: Laura Quigley

Affiliation (i.e. organization, resident, business):

Address: 23675 Pala Lane Apple Valley, CA 92307

Phone/Cell: 7605598550

Email: laura5801@msn.com

Thank you for your interest in the High Desert Corridor project. We welcome your comments.

I look forward to it being built!!
Can't wait. Please build ASAP.
Think it will help bring people here as it will open up opportunity for people to work and live in the community.

PUBLIC COMMENT PERIOD: The Draft Environmental Impact Statement/Report (Draft EIS/EIR) for the High Desert Corridor is available through December 2. The Draft EIS/EIR is available for review at *dot.ca.gov/dist07/HDC* and *metro.net/hdc.*

WRITTEN COMMENTS: Comments may also be mailed to: Ronald Kosinski, Caltrans District 7, Division of Environmental Planning, 100 South Main Street, MS 16A, Los Angeles, CA 90012.

Response to Comment G-11

Comment Code (Topic)	Response
G-11 (Other)	Your comment in support of the HDC Project is noted.

Comment G-12

Lan, Christine@DOT

From:	Wang, Robert J@DOT
Sent:	Wednesday, December 03, 2014 3:55 PM
To:	Lan, Christine@DOT
Subject:	FW: High Desert Corridor comment
Attachments:	APN#047231149_Andy_SmartCommentWebsite_November2-2014.pdf

From: Wang, Robert J@DOT
Sent: Monday, November 10, 2014 3:46 PM
To: 'andymandegary@yahoo.com'
Cc: Kochaon, Anne; Price, Karl F@DOT
Subject: RE: High Desert Corridor comment

Hi Andy,

Thank for your interest. Please find the attached PDF map.

Meeting locations are:

Four public hearings will be held to provide you to obtain first hand information and express your comments. They are scheduled

1. November 5, 2014 (7 – 9:30 p.m.)
Lake Los Angeles Elementary School
16310 East Avenue Q
Palmdale, CA 93591

2. November 6, 2014 (6 – 8:30 p.m.) *
Endeavour School of Exploration
12403 Ridgecrest Rd
Victorville, CA 92395

3. November 12, 2014 (6 – 8:30 p.m.) *
Larry Chimbole Cultural Center, Manzanita Ballroom
38350 Sierra Highway
Palmdale, CA 93550

4. November 13, 2014 (6 – 8:30 p.m.)
Apple Valley Conference Center
14975 Dale Evans Parkway
Apple Valley, CA 92307

*These meetings will be broadcasted live. To attend, participants can go to ustream.tv/channel/metro-high-desert-corridor.

1

Robert Wang
Associate Environmental Planner/Env.GIS Coordinator/
Biological NSSPs Delegated Reviewer
Caltrans
Division of Environmental Planning
100 South Main Street, Mail Stop 16A
Los Angeles, CA 90012
Lat 34.052014, Lon -118.243394

Tel 213-897-5912
Fax 213-897-9572

From: no-reply@hdccomments.com [mailto:no-reply@hdccomments.com]
Sent: Sunday, November 02, 2014 1:33 AM
To: no-reply@hdccomments.com
Subject: High Desert Corridor comment

Thank you for your comment on the High Desert Corridor Project. Your comment has been received.

Name: ANDY MANDEGARY

Address: 26422 MIMOSA LN
City: MISSION VIEJO
State: CA
ZIP: 92691
Email: ANDYMANDEGARY@YAHOO.COM

Topics

Land Use

Other/General

HI , I HAVE A 5 Acres lad and my APN # 0472-311-49 IN APPLE VALLY. WILL YOU PLEASE CHECK AND LET ME KNOW IF FWY IS GOING TO PASS FROM MY LAND AND WHAT PORTION OF MY LAND WILL BE TAKEN BY THIS PROJECT ? MY CELL NUMBER IS 949-689-0417 AND MY EMAIL IS ANDYMANDEGARY@YAHOO.COM. PLEASE LET ME KNOW BEFORE HEARING .THANK YOU

Response to Comment G-12

Comment Code (Topic)	Response
G-12 (Other)	A map was generated and sent to requester showing the location of the parcel relative to the project footprint.

Comment G-13

Lan, Christine@DOT

From: Wang, Robert J@DOT
Sent: Wednesday, December 03, 2014 3:47 PM
To: Lan, Christine@DOT
Subject: FW: Parcel Inquiry for High Desert Corridor Project
Attachments: APN 3130-051-01.pdf

From: Ho, Billy@DOT
Sent: Monday, November 17, 2014 3:21 PM
To: Wang, Robert J@DOT
Subject: FW: Parcel Inquiry for High Desert Corridor Project

From: Ho, Billy@DOT
Sent: Friday, November 14, 2014 9:28 AM
To: 'altec1eng@aol.com'
Subject: Parcel Inquiry for High Desert Corridor Project

Good morning,

Per your request, I have attached a map of your parcel in relation to the proposed High Desert Corridor footprint.

Thank you,

Billy Ho
California Department of Transportation
Environmental Planner
District 7 Environmental Planning

(213) 897-2045
billy_ho@dot.ca.gov
100 South Main Street
Mail Stop 16A
Los Angeles, CA 90012

Response to Comment G-13

Comment Code (Topic)	Response
G-13 (Other)	A map was generated and sent to requester (QW Parker LLC) showing the location of the parcel relative to the project footprint.

Comment G-14

Lan, Christine@DOT

From: Wang, Robert J@DOT
Sent: Wednesday, December 03, 2014 3:47 PM
To: Lan, Christine@DOT
Subject: FW: Parcel Inquiry for High Desert Corridor Project
Attachments: APN 0437-064-25.pdf

From: Ho, Billy@DOT
Sent: Monday, November 17, 2014 3:21 PM
To: Wang, Robert J@DOT
Subject: FW: Parcel Inquiry for High Desert Corridor Project

From: Ho, Billy@DOT
Sent: Friday, November 14, 2014 9:49 AM
To: 'raderaicevic@aol.com'
Subject: Parcel Inquiry for High Desert Corridor Project

Good morning,

Per your request, I have attached a map of your parcel in relation to the proposed High Desert Corridor footprint.

Thank you,

Billy Ho
California Department of Transportation
Environmental Planner
District 7 Environmental Planning

(213) 897-2045
billy_ho@dot.ca.gov
100 South Main Street
Mail Stop 16A
Los Angeles, CA 90012

Response to Comment G-14

Comment Code (Topic)	Response
G-14 (Other)	A map was generated and sent to requester (Marina Raicevic) showing the location of the parcel relative to the project footprint.

Comment G-15

Lan, Christine@DOT

From: Wang, Robert J@DOT
Sent: Wednesday, December 03, 2014 3:48 PM
To: Lan, Christine@DOT
Subject: FW: Parcel Inquiry for High Desert Corridor Project
Attachments: APN 0463-381-62.pdf; APN 0463-381-63.pdf

From: Ho, Billy@DOT
Sent: Monday, November 17, 2014 3:22 PM
To: Wang, Robert J@DOT
Subject: FW: Parcel Inquiry for High Desert Corridor Project

From: Ho, Billy@DOT
Sent: Friday, November 14, 2014 10:02 AM
To: 'rickmyhro@yahoo.com'
Subject: Parcel Inquiry for High Desert Corridor Project

Good morning Rick,

Per your request, I have attached a map of your parcels in relation to the proposed High Desert Corridor footprint.

Thank you,

Billy Ho
California Department of Transportation
Environmental Planner
District 7 Environmental Planning

(213) 897-2045
billy_ho@dot.ca.gov
100 South Main Street
Mail Stop 16A
Los Angeles, CA 90012

Response to Comment G-15

Comment Code (Topic)	Response
G-15 (Other)	A map was generated and sent to requester (Richard Myhro) showing the location of the parcel relative to the project footprint.

Comment G-16

Lan, Christine@DOT

From: Wang, Robert J@DOT
Sent: Wednesday, December 03, 2014 3:48 PM
To: Lan, Christine@DOT
Subject: FW: Parcel Inquiry for High Desert Corridor Project
Attachments: APN 0437-063-32.pdf

From: Ho, Billy@DOT
Sent: Monday, November 17, 2014 3:22 PM
To: Wang, Robert J@DOT
Subject: FW: Parcel Inquiry for High Desert Corridor Project

From: Ho, Billy@DOT
Sent: Friday, November 14, 2014 10:08 AM
To: 'crispii@aol.com'
Subject: Parcel Inquiry for High Desert Corridor Project

Good morning,

Per your request, I have attached a map of your parcel in relation to the proposed High Desert Corridor footprint.

Thank you,

Billy Ho
California Department of Transportation
Environmental Planner
District 7 Environmental Planning

(213) 897-2045
billy_ho@dot.ca.gov
100 South Main Street
Mail Stop 16A
Los Angeles, CA 90012

Response to Comment G-16

Comment Code (Topic)	Response
G-16 (Other)	A map was generated and sent to requester (Carlos Perez Jr.) showing the location of the parcel relative to the project footprint.

Comment G-17

Lan, Christine@DOT

From: Wang, Robert J@DOT
Sent: Wednesday, December 03, 2014 3:48 PM
To: Lan, Christine@DOT
Subject: FW: Parcel Inquiry for High Desert Corridor Project
Attachments: APN 0439-281-29.pdf

From: Ho, Billy@DOT
Sent: Monday, November 17, 2014 3:22 PM
To: Wang, Robert J@DOT
Subject: FW: Parcel Inquiry for High Desert Corridor Project

From: Ho, Billy@DOT
Sent: Friday, November 14, 2014 10:15 AM
To: 'jcphsa@aol.com'
Subject: Parcel Inquiry for High Desert Corridor Project

Good morning,

Per your request, I have attached a map of your parcel in relation to the proposed High Desert Corridor footprint.

Thank you,

Billy Ho
California Department of Transportation
Environmental Planner
District 7 Environmental Planning

(213) 897-2045
billy_ho@dot.ca.gov
100 South Main Street
Mail Stop 16A
Los Angeles, CA 90012

Response to Comment G-17

Comment Code (Topic)	Response
G-17 (Other)	A map was generated and sent to requester (James Robertson) showing the location of the parcel relative to the project footprint.

Comment G-18

Lan, Christine@DOT

From: Wang, Robert J@DOT
Sent: Wednesday, December 03, 2014 3:52 PM
To: Lan, Christine@DOT
Subject: FW: Map of proposed fwy from Apple Valley to the 14

From: Carol Field [mailto:cfield2@ymail.com]
Sent: Thursday, November 20, 2014 8:11 PM
To: Wang, Robert J@DOT
Subject: Map of proposed fwy from Apple Valley to the 14

Thank you for sending me the information on the location to my property in North Apple Valley to the proposed fwy. As it turns out, the road looks like it will be using a very small portion of the land.. I would appreciate it if you would send me the proxsemity of the proposed road to the house my daughter lives in. The address is 24254 Yucca Loma Rd. in East Apple Valley. I am interested in where the road will be along that entire neighborhood. You have been very helpful which I appreciate a great deal.
Thank You,
Carol Field
cfield2@ymail.com

Response to Comment G-18

Comment Code (Topic)	Response
G-20 (Other)	A map was generated and sent to requester (Carol Field) showing the location of the parcel relative to the project footprint.

Comment G-19

Lan, Christine@DOT

From: Wang, Robert J@DOT
Sent: Wednesday, December 03, 2014 3:49 PM
To: Lan, Christine@DOT
Subject: FW: APN 3022-012-034 Palmdale Meeting November 12th

From: Elasaad, Mohamad [mailto:MELASAAD@dpw.lacounty.gov]
Sent: Tuesday, November 18, 2014 11:24 AM
To: Wang, Robert J@DOT
Subject: RE: APN 3022-012-034 Palmdale Meeting November 12th

Thanks Robert.

Moe

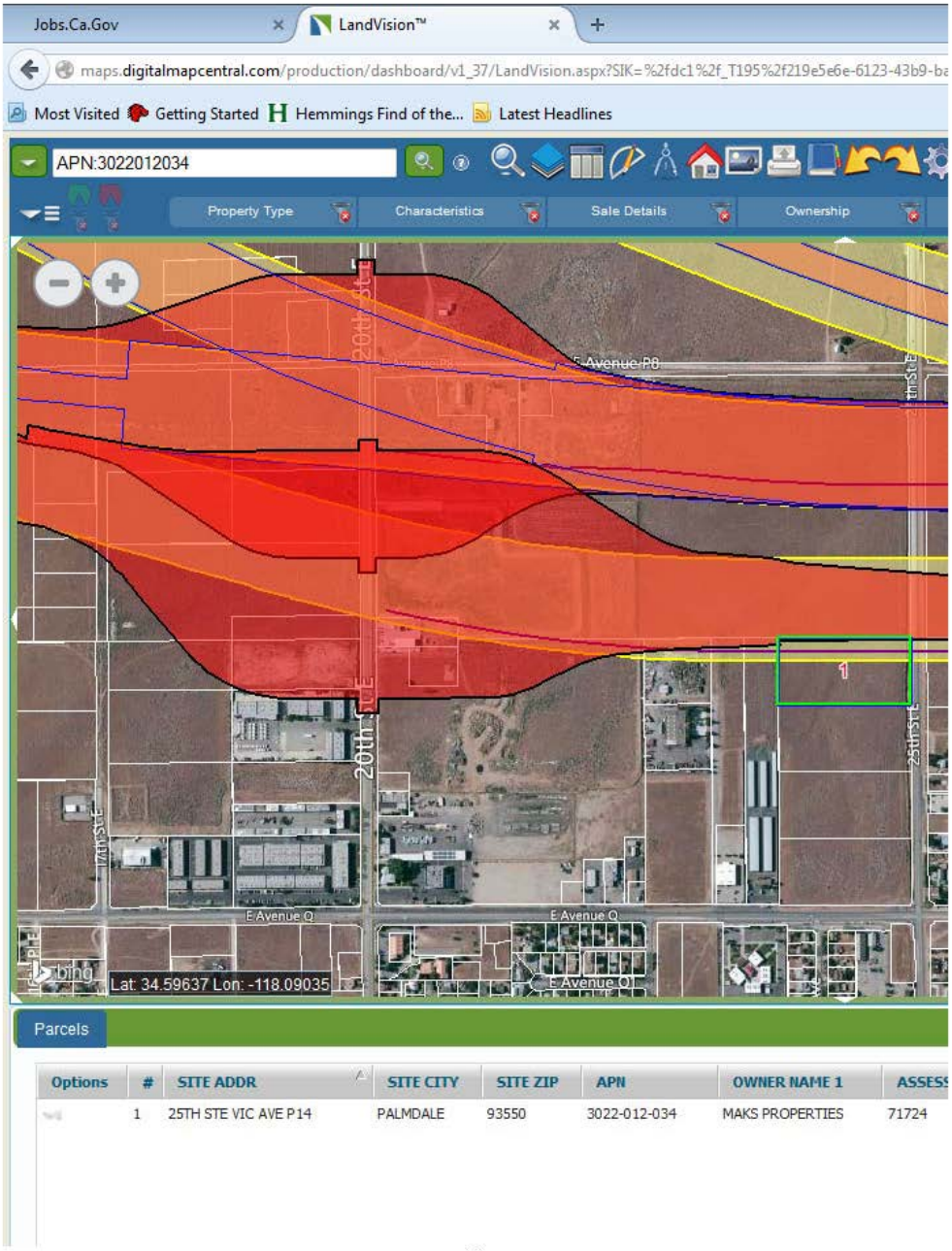
From: Wang, Robert J@DOT [mailto:robert.wang@dot.ca.gov]
Sent: Tuesday, November 18, 2014 11:13 AM
To: Elasaad, Mohamad
Cc: Price, Karl F@DOT; Ho, Billy@DOT; Lan, Christine@DOT
Subject: APN 3022-012-034 Palmdale Meeting November 12th

Hi Moe,

Per your request.

Thank you for your interest in this project.

1


Jobs.Ca.Gov
LandVision™
maps.digitalmapcentral.com/production/dashboard/v1_37/LandVision.aspx?SIK=%2fdc1%2f_T195%2f219e5e6e-6123-43b9-ba
Most Visited
Getting Started
Hemmings Find of the...
Latest Headlines
APN:3022012034
Property Type
Characteristics
Sale Details
Ownership
E Avenue P8
20th St E
25th St E
17th St E
E Avenue Q
1
Lat: 34.59637 Lon: -118.09035
Parcels
Options
#
SITE ADDR
SITE CITY
SITE ZIP
APN
OWNER NAME 1
ASSESS
1
25TH STE VIC AVE P14
PALMDALE
93550
3022-012-034
MAKS PROPERTIES
71724

2

Robert Wang
Associate Environmental Planner/Env.GIS Coordinator/
Biological NSSPs Delegated Reviewer
Caltrans
Division of Environmental Planning
100 South Main Street, Mail Stop 16A
Los Angeles, CA 90012
Lat 34.052014, Lon -118.243394

Tel 213-897-5912
Fax 213-897-9572

Response to Comment G-19

Comment Code (Topic)	Response
G-19 (Other)	A map was generated and sent to requester (Mohamad Elasaad) showing the location of the parcel relative to the project footprint.

Comment G-20

Metro

Caltrans

High Desert Corridor
Draft EIS/EIR

Comment Sheet

Name: Mike Anderson

Affiliation (i.e. organization, resident, business): resident

Address: 17220 El Mirage Rd El Mirage

Phone/Cell:

Email: NA

Thank you for your interest in the High Desert Corridor project. We welcome your comments.

I would appreciate if you use the B1 Route for HDC. It would benefit me so much and cost less to build for a number of reasons. We know Kay field was a dangerous intersection & believe it is no longer a problem.

PUBLIC COMMENT PERIOD: The Draft Environmental Impact Statement/Report (Draft EIS/EIR) for the High Desert Corridor is available through December 2 at 5pm. The Draft EIS/EIR is available for review at *dot.ca.gov/dist07/HDC* and *metro.net/hdc.*

WRITTEN COMMENTS: Comments may also be mailed to: Ronald Kosinski, Caltrans District 7, Division of Environmental Planning, 100 South Main Street, MS 16A, Los Angeles, CA 90012.

Response to Comment G-20

Comment Code (Topic)	Response
G-20 (Design)	Your comment in support of Variation B1 is noted.

Comment G-21

Metro

Caltrans

High Desert Corridor
Draft EIS/EIR

Comment Sheet

Name: George K. Calloway

Affiliation (i.e. organization, resident, business): MAC

Address: 1653 Adobe MTN Rd El Mirage 92301

Phone/Cell: (760) 388-4105

Email: ELMGEO@AOL.COM

Thank you for your interest in the High Desert Corridor project. We welcome your comments.

Please consider B1 Route for the High Desert Corridor since it will #1) be the Least costly to build Route #2) be the most Beneficial to the Community of El Mirage #3) Be the least impact on Residents and their homes in Community #4) be the ONE Route (B1) that you will get the most support of the Community of El Mirage.

PUBLIC COMMENT PERIOD: The Draft Environmental Impact Statement/Report (Draft EIS/EIR) for the High Desert Corridor is available through December 2 at 5pm. The Draft EIS/EIR is available for review at *dot.ca.gov/dist07/HDC* and *metro.net/hdc.*

WRITTEN COMMENTS: Comments may also be mailed to: Ronald Kosinski, Caltrans District 7, Division of Environmental Planning, 100 South Main Street, MS 16A, Los Angeles, CA 90012.

Response to Comment G-21

Comment Code (Topic)	Response
G-21 (Design)	Your comment in support of Variation B1 is noted.

Comment G-22

Metro

Caltrans

High Desert Corridor
Draft EIS/EIR

Comment Sheet

Name: James V Farquhar

Affiliation (i.e. organization, resident, business): Lifetime Member & Past President of EMTA

Address: 2777 Venus El Mirage 92301

Phone/Cell: 760-793-1215

Email: FARPBC@ad.com

Thank you for your interest in the High Desert Corridor project. We welcome your comments.

I hope you consider B1 as the off ramp on Sheep Creek Road. This benefits the Community of El Mirage without upsetting a long time resident that lives on Sheep Creek Road directly across from the old dairy and works within El Mirage and the least costly route for building the High Desert Corridor

PUBLIC COMMENT PERIOD: The Draft Environmental Impact Statement/Report (Draft EIS/EIR) for the High Desert Corridor is available through December 2 at 5pm. The Draft EIS/EIR is available for review at *dot.ca.gov/dist07/HDC* and *metro.net/hdc.*

WRITTEN COMMENTS: Comments may also be mailed to: Ronald Kosinski, RK Caltrans District 7, Division of Environmental Planning, 100 South Main Street, MS 16A, Los Angeles, CA 90012.

Response to Comment G-22

Comment Code (Topic)	Response
G-22 (Design)	Your comment in support of Variation B1 is noted.

Comment G-23

Metro

Caltrans

High Desert Corridor
Draft EIS/EIR

Comment Sheet

Name: Jim M. Hill Jr.

Affiliation (i.e. organization, resident, business): Long Term Resident & Property Owner

Address: 2779 Venus El Mirage

Phone/Cell:

Email: El mirage ca@aol.com

Thank you for your interest in the High Desert Corridor project. We welcome your comments.

Please consider Route B1 for the HDCP it is the most effective and beneficial to us in El Mirage. Concerns of John Krey Airfield should NOT be AN ISSUE any more. MR KREY has passed away and he & his son has or will NEVER use the dirt Airfield. To use any of the other alternatives would effect Residents of El Mirage in a very Negative.

Thank You

PUBLIC COMMENT PERIOD: The Draft Environmental Impact Statement/Report (Draft EIS/EIR) for the High Desert Corridor is available through December 2 at 5pm. The Draft EIS/EIR is available for review at *dot.ca.gov/dist07/HDC* and *metro.net/hdc.*

WRITTEN COMMENTS: Comments may also be mailed to: Ronald Kosinski, Caltrans District 7, Division of Environmental Planning, 100 South Main Street, MS 16A, Los Angeles, CA 90012.

Response to Comment G-23

Comment Code (Topic)	Response
G-23 (Design)	Your comment in support of Variation B1 is noted.

Comment G-24

Caltrans

High Desert Corridor
Draft EIS/EIR

Comment Sheet

ne: Sera Graham Hill

ffiliation (i.e. organization, resident, business): El Mirage Resident

Address: 2779 Venus

Phone/Cell:

Email: elmirage ca@aol.com

Thank you for your interest in the High Desert Corridor project. We welcome your comments.

Please consider HDCP Route B1 for El Mirage esp at the Sheep Creek Off Ramp.
Mr Krey who was a life time friend of my parents has passed away and his son doesn't plan to continue with the ranch so it will not effect the HDCP.
B1 is the most beneficial to us in El Mirage and our concerns and Recommendations should be Highly taken since we as a community will be more impacted than other communities since it goes through our whole community

PUBLIC COMMENT PERIOD: The Draft Environmental Impact Statement/Report (Draft EIS/EIR) for the High Desert Corridor is available through December 2 at 5pm. The Draft EIS/EIR is available for review at *dot.ca.gov/dist07/HDC* and *metro.net/hdc.*

WRITTEN COMMENTS: Comments may also be mailed to: Ronald Kosinski, RK Caltrans District 7, Division of Environmental Planning, 100 South Main Street, MS 16A, Los Angeles, CA 90012.

Response to Comment G-24

Comment Code (Topic)	Response
G-24 (Design)	Your comment in support of Variation B1 is noted.

Comment G-25

Lan, Christine@DOT

From:	Wang, Robert J@DOT
Sent:	Wednesday, December 03, 2014 3:58 PM
To:	Lan, Christine@DOT
Subject:	FW: November 12th Meeting Palmdale....HDC APN 3084-003-008
Attachments:	APN#3084003008_for _Jena&Ralph_November12th_Meeting.pdf

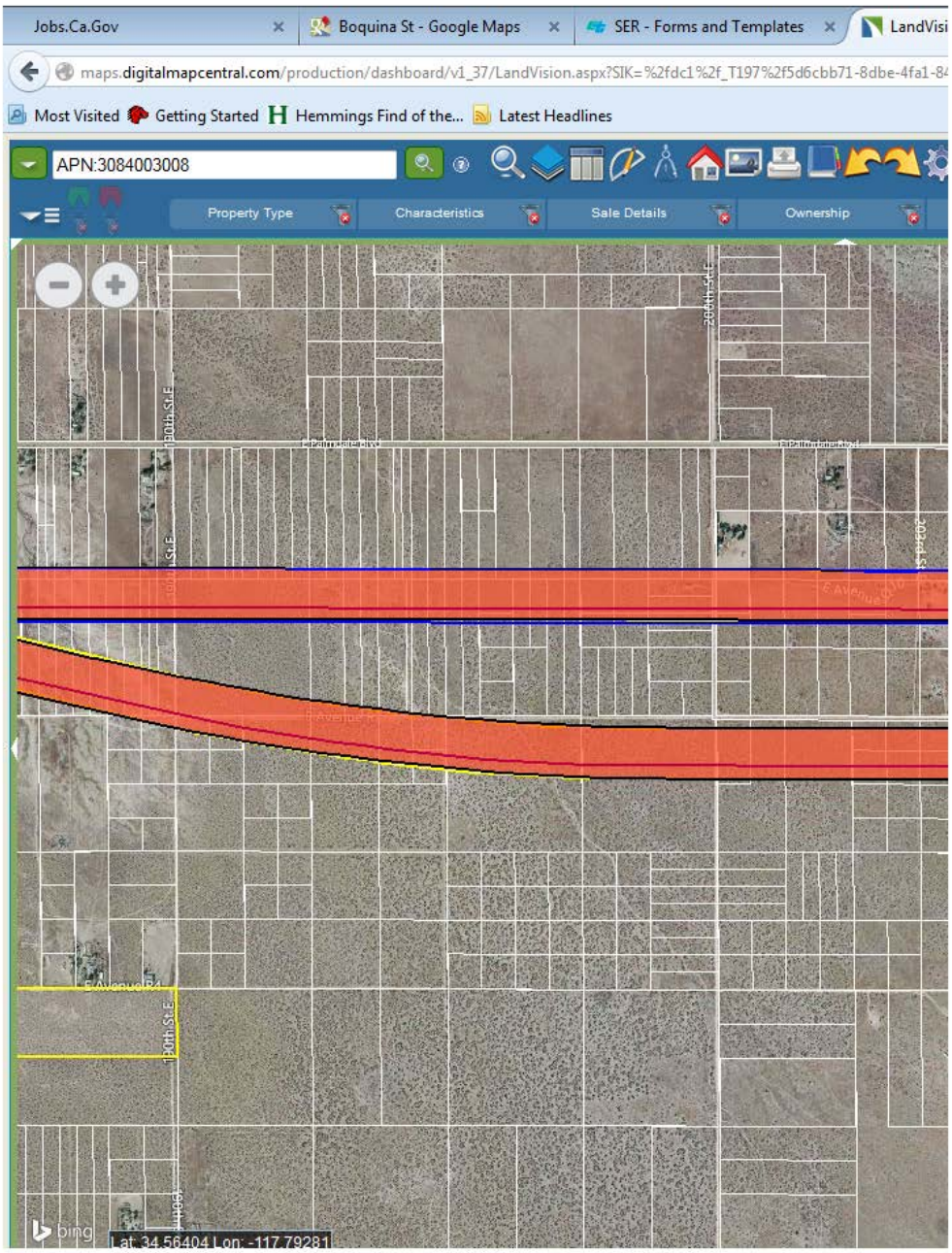
From: Wang, Robert J@DOT
Sent: Monday, November 17, 2014 4:14 PM
To: 'Ralphm@wildblue.com'
Cc: Price, Karl F@DOT; Ho, Billy@DOT
Subject: November 12th Meeting Palmdale....HDC APN 3084-003-008

Hi Ralph and Jena,

This is in response to your inquiry when I met you both at the last meeting.

I hope you find this helpful.

1



2

Response to Comment G-25

Comment Code (Topic)	Response
G-25 (Other)	A map was generated and sent to requester (Ralph and Jena) showing the location of the parcel relative to the project footprint.

Comment G-26

Lan, Christine@DOT

From:	Wang, Robert J@DOT
Sent:	Wednesday, December 03, 2014 3:59 PM
To:	Lan, Christine@DOT
Subject:	FW: APN#3079-005-025 ...November 12th Palmdale Meeting
Attachments:	APN#3079005025_for_Alfredo_November12th_Meeting.pdf

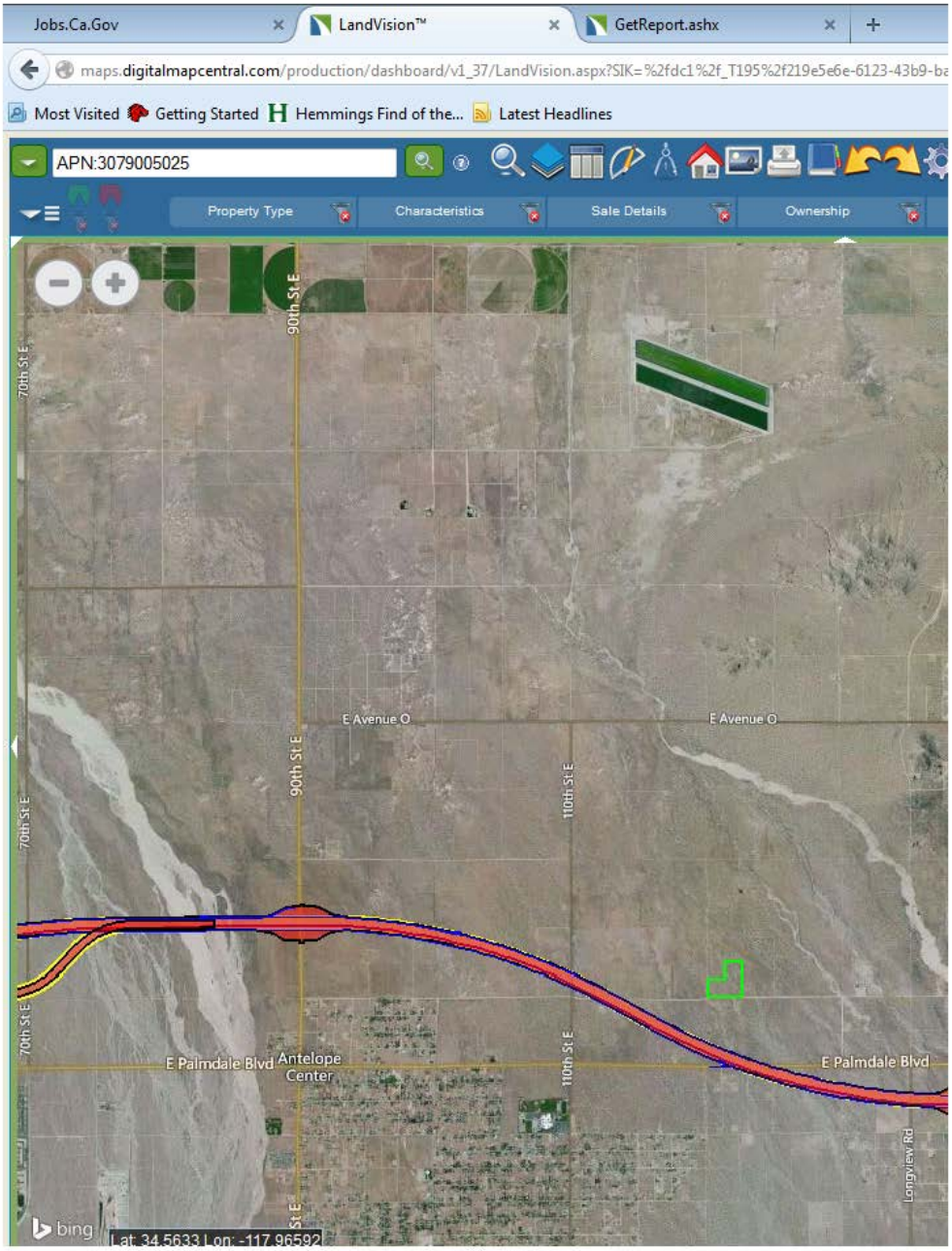
From: Wang, Robert J@DOT
Sent: Tuesday, November 18, 2014 11:01 AM
To: 'Alfredobernardo.AB@gmail.com'
Cc: Price, Karl F@DOT; Ho, Billy@DOT; Lan, Christine@DOT
Subject: APN#3079-005-025 ...November 12th Palmdale Meeting

Hello Aida,

Per your request. The map for the referenced parcel. The PDF is the close-up.

Thank you.

1


Jobs.Ca.Gov
LandVision™
GetReport.ashx
maps.digitalmapcentral.com/production/dashboard/v1_37/LandVision.aspx?SIK=%2fdc1%2f_T195%2f219e5e6e-6123-43b9-ba
Most Visited
Getting Started
Hemmings Find of the...
Latest Headlines
APN:3079005025
Property Type
Characteristics
Sale Details
Ownership
90th St E
70th St E
E Avenue O
110th St E
E Palmdale Blvd
Antelope Center
Longview Rd
bing
Lat: 34.5633 Lon: -117.96592

2

Robert Wang
Associate Environmental Planner/Env.GIS Coordinator/
Biological NSSPs Delegated Reviewer
Caltrans
Division of Environmental Planning
100 South Main Street, Mail Stop 16A
Los Angeles, CA 90012
Lat 34.052014, Lon -118.243394

Tel 213-897-5912
Fax 213-897-9572

Response to Comment G-26

Comment Code (Topic)	Response
G-26 (Other)	A map was generated and sent to requester (Aida Bernardo) showing the location of the parcel relative to the project footprint.

Comment G-27

Lan, Christine@DOT

From:	Wang, Robert J@DOT
Sent:	Wednesday, December 03, 2014 4:01 PM
To:	Lan, Christine@DOT
Subject:	FW:
Attachments:	APN#3091025003_RogerNovember5th_Meeting.pdf

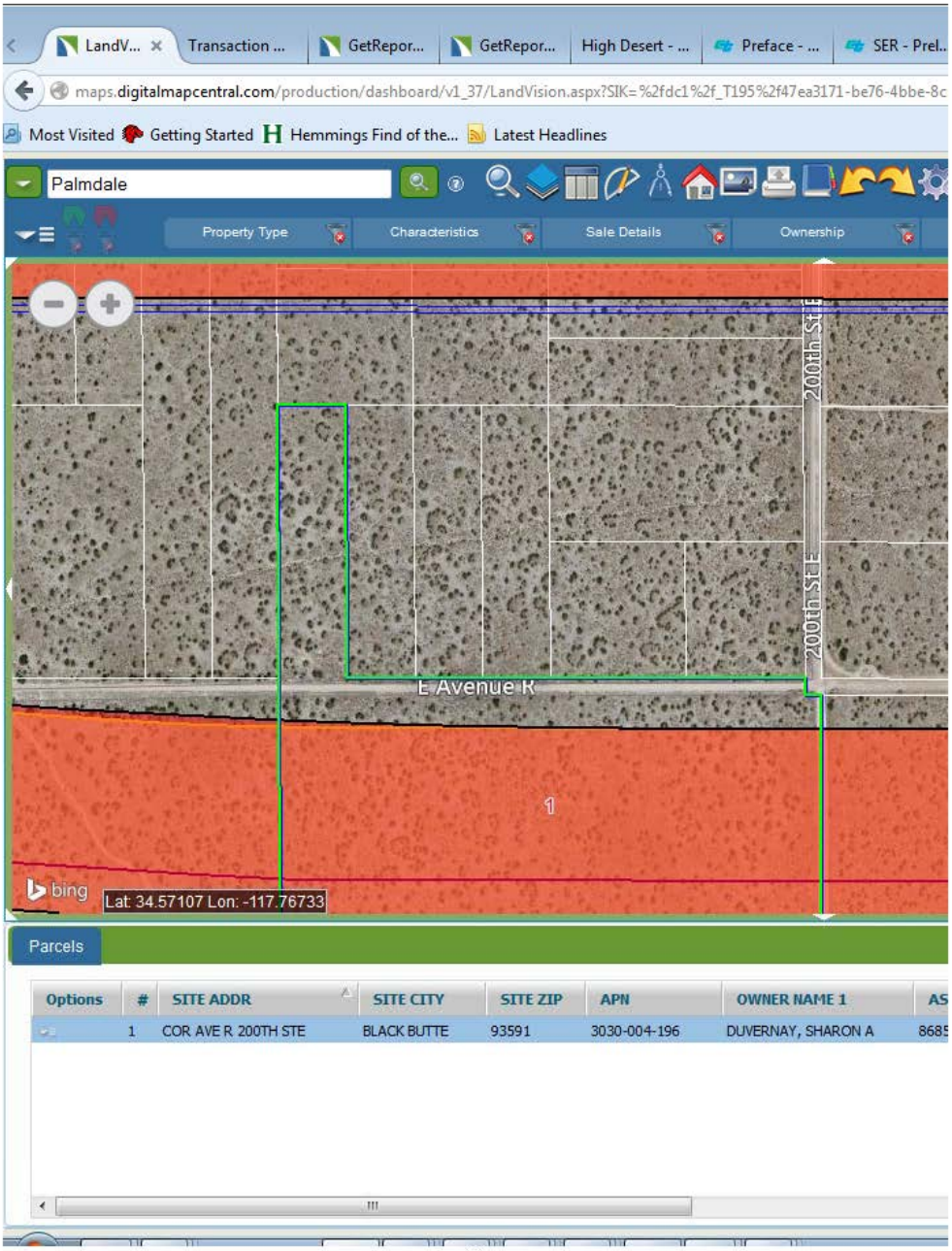
From: Wang, Robert J@DOT
Sent: Wednesday, November 19, 2014 2:12 PM
To: 'Roger@avradionet.com'
Subject:

Hi Roger,

Per your request, the parcel information from the southwest corner of 200th Street East and Avenue R.

Thank you.

1


LandV...
Transaction ...
GetRepor...
GetRepor...
High Desert - ...
Preface - ...
SER - Prel..
maps.digitalmapcentral.com/production/dashboard/v1_37/LandVision.aspx?SIK=%2fdc1%2f_T195%2f47ea3171-be76-4bbe-8c
Most Visited
Getting Started
Hemmings Find of the...
Latest Headlines
Palmdale
Property Type
Characteristics
Sale Details
Ownership
200th ST E
200th ST E
E Avenue R
1
bing
Lat: 34.57107 Lon: -117.76733
Parcels
Options
#
SITE ADDR
SITE CITY
SITE ZIP
APN
OWNER NAME 1
AS
1
COR AVE R 200TH STE
BLACK BUTTE
93591
3030-004-196
DUVERNAY, SHARON A
8685
2

Robert Wang
Associate Environmental Planner/Env.GIS Coordinator/
Biological NSSPs Delegated Reviewer
Caltrans
Division of Environmental Planning
100 South Main Street, Mail Stop 16A
Los Angeles, CA 90012
Lat 34.052014, Lon -118.243394

Tel 213-897-5912
Fax 213-897-9572

Response to Comment G-27

Comment Code (Topic)	Response
G-27 (Other)	A map was generated and sent to requester showing the location of the parcel relative to the project footprint.

Comment G-28

G-28

15457 Eto Camino Rd.
Victorville, CA 92394
December 2, 2014

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

RE: Comments on High Desert Corridor Project

Dear Caltrans Staff:

I find that I must oppose this project of many issues. The first would be that it is unnecessary. There is already the Highway 18/38 corridor going from Victorville to Palmdale, which should have been considered as alternative, therefore the alternatives are inadequate. This project could be built using this footprint including more lanes, bike route, rail and energy corridor. This would be preferable to the idea of destroying a large amount of desert ecosystem which would fragment desert environment stressing wildlife, plant life and current residents, as well as creating the health threat of Valley Fever. G-28-1

It also appears that the traffic studies are woefully inadequate. The estimates of use are greatly higher that would be expected, causing the traffic projection to be flawed. This would not cut down the mileage of truck traffic going to the Los Angeles Basin or the ports and with the tolls there is no guarantee that commercial vehicles would use this corridor. G-28-2

Another greatly flawed part of the project is the portion from the I-15 to Highway 18 through Apple Valley towards Lucerne. Not only is it proposed to go right through neighborhoods, but would dump the traffic onto a 2 lane road. (Kind of like the road to nowhere.) These neighborhoods would be greatly impacted by increased air pollution, noise, vibration problems, light pollution, traffic and in some cases the lose of people homes. This would destroy neighborhoods and the quality of life which the residents moved here for. G-28-3 G-28-4

The rail portion also has problems as is said to connect with another rail projects at each end, both which do not exist at this point, and the Victorville to Las Vegas XpressWest has no funding and may never be built. G-28-5

There is mention of this project being "green" but that portion is also very vague. It would be greener to use the Highway 18/38 corridor, as it is already there and the land around it is already disturbed land. The components of solar transmission, rail, bicycle route and solar generation could incorporated in the project on this existing corridor. Since the proposed project is too expensive and funding has not been secured, it would make sense to use this existing corridor. G-28-6

In reading through the project material it seems that the various components are not a definite part of the project. The rail, energy transmission, energy generation and bike route are all presented but seem to be vague as to whether they will all be part of the project. G-28-7

The plan is based on many assumptions with too little scientific information. I therefore support the "On Actions" alternative. G-28-8

Sincerely,

Carol A. Wiley

Response to Comment G-28

Comment Code (Topic)	Response
G-28-1 (Design)	Your comment against the proposed project is noted. The TSM alternative, which included improving the existing 18/138 corridor, was considered but rejected because it did not adequately satisfy the project Purpose and Need; see Section 2.8.7 of the Final EIR/EIS for a full discussion of the reasons why this alternative was rejected.
G-28-2 (Traffic)	The traffic projections were developed based on the SCAG 2008 Regional Transportation Plan Travel Forecast Model and Adopted Growth Projection. The population of the High Desert Corridor Region (Victor Valley, Antelope Valley, and lands in between), is expected to double by 2040, to over 1.3 million residents. As a result of growth, the two primary roads connecting the High Desert Region with the Los Angeles basin, I-15 and SR-14, will become increasingly congested. This congestion through the San Gabriel Mountain passes will in turn increase the interaction between Antelope Valley and Victor Valley, resulting in a large increase in travel between these two urban centers. Eastbound, approximately two thirds of the motorists using the HDC will begin their trip in Palmdale or Lancaster, with only 20% of the trips originating south of the San Gabriel Mountains via SR-14. These motorists will be destined to Victor Valley (55.5%), I-15 north (21.6%) or south (14.4%) and Lucerne Valley and points east (8.5%). Westbound, 52.7% of the trips will begin their journey in Victor Valley, and two thirds of all trips using the HDC will end in Antelope Valley. The HDC will additionally provide an alternative route between Barstow and Los Angeles if an incident closes I-15 in the Cajon Pass.
G-28-3 (Traffic)	This portion of the proposed project avoids the most populated areas of Apple Valley. Instead, it follows the path identified in the Town's 2009 General Plan, passing through less populated areas. The current volume of traffic on SR-18 between Lucerne Valley and the Bear Valley cutoff does not warrant the widening of the facility. Future year forecasts for 2040 indicate that the volume of traffic is expected to more than double from current levels, with or without the HDC freeway/expressway project. The ultimate widening SR-18 is identified in the "Route Concept Fact Sheet", prepared by Caltrans District 8, dated March 2002.
G-28-4 (Community)	The EIR/EIS provides an analysis on each of the issues identified by your comment on the people and communities within and adjacent to the footprint of the various High Desert Corridor project alternatives, including the Town of Apple Valley. Decision makers will weigh the environmental, social, and economic costs and benefits of the project alternatives in determining whether or not to approve the project and which alternative to select. This will include consideration of noise and vibration, air quality, visual, traffic, property acquisition, and quality of life, among other factors.

Comment Code (Topic)	Response
G-28-5 (Design)	The rail projects at both ends (Palmdale and Victorville) have been planned and studied as indicated in the environmental document. Building a HSR component of the HDC Project would be dependent upon prior completion of at least one, and maybe both, of the adjacent rail lines.
G-28-6 (Design)	Please see the response to comment G-28-1 for reasons why the existing SR -18/138 corridor was rejected from consideration.
G-28-7 (Design)	The HSR feeder service is a stated feature of two of the build alternatives (Freeway/Expressway with HSR and Freeway/tollway with HSR). The Green energy facility and bike path are two additional elements that could be included with any of the four build alternatives. Caltrans considered each of these elements fully and seriously as potential components of the preferred alternative.
G-28-8 (Other)	The EIR/EIS provides a detailed discussion of the project scope (Chapter 2) and a thorough analysis of the existing conditions and potential impacts of the project alternatives (Chapter 3) based on the results of over 30 technical studies.

Comment G-29

December 1, 2014

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

Jerry Brown, Govenor of California
State Capital suite 1173
Sacramento a 95814

Re:
63-mile High Desert Corridor - Lucerne Valley, Ca 92356

City public transportation (VVTA) through Lucerne Valley 7 days a week, 5 am to 9 pm., specifically 16 trips between highway 18 and Bear Valley Cutoff (aka) Deadman's Point) that is---- (highway 18 and Bear Valley road. all the way to Moss trailer Park - a 20 mile stretch. Within last several months this corner was the site for serious 3- vehicle accident.

Hello

This area is a well know dangerous highway, not policed at all, so long-time users make dangerous driving choices, it is not going to change. I have been in this area since 1979.

The speed limit is 55 (ignored for the most part by many) It is daily common place for drivers to try and pass 7 cars or more at a time. Often, I have seen bus drivers see the need to pull off to the right when this occurs. It is also disconcerting to be looking ahead, thinking the car off in the distance is in your lane, going the same direction, only to discover, they are coming towards you in YOUR lane. The bus driver on realizing this, pulls off to the right and stops. This is not occasionally, it is daily.

There are 3 curves on this highway, one very bad one, it drops down to 45 miles an hour. This is where 4 teenagers, from Big Bear burned to death, when another car crossed into their lane. This was probably a driver not familiar with the highway or a long timer, who felt themselves invincible, or on drugs or alcohol.. There is a high rate area for driving under the influence arrests as listed in out Lucerne Valley Leader newspaper Sheriff Arrests. I think the various parole officers dump here, along with 50+ sexual predators, 87% higher rate than Apple Valley, Victorville and Hesperia.

Just imagine what can happen on this already dangerous highway.

Darlene Hastings- Lucerne Valley resident and public transportation rider

Response to Comment G-29

Comment Code (Topic)	Response
G-29 (Other)	Your comment is noted but it is not specific enough to be able to be responded to.

Comment G-30

17 Nov. 2014

HIGH DESERT CORRIDOR PROJECT

Attn: Robert Mochuca-Project Manager:
Ronald Kosinski-Environmental Planning:

After attending the Draft EIS/EIR, progress report for the High Desert Corridor in Palmdale, 11-12-14. I was very disappointed with the actual progress. I was disappointed that the only people willing to speak out on the HDC were negative.

Personally I feel the need for the HDC is vital to the Antelope Valley and Southern California. Ever since my relocation to Palmdale in 1972. I felt very isolated and restricted from travel to areas south east of the A.V. due to the lack of a safe and direct highway connection between Victorville, interstate 10 and the San Bernardino area. G-30-1

My greatest concern with the HDC project is the slow progress and excessive cost of the planning and environmental impact study itself. I believe more effort should be made to speed up the process and reduce the cost.

I also feel there is a essential need to complete the connection and improve highway 138 between interstate 5 near Gorman and State Rout 14 in the A.V. That bypass continuation would allow many motorist to avoid the congested Los Angeles metropolitan area. Significantly save time, reduce miles travailed, save gas and reduce pollution. G-30-2

We the motorist and taxpayers in California pay the highest gas taxes in the U.S. As I understand there will be another substantial increase beginning in January. We already pay more than enough to fund this HDC project. I don't believe the toll-road alternative to be a reasonable consideration. The overtaxed Calif. motorist deserve a break. More effort should be made to acquire additional federal highway funding to return our tax investment. G-30-3

I believe the silent majority of Calif. drivers and general population support the HDC. Please don't allow the anti-progressive negativistic minority to delay or stop this vital project.

Let's get to work and get the job started.

Richard S. Baltzley
38642-17th. St. E.
Palmdale, Calif. 93550

(661) 947-0039

Response to Comment G-30

Comment Code (Topic)	Response
G-30-1 (Other)	Your support for the project is noted. This is a very large and very complex project. There are many potential elements (freeway, tollway, HSR, bike path, green energy corridor) to the project as well as many stakeholders. The time and money spent have been required to ensure that the preliminary design and environmental analysis are rigorous and legally defensible.
G-30-2 (Design)	Caltrans and Metro are currently working on another project, the Northwest 138 Corridor Improvement Project, which is looking at ways to improve SR-138 between I-5 and SR-14. For more information on this Project, including project updates and future meeting information, please refer to Metro's website at: Metro.net/nw138.
G-30-3 (Design)	Your opposition to the Tollroad element of the HDC Project is noted.

Comment G-31

Metro

Caltrans

High Desert Corridor
Draft EIS/EIR

Comment Sheet

Name: Harold O. Wright

Affiliation (i.e. organization, resident, business):

Address: P.O. Box 1598, Upland, CA 91785

Phone/Cell: 909-772-5660

Email: hw@tpmland.com

Thank you for your interest in the High Desert Corridor project. We welcome your comments.

I have attended the public meetings, and I support the HDC project. The "bike lane" seems to be rediculous in terms of the added cost vs the benifit.

Keep up the good work.

PUBLIC COMMENT PERIOD: The Draft Environmental Impact Statement/Report (Draft EIS/EIR) for the High Desert Corridor is available through December 2. The Draft EIS/EIR is available for review at *dot.ca.gov/dist07/HDC* and *metro.net/hdc.*

WRITTEN COMMENTS: Comments may also be mailed to: Ronald Kosinski, Caltrans District 7, Division of Environmental Planning, 100 South Main Street, MS 16A, Los Angeles, CA 90012.

Response to Comment G-31

Comment Code (Topic)	Response
G-31 (Design)	Your support for the proposed project, minus the bike path, is noted.

Comment G-32

Metro

Caltrans

High Desert Corridor
Draft EIS/EIR

Comment Sheet

Name: Charlotte Wright

Affiliation (i.e. organization, resident, business):

Address: 1886 N. Laurel Ave

Phone/Cell: 909-981-6127

Email: charwright@gmail.com

Thank you for your interest in the High Desert Corridor project. We welcome your comments.

I support the High Desert Corridor.

PUBLIC COMMENT PERIOD: The Draft Environmental Impact Statement/Report (Draft EIS/EIR) for the High Desert Corridor is available through December 2. The Draft EIS/EIR is available for review at *dot.ca.gov/dist07/HDC* and *metro.net/hdc.*

WRITTEN COMMENTS: Comments may also be mailed to: Ronald Kosinski, Caltrans District 7, Division of Environmental Planning, 100 South Main Street, MS 16A, Los Angeles, CA 90012.

Response to Comment G-32

Comment Code (Topic)	Response
G-32 (Other)	Your comment in support of the HDC Project is noted.

Comment G-33

Metro

Caltrans

High Desert Corridor
Draft EIS/EIR

Comment Sheet

Name: MARINA & KATARINA RAICEVIC

Affiliation (i.e. organization, resident, business):

Address: P.O. BOX 794, RANCHO SANTA FE, CA. 92270

Phone/Cell: 949-278-9380

Email: RADERAICEVIC@AOL.COM

Thank you for your interest in the High Desert Corridor project. We welcome your comments.

(1). What is fosibility to make FINAL stop on proposed project AT CITY HALL OF Apple Valley LOCATION.

(2). IF That not WORK FOR you, then you should CONSIDER AS the WORST SCENARIO to make minor change NO use Central Ave. INSTEAD original proposal to go further EAST. GO ANY FURTHER EAST FROM Central Av. will be disruptive FOR that quiet neighborhood. ON other WORD your plan will BETTER SERVE WITH Central Avenue Route. Currently along Central Avenue is not much homes or developments VS: original proposal further east with more homes.

PUBLIC COMMENT PERIOD: The Draft Environmental Impact Statement/Report (Draft EIS/EIR) for the High Desert Corridor is available through December 2. The Draft EIS/EIR is available for review at *dot.ca.gov/dist07/HDC* and *metro.net/hdc.*

WRITTEN COMMENTS: Comments may also be mailed to: Ronald Kosinski, Caltrans District 7, Division of Environmental Planning, 100 South Main Street, MS 16A, Los Angeles, CA 90012.

Response to Comment G-33

Comment Code (Topic)	Response
G-33 (Design)	Ending the expressway portion of the project at the Apple Valley City Hall would negate the entire purpose of the SR-18 realignment, which is intended to take traffic off of Happy Trails Highway, which passes the City Hall area, around the east and northern side of the developed part of town. The alignment for the SR-18 bypass was designed as a result of studies which preceded the current effort, specifically the Victor Valley Transportation Plan, prepared for SANBAG by Kimley-Horn and Associates, dated March 2008, and then the High Desert Corridor SR-18 Realignment Traffic Analysis Report, prepared for the City of Victorville by PB Americas, Inc., dated March 2010.

Comment G-34

Metro

Caltrans

High Desert Corridor
Draft EIS/EIR

Comment Sheet

Name: GAIL CULBERTSON
Affiliation (i.e. organization, resident, business): 38539 LARKIN AVE.
Address: PALMDALE, CA 93550
Phone/Cell: 661-947-0259 (HM)
Email: gailculbertson@yahoo.com.

Thank you for your interest in the High Desert Corridor project. We welcome your comments.

I am opposed to this project. 1. It will not improve the Quality of Life for most Residents of the A.V. due to increased Pollution (Air & Noise Quality) from the Added cars + Trucks (mostly using Fossil Fuels) passing through the Area + this Project will make it Harder to travel North-South in the AV (making it more inconvenient for most people) G-34-1

2. You will be destroying a tremendous Amount of Joshua Trees + other Native Desert plants that Have Existed for a thousand years. Even though it was hinted at that these plants will be preserved + Relocated, I do not believe it based on what has happened to them in other Development Projects in this Region. G-34-2

3. Cost!! 6 Billion+ dollars?? It is Irresponsible to Start a project of this magnitude without knowing where + Having the Funding Lined up!! Most of the cost of this project will Eventually be passed onto the Taxpayers of California - Which is something we do not need or want!! G-34-3

GAIL CULBERTSON

PUBLIC COMMENT PERIOD: The Draft Environmental Impact Statement/Report (Draft EIS/EIR) for the High Desert Corridor is available through December 2 at 5pm. The Draft EIS/EIR is available for review at *dot.ca.gov/dist07/HDC* and *metro.net/hdc.*

WRITTEN COMMENTS: Comments may also be mailed to: Ronald Kosinski, RK Caltrans District 7, Division of Environmental Planning, 100 South Main Street, MS 16A, Los Angeles, CA 90012.

Response to Comment G-34

Comment Code (Topic)	Response
G-34-1 (Other)	Your comment in opposition to the proposed project is noted. As indicated in the environmental document, the potential impacts related to Air Quality (Chapter 3.2.6) and Noise (Chapter 3.2.7) have been analyzed. The results of air quality analysis indicate that, with the exception of PM^{10} emissions immediately adjacent to the corridor, no adverse air quality impacts would occur as a result of the proposed project operation. Mitigation measures will be implemented and enforced to minimize air quality impacts during the construction phase of the project. The results of noise analysis indicated there would be an increase in traffic noise along the corridor. A mitigation measure in the form of soundwall construction has been incorporated into the project where it is determined reasonable and feasible. With respect to north-south movement, 17 interchanges are proposed to be built between SR-14 and I-15. In addition, 15 grade-separated crossings are also proposed along this stretch of the corridor. See Figure 2-24 in the final environmental document for more information about their locations. With these interchanges and crossings, north-south movement will not be hindered.
G-34-2 (Biology)	It is anticipated with the implementation of the proposed project that Joshua trees will be impacted. To reduce or offset impacts to Joshua trees and Joshua tree woodlands, individual Joshua trees will be translocated. To ensure the success of those translocated Joshua trees, a habitat mitigation monitoring plan will be implemented. As for impacts to Joshua tree woodlands, in-kind habitat will be preserved and enhanced. Please see Mitigation BNC-3 in the Final EIR/EIS.
G-34-3 (Other)	It is a typical step in roadway network planning to first identify the need for the project, then to study the option to resolve the project need. Once the project is identified, it is programmed into the Regional Transportation Plan so that funding can be identified and allocated. The draft environmental document described several funding options that will be considered by the project proponent.

Comment G-35

Metro

Caltrans

High Desert Corridor
Draft EIS/EIR

Comment Sheet

Name: Roger & Sharon Andrews

Affiliation (i.e. organization, resident, business):

Address: 7447 Lemp Ave

Phone/Cell: 818-764-0193

Email: RPA43@Yahoo.com

Thank you for your interest in the High Desert Corridor project. We welcome your comments.

I Was at the meeting Wed Nov 5th
It Was very helpful having the maps
on display. I am for this project.

PUBLIC COMMENT PERIOD: The Draft Environmental Impact Statement/Report (Draft EIS/EIR) for the High Desert Corridor is available through December 2 at 5pm. The Draft EIS/EIR is available for review at *dot.ca.gov/dist07/HDC* and *metro.net/hdc.*

WRITTEN COMMENTS: Comments may also be mailed to: Ronald Kosinski, Caltrans District 7, Division of Environmental Planning, 100 South Main Street, MS 16A, Los Angeles, CA 90012.

Response to Comment G-35

Comment Code (Topic)	Response
G-35 (Other)	Your comment in support of the project is noted.

Comment G-36

Hi Anne,

I am working on a systems engineering paper for my Master's of Science (MS) degree at Southern Polytechnic State University (SPSU) in Marietta, Ga. However, I live here in Southern California in Lancaster. I would like to know if you could help with one of my questions about the PTC expansion. If the answer is somehow proprietary, please let me know and I will make and educated guess.

Where did the request or projection for 6,200 parking spaces come from? Was it derived from future park and ride? The HSR rail users only? is it in the EIR report? I could not find the source.

Thanks. Any information you can provide will be helpful.

I met a white haired man who may be 6' 2" from Parsons at the Lake Los Angeles public meeting, but I don't remember his name.

Ray Borough

rborough@spsu.edu

Response to Comment G-36

Comment Code (Topic)	Response
G-36 (Traffic)	The 6,200 parking expansion number was estimated by our traffic engineer, and it applies to the extension of XpressWest service between Las Vegas and Victorville extended to Palmdale. The parking space requirement assumes that the Palmdale Transportation Center (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 the CAHST would be additional. We estimated how many riders would ride by day of the week and hour of the day based on auto vehicle arrival patterns crossing the California/Nevada state line. Data was obtained from Nevada DOT and used for the Ivanpah Airport Access Study, which was conducted for Clark County a few years ago. Ivanpah would be a new airport located south of Las Vegas, and is intended to serve growth beyond the capacity of McCarran International 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. Section 3.13 of the Traffic Study technical report summarizes the demand relationships (page 3-70). The parking requirement is also detailed in the HSR feeder service technical report. The intent of the parking demand estimation was to determine a footprint required to accommodate the demand so that it could be analyzed in the environmental document. You can also visit the FRA website and look up the Desert Express Record of Decision, and the Victorville Station Traffic Impact Study. The parking estimate for that station was some 15,000 spaces. The extension to Palmdale would reduce the demand for parking in Victorville however as some of the riders would board in Palmdale instead of Victorville.

Comment G-37

Lan, Christine@DOT

From:	Wang, Robert J@DOT
Sent:	Wednesday, December 03, 2014 3:56 PM
To:	Lan, Christine@DOT
Subject:	FW: HDC Parcel Map Request from meeting....November 6th
Attachments:	APN#045935221_James_November6th-Meeting.pdf
Follow Up Flag:	Follow up
Flag Status:	Flagged

From: Wang, Robert J@DOT
Sent: Monday, November 10, 2014 3:54 PM
To: 'jimgrinstead@yahoo.com'
Cc: Kochaon, Anne; Price, Karl F@DOT; Ho, Billy@DOT; Lan, Christine@DOT
Subject: HDC Parcel Map Request from meeting....November 6th

Hi Jim,

Thank you for your interest.

Additional meeting locations:

1

Four public hearings will be held to provide you to obtain first hand information and express your comments. They are scheduled:

1. November 5, 2014 (7 – 9:30 p.m.)
Lake Los Angeles Elementary School
16310 East Avenue Q
Palmdale, CA 93591

2. November 6, 2014 (6 – 8:30 p.m.) *
Endeavour School of Exploration
12403 Ridgecrest Rd
Victorville, CA 92395

3. November 12, 2014 (6 – 8:30 p.m.) *
Larry Chimbole Cultural Center, Manzanita Ballroom
38350 Sierra Highway
Palmdale, CA 93550

4. November 13, 2014 (6 – 8:30 p.m.)
Apple Valley Conference Center
14975 Dale Evans Parkway
Apple Valley, CA 92307

*These meetings will be broadcasted live. To attend, participants can go to ustream.tv/channel/metro-high-desert-corridor.

Robert Wang
Associate Environmental Planner/Env.GIS Coordinator/
Biological NSSPs Delegated Reviewer
Caltrans
Division of Environmental Planning
100 South Main Street, Mail Stop 16A
Los Angeles, CA 90012
Lat 34.052014, Lon -118.243394

Tel 213-897-5912
Fax 213-897-9572

Response to Comment G-37

Comment Code (Topic)	Response
G-37 (Other)	A map was generated and sent to requester (Games Grinstead) showing the location of the parcel relative to the project footprint.

Comment G-38

Lan, Christine@DOT

From: Wang, Robert J@DOT
Sent: Wednesday, December 03, 2014 3:57 PM
To: Lan, Christine@DOT
Subject: FW: HDC Parcel Map Request Parcel # 0457-173-15
Attachments: VariationB and B1fromChapter2-Env_Document_HDC.pdf

Follow Up Flag: Follow up
Flag Status: Flagged

From: Wang, Robert J@DOT
Sent: Wednesday, November 12, 2014 11:31 AM
To: 'Debora Masterson'
Cc: Curt Masterson; Price, Karl F@DOT; Ho, Billy@DOT
Subject: RE: HDC Parcel Map Request Parcel # 0457-173-15

Hi Debora,

The variation (B)that goes through your property was developed early on before B-1. Variation B-1 came later, as a result of further analysis and developed (around October 2012).

For reference, the main alignment in that area, the most northern one, goes through the former Meadowbrook Dairy property, while B-1 passes through the Krey Field area.

Thanks.

Robert Wang
Associate Environmental Planner/Env.GIS Coordinator/
Biological NSSPs Delegated Reviewer
Caltrans
Division of Environmental Planning
100 South Main Street, Mail Stop 16A
Los Angeles, CA 90012
Lat 34.052014, Lon -118.243394

Tel 213-897-5912
Fax 213-897-9572

From: Debora Masterson [mailto:deborawkart@gmail.com]
Sent: Monday, November 10, 2014 4:58 PM
To: Wang, Robert J@DOT
Cc: Curt Masterson
Subject: Re: HDC Parcel Map Request Parcel # 0457-173-15

Hi Robert,

1

Another question, why are there 3 alternate routes in this area? In what order were they determined?

best, Debora

Debora Masterson, M.A. French
Certified TESL Instructor
Cell: 818-635-7855

On Nov 10, 2014, at 3:57 PM, Wang, Robert J@DOT <robert.wang@dot.ca.gov> wrote:

Hi Debora,

Thank you for your interest.

Additional meeting locations:

<image001.jpg>

Robert Wang
Associate Environmental Planner/Env.GIS Coordinator/
Biological NSSPs Delegated Reviewer
Caltrans
Division of Environmental Planning
100 South Main Street, Mail Stop 16A
Los Angeles, CA 90012
Lat 34.052014, Lon -118.243394

Tel 213-897-5912
Fax 213-897-9572

<APN#045717315_for_Debora_November6th_Meeting.pdf>

2

Lan, Christine@DOT

From:	Wang, Robert J@DOT
Sent:	Wednesday, December 03, 2014 3:57 PM
To:	Lan, Christine@DOT
Subject:	FW: HDC Parcel Map Request Parcel # 0457-173-15
Attachments:	VariationB and B1fromChapter2-Env_Document_HDC.pdf
Follow Up Flag:	Follow up
Flag Status:	Flagged

-----Original Message-----
From: Wang, Robert J@DOT
Sent: Wednesday, November 12, 2014 11:14 AM
To: 'Debora Masterson'
Cc: Curt Masterson; Price, Karl F@DOT; Ho, Billy@DOT
Subject: RE: HDC Parcel Map Request Parcel # 0457-173-15

Hi Debora,

I've included a map which references what the names of each variation are for that particular area. The text description for these variations can be found in Chapter 2 on page 2-27 of the environmental document, the map on page 2-28.

Hope this helps.

Robert Wang
Associate Environmental Planner/Env.GIS Coordinator/ Biological NSSPs Delegated Reviewer
Caltrans Division of Environmental Planning
100 South Main Street, Mail Stop 16A
Los Angeles, CA 90012
Lat 34.052014, Lon -118.243394

Tel 213-897-5912
Fax 213-897-9572

-----Original Message-----
From: Debora Masterson [mailto:deborawkart@gmail.com]
Sent: Monday, November 10, 2014 4:53 PM
To: Wang, Robert J@DOT
Cc: Curt Masterson
Subject: Re: HDC Parcel Map Request Parcel # 0457-173-15

Hi Robert,

1

Thank you so much for sending this! Could you clarify what the name of the alternate route is that goes through our property? Is it B or B1? I am CC:ing my brother on this.

Warm regards, Debora

Debora Masterson, M.A. French
Certified TESL Instructor
Cell: 818-635-7855

On Nov 10, 2014, at 3:57 PM, Wang, Robert J@DOT <robert.wang@dot.ca.gov> wrote:

> <APN#045717315_for_Debora_November6th_Meeting.pdf>

Response to Comment G-38

Comment Code (Topic)	Response
G-38 (Other)	A map was generated and sent to requester (Deborah Masterson) showing the location of the parcel relative to the project footprint.

Comment G-39

Lan, Christine@DOT

From: Wang, Robert J@DOT
Sent: Wednesday, December 03, 2014 3:56 PM
To: Lan, Christine@DOT
Subject: FW: HDC Parcel Map Request APN 3210-221-01-0-000
Attachments: APN#3210221010000_for-Jennifer_November5th_Meeting.pdf

---

From: Wang, Robert J@DOT
Sent: Monday, November 10, 2014 4:01 PM
To: 'yurainc188@yahoo.com'
Cc: Kochaon, Anne; Price, Karl F@DOT; Ho, Billy@DOT; Lan, Christine@DOT
Subject: HDC Parcel Map Request APN 3210-221-01-0-000

Hi Jennifer,

Thank you for your interest.

Additional meeting locations:

Four public hearings will be held to provide you to obtain first hand information and express your comments. They are scheduled

1. November 5, 2014 (7 – 9:30 p.m.)
Lake Los Angeles Elementary School
16310 East Avenue Q
Palmdale, CA 93591

2. November 6, 2014 (6 – 8:30 p.m.) *
Endeavour School of Exploration
12403 Ridgecrest Rd
Victorville, CA 92395

3. November 12, 2014 (6 – 8:30 p.m.) *
Larry Chimbole Cultural Center, Manzanita Ballroom
38350 Sierra Highway
Palmdale, CA 93550

4. November 13, 2014 (6 – 8:30 p.m.)
Apple Valley Conference Center
14975 Dale Evans Parkway
Apple Valley, CA 92307

*These meetings will be broadcasted live. To attend, participants can go to ustream.tv/channel/metro-high-desert-corridor.

1

Robert Wang
Associate Environmental Planner/Env.GIS Coordinator/
Biological NSSPs Delegated Reviewer
Caltrans
Division of Environmental Planning
100 South Main Street, Mail Stop 16A
Los Angeles, CA 90012
Lat 34.052014, Lon -118.243394

Tel 213-897-5912
Fax 213-897-9572

Response to Comment G-39

Comment Code (Topic)	Response
G-39 (Other)	A map was generated and sent to requester (Jennifer Silvermail) showing the location of the parcel relative to the project footprint.

Comment G-40

Lan, Christine@DOT

From: Wang, Robert J@DOT
Sent: Wednesday, December 03, 2014 3:56 PM
To: Lan, Christine@DOT
Subject: FW: Parcel info request APN # 0459-352-08
Attachments: APN#045935208_for_Gabriel_November6th_Meeting.pdf

---

From: Wang, Robert J@DOT
Sent: Monday, November 10, 2014 4:04 PM
To: 'gmprec@verizon.net'
Cc: Ho, Billy@DOT; Lan, Christine@DOT; Price, Karl F@DOT; Kochaon, Anne
Subject: Parcel info request APN # 0459-352-08

Hi Gabriel,

Per your request parcel info.

Additional meetings:

Four public hearings will be held to provide you to obtain first hand information and express your comments. They are scheduled:

1. November 5, 2014 (7 – 9:30 p.m.)
Lake Los Angeles Elementary School
16310 East Avenue Q
Palmdale, CA 93591

2. November 6, 2014 (6 – 8:30 p.m.) *
Endeavour School of Exploration
12403 Ridgecrest Rd
Victorville, CA 92395

3. November 12, 2014 (6 – 8:30 p.m.) *
Larry Chimbole Cultural Center, Manzanita Ballroom
38350 Sierra Highway
Palmdale, CA 93550

4. November 13, 2014 (6 – 8:30 p.m.)
Apple Valley Conference Center
14975 Dale Evans Parkway
Apple Valley, CA 92307

*These meetings will be broadcasted live. To attend, participants can go to ustream.tv/channel/metro-high-desert-corridor.

1

Robert Wang
Associate Environmental Planner/Env.GIS Coordinator/
Biological NSSPs Delegated Reviewer
Caltrans
Division of Environmental Planning
100 South Main Street, Mail Stop 16A
Los Angeles, CA 90012
Lat 34.052014, Lon -118.243394

Tel 213-897-5912
Fax 213-897-9572

Response to Comment G-40

Comment Code (Topic)	Response
G-40 (Other)	A map was generated and sent to requester (Gabriel Adler) showing the location of the parcel relative to the project footprint.

Comment G-41

Lan, Christine@DOT

From: Wang, Robert J@DOT
Sent: Thursday, December 04, 2014 11:27 AM
To: mu hu
Cc: Lan, Christine@DOT; anne.kochaon@parsons.com
Subject: RE: From: Mae APN # 0469-161-24-000
Attachments: APN#046916124000_for-Mae_Suarpha_Nitarumphong_November5th_Meeting.pdf

Hi Mae,

Thank you for your interest in this project. Attached please find the project footprint in relation to your parcel. The Victorville HDC rail spur bisects your parcel.

Robert Wang
Associate Environmental Planner/Env.GIS Coordinator/
Biological NSSPs Delegated Reviewer
Caltrans
Division of Environmental Planning
100 South Main Street, Mail Stop 16A
Los Angeles, CA 90012
Lat 34.052014, Lon -118.243394

Tel 213-897-5912
Fax 213-897-9572

From: mu hu [mailto:mu.hu518@gmail.com]
Sent: Monday, December 01, 2014 5:58 PM
To: Wang, Robert J@DOT
Subject: From: Mae

Hello Robert;

This is my APN: 0469-161-24-0-000. I would like to know these land information. Please cant you send me the information. My email is mu.hu518@gmai.com, or call me cell 626-246-5303. THANK YOU

Best Regards

Mae 12-01-2014

Response to Comment G-41

Comment Code (Topic)	Response
G-41 (Other)	A map showing the relative location of the parcel to the project location was sent to the requester.

Comment G-42

22 November 2014

Bradford W. Berger
PO Box 142
Pioneertown, CA 92268
760-228-0738

Ronald Kosinki, Caltrans District 7
Division of Environmental Planning
100 South Main St, MS 16A
Los Angeles, CA 90012

Dear Mr. Kosinki,

Please consider this letter as my comments and suggestions regarding the Draft Environmental Impact Statement/Report (EIS/EIR) for the proposed High Desert Corridor (HDC) project.

There are several issues I feel are of major concern:

1) The document addresses impacts the HDC would have on roads in communities the road would go through, however, it does not address in any thorough way the larger-scale road flow impacts that would occur. For instance, highway 138 from Gorman to its intersection with highway 14, just north of Lancaster, will likely have increased traffic due to the HDC. It makes the 138 to the HDC a more viable alternate to interstate 5 to get to San Bernardino. How will that road and the communities along it accommodate the increase? G-42-1

   Another roadway that will likely be impacted is highway 247 that connects to highway 18 from Victorville and goes to Yucca Valley. The HDC will act like a magnet, pulling traffic flow through all major highways near it – even if they are presently two-lane, rural highways. Those who live near these roads will suffer from increased traffic. With higher traffic flows will come more accidents and a decreased quality of life.

2) In addition to the large-scale traffic flow alterations due to the project, the connectivity will likely have an impact on development and land use far beyond the location of the HDC. Essentially, the HDC is one part of a road system on the back side of the coastal range that would allow urbanization of the Mojave desert. The EIS/EIR fails to account for these impacts, and further plans for converting highways to interstate by the agencies involved with this project, such as Caltrans, are left without analysis. The EIS/EIR reviews projected population for the towns in the vicinity of the HDC, but fails to recognize that the road would help fuel the increase. The viewpoint of the document is that the HDC is meant to G-42-2

fill current need, but doesn't acknowledge its own contribution to creating that need.

3) The broad impact to the Mojave desert from the HDC cannot be looked at in isolation from the impact that large-scale energy projects will have on it. These cumulative impacts have the potential to decimate the area. The HDC EIS/EIR should consider the findings of the Desert Renewable Energy Conservation Plan (DRECP) that is still in the draft stage. G-42-3

I believe it is clear that the HDC is a small piece of a grander alteration of the Mojave desert to land use incompatible with wildlife, natural landscapes, and California water supplies. This project has the potential to set in motion other road and development projects. The EIS/EIR for the High Desert Corridor should take all these impacts and possible projects into account. G-42-4

I appreciate your concern in this matter and look forward to reviewing the Final EIS/EIR. Please keep me informed about this project using the address listed above.

Sincerely,

Bradford W. Berger

Bradford W. Berger

Response to Comment G-42

Comment Code (Topic)	Response
G-42-1 (Traffic)	Traffic volumes would increase by a small amount along SR 138 between I-5 and SR-14 under the Build Alternative. In the western portion of SR 138, just east of the Centennial master planned community on Tejon Ranch, two-way traffic volumes are forecast to be approximately 400 vehicles per day higher in 2038 (about 2%) under the build HDC alternative compared to the no-build alternative. Closer to SR-14, two-way traffic volumes are forecast to be approximately 1,500 vehicles per day (about 5%) higher in 2038 under the build alternative compared with the no-build alternative. These increased volumes would not be of a magnitude to significantly impact traffic operations along SR 138 between I-5 and SR-14. Under either HDC scenario, this portion of SR-14 would warrant consideration for widening from 2-lanes under existing conditions to four-lanes as either a conventional highway or expressway to accommodate year 2038 forecast traffic volumes. Please note that Caltrans and Metro are in the process of evaluating a project to widen SR-138 between I-5 and SR-14 from 2 lanes to 4 lanes. Should that project be built, this minor impact on traffic along this section of SR-138 would be even smaller. Also, for a discussion of traffic impacts on SR-247, please see the response to comment SC-30-1.
G-42-2 (Growth)	A *Growth-Related Indirect Impact Analysis Report* was prepared to assess the potential for this project to induce growth in the High Desert region. The report concluded that the HDC is not expected to attract new growth to the area beyond what is forecast and planned for. However, it will induce some new development to shift from other locations to the new interchanges created by the HDC. The report also states 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 report 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. All of these findings are summarized in Section 3.1.2 of both the Draft and Final EIR/EIS.

Comment Code (Topic)	Response
G-42-3 (Energy)	The Final EIR/EIS contains an analysis of potential impacts that the proposed project might have on the full range of environmental resources as required by CEQA and NEPA. The cumulative impacts associated with past, present and reasonable foreseeable future projects, including large-scale energy projects, were evaluated and addressed in Section 3.7 of the Final EIR/EIS. The DRECP provides a framework that "will help provide effective protection and conservation of desert ecosystems while allowing for the appropriate development of renewable energy projects (www.drecp.org)." The U.S. Fish and Wildlife Service and the California Department of Fish and Wildlife are two of the key agencies involved with its development. Caltrans has coordinated closely with these agencies to develop measures to avoid, minimize or mitigate impacts to biological resources that may result from development of the HDC Project.
G-42-4 (Cumulative)	Please see the responses to comments G-42-2 and G-42-3.

Comment G-43

Price, Karl F@DOT

From: Kosinski, Ron J@DOT
Sent: Tuesday, December 02, 2014 4:10 PM
To: Price, Karl F@DOT
Subject: HDC Public Comment

Responded with got it thanks

From: Brenda Avadian [mailto:BAvadian@avradionet.com]
Sent: Tuesday, December 02, 2014 4:01 PM
To: Kosinski, Ron J@DOT
Cc: hdc@arellanoassociates.com
Subject: RE: Reminder: Public Comment Period Ends Tomorrow

Dear Ron,
Please accept this email in response to the Public Comments for the High Desert Corridor.
With the rains we've had intermittent Internet connection and I wanted to be sure you received this before the end of the day.
As the Juniper Hills Town Council President, this is what I sent to the Juniper Hills Community. I waited till the last possible minute to receive replies and have not received any as of this writing. However, some residents have told me they have already sent their input to you—perhaps directly or via Norm Hickling's office, or??

Although most of this is a summary, it lays out the issues addressed in a convenient manner for interested parties to comment upon going forward. I have found when I read others' comments at meetings, it helps me better express the context of my thoughts.
At the end is my assessment as a concerned individual resident. Although, I wrote this as a Council President, my views have not been formally voted on by our Town Council.

From: BAvadian@avradionet.com
Sent: Saturday, November 15, 2014 8:27 AM
To: juniperhillscommunity
Subject: STREAMED VIDEO of the Metro High Desert Corridor (HDC) meeting - Wed Nov 12

Dear JH Community Members,
For those who were among the 50 or so attendees at the Chimbole Cultural Center, I'd like to hear from you—if YOU SEND a COMMENT before December 2 to Ron Kosinki, Project Coordinator, copy (cc) me in your email and I'll summarize relevant comments for our community. (See item 6, below.) [I'm giving up Pancake Breakfast for this and client calls this morning. Perhaps, I should have had my pancakes delivered?]

For those who missed last Wednesday evening's session on the High Desert Corridor (HDC) there is a one-hour video from the event.
From the website: http://www.ustream.tv/recorded/55351708 For more information visit: http://www.dot.ca.gov/dist07/HDC/

The HDC project is currently being proposed as an approximately 63-mile long, east–west multipurpose transportation corridor that could accommodate a highway, an energy production and/or transmission facilities and a high speed rail feeder service line, between State Route 14 in Los Angeles County and State Route 18 in San Bernardino County. The project aims to improve mobility and access for people and goods in the rapidly growing Antelope, Victor, and Apple Valley areas of Los Angeles and San Bernardino counties.

1. A brief 1.5 min overview of the three proposed plans for the Palmdale Transportation Center (PTC) with four other options—also see more at 17-19 minute range in video.

1

2. Ron Kosinki overviewed the evening's session 7 min
   a) HDC Project Partner Agencies
   b) Purpose and Need for the HDC
3. Robert Machuca, Project Manager overviewed the following items for the next 8m to 22 min
   a) the map and the variations (loops) proposed to mitigate potential problems along the corridor and
   b) preparing this for the High Speed Railway system proposed from San Francisco and Los Angeles and connecting to Victorville and even Las Vegas.
   c) Eight proposed lanes with possible bike lane
   d) To raise funding, consider toll road 31 miles from 100th street East to US 395 and also Green Energy initiatives to achieve a near net-zero energy
   d) Alternatives being studied in Draft EIS/EIR including visuals with eight lanes, median (to accommodate high-speed rail)
   e) Funding so far for the study and the alternatives—such as a $3.5B – $8.1 Billion, depending which variations are chosen—from an eight-lane to a freeway system with high speed rail
4. Karl Price, Environmental Project Manager 22 min
   a) overviewed study components—what was studied and the key impacts such as Land Use and Growth (see 25 to 27 minutes). "Not expected to attract new growth beyond what is currently predicted, but location of growth will shift." [to Adelanto and Victorville areas but not in rural areas] Improve jobs/housing balance."
   b) A chart of the large number of properties that will need to be acquired to make this happen. (28min 50 sec) Anyway from the full or partial acquisition of 82 parcels to 1,266.
   c) a number of North South roads will be cut off.
   d) addressed minimal visual impact at 32- 35 min and wildlife and plant impact
5. Additional brief presentations made from 35 min to 40 minutes prior to taking public comments for the remaining 20 minutes.
   a) Life-long resident Jim Alexander who's against the HDC
   b) Denard Queen(sp?) who lives in Apple Valley and proposed an alternative plan he had put together in 2010 for a lot less money than $6 Billion. (He says he was a computer professional for 30 years and ran an entrepreneurial group.)
   c) Sam Wilson at 47 min who spoke about the homes that would be affected—esp. with the HUD housing that decreased values and now, the County's Eminent Domain which will be based on these lower prices. Additionally, there have rarely been higher property values near freeways.
   d) Ingrid VanDerHope a 40-year resident of the valley (at 51 min) who votes for the no-build alternative given we already have the 138. She also says that the east west corridor will only bring high winds for bike riders. She was the first person to get an applause.
   e) Ginger Stout at 53 min wants to see clearer focus of truck traffic esp. with diesel and particulate matter, which is an issue for the Long Beach corridor.
   f) Michael Spaulding is a realist—if you do not have the money you should not build anything. You're being unfair to the poor who live along the corridor...you're only hurting the 'small' people. As a former appraiser for the Vegas area, he says, developers blow into town and build housing but would not live there.
6. **Taking input until DECEMBER 2.** Send them to Ronald Kosinki at http://hdccomments.com/

My assessment (as one individual who takes time to listen and read the information):
It takes a lot of planning to move forward. Progress is scary.
The Green Energy folks will see ways to get involved. Although, we need to take these initiatives, we won't like the glare of solar panels and the hum of windmills close by. Given the experiences (complaints) from the Oso area (NW of our Valley) about the irresponsibility and lack of good citizenship among these green energy companies, we should all be concerned. G-43-1
Residents, like Jim Alexander who will find the freeway within 200 yards of his life-long home, may get fed up and flee and sell out—especially, long-term residents who are tired of the changes and sell their properties for G-43-2

2

this corridor to these businesses. Yet, as the hands of time march on, progress needs to also move forward and if we consider it took similar initiatives to create the Golden State Freeway, the 14, the 15, etc. G-43-2
So, what are your thoughts? Again, please post your comments here: http://hdccomments.com/ and also send me a copy.

Brenda Avadian, MA
President
Juniper Hills Town Council
661-944-1130

From: High Desert Corridor [mailto:hdc@arellanoassociates.com]
Sent: Monday, December 01, 2014 4:35 PM
To: bavadian@avradionet.com
Subject: Reminder: Public Comment Period Ends Tomorrow

Having trouble viewing this email? Click here

3

Response to Comment G-43

Comment Code (Topic)	Response
G-43-1 (Energy)	You comment/concern is acknowledged. Although we have no control over development that occurs outside of our right-of-way, Caltrans will make every attempt to develop the HDC, including the green energy elements, in a manner that minimizes impacts to local residents.
G-43-2 (General)	Your comment is acknowledged and we appreciate your efforts to encourage others to provide comments as well.

Chapter 7 Responses to Electronic Comments Received from the General Public

This section provides responses to comments that were submitted via the project website at http://www.hdccomments.com. A total of 72 comments were submitted and are summarized below.

Table 7.1. Summary of Electronic Comments Received from the General Public

Comment Code	Commenter Name	Date Received	Comment Topics
SC-1	Paul Masterson	11/26/2014	Project design and alternatives
SC-2	Joshua Moore	10//28/2014	Project design and alternatives
SC-3	Andy Mandegary	11/2/2014	Land use
SC-4	Kristy Lee	11/3/2014	Project design and alternatives
SC-5	Cole Santos	11/4/2014	Community impacts
SC-6	Andrew Wang	11/6/2014	General
SC-7	Michael Breen	11/7/2014	Community impacts, traffic and transportation
SC-8	Virginia Watkin	11/8/2014	Project design and alternatives
SC-9	Gerry Smith	11/10/2014	Traffic and transportation
SC-10	Annamarie Dyemartin	11/11/2014	Project design and alternatives, growth, community impacts
SC-11	David O'Hall	11/12/2104	Traffic and transportation
SC-12	Barb Hampton	11/12/2014	Project design and alternatives
SC-13	Maureen Sundberg	11/13/2014	Air quality, noise
SC-14	Teri Weat	11/13/2013	Air quality
SC-15	Harold Reid	11/13/2014	Project design and alternatives
SC-16	Kenneth Vernon	11/14/2014	Community Impacts
SC-17	Chih-wei Wan	11/17/2014	General
SC-18	Roger Rudick	11/24/2014	Project design and alternatives, growth, traffic and transportation, air quality
SC-19	Jewell Thomas	11/25/2014	Project design and alternatives

Comment Code	Commenter Name	Date Received	Comment Topics
SC-20	Stev Weidlich	10/3/2014	General
SC-21	Rhonda Heathcoat	10/8/2014	Visual/aesthetics, air quality, noise
SC-22	Barry Thomas	10/21/2014	Traffic and transportation
SC-23	Mark Baumgartner	11/28/2014	Project design and alternatives
SC-24	Patricia Glover	11/28/2014	Project design and alternatives, land use, community impacts, traffic and transportation
SC-25	Mike Greene	11/28/2014	Project design and alternatives, community impacts, traffic and transportation, construction impacts, cumulative impacts
SC-26	Jonathan Baty	11/29/2014	Project design and alternatives, traffic and transportation energy
SC-27	Cheryl West	11/30/2014	Project design and alternatives
SC-28	Bruce Burch	11/30/2014	Right of way/relocation, farmland/grazing land, project design and alternatives
SC-29	Joseph Stenger	11/30/2014	General
SC-30	Bill Lembright	11/30/2014	Traffic and transportation, cumulative impacts
SC-31	Matthew Ballmer	12/2/2014	Project design and alternatives, community impacts, traffic and transportation, visual, air quality, noise, construction impacts, cumulative impacts
SC-32	Herlinda Quinones	11/30/2014	Traffic and transportation
SC-33	Frank Quinones	11/30/2014	Traffic and transportation
SC-34	Doug Parker	12/1/2014	Project design and alternatives
SC-35	Keith Walton	12/1/2014	General
SC-36	Candace Walton	12/1/2014	General
SC-37	Rusty LaGrange	12/1/2014	Project design and alternatives
SC-38	John King	12/1/2014	Project design and alternatives
SC-39	Edward Lemoine	12/1/2014	Community impacts
SC-40	Michael Joy	12/1/2014	Project design and alternatives, land use
SC-41	Millie Rader	12/1/2014	Traffic and transportation
SC-42	Lee Risler	12/1/2014	Project design and alternatives

Comment Code	Commenter Name	Date Received	Comment Topics
SC-43	Bryan Baker	12/1/2014	Traffic and transportation
SC-44	Linda Parker	12/1/2014	Land use, community impacts, air quality, noise, biological environment, construction impacts
SC-45	Jessica McBride	12/2/2014	General
SC-46	Lorraine Cross	12/1/2014	Traffic and transportation, cumulative impacts
SC-47	George Yablonsky	12/1/2014	Project design and alternatives
SC-48	Randy Savitt	12/1/2014	Noise
SC-49	Debora Masterson	12/1/2014	Project design and alternatives
SC-50	Craig Ingraham	12/1/2014	Construction impacts
SC-51	Cyndie Granados	12/1/2014	Community impacts, paleontology, noise, biological environment
SC-52	Rob Koslowsky	12/1/2014	General
SC-53	Kimberly Maevers	12/1/2014	Project design and alternatives, land use, traffic and transportation, visual, noise, construction impacts, cumulative impacts
SC-54	Curt Masterson	12/1/2014	Project design and alternatives
SC-55	Matthew Ballmer	12/2/2014	General
SC-56	Lauren Ell	12/1/2014	Project design and alternatives
SC-57	Shirley Perl	12/1/2014	Project design and alternatives, community impacts
SC-58	Derek Girling	12/1/2014	Traffic and transportation, cumulative impacts
SC-59	Donyale Fowler	12/1/2014	Project design and alternatives, land use, growth, farmland/grazing land, community impacts, traffic and transportation, visual, cultural resources, air quality, noise, biological environment
SC-60	Jenny Wilder	12/2/2014	Land use, community impacts, traffic and transportation, air quality, noise, biological environment
SC-61	Shirley Gibbons	12/2/2014	General
SC-62	Tim Jones	12/2/2014	Community impacts, visual/aesthetics, noise
SC-63	Debi Allen	12/2/2014	Project design and alternatives
SC-64	Alan Brechlin	12/2/2014	General

Comment Code	Commenter Name	Date Received	Comment Topics
SC-65	John Smith	12/2/2014	Community impacts, traffic and transportation, noise
SC-66	Franklin Fowler	12/2/2014	General
SC-67	Rick Mortazavi	12/2/2014	Community impacts
SC-68	Paul Ballmer	12/2/2014	Project design and alternatives, community impacts
SC-69	Elizabeth Ballmer	12/2/2014	Land use
SC-70	Ezequiel Gutierrez	12/2/2014	Project design and alternatives, land use, growth, community impacts, utilities/emergency services, traffic and transportation, visual, air quality, noise, biological environment, cumulative impacts
SC-71	Allison Ballmer	12/2/2014	General
SC-72	Joan Schneider	12/2/2014	Cultural resources

Comment SC-1

SC-1-1

While reviewing the alternatives in the Sheep Creek off ramps I noticed on the link below that alternative B1 is not on the map. (see below)

http://www.dot.ca.gov/dist07/sync/cpimages/file/Aerial of San Bernardino.pdf.

Does this mean it is no longer up for consideration? Or is the map outdated? Please advise.

My understanding is that there are three routes in consideration. #1.What I consider the main highway that would include the Water Treatment facility, #2. Alternative B1 which includes Krey private airfield and #3. Alternative B.

The shortest distance between two objects is a straight line. The straightest line would seem to be the most cost effective. What does the cost analysis indicate when reviewing the three routes? Please advise.

Alternative B1, if it is still up for consideration would involve a private airfield. My understanding is that there are plans to build an International airfield as a part of the overall development. Is this still in the plan? If so, the private airfield would become obsolete?

Which brings us to Alternative B. Alternative B is the furthest route from point A to point B. A few things come to mind. It would cost more to construct, it would add miles and cost in fuel to every driver using the highway for generations to come. It would add additional cost and dependency on oil while adding more travel time commuting.

I vote for the main highway or Alternative B1.

Response to Comment SC-1

Comment Code (Topic)	Response
SC-1-1 (Design)	Your comment in support of the main alignment and Variation B1 is noted. All three routes, the main alignment, Variation B1 and Variation B are still being considered. You raise valid points and they will be taken into consideration during the selection process. The main alignment and Variation B1 are both more direct and shorter than Variation B, which will reduce travel time and area of impact. However, the total cost for each route is similar due to the fact that the additional land acquisition and construction costs required for Variation B are similar to the additional mitigation costs for the former dairy farm (main alignment) and the Krey Field (Variation B1). The right of way mitigation cost for both Main Alignment and Variation B1 will offset the additional construction cost for Alternative B for the longer route. Although Main Alignment requires mitigation to the dairy farm, and Variation B1 requires mitigation to the Krey Field Airport, they both are indeed a shorter and more direct route than Variation B.

Comment SC-2

SC-2-1

I live in north Apple Valley within an eyeshot of the proposed route to highway 18. I am of course not happy about the proposed route of the corridor through Apple Valley. i can count the number of times I have gone to Palm Dale in the last 10 years on one hand. I moved to north Apple Valley because it is a beautiful area with a great view somewhat removed from the hustle and bustle of a busier area building of the "corridor" would have a negative impact on my quality of life. I would like to know How many lanes are you expecting to have, and how you plan to build them so I don't get cut off from the rest of Apple Valley? Have you guys considered the visual impact you are going to create in the area and how about the noise pollution/ degradation of air quality due to higher amounts of traffic right down the street? Why would you ruin a rural area instead of using an area that already receives lots of traffic? What protections do I have for property value when turn my quiet neighborhood into one of noise and pollution?

Response to Comment SC-2

Comment Code (Topic)	Response
SC-2-1 (Design)	The Apple Valley segment of the HDC is proposed as an Expressway with two lanes in each direction. It will be at-grade, with traffic at intersections controlled by stop lights to facilitate cross traffic. Please see Chapter 2.4 for a full discussion of the proposed design features, including the number of lanes, lane configuration and interchanges (also see Figure 2-23). With regard to visual impacts, Section 3.1.7 of the Final EIR/EIS states that each build alternative would have a moderately high visual impact and soundwalls and other structures that would be constructed as part of the project would block some views of the desert landscape and change the visual character in certain areas. The avoidance, minimization, and/or mitigation measures identified in the document include using slope rounding techniques to reflect natural grades; minimizing the number and brightness of light standards to preserve the desert night sky; minimizing elevated structures to the extent practicable; using context sensitive design textures and colors characteristic of the natural environment; and incorporating native trees and plants into landscape plans. With these measures in place, the impacts are considered to be less than significant. With respect to your concerns about project-related noise generation, the methods used to analyze noise impacts are summarized in Section 3.2.7 of the EIR/EIS. The studies found that some residential areas, a school, a park, and a church would be impacted as a result of the project. The use of soundwalls has been shown to reduce the effects of traffic-generated noise and several soundwalls have been proposed at appropriate locations along the corridor. These are identified in Tables 3.2.7-4 through 3.2.7-8 of the Final EIR/EIS. Overall, based on a review of studies conducted on transportation projects in California and elsewhere, substantial adverse impacts to property values and community investment are not expected to result from building the High Desert Corridor.

Comment SC-3

SC-3-1

HI , I HAVE A 5 Acres lad and my APN # 0472-311-49 IN APPLE VALLY. WILL YOU PLEASE CHECK AND LET ME KNOW IF FWY IS GOING TO PASS FROM MY LAND AND WHAT PORTION OF MY LAND WILL BE TAKEN BY THIS PROJECT ? MY CELL NUMBER IS 949-689-0417 AND MY EMAIL IS ANDYMANDEGARY@YAHOO.COM. PLEASE LET ME KNOW BEFORE HEARING .THANK YOU

Response to Comment SC-3

Comment Code (Topic)	Response
SC-3-1 (Other)	A map was generated and sent to requester showing the location of the parcel relative to the project footprint.

Comment SC-4

SC-4-1

I am the property owner of E 105th & Q Ave. base on your design. it is going to take an at least over 18 ac from my property. that was a lot of loss and will affect my future development. if there are not a freeway exit. why you do not move the section to 110th. there can be a main road for exit. save a lot property cut, money for acquisition cost for land and a lot convenient for future resident growth for school traffic and save time to reach school. pleas think about it!

respectfully

kristy lee

Response to Comment SC-4

Comment Code (Topic)	Response
SC-4-1 (Design)	The project team has considered numerous alignment alternatives with the goal of having the least overall impact to the community and various environmental resources while meeting the appropriate engineering design standards. Because Little Rock Wash, Big Rock Wash and existing houses in Sun Village are nearby, the proposed alignment has been determined to have fewer impacts. It is possible that a partial right of way acquisition could be considered to minimize impacts to this particular parcel, so that a major portion of this land could still be further developed.

Comment SC-5

SC-5-1

With most people now using traffic apps to be informed of any delays/accidents on their route, please be aware of the issue that would arise for anyone traveling East on the proposed highway whenever there is an incident on the South 15 in Apple Valley, Victorville, or Hesperia. People would use the alternate route of the 395 South. This section is only a single lane in each direction for a majority of the distance. With the cancellation of Project 34041 this would create an even greater congestion then there already is with the Weekend/Holiday traffic. I have not seen any official release on adjusting this stretch of the 395. Thank you.

Response to Comment SC-5

Comment Code (Topic)	Response
SC-5-1 (Community)	Project 34041 was proposed to realign US 395 to the west of the existing alignment as a four lane expressway. This portion of the overall US 395 widening project is located on the western edge of Adelanto and the Project Approval/Environmental Document phase of project development is "on hold." In the absence of this realignment and upgrading effort, a separate, locally funded project (OF630) is proceeding through the design process. This project would widen US 395 on its existing alignment, for a distance of approximately 19.3 miles, from I-15 north through the northern limits of Adelanto at Calleja Road. Funding for widening a portion of Highway 395 is included in the 2013/2014 SANBAG project list for Adelanto for two segments, from Palmdale Road to Air Expressway ($4.778 million) and from Air Expressway to Calleja Road ($4.375 million).

Comment SC-6

SC-6-1

The project is interesting to learn about.

Response to Comment SC-6

Comment Code (Topic)	Response
SC-6-1 (Other)	Thank you for your interest in the project. Please visit www.Metro.net to receive regular project updates.

Comment SC-7

SC-7-1

RE: P1-5 Facility Segments/Antelope Valley Segment (SR-14 to 100th Street East)

In this section, it is mentioned that this project would require the closure of the partial interchange of SR-14 at Rancho Vista Boulevard. This partial interchange is crucial to residents of Quartz Hill and West Palmdale who rely on it to access SR-14 to commute to the Santa Clarita Valley and Los Angeles for work. Removal of this interchange would force this traffic to divide between Palmdale Boulevard and Avenue N.

To use Palmdale Boulevard as a substitute for the current Rancho Vista Interchange is impractical because 1) traffic would filter down 25th or 30th Streets West from Rancho Vista Boulevard. Traffic on 30th Street West would then route to Avenue P-8 then be forced over to 25th Street West/Highland St and further congest the area in and around Cottonwood Elementary School, Highland High School and the soon to be opened David G. Millen Intermediate School. Traffic along this route would also negatively affect traffic near Ocotillo Elementary School on Elizabeth Lake Road. 2) Traffic that did not pass through the Highland High School area to Elizabeth Lake Road would remain on Rancho Vista Boulevard to 10th Street West and turn south on 10th Street West to Palmdale Boulevard increasing congestion around Beechdale Road where traffic would be emerging from Desert View Highlands and the current Juniper Intermediate School.

Utilization of Avenue N would also increase heavily. This is dangerous as Avenue N from 45th Street West to SR-14 is two-lane blacktop with limited shoulder. The interchange at Avenue N is currently regulated only by stop signs at the ends of the exit ramps and the overpass guard rails make turns dangerous. The presence of residential and commercial property in close proximity to the Avenue N interchange make upgrading the interchange costly to accommodate the increased traffic flow.

The partial interchange of SR-14 and Rancho Vista Boulevard is also crucial to businesses in the Antelope Valley Mall retail district. Customers who enter and leave the area via this interchange will find it more difficult to access the area and may consider shopping elsewhere if this access is closed - especially on weekends and during holidays when this area is more heavily congested than normal.

SC-7-2

RE: Inclusion of High Speed Rail service from Palmdale to Apple Valley.

This mode of transportation serves no useful purpose - it is a "train from nowhere to nowhere". Even with projected population growth between now and the year 2040, there will be no viable justification for building HSR service.

Response to Comment SC-7

Comment Code (Topic)	Response
SC-7-1 (Community)	The existing interchange at SR-14 and Rancho Vista Boulevard provides access to and from the south along SR-14. Access for movements to and from the north is located a short distance away at 10th Street West, at the northeastern edge of Antelope Valley Mall. The proposed project would close the freeway on- and off-ramps at Rancho Vista Boulevard, and replace them with on- and off-ramps to both southbound SR-14 and the eastbound High Desert Corridor freeway at 10th Street West. That interchange would then provide full service in both directions of SR-14, instead of the split arrangement which exists today. It would also comply with the Caltrans Highway Design Manual which states that "isolated off-ramps or partial interchanges shall not be used because of the potential for wrong-way movements. In general, interchanges with all ramps connecting with a single cross street are preferred." (Section 502.2).
SC-7-2 (Traffic)	HSR service is an element of two of the build alternatives. It is proposed as a way to close the gap between two other proposed HSR systems, the XpressWest system that would run between Las Vegas and Victorville, and the California HSR system running from San Francisco to Los Angeles (and beyond). The HSR service could alternatively serve as an extension of MetroRail service, or a feeder service to the existing MetroRail trains which run from Lancaster and Palmdale to Union Station in downtown Los Angeles.

Comment SC-8

SC-8-1

Curious as to why the eastern end of the proposed highway would not simply end at Interstate 15. What is the reasoning for taking the highway through Apple Valley to join Bear Valley Road at the existing junction of BVR and Highway 18?

Response to Comment SC-8

Comment Code (Topic)	Response
SC-8-1 (Design)	The High Desert Corridor freeway/tollway/expressway project extends from SR-14 in Palmdale, to I-15 in Victorville, and continues east and southeasterly through the Town of Apple Valley to join existing SR-18 at the junction of Happy Trails Highway (SR18) and Bear Valley Road. The proposed project would adopt a new alignment for SR-18 to join directly with HDC. The existing alignment of SR 138 and SR-18 between Palmdale and Apple Valley will be relinquished to the local cities and counties. The purpose of realigning SR-18 within the Town of Apple Valley is to remove through traffic to I-15 and points west from Happy Trails Highway and Bear Valley Road; both of these are currently congested and will continue to be if the HDC is not built. Widening either Happy Trails Highway or Bear Valley Road to accommodate future traffic demands would likely have significant cost and right-of-way impacts.

Comment SC-9

SC-9-1

This hd corridor is long past due!! Bring it on already!!

Response to Comment SC-9

Comment Code (Topic)	Response
SC-9-1 (Traffic)	Your support to the project is noted.

Comment SC-10

SC-10-1

No money, toll! Why would I want to pay when I can drive for free!

SC-10-2

Our community doesn't want to be another San Fernando Valley, SF use to be a beautiful place to live until every single empty space was filled up. Many people moved here for the ruralness of the area.

SC-10-3

Who is going to benefit from this highway? Not the Lake LA, maybe the community around 90th East and Palmdale area. There goes the last frontier! People have been travlering years on the old roads why change? So it takes a little longer, the area you pass through is beautiful to view, take time to smell the roses!

SC-10-4

Money!! We need to spend money on more important things like keeping our borders safe, education, roads, water storage. Don't waste my hard earned tax dollars!

Response to Comment SC-10

Comment Code (Topic)	Response
SC-10-1 (Design)	Your opposition to the toll alternatives is noted.
SC-10-2 (Growth)	The purpose of the proposed project is to improve east-west mobility through the High Desert region of southern California. The lack of route continuity along SR-138 and SR-18 contributes to traffic congestion and reduced Level of Service (LOS) on adjoining highways and local streets. In addition, the corridor is increasingly unable to accommodate the existing and projected traffic demand attributed to residential and commercial growth in the Antelope and Victor valley areas. This anticipated and planned growth is resulting in inadequate capacity along the existing west-east roadways. Note also that this project is planned and developed to accommodate anticipated and planned growth, and will not directly induce growth. Although a shifting of growth to the proposed interchange locations along the corridor could be anticipated, the rural desert areas in between are not expected to be disturbed as a result of this project.
SC-10-3 (Community)	Everyone will still have the option of using the existing, old roads. Anyone who chooses to use the new facility will benefit by saving time.
SC-10-4 (Other)	The sources of funds for construction are not known at this time. It is likely that funding of construction and property acquisition will be from a combination of state, federal and private sources.

Comment SC-11

SC-11-1

I think they should put the solar collectors over the bike lane to shade the bike lane.

Response to Comment SC-11

Comment Code (Topic)	Response
SC-11-1 (Traffic)	You input is noted. It will be shared with the project design team to see if it is feasible.

Comment SC-12

SC-12-1

I question why the need to extend beyond the Logistics Airport and thereby burdening the local populace, and Hwy 18.

SC-12-2

If Hwy 18 will no longer be a designated state hwy. there is an additional burden on cost of maintenance and no regard for local populace access routes.

Response to Comment SC-12

Comment Code (Topic)	Response
SC-12-1 (Design)	In 2005, the High Desert Corridor, identified as E-220, was officially recognized in Section 1105 of the Intermodal Surface Transportation Efficiency Act as a High Priority Corridor on the National Highway System between Los Angeles and Las Vegas via Palmdale and Victorville. As such, the corridor extends from SR-14 in Palmdale to I-15 in Victorville. The extension east of I-15 to SR-18 is part of the "Recommended Plan for 2035" identified in the Victor Valley Area Transportation Study, which was prepared for the San Bernardino Associated Governments (SANBAG) in 2008.
SC-12-2 (Land use)	Once the Apple Valley segment of the HDC Project is completed, plans currently call for relinquishing this route to the local jurisdiction; it would be operated and maintained by the local jurisdiction and all associated costs would become their responsibility. Relinquishment would not, by itself, alter access routes for the public.

Comment SC-13

SC-13-1

At the present, the High Desert has wonderful air quality. That will end when we have a freeway in our backyards.

SC-13-2

I moved up here to get away from the noise of the Los Angeles area. I don't need a freeway a mile from my house on two sides. Nor do I want the light pollution. We have a wonderful telescope at the local science center that will be heavily impacted by all the additional lights.

SC-13-3

Why does the freeway have to go through Apple Valley at all? There are no off ramps past Dale Evans so why not stop this freeway at the 15 freeway. It makes no sense and will cost a fortune just to ruin our peace and quiet. Stop it at the 15 freeway.

Response to Comment SC-13

Comment Code (Topic)	Response
SC-13-1 (Air quality)	An air quality analysis was conducted to assess the project impacts on air quality based on the predicted traffic volume for the future design year (2040). The results are summarized in Section 3.2.6 of the EIR/EIS. The parameters analyzed include criteria pollutants, Mobile Sources Air Toxics, and greenhouse gas. Based on the results of the analysis, impacts to both localized and regional air quality within the project area are not anticipated. Standard mitigation measures will be implemented during project construction to ensure that these temporary impacts to air quality are minimized.
SC-13-2 (Noise)	Every effort is being made to reduce the impacts of the proposed project. The impact from traffic noise has been analyzed (see Section 3.2.7) and soundwalls have been proposed to reduce impacts where Noise Abatement Criteria (NAC), which represent the upper limit of acceptable highway traffic noise for different types of land uses and human activities, is approached or exceeded. Visual impact analysis has also been conducted. Mitigation measures to preserve the dark night sky as a natural resource in the desert region communities have been incorporated into the project (see Section 3.1.7 of the EIR/EIS).

Comment Code (Topic)	Response
SC-13-3 (Other)	In 2005, the High Desert Corridor, identified as E-220, was officially recognized in Section 1105 of the Intermodal Surface Transportation Efficiency Act as a High Priority Corridor on the National Highway System between Los Angeles and Las Vegas via Palmdale and Victorville. As such, the corridor extends from SR-14 in Palmdale to I-15 in Victorville. The extension east of I-15 to SR-18 is part of the "Recommended Plan for 2035" identified in the Victor Valley Area Transportation Study, which was prepared for the San Bernardino Associated Governments (SANBAG) in 2008.

Comment SC-14

SC-14-1

Too much noise dont need it and smog from cars and trucks to close to my house we moved out in the county for piece and quiet which we have enjoyed for twenty two years we dont want this to close to our house i have kids and grandkids dpnt want the danger from the freeway hell no is my vote

Response to Comment SC-14

Comment Code (Topic)	Response
SC-14-1 (Other)	Your comment against the proposed project is noted.

Comment SC-15

SC-15-1

I was the chief design engineer at George Air Force Base. The western alternative is too close to the runway. That's the main runway on the base. It should go south of the prison along Rancho Road which is one mile south of Air Base Road. This is very important. Also, it's the standard procedure to leave the existing infrastructure to operate during construction. You can't build over top of Air Base Road.

Response to Comment SC-15

Comment Code (Topic)	Response
SC-15-1 (Design)	The project team has coordinated with the City of Victorville and the FAA to avoid potential operation and safety conflicts with air flights at SCLA. The horizontal and vertical alignments of the HDC/HSR had been designed to be outside of the ultimate flight approach surface. Utilizing information from FAA's re-validated Airport Layout Plan for SCLA provided by Mr. Victor Fajardo, Associate Civil Engineer with City of Victorville, an exercise was performed to ensure that the proposed HDC/HSR poses no risk to the operations of SCLA Runway 17/35 and Runway 3/12. Based on the results of this exercise, drawings were prepared and provided to FAA in August 2014. The exercise yielded the following results: For Runway 17/35, the proposed HDC/HSR is approximately 0.6 mile south of the runway and is completely outside of the ultimate runway protection zone. With the ultimate air approach surface slope of 34:1 vertically and 7:1 horizontally, there is a minimum of 31 feet clearance between the top of the rail caternary system and freeway sign structures and the air approach surface. For Runway 3/12, the proposed HDC/HSR is approximately 1.1 miles southwest of the runway and is completely outside of the ultimate runway protection zone. With the ultimate air approach surface slope of 34:1 vertically and 7:1 horizontally, there is a minimum of 62 feet clearance between the top of the rail caternary system and freeway sign structures and the air approach surface. The Variation E alignment approximately 1.1 mile south of the Air Base Road does provide additional horizontal and vertical clearances to the flight path, but both alignments are deemed functional as far as airport operation is concerned. Standard construction procedure will be followed during construction to minimize impacts to airport operations. Detour routes will be provided should any existing routes be closed during construction to ensure accessibility. With the main alignment being selected, a portion of Air Base Road will be permanently closed between Phantom Road W and Phantom

Comment Code (Topic)	Response
	Road E. With local interchanges proposed at Phantom Road W and Phantom Road E, the HDC would serve as mitigation to replace this portion of Air Base Road. The HDC traffic study has concluded that there will be no adverse impacts to traffic circulation.

Comment SC-16

SC-16-1

This Freeway will adversely affect my community by removing the Hwy designations for both Hwy 18 and Hwy 138 in my community having an adverse affect on road quality and safe access. Further this will open our Desert to Mega-Warehouses and growth that will over draft our water supply. I am opposed to the Project!

Response to Comment SC-16

Comment Code (Topic)	Response
SC-16-1 (Community)	The existing SR-138/SR-18 facility was originally designed as a two-lane conventional highway. A series of improvement projects have been implemented over the years, and these have added lanes in various locations such that the highway currently varies from a two- to six-lane facility. Widening the highway from two to four lanes between Avenue T in Palmdale to SR-18 in Llano has been an ongoing project; however widening is problematic in certain areas due to right of way constraints or impacts to sensitive cultural resources. Following construction of the HDC, the existing alignment of SR-138/SR-18 from SR-14 to I-15 would likely be relinquished to local entities. Before this relinquishment could occur, the facilities would need to be brought to a "state of good repair." A significant budget for such improvements is included in the cost estimates for the build alternatives. One aspect of the upgrading is the remedy of the non-standard vertical alignment of SR-18 between its junction with SR-138 and the intersection of US 395. Flattening of the existing hills and valleys and widening SR-18 to four lanes is assumed to occur under both the build and no build alternatives. Regarding the potential of opening the High Desert Region to "mega-warehouses," the potential for this land development is weak and is not supported by land use plans for either Los Angeles or San Bernardino counties. The development of future logistics distribution centers, if any, will be confined to the populated centers of Antelope and Victor valleys.

Comment SC-17

SC-17-1

I support High Desert Corridor Project.

Response to Comment SC-17

Comment Code (Topic)	Response
SC-17-1 (Other)	Your support for the project is noted.

Comment SC-18

SC-18-1

The freeway component of this project is pointless. However, the rail component makes good sense because it'll integrate a Vegas train into the CaHSR project. Be bold enough just to build the rail part. We've spent enough money on asphalt.

SC-18-2

I'm all for bike lanes, but across the high desert? I don't get it.

SC-18-3

Two railway tracks will take up the room of two highway lanes. Think how much better it would be to abandon the huge swath required for an entire freeway. Just build the rail tracks.

Response to Comment SC-18

Comment Code (Topic)	Response
SC-18-1 (Design)	Your support for the rail component of the HDC Project is noted.
SC-18-2 (Traffic)	Incorporation of the bikeway element into the range of project alternatives provides the possibility for an extensive regional bike network. Many of the cities along the HDC already have existing bicycle or other non-motorized transportation master plans that support growing bicycle transportation infrastructure between areas. To support this goal, the draft environmental documents evaluate the potential viability of placing a bikeway within the corridor connecting with the existing and proposed bike paths in Palmdale and Adelanto. The environmental documents include a rough design of the bikeway alignment and identify areas of separation from motorized traffic to maintain safety, and points of access, plus potential impacts and remedies.
SC-18-3 (Design)	Chapter 1 of the EIR/EIS discusses the purpose and need for this project. The primary purpose of the project is to facilitate east-west movement across the high desert. Since it is a fact that the majority of people travel by car, failing to include a freeway as part of a multi-modal project would severely reduce our ability to satisfy this purpose.

Comment SC-19

SC-19-1

I have a concern on the highway portion from the I-15 fwy through Apple Valley, the area that the highway is going to be built does not have much traffic I don't think that portion (apple valley) should be built. if it were designs to help the growth of apple valley then maybe however the route that is planned is actually taking traffic from very little population and traveling to another very little population, I think the expense of this portion is pointless & unneeded. I am in absolute agreement that we need service between Palmdale and Victorville due to the upcoming Express West rail project. I would like to see highway and rail.

SC-19-2

another concern is the bike way. I don't think the expense of building this is necessary. have there been any studies for a) effects of the vehicle exhaust's to bike riders? b) seasonal weather, how many bike riders will be using this when it is 110 plus degrees? or below freezing temps?

Response to Comment SC-19

Comment Code (Topic)	Response
SC-19-1 (Design)	The realignment of SR-18 around the eastern and northern sides of the Town of Apple Valley is intended to relieve traffic congestion along Happy Trails Highway (existing State Route 18) and Bear Valley Road. Both roads are currently heavily utilized, and will be more heavily utilized in the future. Right of way constraints along both roadways preclude widening these roads without significant disruptions to adjacent businesses and motorists who currently utilize the roads. The Town of Apple Valley's General Plan anticipates the construction of the High Desert Corridor along the alignment reflected in the EIR/EIS. Policy 2.E of the General Plan states, "The Town shall protect right-of-way for the High Desert Corridor as determined by Caltrans." The HDC is expected to enhance the movement of motorists and goods, and serve land development anticipated for the corridor along the east and northern sides of Apple Valley.
SC-19-2 (Other)	Your opposition to the bike path is noted. The bike path has been included in this project, at the request of local residents, as a way of connecting the existing and proposed bike paths in the cities of Palmdale and Adelanto. As part of a multi-modal project, it will provide another alternative for people to utilize when and where they choose.

Comment SC-20

SC-20-1

I would like to thank you for making one of the most attractive covers ever in the history of CEQA. I am especially fond of Brad the Tortoise. I request that all other animals on the cover also be named and have their names prominently displayed on the cover. This includes the ground squirrel with whom Brad clearly has a close relationship, as well as the other tortoises, other ground squirrel, the monarch butterfly, the radioactive butterflies, and the peyote-dream-esque Technicolor hawk riding a bike.

Response to Comment SC-20

Comment Code (Topic)	Response
SC-20-1 (Other)	Caltrans appreciates your feedback. The main purpose of the colorful cover is to attract the public to open and review the draft environmental document. The cover of the final environmental document will be simplified to match the standard format generally used by Caltrans.

Comment SC-21

SC-21-1

People have made their home in the high desert have done so because they did not want to look at and be surrounded by buildings and freeways. Now, in todays economy, this will be forced upon us, and we cannot move. How is this allowable? Who is protecting our civil rights as home owners? This is wrong in so many different directions. I am a little guy. I do not have the money to have a voice. It breaks my heart that I will be forced to live with this until I die.

SC-21-2

People have located to the high desert for the quality of life provided by living in a rural community. This will bring large city noise and pollution same as in a large city. There is nothing to prove there is a demand for this type of project. Is this a case "if they build it, they will come." California is just about wall to wall cement & hwys now.

Response to Comment SC-21

Comment Code (Topic)	Response
SC-21-1 (Visual)	The introduction of large scale manmade elements will unavoidably alter the visual character of the project area. The visual section of the Draft EIR and the Visual Impact Assessment study recommends many measures to minimize this visual impact. In keeping with our Context Sensitive Solutions Policy, to the extent practicable, the project will keep elevated structures, such as bridges over waterways and overpasses, viaducts for the roadway, and the HSR line, as low as possible, or design to integrate them into the surrounding environment. The project will use context sensitive aesthetic treatments on structures and architecture and where feasible, the project will plant native vegetation between the roadway and communities to provide a more natural visual buffer.
SC-21-2 (Air quality, Noise)	The existing traffic conditions and projected growth in the area (as documented in the EIR/EIS) indicate that there is a need, or demand, for this project. The traffic study and growth analysis prepared for this project indicate that the population will increase and traffic conditions will become worse over time if no project is built. If the HDC is built, the project is not likely to stimulate growth. It will, however, tend to shift the growth that does occur toward the freeway interchanges and rail stations in Palmdale and Victorville/Adelanto. The area along the corridor would likely remain a rural community as it currently is. In addition, air and noise analyses were conducted. The project will likely result in a violation of the air quality standard for PM_{10}. There will also be an increase in noise levels. However, soundwalls have been proposed in those limited areas where the National Abatement Criteria (NAC) has been approached or exceeded.

Comment SC-22

SC-22-1

I would like to see more inclusion of bicycle paths and features/amenities such as drinking fountains and maintenance stations. I am an avid cyclist and I believe the Amgen Tour of California should be considered when making improvements to routes in beautiful, scenic country like what is found in the Los Angeles and San Bernardino county high deserts.

Response to Comment SC-22

Comment Code (Topic)	Response
SC-22-1 (Traffic)	Caltrans and Metro recognize the importance of the bicycle facility as an integral part of the project. It will therefore be included as a component of the project. Please see Section 2.2.2, Bicycle Access Facility, of the EIR/EIS for the detailed concept of the proposed bicycle facility.

Comment SC-23

SC-23-1

As a Victorville resident of over 10 years, my main comment on the project alternatives would be to stress the importance of including rail in the corridor. Victorville is currently stranded in terms of commuter rail; Metrolink has no feasible plans to offer service through the Cajon Pass, and the current Amtrak service is suited more for long-distance travel and not for local residents looking to travel into Los Angeles for the day.

Currently, Victor Valley locals wishing to take Metrolink must either drive through the Cajon Pass to Rancho Cucamonga to take the San Bernardino Line, or they must cross the desert to Palmdale for the Antelope Valley line. As things stand now, driving to Rancho Cucamonga is the better option, with a shorter travel time, and a generally safer drive. A rail feeder option could at least give us the hope of, if not HSR, perhaps a Metrolink extension of the AV line to the Victor Valley. This would improve employment options for local residents, as commuting to the Antelope Valley (as well as Los Angeles) would be a much more realistic option.

The HDC itself offers much more travel flexibility for residents in the Victor Valley, and I support it fully. With the explosion in LA-area rail options over the last 20 years, it would be shortsighted not to include a rail option in this project; our local region is in the process of bouncing back from the big housing and economic bust, with new businesses opening weekly, and commercial construction ongoing. By the time the HDC is completed, the Victor Valley population should be in a position to make the best use of it, along with the expected commercial traffic from the LA area.

Thanks for your time and best of luck with the project.

Response to Comment SC-23

Comment Code (Topic)	Response
SC-23-1 (Design)	Thank you for your support and arguments in favor of including the rail component as a part of this project.

Comment SC-24

SC-24-1

Not good for the Mojave Desert...period.....

SC-24-2

Not good for the Mojave Desert...period...

SC-24-3

Not good for traffic, environment, air quality

SC-24-4

Invades everything the residents of the Fragile Mojave Desert have moved here for.

SC-24-5

Invades everything the residents of the Fragile Mojave Desert have moved here for....join our beautiful nature...don't destroy it...

SC-24-6

Destroys everything the Fragile Mojave Desert is..

SC-24-7

Destroys the culture of the residents of the Mojave Desert.

SC-24-8

Destroys the Fragile Mojave Desert...City people need to stay in city.

SC-24-9

Destroys our water quality

SC-24-10

Destroys our Geology of the Fragile Mojave Desert

SC-24-11

Destroys the Fragile Mojave Desert...there is only one Mojave Desert...leave it be.

SC-24-12

Forget about air quality as we know it. Leave the Fragile Mojave Desert alone, please.

SC-24-13

The noise and light pollution as well as air pollution will change the identity of the Fragile Mojave Desert. These ideas are like locusts...you have run out of cities to ruin, now you want to move to fragile environments...please do not do this..

SC-24-14

We don't need this ...please quit destroying nature...we only have one Fragile Mojave Desert

SC-24-15

Will destroy everything in its path...something always has to pay for these idiotic ideas. leave things alone....its ok if something wants to stay the same...

SC-24-16

More like DEstruction Impacts...will destroy the land, air, visuals, peace, animals corridors, dark skies that we all enjoy now....come and enjoy the Fragile Mojave Desert....you won't want to destroy it if you do. What kind of people are you ...you must ask yourself.

SC-14-17

The impact of this project is destruction of everything the Fragile Mojave Desert is..please...leave things alone...its ok if its natural...people can get here without the freeways

Response to Comment SC-24

Comment Code (Topic)	Response
SC-24-1 (Design)	Your opposition to the project is noted.
SC-24-2 (Land use)	Your opposition to the project is noted.
SC-24-3 (Growth0	Impacts to various environmental resources resulting from project construction and implementation were analyzed and documented in the EIR/EIS prepared for this project. Mitigation measures have been identified to minimize impacts to resources when adverse or potentially adverse impacts are expected. The purpose of the proposed project is to improve east-west mobility through the High Desert region of southern California. The lack of route continuity along SR-138 and SR-18 contributes to traffic congestion and reduces the Level of Service (LOS) on adjoining highways and local streets. The project will help improve local and regional traffic flow on as described in Section 3.1.6 of the EIR/EIS. Based on the results of impact analysis, the project is likely to result in a violation of the state PM_{10} air quality standards as described in Section 3.2.6 of the EIR/EIS.
SC-24-4 (Farmland)	Your opposition to the project is noted.
SC-24-5 (Community)	As stated in Chapter 1 of the environmental document, the project has been long-planned with several agencies and local communities participated in the planning effort. Chapter 1 also discusses the purpose and need for the project; key among these is the need to increase capacity of east-west transportation facilities to accommodate existing and future transportation demand. Throughout the planning process, the project design elements have been modified numerous times to avoid or minimize impacts to the communities and the environment. Mitigation measures have also been identified and incorporated into the project to ensure that the project impacts will be minimized to the greatest extent possible.
SC-24-6 (Utilities)	Please see the response to comment SC-24-5.
SC-24-7 (Traffic)	If you are using the word "culture" to refer to your "way of life", you should be aware that change will occur in the high desert with or without the HDC. Population will continue to grow, bringing with it more homes, businesses and cars. Without the HDC, traffic congestion will continue to increase. The HDC will help relieve congestion and increase mobility for residents in the high desert; it is not expected to alter their way of life. If you are referring to cultural resources (historic, archaeological), please see Chapter 3.1.8 for a discussion of the efforts being made by Caltrans to preserve those resources.

Comment Code (Topic)	Response
SC-24-8 (Visual)	Your comment is noted.
SC-24-9 (Hydrology)	The project will be constructed using infiltration basins and appropriate water quality Best Management Practices to ensure that there is no adverse impact to water quality. In addition, all appropriate permits (NPDES, Clean Water Act Section 401) will be obtained prior to construction.
SC-24-10 (Geology)	The geotechnical studies completed for this project concluded that there will be no adverse impacts to geologic resources resulting from this project.
SC-24-11 (Hazardous)	Your opposition to the proposed project is noted.
SC-24-12 (Air quality)	The proposed project will be in compliance with all state and federal air quality standards, with the possible exception of the state 24-hour PM_{10} standard. Please refer to Chapters 3.2.6 and 3.6 in the EIR/EIS for specific details about the air quality analysis.
SC-24-13 (Noise)	Your comment against the proposed project is noted. Refer to Chapters 3.2.7 (Noise), 3.1.7 (Visual) and 3.2.6 (Air Quality) for a discussion of potential impacts and minimization/mitigation measures pertaining to noise, light pollution and air quality.
SC-24-14 (Energy)	Your opposition to the proposed project is noted.
SC-24-15 (Biology)	No project of this size can avoid impacts completely. However, numerous changes have been made to the project in an effort to minimize our impacts on the environment. These avoidance, minimization and mitigation measures are summarized in Appendix F of the EIR/EIS.
SC-24-16 (Construction)	Your comment is noted.
SC-24-17 (Cumulative)	Your comment is noted.

Comment SC-25

SC-25-1

We live in the unincorporated area of East Apple Valley (East of Joshua Rd). San Bernardino County does not maintain the unpaved roads in our district. There are three paved, maintained roads for ingress and egress used by the area's residents. These are Laguna Seca (aligned North/South), Cahuilla (East/West) and Standing Rock (East/West). The proposed Corridor road passing North/South in our area will intersect Cahuilla and Standing Rock Roads. It is critically important to the area's residents that both of these two paved roads remain unimpeded for access to Joshua and Central roads to the West, for movement in and out of the area. Provided use of the paved roads mentioned is not restricted by the Corridor, the Corridor will be a welcome infrastructure improvement.

Regards, Mike Greene

Response to Comment SC-25

Comment Code (Topic)	Response
SC-25-1 (Design)	Comment regarding proposed access concerns is noted. The HDC is being designed to improve circulation and create as little disruption to existing traffic patterns as possible. Currently as discussed in Chapter 2, Section 2.4.3 Interchanges, proposed access points within Apple Valley (expressway at-grade intersections) are at: Waalew, Central, Joshua Road, Standing Rock Road, and Yucca Loma Road, Freeway Interchanges are proposed at Choco Road and Dale Evans Parkway (as shown in Figure 2-23 in the HDC environmental document). The residents in the area you mention will have direct access to Joshua and Central via Standing Rock Rd as they proceed west of the at grade intersection of HDC and Standing Rock. These same residents will have direct access to Joshua via Cahuilla. Access to Central via Cahuilla will require travelers to turn south onto Joshua and then drive westerly along HDC to Central.

Comment SC-26

SC-26-1

It is imperative the traffic analysis be redone to VMT standards as recommended by the state. Cyclists and other active transportation participants are required to be accommodated in all transportation projects. This plan is severely lacking in that regard. Integration with the Route 66 National Bicycle Route and designs to promote long distance bicycle tourism in the high desert is imperative. San Bernardino County needs to recognize its national caliber as a cycling destination and capitalize on it. Far to many cyclists are killed because of inadequate paved shoulders, excessive speeds and signalized intersections that do not use video detection of cyclists. All of these along with adequate shade structures and hydration stations should be designed into this plan.

SC-26-2

It is imperative the traffic analysis be redone to VMT standards as recommended by the state. Cyclists and other active transportation participants are required to be accommodated in all transportation projects. This plan is severely lacking in that regard. Integration with the Route 66 National Bicycle Route and designs to promote long distance bicycle tourism in the high desert is imperative. San Bernardino County needs to recognize its national caliber as a cycling destination and capitalize on it. Far to many cyclists are killed because of inadequate paved shoulders, excessive speeds and signalized intersections that do not use video detection of cyclists. All of these along with adequate shade structures and hydration stations should be designed into this plan.

SC-26-3

Promoting active transportation corridors in San Bernardino and the High Desert Region will serve the area tremendously and save energy.

Response to Comment SC-26

Comment Code (Topic)	Response
SC-26-1 (Design)	The Governor's Office of Planning and Research (OPR) has issued a Preliminary Discussion Draft of Updates to the CEQA Guidelines for implementing SB 743. OPR expects to complete the rulemaking process in early 2015 and to phase in the guidelines statewide starting in 2016. The proposed CEQA guidelines prohibit lead agencies from categorizing traffic congestion as a significant impact, opting instead for adopting vehicle miles traveled (VMT) as the appropriate metric for measuring transportation system performance. The draft guidelines, issued by OPR pursuant to the SB 743 CEQA reform bill passed last year, are intended to facilitate infill land development, and to not punish alternative road utilization projects such as transit priority lanes, bike lanes and pedestrian uses of transportation corridor right-of-way for non-automobile capacity uses. The proposed guidelines do not limit jurisdictions from using the option of LOS under their police power for general plans, zoning codes, fee programs, or, in the case of Caltrans, using LOS as a criteria for roadway design requirements (e.g. How many freeway lanes are required to accommodate forecasted demand at a LOS "D" standard of operational performance). As far as accommodating cyclists and pedestrians is concerned, the High Desert Corridor includes the provision of a multiuse path running parallel to the freeway for most of the length of the project, consistent with bicycle plans adopted by the local participating entities.
SC-26-2 (Traffic)	Please see response to SC-26-1.
SC-26-3 (Energy)	The High Desert Corridor project proposes a new multipurpose transportation corridor linking SR-14 in Los Angeles County with US-395, I-15 and SR-18 in San Bernardino County. In an effort to achieve a truly multipurpose corridor, the build alternatives include incorporation of a bikeway element, running parallel to the freeway, connecting with the existing and proposed networks of bike paths in Palmdale and Adelanto.

Comment SC-27

SC-27-1

I am against a corridor highway linking Palmdale/Lancaster with the communities of the Morongo Basin. Hwy. 62 is one of the most dangerous for traffic accidents and fatalities in the state. I question adding another dangerous highway and the need to link the above mentioned communities. Most people reside in Joshua Tree area to enjoy the quiet of nature, the wildlife, and the slow pace. If we wanted to hear the constant roar of a highway we probably would have settled or remained in a major city.

Response to Comment SC-27

Comment Code (Topic)	Response
SC-27-1 (Design)	The proposed project will extend from Palmdale to Apple Valley, approximately 50 miles from Landers, the nearest community in the Morongo Basin. Residents of the Morongo Basin will not be able to see or hear evidence of the project. It will be designed and built using current standards and will not be "another dangerous highway."

Comment SC-28

Re: HDC Project #80

The attached are letters sent to HDC project leaders urging the adoption of Variation D. We have commented in multiple categories because we feel we are impacted in multiple categories: Land Use, Agriculture, Business, and Community. In reality, we are in favor of the NO BUILD option feeling this will serve our area best. Should the project go forward, we urge the adoption of Variation D for all of the reasons outlined in these documents.

SC-28

THOMAS P. KESTLER, A.P.C.
R. STEVEN DERRYBERRY
KIMBERLY R. ROSE-MCCASLIN

KESTLER
DERRYBERRY LLP

641 W. LANCASTER BLVD, STE 205
LANCASTER, CALIFORNIA 93534
TEL. (661)945-6115
FAX (661)948-4772
EMail info@kestlerderryberry.com

September 12, 2014

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

CLIENT'S COPY

Re: High Desert Corridor; Variation D
Our File No. 32626

Dear Mr. Machuca:

Our office represents Bruce D. Burch, Coreen M. Savikko, and Coruce Properties, LLC, both individually and collectively, as owners of Los Angeles County Assessor's parcel numbers 3084-004-006, 010, 011 and 015 ("Subject Properties"). Each of the Subject Properties are approximately five (5) acres in size, with the exception of parcel 006 at approximately two and one half (2 1/2) acres, for a combined size of 17.5 acres. Pursuant to the plans and information provided by Caltrans and Metro, the currently proposed alignment of the main corridor of the High Desert Corridor project will cause the loss of nearly all of the subject properties, forcing the relocation of the primary residence of Mr. Burch and Ms. Savikko as well as destroying significant portions of income producing property. SC-28-1

Assessor's parcel number 010 contains the 2,669 square foot residence of Mr. Burch and Ms. Savikko. This home has been the primary residence of Mr. Burch and Ms. Savikko for more than 15 years. Mr. Burch and Ms. Savikko have dedicated much time and expense to the continuous customization and improvement of their home, including the addition of a 750 square foot combined office and guest house. Mr. Burch and Ms. Savikko have both modernized and expanded the house to make it what it is today; a nearly 3,500 square foot customized and personalized home. SC-28-2

Aside from being the existing primary residence, the Subject Properties are also home to Coruce Vineyards and Winery. The vineyard, planted in 2000, currently consists of 500 mature vines. Harvests from these vines are sold commercially to various private winemakers and are used in the production of Coruce Vinyards wine. Coruce Vineyards wines have received extensive critical acclaim winning medals from bronze to gold in local and international competitions. Due to the success of Coruce Vinyards and Winery, Coruce is finalizing plans for the planting of an additional 2500 vines across the Subject Property. Coruce has satisfied the rigorous prerequisites SC-28-3

Osama Megalla
September 12, 2014
Page 2

license issued to Coruce from California's Department of Alcohol Beverage Control is site specific. As such, any relocation of Coruce will force the forfeiture of the existing license and cause Coruce to undergo the arduous and costly process of re-application and/or relocation of the license.

Additionally the Subject Property is home to an expansive lavender farm owned and operated as Antelope Valley Homestead Lavender. This is the first lavender farm in the Antelope Valley and consists of more than 1,000 lavender plants of eleven different varieties. The Antelope Valley Homestead Lavender farm uses no pesticides or fertilizers and as a result is listed as a Certified Naturally Grown Farm. The farm produces lavender products which are available worldwide via the internet and locally through various area farmer markets. Antelope Valley Homestead Lavender also provides U-Pick opportunities to the community May through July when the lavender is at its peak growing and blooming season. "Antelope Valley Homestead Lavender" derives its name from the a twenty by twenty foot shack built as a homestead in the late 1920's or early 1930's. The historical homestead shack still stands on the property today and has been reinforced to become Antelope Valley Homestead Lavender's lavender work area and drying room. SC-28-3 CONT'D

As can be deciphered from the foregoing, placement of the High Desert Corridor along the proposed main corridor line will not just destroy the primary residence of our clients but also eliminate two successful locally based small businesses which through their extensive exposure throughout the state and nationally, has shed positive light on the small community of Lake Los Angeles. However, this can be avoided altogether with placement of the Corridor along the proposed Variation D. As indicated in the Caltrans High Desert Corridor Alternatives Analysis report dated September 2011, Variation D is not only a viable alternative but was determined to be a better alternative than the main corridor line where it is located farther away from developed areas yielding a lesser construction and environmental impact at only a slightly higher cost. SC-28-4

Our office is eager to open up an amicable dialog with officials so that we may further advise the agencies of the benefits of locating the project along Variation D. Please be advised however, that should a decision be made to place the Corridor along the currently proposed main corridor line, or in any other manner which will effectuate a condemnation of our clients' property, our clients will mount a vehement defense of their home and livelihood.

Thank you for your anticipated cooperation. We look forward to hearing from you.

Very truly yours,

KESTLER | DERRYBERRY LLP

R. STEVEN DERRYBERRY
Attorney at Law

RSD/krm
cc: Client

Response to Comment SC-28

Comment Code (Topic)	Response
SC-28-1 (Other)	Your support for the No Build Alternative and Variation D is noted.
SC-28-2 (Right of way)	Caltrans understands and appreciates your concern regarding potential impacts to the property that you describe. If it is determined that the property will be affected once the design is finalized and funding is made available, appraisals, acquisition, and relocation assistance will be performed under applicable laws. Interactions with property owners will be in accordance with the California Relocation Assistance Law (Government Code §7260 et seq.) or the Uniform Relocation Assistance and Real Property Acquisition Policies Act of1970, as amended (42 U.S. Code Chapter 61 et seq.). Property owners will be personally notified in writing of necessary right of way acquisitions. Loss of business goodwill may also be applicable. Please continue to conduct business and any residential actives as usual. Please do not let the proposed project influence activities on site. If applicable, consideration and compensation for the real estate will be provided for under law.
SC-28-3 (Farmland)	Please see response to Comment SC-28-2.
SC-28-4 (Design)	Your support for Variation D is noted. As you indicate, Caltrans has documented that Variation D is a superior option that would result in fewer environmental impacts than the main alignment. For that reason, the Final EIR/EIS identifies Variation D as part of the preferred alternative.

Comment SC-29

SC-29-1

This is an important project that will help to relieve current and future traffic congestion and provide for more efficient travel that will reduce fuel consumption with related benefits to air quality and climate change. Project construction will provide a substantial economic stimulus to the region and the resulting infrastructure investment will improve travel safety and will benefit the region for the long term. I fully support the project with mitigation to minimize significant impacts.

Response to Comment SC-29

Comment Code (Topic)	Response
SC-29-1 (Other)	Your support to the project is noted. Caltrans and Metro are committed to minimizing or mitigating any identified environmental impacts that may be directly or indirectly caused by this project to the extent feasible and applicable as indicated in the EIR/EIS.

Comment SC-30

SC-30-1

The proposed High Desert Corridor should either end at the I-15, or Highways 18 and 247 should be widened to four lanes all the way to Yucca Valley where they intersect Highway 62. Anything less will be a disaster and a traffic nightmare. Bill Lembright

SC-30-2

There will be excessive fatalities and gridlock.

Response to Comment SC-30

Comment Code (Topic)	Response
SC-30-1 (Traffic)	The SCAG Regional Travel Demand Model used for the High Desert Corridor Traffic Study forecasts daily traffic volumes on SR-18 west of Lucerne Valley to be in the range of 26,000 to 28,000 vehicles per day in year 2040, with or without the High Desert Corridor project. Construction of the High Desert Corridor will not adversely affect traffic conditions on SR-18 east of Apple Valley or on SR-247.
SC-30-2 (Cumulative)	The volume of traffic forecast for SR-18 between its junction with Bear Valley Road and Lucerne Valley is sufficient to warrant consideration of widening the roadway from two lanes to four lanes as a conventional highway, or upgrading the facility to a four-lane expressway. As a two-lane conventional highway, the facility would operate at the cusp of Level of Service D/E, indicating speeds of approximately 40 miles per hour during peak travel times of the day. Consideration of the addition of safety features, such as a center soft median rumble strip or a median concrete barrier, would likely be considered in advance of traffic volumes reaching the levels indicated for year 2040.

Comment SC-31

SC-31-1

In 2010 the Apple Valley Town plan had the expressway mapped out. It crossed Joshua at standing rock, it now comes further north and crosses at of Flint Rd. How and why did this particular location and route change? How can it be changed again? How can any part of the route be adjusted so that fewer homes and families are not disrupted, subject to relocation or decrease in home values?

Why does this EIR not include more alternative routes through less populated areas? Why was the intersection of the state hwy 18 and Bear Valley road determined to be the best terminus? Why wasn't there an alternative eastern segment studied through the northern part of Apple Valley, following Stoddard Wells Rd, east to Lucerne Valley cutoff north of Sidewinder Mountain? This route would facilitate the commercial/industrial development desired of north Apple Valley and avoid all the negative impacts to the greater number of residential communities of Apple Valley.

SC-31-2

This draft EIR does not adequately address the drastic impact to lifestyle and property values for those residents with homes near and not currently provisioned for subsidized relocation in any of the three segments of the proposed High Desert Corridor freeway project. The construction and use of this freeway will adversely impact the air and water quality enjoyed by the residents adjacent to its path. This EIR does not address, per CEQA, enough of these and off site impacts caused by construction and increased traffic. How will the decreased air, water and noise quality be mitigated or how will effected residents be compensated? Noise is a major concern as it travels extremely well and far in the desert environment with little natural acoustic barriers. The proposed noise walls are crude and ineffective where there is little other material to absorb the sounds created by highway traffic and speeds.

Why is the financial impact and loss of property value to those families near the project whose homes are not currently slated for relocation specifically addressed in this report?

SC-31-3

This report does not adequately address the offsite impacts to local communities' increased traffic. It was purported at the Apple Valley Hearing and in the EIR that the HDC would not increase traffic, only facilitate the natural increase. This premise is false as it fails to attribute more traffic based on the attractive alternative it would provide, thus luring additional trips that would not otherwise take this route. Additionally the development and growth of the "Desert Gateway" community and town centers is fundamentally premised on the construction and presence of the HDC.

Per CEQA offsite impacts must be accounted for and mitigations must be studied and proposed. What are those for this project?

What will be done to mitigate the increased traffic at the end point of the eastern end of the project where current roads and infrastructure lack mutual function and design capacity?

SC-31-4

At the Apple Valley town hearing it was stated the proposed landscaping to "hide" and conceal the highway/expressway would consist of native desert vegetation. This is absurd. The native creosote bush, rabbit brush and Joshua trees do not grow densely enough, high enough or fast enough to provide such cover. What other native desert plants are referred to that would blend the monstrous above grade structure into the environment?

The proposed sound walls would add height to any part of the corridor. the eastern expressway portion is proposed through many residential neighborhoods that enjoy great views of the Victor Valley, San Bernardino and Angeles Crest mountains. Even though it Is proposed to be at-grade, These sound barriers would negatively impact the visual aesthetics now available. How would effected residents be compensated for their loss?

SC-31-5

Construction of this will undoubtedly cause profound dust and decreased air quality for adjacent and nearby communities. This is unacceptable to subject people to these health hazards without an option of full compensation of relocation. Mitigation and control of dust would require much water and is completely irresponsible in a desert environment with an already limited and dwindling water resource which is currently subject to waste and illegal appropriations.

SC-31-6

Noise is a major concern as it travels extremely well and far in the desert environment with little natural acoustic barriers or material to absorb sound. The proposed noise walls are crude and ineffective to absorb the sounds created by highway traffic and speeds. If anything they only to deflect it, if not concentrate it in one direction, thus making it worse unless the entire corridor was enclosed. This is not the case for the eastern expressway portion. The noise generated from the estimated traffic would greatly diminish our property values, lifestyle and well being. How would remaining effected residents be compensated for their loss?

SC-31-7

Construction of this will undoubtedly cause profound dust and decreased air quality for adjacent and nearby communities. This is unacceptable to subject people to these

health hazards without an option of full compensation of relocation. Mitigation and control of dust would require much water and is completely irresponsible in a desert environment with an already limited and dwindling water resource which is currently subject to waste and illegal appropriations.

SC-31-8

The construction and use of this freeway will adversely impact the air and water quality enjoyed by the residents adjacent to its path. This EIR does not address, per CEQA, enough of these and off site impacts caused by construction and increased traffic. How will the decreased air, water and noise quality be mitigated and how will affected residents be compensated?

The cumulative impacts of this project are that of enhanced development and increased use of local resources over time. This project will enable more people to use more local natural resources, anything to the contrary is simply untrue and not substantiated. In fact, not building it would decrease the movement of people to the high desert and reduce overall consumption of natural resources because it would be more difficult to get around and less desirable to develop homes and commercial use of the land. So, the HDC would in fact lessen the sustainability of the high desert communities, especially in regards to water. The Antelope and Victor Valleys already are dependent on the State Water Project and other recharge projects to meet the current water consumption. The state water project resources are competed for by millions others in the state. Juxtaposing the survival of our local future against an increasing number of competitors by creating higher demand though more development is foolish and a never ending pursuit of more, thus not sustainable. The increased demand for water, either through the construction of the project or through the prolonged planned development that coincides with its use, is simply beyond what the desert environment can sustain.

SC-31-9

How long is this EIR/EIS valid for? How soon would the project need to be started before another EIR/EIS is required? If the project is not built or started within a certain time, does another EIR/EIS need to be completed? What other reasons would require the EIR/EIS to be redone?

Due to the obvious negative impacts to the communities through which this project is proposed I object to this project in its entirety and support a NO BUILD option.

Response to Comment SC-31

Comment Code (Topic)	Response
SC-31-1 (Design)	In 2005, the High Desert Corridor, identified as E-220, was officially recognized in Section 1105 of the Intermodal Surface Transportation Efficiency Act as a High Priority Corridor on the National Highway System between Los Angeles and Las Vegas via Palmdale and Victorville. As such, the corridor extends from SR-14 in Palmdale to I-15 in Victorville. The corridor continues east of I-15 as SR-18, as a realignment of that state route to the eastern edge of the Town of Apple Valley. This alignment is consistent with the "Recommended Plan for 2035" reflected on Figure 4-1 of the Victor Valley Area Transportation Study, prepared for the San Bernardino Associated Governments in 2008.
SC-31-2 (Community)	To the greatest extent practicable, it is Caltrans' intention to avoid and/or minimize impacts to properties that lie near or adjacent to a transportation facility. However, elimination of all associated impacts on adjacent properties is not always possible. Any alternative of the HDC Project will incorporate mandatory avoidance and mitigation measures to minimize impacts to noise, air, traffic, and quality of life concerns for nearby residents, both in terms of construction and long-term operation of the facility. As described in Section 3.2.7, Noise, of the Draft EIR/EIS, noise impacts from the proposed project were identified and associated abatement measures were incorporated into the project. The use of sound walls as noise-abatement facilities has been demonstrated to be effective in the reduction of traffic-generated noise. Research studies that analyzed the proximity impacts from transportation projects have identified both positive and adverse effects on property values. 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, house values will rebound and become normalized over time. Associated landscaping and refinements in project design to include community compatibility features and enhancements are proposed for the HDC Project have tended to have a positive effect 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; such features would generally improve community cohesion, help create a more inviting neighborhood and improve residential desirability for those places. Implementation of the Preferred Alternative may have the effect of improving property values by providing residents with a more efficient transportation system. When viewing the HDC improvements to the desert region as a whole, property values are likely to improve. Substantial adverse impacts to local property values are not anticipated from project implementation.

Comment Code (Topic)	Response
SC-31-3 (Traffic)	The proposed project will accommodate both the natural increase in traffic attributable to High Desert region population and employment growth as well as motorists who select alternative routes between external gateways, such as I-15 and the Los Angeles basin, for example. The majority of trips using the facility will be local to the High Desert region, having an origin, destination, or both within Antelope Valley or Victor Valley. Traveling eastbound across the Los Angeles/San Bernardino county line for example, 64% of the motorists using the freeway are forecast to originate in Antelope Valley while 20 percent originate from the south of Palmdale and 9 percent originate from the west of Lancaster. These motorists are destined to Antelope Valley (55.5%), I-15 (21.6 percent to the north and 14.4 percent to the south) and Lucerne Valley or points east along SR-18 (8.5%). These represent average weekday conditions. On weekends, more regional traffic would be expected to use the HDC facility as an alternative route of travel to or from Las Vegas. Regarding the eastern end of the project, where the realigned SR-18 joins the existing SR-18 near the Bear Valley Road cutoff, the traffic forecasts indicate that the traffic volumes on SR-18 traveling to Lucerne Valley and points east will be approximately the same under both the no build and build alternative conditions. This forecast is logical, as construction of the proposed HDC freeway/expressway project will not alter land development in Lucerne Valley. Traffic volumes resulting from forecast land development are expected to more than double along SR-18 leading to Lucerne Valley by 2040, with or without the HDC Project. The doubling of traffic volumes will warrant consideration of widening SR-18 from two lanes to four lanes, as a conventional highway which permits driveway access, or as an expressway on a new alignment, running parallel to the existing facility. As the planning, design, funding, and construction of roadway widening projects take many years to accomplish, planning for the potential eventual widening of SR-18 should be advanced through SANBAG.
SC-31-4 (Visual)	It is true that native vegetation will not completely conceal the proposed highway and rail corridor. Vegetation will, however, add texture and depth that will soften its appearance. The statement given at the town hearing was inaccurate and/or incomplete. There are no soundwalls recommended within San Bernardino County (one wall was proposed between Joshua Road and Standing Rock Road but it did not pass the reasonable/feasible test - see Chapter 3.2.7 of the EIR/EIS). In those locations where a wall is recommended due to the proposed facility creating new sound impacts in an established community, the community has the right to accept or reject the soundwalls through a voting process. If the soundwall is proposed within State right-of-way, a simple majority of the benefited property owners would be required to vote in favor of the soundwall being built. If the soundwall is proposed on private property, 100 percent of the benefited property owners would have to vote for the wall before it could be built. If the property owners vote for the soundwall, they will be given an opportunity to provide input regarding the aesthetic design of the wall through an on-going outreach program.

Comment Code (Topic)	Response
SC-31-5 (Air quality)	Construction air quality impacts of the proposed project are described in Section 3.6 of the EIR/EIS. Construction emissions are by nature limited, and would have no long-term effect on air quality. Active construction sites would be watered regularly to control dust, in accordance with local air quality management agency rules. If Caltrans identifies and wishes to employ a more effective method of dust control than periodic watering, the air districts have procedures for approving alternative control methods, 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 statues that apply to work performed under each construction contract, including air pollution control rules, regulations, ordinances and statues provided in Government Code § 11017 (Pub Cont Code §10231). Also please refer to response to comments 4P-10-2 and F-4-16 for more information on construction emissions.
SC-31-6 (Noise)	The Traffic Noise Study Report for The High Desert Corridor Project (June 9, 2014) evaluates the entire area within the project limits. Preliminary noise abatement measures necessary for the proposed project to comply with state and federal noise abatement regulations are also analyzed and presented in that document. The results of this analysis are summarized in Chapter 3.2.7 of the EIR/EIS. If your residence is truly adversely affected by a high noise level that cannot be mitigated, there is the possibility that relocation assistance could be provided.
SC-31-7 (Construction)	Air quality impacts are addressed in the Air Quality section of the environmental document (Section 3.2.6). Construction impacts are disclosed in Section 3.6. Note that potential health hazards from air pollutants are embodied in the ambient air quality standards (i.e., they are health-based standards). The project will be constructed in phases. Dust would occur chiefly during the early phase where grading and excavation take place. The project proposes to use the standard dust mitigation measures for the most part to minimize dust impacts. As far as the water usage is concerned, water used in construction will be conserved as much as possible. During the construction phase, to further 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 alternative 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 subregional water reclamation facilities. Construction of the facilities began in April 2015 and the project is

Comment Code (Topic)	Response
	scheduled for completion by mid-2017. Potable water resources would be protected by utilizing reclaimed water for dust suppression and, if necessary, landscape irrigation.
SC-31-8 (Cumulative)	Continued development within the groundwater basins could also interfere with groundwater recharge. New development occurring in vacant areas that currently serve as groundwater recharge areas would reduce recharge potential within the groundwater basins. The potential impacts to groundwater recharge within the project corridor, as analyzed in the final environmental document Section 3.2.2, would be less than significant with implementation of the proposed Project. Although implementation of the proposed Project would not have a cumulatively considerable contribution to adverse effects on groundwater recharge within the Project area, the overall growth and development that would take place throughout the groundwater basins would directly and/or indirectly result in the loss of groundwater recharge areas. This loss would be mitigated through implementation of the Urban Water Management Plans prepared by all of the water agencies within the HDC corridor in accordance with the Urban Water Management Plan Act (California Water Code § 10610 et seq.). Any loss in groundwater would also be mitigated by the Victor Valley Wastewater Reclamation Authority's project which 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. Implementation of the two sub-regional water reclamation facilities would increase groundwater supplies and reduce water currently imported through the State Water Project from the Bay-Delta. Thus, impacts associated with groundwater from implementation of the proposed Project would be less than significant and the proposed Project would not have a cumulatively considerable contribution to the cumulative effects related to groundwater. With respect to general air quality concerns, please refer to EIR/EIS Section 3.2.6 Air Quality, which contains detailed information and descriptive analysis on the build alternative that comprises the most complete set of proposed project features, including the Tollway and HSR systems, to demonstrate conformity with federal air quality goals. Furthermore, emissions of particulate matter of less than 2.5 and 10 microns in diameter ($PM_{2.5}$ and PM_{10}) standards were estimated for all alternatives based on the forecast travel activity data and emission factors generated from the latest U.S. Environmental Protection Agency-approved emissions model, EMFAC2011. The studies found the project would likely cause violations of the State's 24-hour standard for PM_{10}. As discussed in the final environmental document Section 3.6, Construction Impacts, standard conditions (specifically SC-22 and 23) will be implemented to minimize short-term air quality impacts, including odors and dust. With respect to your concerns on project-related noise generation, this issue is addressed in EIR/EIS Section 3.2.7, Noise, and the associated technical Noise Study Report prepared for the project. As described therein, noise

Comment Code (Topic)	Response
	measurements were taken at sensitive locations within the project study limits to establish baseline conditions, calibrate the future traffic noise model, determine the interior noise levels in classrooms, and determine the drop-off rate from the front to backyard at certain residences. Future No Build and Built Alternative traffic noise levels were modeled to obtain the worst-case noise scenario. The studies found some residential areas, a school, a park, and a church within the project limits, would be impacted as a result of the project build alternatives. Based on noise levels and the assessment of "reasonable and feasible" criteria for noise-abatement measures required by the Caltrans Traffic Noise Analysis Protocol (and described in Section 3.2.7), numerous soundwalls have been identified for the project in appropriate locations. The use of such noise-abatement facilities has been shown to reduce traffic-generated noise. Tables 3.2.7-4 through 3.2.7-8 of the final environmental document summarize the soundwalls under consideration along the project corridor. Decisions on abatement/mitigation will be made upon completion of the project design and where approved by property owners per applicable Federal Highway Administration (FHWA) and Caltrans guidelines. During the construction phases of the project, noise may intermittently dominate the sound environment in the immediate area of construction activity. Caltrans, however, applies standard specifications that address noise generated during construction and comply with applicable local, State, and federal regulations. Mitigation techniques for control of equipment noise can provide the most effective means to minimize the effects of construction activity impacts. These standard conditions, identified as SC-CI-24 through SC-CI-31, are listed under Avoidance, Minimization, and/or Mitigation Measures – Noise and Vibration, Standard Conditions in final environmental document Section 3.6, Construction.
SC-31-9 (Other)	The final environmental document would be valid for approximately 3 years from the time it is approved. If the project doesn't advance to the next milestone in the project development process, such as obtaining resource agency permits, final design, right-of-way acquisition or construction, then a reevaluation would need to be completed to determine and document whether or not the decision made remains valid for the requested action or if additional analysis and/or documentation is necessary. The reevaluation would basically determine whether the project footprint, scope and alternatives remain the same as when the project Final EIR/EIS was approved. In the event changes to the project description occur that would result in the change to the level of impacts that are more adverse than what have been disclosed in the current environmental document, a supplemental environmental document will be prepared. Your support for the No Build alternative is noted.

Comment SC-32

SC-32-1

We object to the road project from Palmdale through Lucerne Valley, Highway 18 through Hwy 247. Either stop the project at I-15, or make highway 18 and Highway 247 six lanes. The traffic is already too heavy for the area.

Response to Comment SC-32

Comment Code (Topic)	Response
SC-32-1 (Traffic)	The SCAG Regional Travel Demand Model utilized for the High Desert Corridor Traffic Study forecasts that traffic volumes on SR-18 between Lucerne Valley and Apple Valley/Hesperia will increase to 26,000 to 28,000 vehicles per day by year 2040. This volume of daily traffic is forecast to occur with or without the High Desert Corridor project, and is sufficient to warrant consideration of widening SR-18 from two lanes to four lanes. Consideration of widening SR-18 east of its junction with Bear Valley Road is appropriately considered as a separate project, independent from the High Desert Corridor project.

Comment SC-33

SC-33-1

I object the proposed road from Palmdale through Lucerne

Valley, the traffic is already too heavy for the area. Either stop the project at Interstate 15, or widen Highway 18 and Highway 247 six lanes. Enough is enough.

Response to Comment SC-33

Comment Code (Topic)	Response
SC-33-1 (Traffic)	The SCAG Regional Travel Demand Model utilized for the High Desert Corridor Traffic Study forecasts that traffic volumes on SR-18 between Lucerne Valley and Apple Valley/Hesperia will increase to 26,000 to 28,000 vehicles per day by year 2040. This volume of daily traffic is forecast to occur with or without the High Desert Corridor project, and is sufficient to warrant consideration of widening SR-18 from two lanes to four lanes. Consideration of widening SR-18 east of its junction with Bear Valley Road is appropriately considered as a separate project, independent from the High Desert Corridor project.

Comment SC-34

SC-34-1

NO BUILD.

Response to Comment SC-34

Comment Code (Topic)	Response
SC-34-1 (Other)	Your support to the No Build Alternative is noted.

Comment SC-35

SC-35-1

don't build

Response to Comment SC-35

Comment Code (Topic)	Response
SC-35-1 (Other)	Your support to the No Build Alternative is noted.

Comment SC-36

SC-36-1

don't build

Response to Comment SC-36

Comment Code (Topic)	Response
SC-36-1 (Other)	Your support to the No Build Alternative is noted.

Comment SC-37

SC-37-1

It seems suspect to introduce an infrastructure expansion for a highway to run from Palmdale through Victorville and Apple Valley to Hwy 18 then into Lucerne Valley... when our rural community doesn't even have the ability to handle its own traffic on secondary (listed) roads. How are we to survive a large amount of traffic? We don't have turning lanes, or shoulders in most sections, or traffic lights. We beg for repairs and get nothing in return. And now you have our area earmarked for expansion? What drug are you on?

Response to Comment SC-37

Comment Code (Topic)	Response
SC-37-1 (Traffic)	The SCAG Regional Travel Demand Model used for the High Desert Corridor Traffic Study forecasts daily traffic volumes on SR-18 west of Lucerne Valley to be in the range of 26,000 to 28,000 vehicles per day in year 2040, with or without the High Desert Corridor project. Construction of the High Desert Corridor will not adversely affect traffic conditions on SR-18 east of Apple Valley or on SR-247. Transportation projects, both large and small, take years to plan, design, and implement. To advance a candidate project for funding consideration, cities, counties, regional planning agencies and Caltrans nominate potential projects. Depending on the complexity of the project and if it involves new construction versus maintenance and repairs, environmental documents may need to be prepared, particularly in the case where expansions to capacity are being proposed. The addition of turning lanes, shoulders, traffic signals and roadway repairs are fortunately typically exempt from detailed environmental investigations. In the case of unincorporated San Bernardino County, these improvements can be pursued with SANBAG.

Comment SC-38

SC-38-1

I approve the proposed route from the 14 freeway to Deadmans point.

I believe it is going to be a very positive thing.

It is what this area need.

Thanks you

Response to Comment SC-38

Comment Code (Topic)	Response
SC-38-1 (Design)	Your support to the project is noted.

Comment SC-39

SC-39-1

It is noted that the High Desert Corridor is planned to end at Hwy 18 / Deadman's Point. I wish to suggest that the new Corridor freeway end at either Hwy 395 or I15 so that the town of Lucerne Valley and others along Hwy 18 are not impacted by the increased traffic going through to Yucca Valley, Palm Springs, etc. If this is not possible then provision should be made for a 4 lane highway from Deadman's Point on to Yucca Valley. Thank you.

Response to Comment SC-39

Comment Code (Topic)	Response
SC-39-1 (Traffic)	The SCAG Regional Travel Demand Model utilized for the High Desert Corridor Traffic Study indicates that the traffic volume on SR-18 east of its junction with Bear Valley Road will be very similar either with or without the High Desert Corridor. Under either build or no build conditions, traffic volumes are forecast to be 26,000 to 28,000 vehicles per day, west of Lucerne Valley in 2040. This level of daily traffic volume would be sufficient to warrant consideration of widening SR-18 from two lanes to four lanes, either as a conventional highway or expressway facility. Widening SR-18 to four lanes could be pursued independently from the High Desert Corridor project.

Comment SC-40

SC-40-1

High Desert Corridor Please consider widening HWY 18 to four lanes instead of the current two lanes, When you increase the length of the corridor from Yucca to dead-mans corner the flow of Semi-truck traffic will increase exponentially. At two lanes it is a problem now, with the increase it will be a disaster.

SC-40-2

High Desert Corridor Please consider widening HWY 18 to four lanes instead of the current two lanes. Please consider to increase the length of the corridor from Yucca to I-15 so that the flow of traffic is accessible and easy to use by all who travel on this road. At two lanes it is a problem now, with the increase it will be a disaster. Most business's in Lucerne Valley are at this time far enough from Hwy -18 to allow for this to occur.

Response to Comment SC-40

Comment Code (Topic)	Response
SC-40-1 (Traffic)	The SCAG Regional Travel Demand Model was utilized to forecast traffic volumes for the High Desert Corridor Traffic Study. The model indicates that traffic volumes on SR-18 between Lucerne Valley and its junction with Bear Valley Road, are forecast to increase to 26,000 to 28,000 vehicles per day by the year 2040. That volume of daily traffic would warrant consideration of widening SR-18 from two lanes to four lanes, either as a conventional highway or expressway. The current average annual daily traffic volume on this stretch of road is approximately 9,400 vehicles per day. This volume of traffic does not warrant widening of SR-18 at this time. Consideration of future widening of State Route 18 between Lucerne Valley and Apple Valley should be advanced through SANBAG, for nomination to Caltrans and SCAG for inclusion in the Regional Transportation Plan. See also Response to Comment L-13-1.
SC-40-2 (Traffic)	Please see the response to SC-40-1.

Comment SC-41

SC-41-1

I am commenting on the proposed High Desert Corridor on Highway 18, from Palmdale to Deadman's Point just east of Apple Valley.

This new wider road will dump a whole new wave of traffic on an all ready overburdened strip of Highway 18.

If you do follow through with this proposal please add to it one of two things, either have the Corridor end at I-15, or widen Highways 18 and 247 to four lanes.

If one of these does not happen you are going to see a dramatic increase in accidents on the east side of the new corridor.

Thank you for your time, Millie Rader.

Response to Comment SC-41

Comment Code (Topic)	Response
SC-41-1 (Traffic)	The SCAG Regional Travel Demand Model was utilized to forecast traffic volumes for the High Desert Corridor Traffic Study. The model indicates that traffic volumes on SR-18 between Lucerne Valley and its junction with Bear Valley Road, are forecast to increase to 26,000 to 28,000 vehicles per day by the year 2040. That volume of daily traffic would warrant consideration of widening SR-18 from two lanes to four lanes, either as a conventional highway or expressway. The current average annual daily traffic volume on this stretch of road is approximately 9,400 vehicles per day. This volume of traffic does not warrant widening of SR-18 at this time. Consideration of future widening of State Route 18 between Lucerne Valley and Apple Valley should be advanced through SANBAG, for nomination to Caltrans and SCAG for inclusion in the Regional Transportation Plan.

Comment SC-42

SC-42-1

I believe the High Desert Corridor project should end at I-15 at Victorville. To continue to the east side of Apple Vly would needless destroy many existing residentual areas as well as many businesses. It would also encourage heavy trucks to go further east through rural areas on a small country road to join the I-10 near Palm Springs. This would create unnessacesary traffic and dangerous conditions for many people.

Response to Comment SC-42

Comment Code (Topic)	Response
SC-42-1 (Design)	The Town of Apple Valley has been working with Caltrans to preserve land for a future transportation corridor that would enhance the movement of motorists and goods. Policy 2.E of the Apple Valley 2009 General Plan states, "The Town shall protect right-of-way for the High Desert Corridor as determined by Caltrans." This right-of-way protection is intended to minimize disruption to residential areas and businesses which might otherwise be affected by the project. Insofar as the High Desert Corridor project encouraging heavy trucks to utilize SR-18 to reach Palm Springs, traversing SR-18 to SR 247, to SR 62, to I-10 would be an unusual route choice for truckers, given the alternative all freeway route of Interstates 15, 215, 210 and 10 to accomplish the same trip.

Comment SC-43

SC-43

Comments on the High Desert Corridor Draft EIR/EIS

by Bryan Baker – December 2014

General comments

Details for some of the following general comments are provided in the comments that follow on specific pages/sections of the EIR/EIS and Traffic Study.

- Population growth estimates used in the EIR/EIS and Traffic Study are outdated and overstate expected growth. The outputs from the traffic model and other analysis cannot be relied upon to provide an accurate picture of expected traffic flows in the future. Details are provided below in the comments on specific sections of the EIR/EIS. SC-43-1
- Current traffic counts are grossly exaggerated in the Traffic Study and EIR/EIS. The 2040 forecast for cross-desert traffic represents a 600 percent increase over most recent available traffic counts on existing roadways. Due to incorrect values input to the traffic model, predictions of traffic for 2040 are far higher than should be expected, and levels of traffic forecast for the HDC itself must also be exaggerated. Details below. SC-43-2
- The reductions in greenhouse gas emissions that are calculated in the EIR/EIS are faulty because of the exaggerated estimates of population and traffic. SC-43-3
- Because of exaggerated traffic forecasts, the predicted levels of traffic on the tollway option are also much higher than can reasonably be expected. This would put any tollway operation in danger of underfunding and financial default by any private operator of the tollway. SC-43-4
- The presentation by HDC staff at the Draft EIR/EIS public hearings claimed that the HDC would promote no new growth and that traffic would be no higher as a result of the HDC. This claim is not credible in light of the history of new freeway construction in California, especially in rural areas. SC-43-5
- The TSM/TDM alternative, which was dropped from consideration for the Draft EIR/EIS, would have provided the most "bang for the buck" for the High Desert. Its cost would be a fraction of the HDC. The existing SR-18/SR-138 route is in fact the preferred route for most traffic crossing the desert. With the improvements such as in the TSM/TDM, it could be made safer and more reliable. It could provide the High Desert with a completely adequate cross-desert transportation route for the next several decades. SC-43-6
- As for a "continuous" freeway corridor across the desert that long-distance trucks and other vehicles could use, there already is a suitable existing route: SR-58 between Mojave and Barstow. This is a sparsely-traveled, underutilized freeway that can be used to bypass the Inland Empire freeways that the HDC purports to relieve of traffic. SR-58 would only require a few miles more travel than the proposed HDC route for long-distance traffic. SR-58 is currently receiving some upgrades and could soon be a full freeway along this entire route. There is no need to construct an entirely new major highway to allow travel from, say, the San Fernando Valley to Barstow and beyond; SR-58 could easily fill this role. SC-43-7

- Based on the above comments, the only valid option for the project is the No-Build Alternative. There is insufficient evidence in the EIR/EIS of need in for a massive new freeway that is destructive to both natural and human communities of the High Desert. SC-43-8

Specific Comments on the Draft EIR/EIS

Summary

S-17: "Cities and towns in the project area are supportive of the HDC Project."

- No specific evidence is provided in the EIR/EIS for this statement. The summary cites positive comments at scoping meetings, but these cannot be considered representative of the communities near the project. I attended several scoping meetings and noted that many of the favorable comments came from individuals who stand to gain from the project, such as contractors and real estate agents. Statements about community support should be removed from the document unless quantitative evidence of support by the general population is provided. SC-43-9

Chapter 1

p. 1-1: "The existing portions of SR-18 and SR-138 would be relinquished (i.e., made a local road, no longer a State highway) to the local jurisdictions (i.e., cities of Palmdale, Adelanto, Victorville, and Town of Apple Valley; and Los Angeles and San Bernardino counties)."

- Traffic volumes on the existing roads will not decrease from current levels, even if the HDC is built. The shift of support for these two state highways to local jurisdictions represents a major increase in the burden of maintenance on county authorities. SC-43-10
- It is also not clear how this change would affect the portion of SR-138 that extends southeastward to and across I-15 towards Silverwood Reservoir. This portion of the route is heavily used by commuters and other travelers between Ontario/San Bernardino and the Phelan/Pinon Hills areas. Travelers on this portion of the current SR-138 would not consider bypassing the existing road and instead drive north on I-15 over an additional twenty miles to the HDC. If that portion is dropped from the state highway system, it will have major impacts on local road maintenance budgets. It would also inconvenience and confuse travelers not familiar with the local highways who are attempting to navigate the area. SC-43-11
- Note that if the SR-138 designation is somehow continued southbound from the HDC so that it coincides with a portion of its current alignment that crosses I-15 and continues past Silverwood Reservoir and on up to Crestline in the San Bernardino Mountains, then the HDC will be causing even more route discontinuity for this highway than the current route. SC-43-12

p. 1-4: "The need for a high-capacity transportation corridor has been recognized by State, regional, and local planners for decades. Originally conceived as the "Metropolitan Bypass" in the 1930s/40s, a freeway alignment generally following SR-138 was intended to provide a northeast bypass of Los Angeles for vehicular trips from the San Joaquin Valley to communities to the east such as San Bernardino and Victorville…"

- The "Metropolitan Bypass" in earlier plans follows a different route than the proposed HDC. A map of freeway plans from the earlier era can be seen at http://www.cahighways.org/maps/1956-la-mteb2.pdf (retrieved from http://www.cahighways.org/maps-sc-fwy-pt2.html on 23 Nov 2014). The Metropolitan Bypass follows closely the current Pearblossom Highway on the south side of Palmdale, and would have continued southeastward along the current SR-138 toward San Bernardino. This road would have moved traffic from the Antelope Valley toward the San Bernardino area, not toward the Victorville and Barstow areas. This earlier proposal should not be cited as evidence for an earlier recognized need for the HDC. SC-43-13
- The historical plans by planners in earlier eras included a large number of other freeways and expressways that have subsequently been abandoned. The map cited above shows an example of the absurd number of freeways planned in earlier decades. For example, a new "Barstow Freeway" in these plans would have extended directly over the San Gabriel Mountains. See http://www.latimes.com/local/la-me-forgotten-freeways-20141028-htmlstory.html and http://www.slate.com/articles/life/transport/features/2010/unbuilt_highways/los_angeles_the_beverly_hills_freeway.html for exposés on the freeway network once envisioned by planners. Only a fraction of these were ever built. Citing earlier plans for regional freeways as evidence for the need for the HDC is illegitimate. SC-43-14

p. 1-9: "The lack of route continuity along SR-138 and SR-18 contributes to traffic congestion and reduced LOS on adjoining highways and local streets."
p. 1-19: "The SR-138/SR-18 route is largely discontinuous and lacks route continuity (see Figure 1-2). There is no direct east-west connection between the developed areas of the southern Antelope and Victor valleys. From the vicinity of the proposed eastern terminus, SR-18 (Happy Trails Highway) circuitously bends through Apple Valley into Victorville where it becomes D Street…Regional and inter-regional traffic, including heavy trucks, merge with local traffic using this segment to access Victor Valley cities, thereby creating conflicts in vehicular movement."

- These statements imply that the current route is a complex one, requiring multiple driver decisions and lane changing when crossing the desert. In fact, the route between the city limits of Palmdale and Victorville requires exactly one turn to proceed between Palmdale and Victorville. This one turn occurs in the middle of the route where traffic tends to be among the lowest levels on the entire route. The EIR/EIS provides no evidence that this one turn contributes to traffic congestion. SC-43-15
- The passages also imply that the fact that SR-18 shares the roadway with I-15 for three miles is a source of confusion and congestion. This statement reveals a lack of knowledge about the local use of these roads. Few trips extend across these two segments of SR-18. Almost no commuters, for instance, live in eastern Apple Valley and commute to Palmdale. Those that do traverse the entire route do not find it overly complex or congestion-inducing. Many highways share some portion of their alignment with other designated highways, and such alignments do not in themselves cause congestion or confusion. SC-43-16

p. 1-11 Table 1-2, "Posted Speed Limits on SR-138/SR-18"

- The number of lanes for SR-18 at D Street in the City of Victorville is incorrect. The road has four lanes throughout this segment, not two. SC-43-17

p. 1-12: "It is estimated that approximately 66,000 vehicles crossed this imaginary screenline during an average weekday in 2010. As shown in Table 1-3, approximately 133,500 vehicles (combined eastbound and westbound daily totals) are forecast to cross the county line along five roadways in the year 2040, a doubling of traffic compared to 2010." SC-43-18

- The figure of 66,000 vehicles contradicts the latest available traffic volume figures from the state and county. The latest available traffic counts are listed below, including state and county sources. Current figures are for 2013 AADT (or ADT for county data) at the county line unless noted.

	2013 AADT		EIR 2040 Projection
Route	BACK	AHEAD	(Sum EB/WB)
East Ave G/Shadow Mountain Road[1]	16	16	18,844
El Mirage Rd[2]	2,457	2,457	33,051
Palmdale Rd/SR-18	5,400	5,400	20,026
SR-138	9,500	8,600	45,100
Angeles Crest Hwy/SR-2	1,700	1,550	16,495
TOTALS	19,073	18,023	133,516

[1]Shadow Mtn Rd value dated 1/5/2012. [2]El Mirage Rd value is at Sheep Creek Rd.

Sources: for state highways, http://www.dot.ca.gov/hq/traffops/saferesr/trafdata/index.htm; for county roads, http://www.sbcounty.gov/dpw/trafficadt/AvgDailyTraffic.aspx.

The total current daily traffic on all five of these roads is approximately 19,000 vehicles, not 66,000 as claimed in the EIR/EIS. The forecast for a doubling of traffic on these roads (in the no-build alternative) is incorrect. Instead, the forecast of 133,000 vehicles per day represents **a 600 percent increase (or sevenfold) over current traffic!** This would be with no build of the HDC and no enhancement of the quality of other roads over their present state. Even with the EIR/EIS's prediction of doubling of regional population (which in itself is doubtful; see below), and accounting for any extra vehicle numbers based on passenger car equivalents, an increase of sevenfold is obviously incorrect. The traffic increase predicted in the EIR/EIS is not credible and should cause the forecasts for traffic with the HDC, as well as all benefit calculations for the HDC in the draft EIR/EIS, to be rejected. SC-43-19

- A further indication of the incorrect nature of the forecast is in the values for East Avenue G/Shadow Mountain Road. This road is an unimproved dirt road as it crosses much of the desert between the two valleys. The current volume of traffic, as measured by the county, is on the SC-43-20

order of a dozen or two dozen vehicles per day. The EIR/EIS model forecasts a total of nearly 19,000 vehicles per day on this road in 2040. This is with an unimproved dirt road!

- A 2012 study by San Bernardino County's Department of Public Works predicted only a 61 percent increase in traffic by 2035 on one of the main cross-desert roads, Phelan Road (at Johnson Rd, near the county line), which feeds into SR-138 (http://www.sbcounty.gov/dpw/transportation/traffic/Traffic-Volume-Expansion-Factors.pdf; retrieved from http://www.sbcounty.gov/dpw/transportation/traffic_division.asp on 23 November 2014). This is lower than even the nominal doubling of traffic mentioned in the above EIR/EIS passage, even without its inflated initial values. SC-43-21
- A final problem with the traffic analysis is the inclusion of both SR-138 and SR-2. Traffic on SR-138 at the county line is traveling between the Ontario/San Bernardino or Phelan/Pinon Hills areas and Palmdale or communities along the way. A simple look at the map or generation of a route using Google Maps will make it obvious that travelers on this route would not detour northward six or seven miles in order to take the HDC, especially if the HDC is a toll road. The only exception would be when the vehicle is traveling between points north of Palmdale/Lancaster and the southeastern portion of SR-138. This represents a small minority of the traffic traveling SR-138 near the county line. The case with SR-2 is even more extreme. Virtually none of this traffic on SR-2 at the county line would detour northward to take any portion of the HDC in lieu of using SR-2 at this point. These roads should have been excluded from analysis of traffic impacts of the HDC. This would exclude almost two-thirds of the traffic that the EIR/EIS includes as related to the HDC. The fact that the traffic model forecasts greatly reduced traffic on these roads with the HDC in place (see below) further illustrates the problem with including these roads in the analysis. SC-43-22
- The forecast should have taken account of of SR-58 as an alternative route across the High Desert. Vehicles and trucks seeking an alternative to freeways such as I-210 and I-15 to Barstow could take SR-14 to SR-58 as an alternative route to avoid traffic in the Inland Empire. SC-43-23

p. 1-13: "Current accessibility to state highway [sic] **is poor…"**

- This statement is without justification or elaboration. How is current access to state highways poor? Can travelers not enter state highways easily? The statement should be stricken from the document unless it can be explained and justified with quantitative facts. SC-43-24

p. 1-13: "It is projected during the design year (2040) that motorists would average approximately 33 to 34 miles per hour (mph) using existing highways. Conditions contributing to this include circuitous routing; two-lane highways without enough passing lanes in rural segments of the corridor; lower speed limits and signalized controls at intersections in urban areas; delays at railroad grade crossings; and cross/merging traffic along the entire corridor."

- The analysis here assumes no improvements will be made to existing routes. This is not realistic, especially if the HDC is not built and a small portion of similar funding is used to improve existing routes. The analysis here must acknowledge that traffic flow could readily be improved with SC-43-25

modest enhancements to existing roadways (e.g., like those described in the now-abandoned TSM/TDM alternative).

p. 1-14: "As shown in Table 1-4 and Figure 1-4, the Antelope and Victor valleys have experienced explosive population growth in recent years, and this growth is expected to continue for at least the next 2 decades."

- The population estimates cited in Table 1-4, which echo values from the Traffic Study (e.g., Table 3-2), are taken from a 2008 SCAG study. However, these estimates are clearly outdated and overstated. Compared to the 2008 estimates, the 2012 SCAG estimates for 2035 predict dramatically lower populations for both Antelope and Victor valleys. See the table below for a comparison based on figures from the Traffic Study. The EIR/EIS arbitrarily adopts the earlier and outdated forecasts, and therefore its conclusions relating to population effects on traffic must be considered suspect and inaccurate. SC-43-26

	2008 Forecast	2012 Forecast
Palmdale	363,252	206,586
Lancaster	261,501	191,995
Total Antelope Valley	624,753	398,581
Adelanto	114,398	68,252
Apple Valley	95,681	112,988
Hesperia	211,108	132,056
Victorville	182,275	189,513
Total Victor Valley	603,462	502,809
Grand Total	**1,228,215**	**901,390**

Source: HDC Traffic Study, tables 3-2 and 3-4.

- Even the 2012 SCAG population growth projections may be unrealistic. For instance, earlier predictions from the California Department of Finance were shown to be overestimated (see http://www.usc.edu/schools/price/futures/pdf/2012_Pitkin-Myers_CA-Pop-Projections.pdf (cited at http://www.sciencedaily.com/releases/2012/04/120424142117.htm; also http://sfpublicpress.org/news/2012-06/ever-changing-population-predictions-frustrate-bay-area-smart-growth-planning). The recent trends in immigration, births and deaths have caused downward revisions of population growth, and further revisions may be appropriate. SC-43-27
- Furthermore, population in exurban areas such as the Antelope and Victor valleys will be constrained by economic and regulatory factors. The severe downturn of the 2008-9 Great Recession caused a decline in the population of the valleys, and growth since then has been well below one percent per year. Virtually no new housing has been constructed in the area since the recession. In addition, California laws AB32 (a climate change bill) & SB375 (an anti-sprawl bill) will limit growth in exurban areas. A recent decision by a federal appeals court rejecting the San Diego transportation plan for additional freeways reinforces the bleak picture for new freeways (http://www.utsandiego.com/news/2014/nov/24/enviornment-san-diego-transportation- SC-43-28

environment/). Because of these and the over-projections of traffic in general, population projections from SCAG are unrealistic, and therefore traffic projections are overestimated.

p. 1-18f: "Recent emergencies and events have closed parts of the existing highway network for extended periods of time. Interstates 5 and 15 and State Routes 2, 14, 18, and 138 have all been closed at some point in the recent past due to inclement weather, accidents, wildfires, or earthquakes…"

- The fact that other highways in the region have been closed by various events cannot be considered justification for building yet another major highway. If that were the case, then one could easily justify building many more freeways in the Los Angeles urban core in order to relieve the regular closures and backups that occur even more frequently there. Existing routes in the High Desert already provide alternative routes in the event of emergencies. No evidence is provided that these existing routes cannot handle traffic due to emergencies. SC-43-29

p. 1-20: "Traffic continuing west from the shared portion of SR-18/I-15 must exit at the Palmdale Road off-ramp to continue on SR-18, where the route resumes as an east-west local road known as Palmdale Road… the highway name changes to Pearblossom Highway… changing names to Fort Tejon Road and again to 47th Avenue East."

- This seems to be making a case for a new freeway simply on the basis that the local name for SR-18/SR-138 changes over its course. Apparently the authors seem to think that drivers are so busy staring at road name signs that they cannot pay attention to the state highway markers along the way. SC-43-30

p. 1-20: "Mobility along the existing SR-138/SR-18 corridor is hindered by speed limit changes (see Table 1-2), numerous traffic signals, at-grade railroad crossings, and other direct-access points (e.g., driveways and local roadways)…"

- Speed limit changes per se do no limit mobility. All but a few miles of the entire SR-138/SR-18 route is at a limit of 50 or above. Speed limits below 40 are quite rare along the route, limited almost exclusively to school zones which are short geographically and temporally restricted to a few hours per day during the week. As for at-grade railroad crossings, only two occur along the entire route, and both could be circumvented by grade separations, such as in the TSM-TDM alternative that was excluded recently from the HDC process. SC-43-31

p. 1-21: "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."

- Both of these airports are already within a few miles of existing freeways, and therefore do not need a major new freeway in order to improve access per se. Limited, local improvements to access roads would be adequate to provide for significant growth in their use. As the EIR admits, "Victor Valley is strategically situated along I-15, US 395, and the main lines for BNSF Railway SC-43-32

Company and Union Pacific Railroad (UPRR)" (p. 1-22). These existing roadways and railways provide for good transportation access to SCLA. The EIR then goes on to state, "Existing east-west transportation facilities through the Victor Valley are still deficient," but provides no evidence that traffic SCLA requires significantly improved westbound road access. SC-43-32 (con't)

p. 1-23: "Palmdale Regional Airport is considered a future site for an aerospace economic development cluster, and research and development and/or logistics distribution center (High Desert Corridor Traffic Study Report, 2014). While no specific plan for the airport currently exists…"

- No evidence exists that Palmdale airport will host significant activity in the foreseeable future. The airport has had scheduled commercial service only briefly during the 1990s and mid-2000s. All scheduled passenger service was discontinued in 2008, and was only viable during the period by virtue of federal grant support. During that period, the average volume for all flights was *less than 100 passengers per day* (http://en.wikipedia.org/wiki/Palmdale_Regional_Airport). While the EIR claims that development has been proposed around the airport, no specific plans are cited and no evidence is provided that significant development will occur. Even if development does occur, no evidence is provided that transportation demand would be created for the HDC route, or that existing transportation corridors, such as SR-14, SR-58 and Los Angeles-area roads, would not be sufficient to handle the demand. Based on past and current conditions, it is inappropriate to include any significant additional traffic from this airport in the estimates for the HDC. SC-43-33

p. 1-23: "The HDC is considered an integral component for the future development of these hub airports, because it would greatly enhance east-west accessibility between major transportation corridors within these cities, and beyond."

- Several problems are obvious with this statement. First, who is it that considers the HDC an integral component? No authority or evidence is cited. **Second, no evidence is given that goods or people would need to travel between the two airports.** No similar need would likely be cited for travel between other hub airports, such as between Ontario and Los Angeles International airports. The fact that SCLA is a logistics/cargo facility would make it extremely unlikely that cargo would be transported between the two airports. SC-43-34

p. 1-24: "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."

- The XpressWest rail has failed to secure a $6.5-billion federal loan that would have funded the majority of the project, at least per the backers' public estimates. Opposition by budget committee chairmen in the US Congress makes it unlikely any significant federal funding will occur. An analysis published by the Reason Foundation demonstrated the high cost risks and problematic ridership projections for the line (http://reason.org/files/xpresswest_victorville_las_vegas_train.pdf). The report pointed out that the transfer of the public right-of-way in the I-15 median to the private project would likely SC-43-35

preclude addition of lanes to the I-15, when the train would divert only a small portion of the traffic on the I-15. Based on recent events, the prospects for the train look bleak.

- Besides the unlikely nature of the HSR connection at Victorville, the EIR identifies no potential funding or corporate/agency support for the HSR portion of the HDC itself. At this point the HSR component is simply an idea. No evidence is provided for demand for the HSR itself, either as a commuter link or as a way to connect the proposed HSR lines at either end. SC-43-36
- The EIR provides no evidence or analysis for the demand or costs of the HSR component. There is therefore no justification for inclusion of the HSR component in any decision about the HDC. The HSR component does not qualify as a "reasonably foreseeable alternative" (p. 1-24) that would require its inclusion in transportation planning. SC-43-37

p. 1-25 Green Energy: "The plan to install green energy features into the project will create a positive impact. Additionally, the use of any green energy alternatives will help offset the energy necessary to operate the HDC."

- The elements described in the EIR for green energy are neither integral nor essential components of the project. The EIR suggests that solar energy could be generated along the route right-of-way. This is obviously true, but solar energy could also be generated on the same land without the HDC at all. It could also be generated on adjacent land, or on any other land in the region. SC-43-38
- The idea of a green energy component is not a justification for the HDC itself. Like the HSR components, no specific analysis is provided for the needs or costs of the Green Energy component. It cannot therefore be counted as a justification for the project. It was obviously inserted by proponents in an attempt to attract support from people who otherwise support "green energy." SC-43-39

p. 1-26: "The [San Bernardino County General] Plan encourages the growth and development of new roads without compromising impacts to open space, aesthetics, natural resources, and air quality."

- Where is this endorsement of new roads in the 2007 General Plan? The Circulation and Infrastructure Element (called the "Transportation/Circulation Element" in the EIR) does not appear to specifically discuss new road construction. County Plan was reviewed 24 November 2014 at http://www.sbcounty.gov/Uploads/lus/GeneralPlan/FINALGP.pdf. SC-43-40
- The 2007 General Plan Circulation and Infrastructure Element does have a policy to "Encourage the reduction of automobile usage through various incentive programs" (CI3.1). The HDC would certainly not encourage reduction of automobile usage. SC-43-41
- In any event, the HDC could hardly be said to have few impacts on open space and natural resources, since it will destroy around 3,000 acres (over 4.5 square miles) of currently mostly undeveloped land. SC-43-42

p. 1-31: "On weekdays, Metrolink runs 90 trains per day on this line passing Palmdale. On weekends, 24 trains provide service."

- According to http://www.metrolinktrains.com/schedules/line/name/Antelope%20Valley/service_id/1142.html (accessed 26 October 2014), 10 southbound trains and 10 northbound trains stop at the Palmdale Metrolink station on weekdays, and 6 each way on weekends. SC-43-43

p. 1-31: "A rail feeder service between Victorville and Palmdale would effectively extend Metrolink service to more than 300,000 residents living in Victor Valley cities today and double this number by 2040."

- This is misleading. First, the HSR service would be a completely separate train service and agency, so travelers would need to book separate tickets, pay separate fees, and plan for different schedules. Second, no estimate is given for the costs of such travel, and the HSR service would likely be much more expensive than typical commuter rail rates. Third, the time required to take the HSR service plus Metrolink would likely exclude a most people from using this combination for commuting to the central Los Angeles area. By the same logic, one could claim that the Amtrak service from Victorville to San Bernardino and Los Angeles *already* effectively extends Metrolink service to the Victor Valley. SC-43-44

Chapter 2

p. 2-3: "Traffic circulation and congestion currently experienced on Palmdale Boulevard, Pearblossom Highway, Air Expressway, Palmdale Road, and Happy Trails Highway (existing SR-18) would remain from increasing transportation demand. Accident rates on SR-138 would remain high or increase…"

- This entire section is misleading because it assumes that no other improvements would occur on the existing roads. In fact, continued modest investments in these roads would very likely occur, and would substantially improve their performance and carrying capacity. The EIR does its best to portray the No-Build Alternative in draconian terms, to the detriment of objective evaluation of alternatives. SC-43-45

p. 2-4 Freeway/Tollway Alternative: "…motorists who choose not to use this segment of the HDC would have the option to exit and use local west-east parallel roads adjacent to the HDC…"

- The only nearby roads to the planned HDC route is a series of minor local roads (El Mirage Rd, Avenue P/O). To suggest that these are suitable options for motorists exiting the tollway stretches the imagination. SC-43-46

p. 2-18: "The PV solar power generated for Caltrans can be directly serve loads for lighting and other power requirements on the ROW, or feeding into the grid…"

- Solar power generation may be a useful element for any highway. However, its inclusion here is used as an argument for the build alternatives. But solar power can be generated anywhere, whether along a highway route, or on land that was proposed for a highway that was never built. Whether it is included as part of the HDC should be part of the design phase of the SC-43-47

highway. It does not belong in the EIR/EIS since it does not affect the environmental impact of the road.

- The EIR also suggests that electric vehicle charging stations could be included in the project. These may be helpful if traveling the route in electric vehicles that would otherwise run out of power along the corridor. But such facilities would likely be too remote from population centers to be useful for most vehicles. Further, no specific charging station locations are identified in the EIR, and no other specific plans are identified for the facilities. Like the HSR component, the charging station element is simply an idea, not a plan. SC-43-48
- The HDC build alternatives include a large number of loosely related proposals: a freeway/tollway, high-speed rail, electric transmission lines, solar energy generation, electric vehicle charging, bike lanes, interpretive pullouts, and vista points. It is obvious that the authors are searching for any justification possible for the project. Why then stop at these? Here are a few more suggestions for quite useful enhancements: a boating canal for pleasure and barge transportation (which could link into the existing Mojave River), a re-routing of the Pacific Crest Trail along the HDC, fishing ponds, picnic grounds, playgrounds, and underground parking garages. SC-43-49

p. 2-48: "There are five existing park-and-ride lots within Los Angeles and San Bernardino counties near the HDC…"

- The two park-and-ride lots in San Bernardino County, off I-15, are 6 and 12 miles south of the proposed HDC intersection. These cannot be counted as being anywhere near commuting range of the HDC. SC-43-50

p. 2-65: "The TSM Alternative would not address the need for a continuous, direct east-west connection between the developed areas of the southern Antelope and Victor valleys, because the areas are separated by distances that make connection using existing roads subject to localized conditions that are difficult to overcome without creating a new corridor and developing access restrictions."

- The EIR claims that the TSM would not provide a "continuous" connection. The argument here is circular and tautological: only a new freeway would provide a "continuous" connection, and therefore only a new freeway meets the claimed needs. By this logic, travel between every pair of towns in California requires a freeway between them in order to provide a "continuous" connection. SC-43-51
- The EIR also claims that the TSM Alternative "would require motorists to travel several miles in the wrong direction to reach some destinations." The artificial example of travel between Apple Valley and the (defunct) Palmdale Regional Airport would be a little further via the TSM route. However, the most frequently traveled routes would be more convenient via the TSM route than via the HDC. For example, persons traveling from Palmdale to Hesperia would go several miles out of their way in order to take the HDC route compared to the TSM route. In fact, given that the centers of population for both Antelope Valley and Victor Valley are closer to endpoints SC-43-52

of the TSM Alternative, it is more likely that the HDC route represents a less convenient route than the TSM alternative.

Chapter 3

p. 3-1 "The project is in an urban area."

- The project is mostly in a rural area. Only small areas on either end of the project are currently urbanized. SC-43-53

p. 3-9: "For existing areas within unincorporated Los Angeles County (i.e., Lake Los Angeles), land use policies direct future growth to be within rural town centers and town areas within existing areas to encourage infill development to reduce sprawl development within the area."

- Despite the claims made in public presentations of the HDC Draft EIR/EIS, no major road can be built in a rural area that does not encourage further development and sprawl. Development will occur initially near interchanges, and then extend outward. SC-43-54

p. 3-9: "The [Los Angeles County] Preliminary Plan establishes land use goals to maintain the rural character of the unincorporated towns and their surrounding environment. Overall development within the unincorporated areas of the Antelope Valley is minimal due to the constraints in the Preliminary Plan."
p. 3-10: "In response to Goal D/LU 1, Policy D/LU 1.1 encourages low-density development by retaining Rural Living (RL) zoning within Community Plan areas that are outside the local municipality's sphere of influence and are removed from more urbanized community core areas. Land use goals and policies and low-density zoning ordinances constrain high-density development within the unincorporated areas. With emphasis on maintaining the existing rural environment, future development and growth is expected to be sensitive to the rural nature of the existing environment."

- The general plans for both counties emphasize the rural character of the unincorporated areas, including the High Desert region surrounding the project area. Construction of a large new freeway/tollway in the area is out of character with the plan for the area. Many residents who live near the project area have testified at public hearings for the HDC that the HDC would disrupt their rural way of life. Nothing about the HDC could be said to be "sensitive to the rural nature of the existing environment." SC-43-55

Comments on the Traffic Study for High Desert Corridor

p. 3-16: "The table indicates that the magnitude of growth appears uncertain at the present time, reflecting in part the slowdown in growth affecting the SCAG region as a whole, along with the Antelope Valley sub- region. Given the uncertain growth in the region, the High Desert Corridor project team elected to utilize the SCAG 2008 Adopted Regional Transportation Plan growth forecast for year 2035 as the basis of the 2040(+) design year traffic volumes..."

p. 3-20: "Given the uncertain growth in the region, the High Desert Corridor project team elected to utilize the SCAG 2008 Adopted Regional Transportation Plan growth forecast for year 2035 as the basis of the 2040(+) design year traffic volumes…"

- The Traffic Study justifies using the 2008 growth forecast by appealing to supposed uncertainty in forecasts. However, any uncertainty is created by the authors, not by the data. Both SCAG and Palmdale estimates from 2012 show dramatically slower growth than in the 2008 SCAG figures. The lower forecasts make sense in light of the recent recession and lower economic growth since then, along with documentation that previous forecasts were overly optimistic. The Traffic Study admits that the projections have been lowered because of "the slowdown in growth affecting the SCAG region as a whole, along with the Victor Valley subregion." The 2008 figures are outdated and misleading. Yet the HDC team chose to ignore the most recent estimates and used the much higher 2008 figures for both Antelope and Victor valleys. The population inputs to the traffic forecasts are therefore out of date and exaggerate the contribution of population to traffic. SC-43-56
- The Victor Valley estimates cite the Victor Valley Area Transportation Study for evidence of higher growth than the 2008 SCAG figures, to counter balance the much lower predictions of the 2012 SCAG forecast. However, the VVATS was done around 2008, obviously using figures that are also out of date compared to the 2012 SCAG study (http://www.sanbag.ca.gov/planning2/VVAT/VVATS_appendices.pdf). Therefore there is no justification for using the old 2008 SCAG forecast instead of the 2012 updates. SC-43-57

p. 3-37: "Given the construction of the High Desert Corridor new freeway, linking I-15 with SR 14, the volume of daily traffic crossing the county line will increase to approximately 171,000 vehicles per day on weekdays. Of this volume, the High Desert Corridor will carry approximately 114,000 vehicles daily across the imaginary screenline. With the exception of SR 138, the remaining roads will see significant traffic reductions."

- The Traffic Study predicts major reductions in traffic with the HDC on roads many miles away. Here is a comparison of predicted volumes with no-build and HDC alternatives at the county line, derived from Table 3-6 of the Traffic Study: SC-43-58

Location	No-Build	Freeway/Expressway
East Ave G/Shadow Mtn Rd	18,844	4,089
El Mirage Rd	33,051	2,580
High Desert Corridor	N/A	113,748
SR-18/Palmdale Rd	20,026	4,439
SR-138	45,100	37,106
SR-2/Angeles Crest Hwy	16,495	9,036
Totals	133,516	170,998

Note the forecast that traffic on the Angeles Crest Highway (SR-2) at the county line will drop by almost half with the HDC. Anyone familiar with this route knows that it is a slow, windy, scenic byway traversing basically along the crest of the San Gabriel Mountains. There is virtually no

access along its length to roads leading to the HDC. The prediction in the EIR that traffic will be so profoundly affected by the HDC makes it obvious that the traffic model contains errors.

- The forecast of nearly 114,000 vehicles per day on the HDC itself at the county line is also not credible. This number is significantly more than the current average daily traffic on either the I-15 (66,000) or SR-14 (86,000) at the proposed points of connection with the HDC. It is almost as high as the 2040 predicted ADT on the I-15 at the HDC junction (115,345; from Table 3-11 of the Traffic Study). SC-43-59

p. 3-68: "...the build alternatives allow more vehicles to travel between SR 14 and I-15 compared with the no-build alternative; meaning that vehicles traverse fewer miles on heavily congested freeways such as I-210..."

- The EIR gives no evidence that travelers will divert to the HDC in lieu of the I-210. Page 3-36 casually mentions that a regional aspect suggests that the HDC will save overall travel time. But it provides no details about assumptions or output from this aspect of the study. SC-43-60

Response to Comment SC-43

Comment Code (Topic)	Response
SC-43-1 (Traffic)	The land use assumptions are addressed in Section 3.2 of the Traffic Study Technical Report. Nineteen pages of text, graphics and tables review SCAG, local, and the California State Demographer's forecasts of population and employment. The discussion covers the influence of SB 375 on the forecasting process and the effects of the Great Recession. Given the wide range of population forecasts, the mid ground assumptions are utilized, those being the SCAG 2008 Regional Transportation Plan Adopted Growth Forecast. While higher than the subsequent SCAG 2012 forecasts, issued late in the forecasting process for the HDC, these 2008 RTP forecasts were generally lower than locally based forecasts. Consistent with FHWA's "Interim Guidance on the Application of Travel and Land Use Forecasting in NEPA", issued in March 2010, all of these issues were addressed at length. In the final assessment of the Project Development Team, use of the 2008 RTP year 2035 growth forecasts for the 2040 design year was determined to reasonably account for the economic effects of the Great Recession.
SC-43-2 (Traffic)	The traffic volumes reported for existing conditions cover the Antelope Valley (Palmdale) and Victor Valley portions of the High Desert Corridor. No existing traffic volume information is presented for the High Desert portion of the study area other than for SR-18 and SR 138 in either the Traffic Study Technical Report or Section 3.1.6 of the draft environmental document dealing with Traffic and Transportation/Pedestrian and Bicycle Facilities.
SC-43-3 (Traffic)	Please see the responses to comments SC-43-1 and SC-43-2 for a discussion as to why the population and traffic estimates are valid. To provide input on calculations of air quality impacts and GHG emissions, highway network utilization was measured based on an arbitrary system of one-mile grids covering the High Desert Corridor study area (see Section 3.8 of the Traffic Study Technical Report and Figure 3-24). For the 606 square mile study area broken down into one square mile cells, auto and truck vehicle miles of travel (VMT) and vehicle hours of travel were individually computed for all roadway links within each cell, along with average speed. Alternatives with greater amounts of travel, such as the HDC build alternatives, would generate higher levels of VMT than alternatives having less travel, such as the No Build alternative. These measurements did not cover the Los Angeles metropolitan area located to the south of the San Gabriel Mountain range; hence any reduction or shift in VMT from the LA basin to the HDC was not accounted for. The calculation of GHG was therefore conservatively calculated on the high side.
SC-43-4 (Traffic)	Please see the response to comment SC-43-2 for an explanation as to why the traffic estimates are valid. Also, the tollway alternatives, if pursued, will be subject to independent, investment grade, forecasts of utilization and revenue. The purpose of the forecasting within the HDC Project Approval

Comment Code (Topic)	Response
	and Environmental Document phase of project development was to determine the appropriate size of the roadway elements, such as the number of freeway lanes of traffic, and the number of lanes on the interchange ramps. Additionally, the HDC Traffic Study was utilized to determine the appropriate traffic lane configurations at interchange ramp terminal intersections. All of these calculations are subjected to additional confirmation and checking during the final design phase of project development. In addition to sizing the various components, the traffic volume forecasts and traffic operational performance data provided in the Traffic Study Technical Report are utilized as inputs to the air quality and noise impact assessments.
SC-43-5 (Traffic)	The proposed investment in the HDC will not result in any direct growth-inducement because there is no pending or recently-approved land development projects whose construction is conditioned upon the implementation of the project. Similarly, the project does not include any new roadways or connections that would provide access to areas that are currently inaccessible. In making this determination, Caltrans considered the interrelated factors of accessibility, project type, project location, and growth pressure. The analysis considered changes in travel time and cost, and accessibility to destinations such as employment and shopping, and how those changes, if any, would affect travel behavior and patterns. Consideration was given to whether any change in accessibility would affect growth or land use change, and what resources of concern would be affected by any growth or land use change. In addition, Caltrans consulted with Los Angeles and San Bernardino Counties, and the corridor cities in regards to growth forecasts and planned development.
SC-43-6 (Traffic)	The TSM/TDM alternative was fully addressed in the Traffic Study Technical Report. Based on that assessment, the alternative was dropped from further consideration as it did not meet the purpose and need for the project. One of the lower cost elements of the TSM/TDM alternative, widening existing SR 138 and SR-18 between Palmdale and I-15, is reflected in all of the alternatives (no build and build alternatives) as a baseline assumption.
SC-43-7 (Traffic)	The High Desert Corridor Traffic Study technical report fully recognizes the value of SR 58 as the most appropriate route for connecting traffic flowing on I-5 and SR 99 in the vicinity of Bakersfield (to and from the north) with I-15 and I-40 in the vicinity of Barstow. The HDC is not viewed as a viable alternative route for these movements (see pages 2-88 through 2-107 of the Traffic Study technical report, and Figure 2-46 in particular which illustrates the elevation profiles for Southern California mountain passes). Trucks utilizing the HDC are expected to be traveling between the two concentrations of urban population (Antelope Valley and Victor Valley) and between Los Angeles and I-15/I-40 at Barstow, as an alternative route to I-10 and I-210 in the event of incidents affecting the I-15 Devore interchange area and the Cajon Pass.

Comment Code (Topic)	Response
SC-43-8 (Traffic)	Your comment in support of the no-build alternative is noted.
SC-43-8 (Traffic)	Your quote refers to the governmental entities along the corridor which are all supportive of the proposed project. Their support is borne out by the fact that the cities, Town and counties are all members of the HDC Joint Powers Authority which was formed to help facilitate this project and also by the following: The proposed project is identified in the Metro 2009 Long Range Transportation Plan as well as the SCAG 2012 Regional Transportation Plan project list. Both the Los Angeles County General Plan 2035 and the "Town and Country" 2011 Plan for Antelope Valley place heavy emphasis on fostering projects that help facilitate efficient movement of people and goods. The Mobility Element of the Los Angeles County General Plan has specially designated land use areas within Palmdale and Los Angeles County unincorporated areas for the High Desert Corridor project. The San Bernardino County General Plan, updated in 2007, contains policies and goals that support the identification of long-range transportation corridors, in conjunction with plans of regional transportation agencies to protect sufficient right-of-way for the development of long range corridors. The City of Lancaster's General Plan 2030 identifies the High Desert Corridor as a vital east-west thoroughfare for goods and traffic circulation. The Physical Mobility Element of that plan states, "Promote the creation of a high desert transportation corridor, which will provide a direct connection between I-5 and I-15 to the city of Lancaster." The Palmdale General Plan Circulation Element specifically supports, "A new east-west freeway along the alignment of Avenue P-8, having three lanes in each direction from SR-14 to just east of 90th Street." The High Desert Corridor would also be in line with long-term goals outlined in the Palmdale Trade and Commerce Center Specific Plan. The proposed project is also described in the City of Adelanto's Traffic Circulation Improvement Plan. The plan specifies the need for an improved east-west and north-south circulation system as well as improved access to the Southern California Logistics Airport. The plan also contains a goal to "Investigate all options for the implementation of a HSR system from Orange, Riverside, and San Bernardino County areas to a new major airport." The policies and objectives of the City of Victorville General Plan 2030, Circulation Element, demonstrate support for the proposed action as well. Victorville's Desert Gateway Specific Plan calls for a freeway and expressway component that would link the Victor Valley and Antelope Valley with I-15. The proposed action is also consistent with the Apple Valley 2009 General Plan policy to preserve land for a future transportation corridor that would enhance the movement of motorists and goods. Working closely with land developers and Caltrans, Policy 2.E of the General Plan states, "The Town shall protect right-of-way for the High Desert Corridor as determined by Caltrans."
SC-43-10 (Traffic)	Traffic volumes on all local roads, including the existing Pearblossom Highway and Palmdale Road, currently signed as State Routes 138 and 18 respectively, will increase as a result of population growth in the two metro

Comment Code (Topic)	Response
	areas of Antelope Valley and Victor Valley. Widening Pearblossom Highway and Palmdale Road will be completed prior to construction of the HDC freeway/tollway. Along with widening the roadways from two lanes to four lanes, the vertical alignment will be flattened to eliminate the ups and downs of the rolling terrain which currently exists, particularly along SR-18 between its junction with SR 138 and US 395. These improvements will help mitigate for the increase in traffic. These improvements will also place the highways in a "state of good repair" prior to being relinquished, which will alleviate some of the maintenance costs in the future.
SC-43-11 (Traffic)	The specified portion of SR 138 is currently being improved by Caltrans, with the roadway being widened from two lanes to four lanes. The disposition of this portion of SR 138 following the construction of the HDC proposed action has not been determined.
SC-43-12 (Traffic)	A determination regarding the disposition of existing SR 138 south from its junction with SR-18, following the completion of the HDC proposed action, has not been determined at this time. The existing SR 138 alignment may be re-badged as a different state numbered route.
SC-43-13 (Traffic)	The commenter is directed to www.cahighways.org, specifically unconstructed "Post 1964 Legislative Route 122." In 1965, the origin of the route was defined to be Route 14 south of Palmdale, at a location where Pearblossom Highway exits Route 14. The route would run northeasterly, and easterly, to join Route 58 near Haper Lake Road, approximately 15 miles west of Barstow. The alignment of this route, currently envisioned as the High Desert Corridor from SR-14 to I-5, follows a different alignment, but accomplishes the same metropolitan bypass function. The alignment was revised to take advantage of right-of-way reserved at the southern edge of the LA/Palmdale Regional Airport, to avoid traversing the center of Lake Los Angeles, and to serve the Southern California Logistics Airport.
SC-43-14 (Traffic)	Your comment is noted. Please see Chapter 1 of the EIR/EIS for a detailed discussion of the need for this project.
SC-43-15 (Traffic)	For a traveler approaching Victorville from the west, the current signed alignment routes traffic along Palmdale Road (SR-18) to I-15.The motorist can then travel north on I-15, or continue on 7th Street through Old Town Victorville to Happy Trails Highway. Motorists can avoid the Business Route 18 along 7th Street, and follow the cosigned route along I-15 to the D Street exit. Alternatively, motorists can travel south along I-15 to Bear Valley Road, exit, and proceed east along this heavily congested roadway. For the occasional user, all of these route choices are confusing, and slow.
SC-43-16 (Traffic)	Both Happy Trails Highway and Bear Valley Road are heavily utilized, and congested. The Yucca Loma Bridge project, together with the La Mesa/Nisqually/I-15 interchange project, will relieve some of this pressure, but will not satisfy long-range (2040) travel demands. As the extent and

Comment Code (Topic)	Response
	intensity of Victor Valley and Antelope Valley development increase over time, the need for an alternative, higher speed and direct route will become more apparent, as evidenced by the High Desert Corridor being specifically identified in the Safe Accountable Flexible Efficient Transportation Equity Act; A Legacy for Users (SAFETEA-LU) as project E-220, a high priority corridor on the National Highway System.
SC-43-17 (Traffic)	Table 1-2 has been corrected to indicate 4 lanes. The High Desert Corridor Traffic Study Report correctly identifies the roadway as having four lanes (page 2-37).
SC-43-18 (Traffic)	The text has been corrected. The 66,000 combined corridor volume occurs along the easterly edge of the Antelope Valley, not at the LA/SB county screenline. The reference to the county screenline volume will be revised to indicate the 2010 ADT volume is estimated to be 20,000 vehicles per day. No other correction is needed for draft environmental document Section 3.1.6 (Traffic and Transportation/Pedestrian and Bicycle Facilities), or the Traffic Study technical report as no mention of these volumes occurs elsewhere.
SC-43-19 (Traffic)	As indicated in the response to the previous comment, the text has been revised to indicate that the traffic volume crossing the county screenline in 2010 is approximately 20,000 vehicles per day. Caltrans stands behind, and has documentation to support, all other figures.
SC-43-20 (Traffic)	East Avenue G/Shadow Mountain Road is included in the SCAG Regional Travel Forecast Model roadway network as a two lane (one lane each direction) major collector road. It was therefore assumed to be improved to a two lane conventional highway/county road standard.
SC-43-21 (Traffic)	Section 3.5 of the Traffic Study technical report provides a Traffic Volume Forecast Comparison of the forecasts produced for the High Desert Corridor Project Draft EIR/EIS, the High Desert Corridor SR-18 Realignment Traffic Analysis Report, prepared for the City of Victorville, and the Victor Valley Area Transportation Study, prepared for SANBAG. Figure 3-22 of the HDC Traffic Study technical report illustrates the various traffic volume forecasts produced by the three studies within the Victor Valley portion of the corridor. The forecast results along the east-west roads connecting to the high desert region west of Victor Valley are similar with the exception that the HDC Project reflects the continuation of the HDC freeway to the west of Caughlin Road, whereas the other two studies do not. These other studies do not account for population growth beyond the county line whereas the HDC study does. It is this difference in population growth projections that accounts for the difference in traffic projections.
SC-43-22 (Traffic)	Mention of Angeles Crest Highway (SR-2) traffic volumes along the LA/SB county screenline in the draft environmental document and the Traffic Study technical report is intended to be inclusionary and not

Comment Code (Topic)	Response
	essential for the determination of traffic related impacts or requirements. Figure 3-23 of the Traffic Study technical report illustrates the boundaries of the High Desert Corridor study area utilized for accumulating highway utilization statistics. Angeles Crest Highway falls outside this study area.
SC-43-23 (Traffic)	The SCAG Regional Travel Demand Model, utilized for the High Desert Corridor Traffic Study technical report and draft environmental document, includes SR 58 within the modeled area. Section 2.5.2 of the Traffic Study addresses Freight Movement Data, Studies, and Reports. A subsection titled, "Route Choice for Freight Movement Through High Desert Corridor" states: "Figure 2-46 visually illustrates why truckers choose SR 58 (Tehachapi) or I-5 (the Grapevine) to access Los Angeles and San Bernardino counties from Kern County and points north.' 'The Grapevine profile shows the relative grades of the five-mile section of I-5 between Grapevine, California (elevation 1,499 feet) and the Tejon Pass (elevation 4,144 or 4,160 feet depending on the source). The grade is relatively steady at six percent both up and down. On SR 58, the elevation of Tehachapi Pass is about the same, just over 4,000 (feet). The Tehachapi profile illustrates that the grade is less steep, however, ranging between 2.4 and 2.8 percent along the adjacent railroad line.' 'If a trucker is traveling between Bakersfield (on I-5 or SR 99) and Lancaster, the route choice following SR 58 to SR-14 presents less of a gradient than following I-5 up and down the Grapevine to SR 138. Figure 2-46 illustrates that the distance is relatively the same, following either SR 58/SR14 or I-5/SR 138. In the winter, SR 58 is less subject to closure due to inclement weather than the Grapevine segment of I-5." Throughout the study process, route choice for truck movements was thoughtfully considered.
SC-43-24 (Traffic)	The context for the statement is as follows: "Commuter travel time to job centers is a key factor for household location. People generally prefer to have shorter commutes to work. Current accessibility to state highway(s) is poor, and conditions within the corridor are expected to become more congested given the aforementioned SCAG projections of population growth; therefore, projected travel speeds are forecast to be increasingly slower over time." The draft environmental document text has been changed as follows: The phrase "current accessibility to state highways" will be revised to "current mobility along state highways ..."
SC-43-25 (Traffic)	The existing east-west local streets and highways are assumed to be improved by widening or paving. These upgrades were reflected in the no build alternative, the TSM/TDM alternative, and the build alternatives as a background condition.
SC-43-26 (Traffic)	Section 3.2 of the Traffic Study Technical Report provides 19 pages of text, graphics and tables which review SCAG, local, and the California State Demographer's forecasts of population and employment. The discussion covers the influence of SB 375 on the forecasting process and the effects of the Great Recession. Given the wide range of population forecasts, the mid

Comment Code (Topic)	Response
	ground assumptions were utilized, those being the SCAG 2008 Regional Transportation Plan Adopted Growth Forecast. While higher than the subsequent SCAG 2012 forecasts, issued late in the forecasting process for the HDC, these 2008 RTP forecasts were generally lower than locally based forecasts. Consistent with FHWA's "Interim Guidance on the Application of Travel and Land Use Forecasting in NEPA", issued in March 2010, all of these issues were addressed at length. In the final assessment of the Project Development Team, use of the 2008 RTP year 2035 growth forecasts for the 2040 design year was determined to reasonably account for the economic effects of the Great Recession.
SC-43-27 (Traffic)	The state forecasts are based on recent housing and population trends which fully reflect the effects of the Great Recession. Economic conditions are recovering, and future forecasts prepared by the Department of Finance will reflect growth conditions existing at the time the new forecasts are issued. Evidence indicates that housing construction is rebounding, and while not yet at a pace of pre-recession construction, and perhaps never at that pace given the loose mortgage practices which precipitated the recession, growth will nevertheless resume. The allocation of growth by SCAG between cities and areas south of the San Gabriel Mountain range versus north of the mountains, in the High Desert Corridor, was in large part driven by attempts to meet VMT reduction targets outlined by SB 375. These institutional goals do not limit or affect local entities land use approval authority whatsoever. If developers want to build all or a portion of the Desert Gateway Specific Plan, for example, which identifies the potential for a development comprised of some 26,100 housing units with 82,900 residents, and Victorville entitles this development, then growth will occur when the market materializes for purchasing these houses. What is most certain is that home buyers and cities are not influenced or constrained by SB 375 which was a driving force underlying the SCAG 2012 growth projections.
SC-43-28 (Traffic)	The Sustainable Communities Strategy and Climate Protection Act, SB 375, is a law passed in 2008 by the California legislature that requires each Metropolitan Planning Agency, such as SCAG, to demonstrate, through the development of a SCS, how its region will integrate transportation, housing, and land use planning to meet the greenhouse gas reduction targets set by the State. Related to SB 375, California's major initiative for reducing greenhouse gas emissions is outlined in Assembly Bill 32 (AB 32), the "California Global Warming Solutions Act of 2006. In general, SCAG has based its 2012-2035 Regional Transportation Plan/Sustainable Community Strategy (RTP/SCS) on encouraging infill development and development near existing transportation corridors as well as mixed use and transit oriented development within existing urbanized areas. To further reduce the potential for VMT increases, SCAG has targeted areas within the core of the Los Angeles Metropolitan Area for population growth, with a commensurate reduction in outlying growth forecast for the High Desert's Antelope Valley and Victor Valley areas. While reducing the population

Comment Code (Topic)	Response
	growth projections for these two High Desert metropolitan areas, SCAG has also increased their estimates of jobs per-capita located within these same two areas, with the intent being to further reduce VMT occurring between the High Desert and the Los Angeles basin. The increase in local employment projections would thus locate people closer to employment, goods and services within these established communities, thereby reducing overall VMT. In planning for projected growth, the SCAG 2012-2035 RTP/SCS represents a voluntary growth strategy that retains local government land use autonomy. Neither SB 375 nor any other law requires local member agency general plans or land use regulation to implement the land use policies set forth in the regional (RTP/SCS) plan. Thus, implementation of the regional plan is dependent on local government policy decisions and voluntary action.
SC-43-29 (Traffic)	Natural disasters and traffic incidents have clearly demonstrated the importance of providing motorists with alternative routes for conducting their everyday business of traveling to work and school, and accommodating goods movements which have both regional and national impact. The LA basin is rimed on its north edge by mountains, through which a very small number of mountain passes traverse. The statement on the referenced page is both clearly expressed and accurate and no changes will be made to the document to address this comment.
SC-43-30 (Traffic)	The intent of the text was to be accurate.
SC-43-31 (Traffic)	The quoted text is accurate. The existing signed state route has numerous traffic signals at both ends of the corridor, and the roadways (Palmdale Road and Palmdale Boulevard) are congested during peak travel periods. The at-grade crossing of the UPRR track along Palmdale Boulevard, in Palmdale, is a source of significant delay. No grade separation project is currently envisioned at this location, until such time that the California High Speed Train project alignment (vertical and horizontal) is resolved.
SC-43-32 (Traffic)	The proponents of increased development and economic activity at both airports consider the High Desert Corridor freeway/expressway project to be essential to the success of these inland ports.
SC-43-33 (Traffic)	The SCAG 2008 RTP Aviation and Airport Ground Access Report indicates that forecasts of air passenger activity at the Palmdale Regional Airport range from 2.6 million annual air passengers(MAP), under a constrained airport demand scenario, to 6.3 MAP, assuming implementation of the California High Speed Train service being fully integrated into the airport's ground access system. The constrained scenario forecast of 2.6 MAP was reflected in the modeling conducted for the High Desert Corridor. Separately, consideration was given to a potential Antelope Valley Inland Port in section 4.13 of the High Desert Corridor Traffic Study technical report, titled "Traffic Implications of Antelope Valley Inland Port

Comment Code (Topic)	Response
	and Local Land Use Projections". The text states that, "In addition to the SCAG land use assumptions used for design and environmental impact analysis, an alternative land use data set was tested for a subset of the build alternatives reflecting ...City of Palmdale growth assumptions, which accommodate higher levels of employment and lower levels of housing development ...including the Antelope Valley Inland Port development potential, located adjacent to the Palmdale Regional Airport, serving as an aerospace economic development cluster, and research and development and/or logistics distribution center..." Subsection 4.13.2 details the Antelope Valley Inland Port Assumptions used for the test land use case. The analysis was conducted as a land use sensitivity test to determine if the build project design requirements would be materially changed by realization of the potential land use.
SC-43-34 (Traffic)	The statement refers to SR-14 serving Antelope Valley and I-15 serving Victor Valley (i.e., "major transportation corridors"). The HDC would facilitate travel for goods and people between I-15 and SR-14, and in so doing, would provide enhanced accessibility to the two airports.
SC-43-35 (Traffic)	Financing plans for the XpressWest HSR service between Los Angeles and Las Vegas continue to evolve. In 2015, the Nevada state legislature passed a bill (Senate Bill 457) by a vote of 40-1 establishing the Nevada High-Speed Rail Authority. In November 2015, the agency selected XpressWest to construct and operate a high-speed train from Las Vegas to Southern California. The Nevada project also has early support from the CHSRA, according to spokeswoman Lisa Alley who stated that the authority is exploring opportunities to connect the two systems, as evidenced by the High Desert Corridor environmental documents.
SC-43-36 (Traffic)	Please see the report: "Public-Private Partnership Feasibility Study: High Desert Multipurpose Corridor", prepared by Infraconsult LLC, December 2012 for information regarding financing potentials.
SC-43-37 (Traffic)	The demand for and costs of the HSR component are addressed in the Traffic Study technical report (Table 3-22) and the detailed Project Description (Table 2-4) contained in the draft environmental document, respectively.
SC-43-38 (Traffic)	In addition to transportation alternatives being considered for the HDC, the idea for incorporating green or renewable energy generation and/or transmission has also created interest from the project partners (HDC Joint Powers Authority, Caltrans, Metro, SANBAG, San Bernardino and Los Angeles counties, and all corridor cities). Including the concept of green energy early into the project definition allowed the environmental documents to evaluate the potential for a self-sustaining HDC Project that could also generate revenue opportunities and support public-private partnership funding scenarios. As part of the environmental evaluation process, a Green Energy Feasibility Study was updated and completed in

Comment Code (Topic)	Response
	June 2014 to assess the potential opportunities and constraints of various alternative energy technologies as they relate to the proposed HDC Project. The types of green energy considered in the feasibility study included: water, solar, wind, geothermal, biomass and compressed natural gas.
SC-43-39 (Traffic)	Please see the Green Energy Feasibility Study technical report referenced in the response to the comment above.
SC-43-40 (Traffic)	Section 65400 of the California Government Code requires San Bernardino County to prepare an annual report on the status of the County's General Plan and progress on its implementation. The County of San Bernardino 2012 General Plan Annual Report provides such an update. The Circulation and Infrastructure Element (CI) contains the following relevant policies or programs. CI1.1- states, "The County's comprehensive transportation system will be developed according to the Circulation Policy Map (the Circulation Element Map), which outlines the ultimate multi-modal(non-motorized, highway, and transit) system to accommodate the County's mobility needs and provides the County's objectives to be achieved through coordination and cooperation between the County and the local municipalities in the County, adjacent counties and cities within those counties, Caltrans, and SANBAG." The Circulation Element Map reflects the inclusion of the High Desert Corridor, as does the Town of Apple Valley Street System General Plan Exhibit II-6, the City of Victorville General Plan Circulation Map (Figure Circ -7 Circulation Map), and the City of Adelanto General Plan Land Use/Zoning Map (Updated May 10,2007). Further, the County General Plan policy CI 2.10 states, "Identify important long-range transportation corridors, in conjunction with plans of regional transportation agencies (such as SCAG and SANBAG to protect sufficient right-of-way for the development of long-range corridors"; and CI 2.7 states, "Coordinate with Caltrans, SANBAG, SCAG and other agencies regarding transportation system improvements in the County's Measure I and other adopted Capital Improvement Programs."
SC-43-41 (Traffic)	There are two proposed HSR projects that the HDC is evaluating potential linkages with: the California High Speed Train and XpressWest. Metro, Caltrans and SANBAG have included the study of a HSR feeder service as part of the HDC that would potentially link these two major rail systems in Palmdale and Victorville respectively, and would also connect with Metrolink in Palmdale. This would create the potential to connect the San Francisco, Central Valley, Los Angeles, Las Vegas and San Diego regions through a HSR system, thereby encouraging the reduction of automobile usage. Further, as part of the proposed HDC, a bikeway is also being proposed and has been reflected in the project description addressed by the draft environmental documents. The proposed bike facility would connect with the existing and proposed bike paths in Palmdale and Adelanto and could potentially provide an alternate mode of transportation.

Comment Code (Topic)	Response
SC-43-42 (Traffic)	The HDC is a large project that has the potential to result in substantial impacts to open space and natural resources. This is fully disclosed in the EIR/EIS. The project team has been in close coordination with resource agencies, local jurisdictions and the public, and has attempted to avoid or minimize impacts wherever possible by altering the design or incorporating features (such as wildlife crossings) into the project. Mitigation has been proposed for those significant impacts that could not be avoided.
SC-43-43 (Traffic)	Table 2-18 of the High Desert Corridor Traffic Study technical report indicates that there were 28 weekday Metrolink trains stopping or passing through Palmdale as of October 1, 2012. No mention of the number of trains crossing Palmdale Boulevard is included in Section 3.1.6 of the draft environmental document. The text has been corrected to indicate Metrolink operates 30 passenger trains and UPRR operates 5 or more freight trains daily through this area, as indicated in the December 2, 2014 letter from Metro to Caltrans, included as L-22 in this volume. The referenced 90 trains per day are assumed for design year blended HSR/Metrolink service plus freight. (For reference, the Caltrain commuter rail service between San Jose and San Francisco currently operates 92 trains per weekday.)
SC-43-44 (Traffic)	The text on page 1-31 pertains to the topic of "Independent Utility" of the proposed rail feeder service. The text answers the question, “Would the proposed feeder rail service be viable without other investments in rail, such as the proposed XpressWest service between Victorville and Las Vegas, and the California High Speed Train service?” As indicated in the previous response to comment (SC-43-43), the Metrolink line between Antelope Valley and Los Angeles Union Station can reasonably support both its existing service as well as an increase in service over time. A portion of the increase in service could be attributable to feeder trains from Victorville, running through Palmdale to Union Station. The feeder rail, operating as a high speed route, could traverse the Victorville to Palmdale portion of the route in 30 minutes or less. While the running time for Metrolink between Palmdale and LA Union Station is currently approximately 100 minutes, studies indicate that running skip stop or express trains, such as the Caltrain "Baby Bullet Trains", can reduce this run time to on the order of 70 minutes without significant track or propulsion upgrades. Electrifying the line and operating electric multiple unit trains (EMUs) can further reduce run times. These concepts are currently being investigated by Metro.
SC-43-45 (Traffic)	The description of the No Build Alternative in Section 2.1.1 has been clarified to indicate that no new state highway infrastructure will be constructed within the project area aside from the existing SR-138 safety corridor improvements in Los Angeles County and SR-18 Corridor improvements in San Bernardino County. Collectively, these improvements will provide a four lane conventional highway between Palmdale and US 395 in Victorville. They are included in the No Build Alternative. Local roads will be paved and widened as conditions of development approval.

Comment Code (Topic)	Response
SC-43-46 (Traffic)	The names of the local roads which might provide the alternative toll-free route are not specified in the text. However, all roads currently in service as well as any new roads placed into service by local agencies would be available as alternative routes. It is assumed the existing SR-18 from I-15 to its junction with SR 138, and the existing SR 138 in Los Angeles County, would provide the principal toll-free route alternative.
SC-43-47 (Traffic)	The quoted text is part of the description of the Section 2.2.1 Green Energy Facility. Immediately preceding this section is the description of the Freeway/Expressway Alternative with HSR Feeder/Connector Service (Section 2.1.4), beginning on page 2-5. As part of this alternative description, "Technology Options for Trains" are discussed on page 2-15. The text states that two possible technology options to power the trains for the HSR facility are being considered. Based on the results of the investigation regarding train propulsion, the electrically powered train sets are favored to be compatible with the XpressWest rail system. Power generated from the Photovoltaic Solar panels could thus be used to feed the grid, and run the trains. As a potential element of this project that could result in impacts to the environment, it is appropriate to include this element, and the impacts analysis, in the EIR/EIS.
SC-43-48 (Traffic)	The text on page 2-18 and 2-19 of the Draft EIR/EIS explains that the demand for greener fueling and new vehicle technologies in the future is expected to be higher than present. Federal and state subsidies have encouraged the development of alternative fuels and technologies that use alternative fuels. Because electricity can be generated onsite through solar shade structures, the opportunities for creating renewable energy powered EV stations within the highway ROW are greater than for the installation of other alternative fuels. "The HDC presents an opportunity to construct EV charging stations powered by solar shade structures at rest stops and service areas." The statement is reasonable to advance at this stage of project development. Specific locations and design plans will be prepared as part of the final design.
SC-43-49 (Traffic)	The alternatives and elements proposed for this project are all included to potentially make the HDC a truly modern multi-modal facility. Your proposed additional "enhancements" are noted.
SC-43-50 (Traffic)	The referenced text on page 2-48 comes under Section 2.4.5 High-Occupancy Vehicle lanes and Park-and-Ride Facilities. Following mention of the five park-and-ride lots, the text of the draft environmental document states, "see Section 3.1.6, Traffic and Transportation/Pedestrian and Bicycle Facilities, of this environmental document for details." Page 3-184 of section 3.1.6 provides the following text, under the subtitle Parking Impacts. "The project would not displace existing parking supplies. The project could place additional demand for existing park-and-ride lots in Palmdale. Existing park-and-ride lots in Victor Valley are located 6 and 12 miles away from the HDC and would not be impacted. Two new park-and-

Comment Code (Topic)	Response
	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."
SC-43-51 (Traffic)	The description of the TSM alternative is provided in Section 2.7.7 of the draft environmental document beginning on page 2-62. To paraphrase, ordinarily, the TSM approach to addressing transportation needs typically focuses on very low cost actions. Also, various ride sharing and public transportation elements are suggested. These low cost operational investments, policies, and easy to implement actions were deemed to be insufficient to address the purpose and need of the proposed HDC investment. As a consequence, a serious effort was undertaken to define a TSM alternative that might be viable. Contrary to most minor cost/minor improvement/low benefit proposals, a robust TSM alternative was defined which included 3.4 miles of new freeway in Palmdale, approximately 7 miles of new expressway, approximately 6 miles of new four lane conventional highway, and five miles of widening Palmdale Road to six lanes in Victorville as a "super arterial." Given this significant level of transportation investment, it nevertheless did not fully address the purpose and need for the HDC Project. Route continuity, mobility, level of service and congestion, safety and reliability, regional transportation system accessibility, and greenhouse gas emissions were all considered in the evaluation. Benefits attributable to the alternative were computed using the FHWA sponsored "Surface Transportation Efficiency Analysis Model (STEAM) version 2.0. The TSM alternative was estimated to accrue benefits totaling $1.67 billion over a 20 year life cycle, based on this evaluation. By comparison, the Build Alternatives provided approximately $10 billion of benefits over the same time frame.
SC-43-52 (Traffic)	Figure 2-40 on page 2-63 of the draft environmental document illustrates the alignment of the TSM alternative. For a motorist traveling from SR-14 originating to the south of the San Gabriel Mountains, to a destination north of Victorville along I-15, the TSM route would take approximately 53.5 miles compared to about 49.5 miles with the HDC alignment, about 4 miles longer in length. Hesperia is somewhat south of the proposed corridor and the TSM alignment. Even though the distance from SR-14 in Palmdale to the middle of Hesperia using the HDC is about 66 miles while the distance from the same point using the TSM alternative route is 65 miles, the travel time on the TSM route would be much longer due to the lack of continuity and slower travel speeds.
SC-43-53 (Traffic)	The referenced sentence occurs under the discussion of Timberlands. The text has been changed to indicate that the project is located in both urban and rural areas. As information, approximately one-half of the corridor is located in the Antelope Valley and Victor Valley urban areas, and one-half is located in the High Desert rural area.

Comment Code (Topic)	Response
SC-43-54 (Traffic)	Interstate 5 in California traverses a rural area north of Santa Clarita which extends for approximately 270 miles to Tracy, through northern Los Angeles County, Kern, Kings, Fresno, Merced and Stanislaus counties. The roadway has been designated as I-5 on its current alignment for over 50 years. With the exception of the Tejon Ranch Commerce Center at the base of the Grapevine, the surrounding land use is rural, with an occasional concentration of gas stations and restaurants at junctions of major state routes.
SC-43-55 (Traffic)	The Los Angeles County portion of the High Desert Corridor is addressed by the Town & Country – Antelope Valley Area Plan Update. Policy M 6.3 of the plan states: "Support the development of the High Desert Corridor and the Northwest 138 Corridor Improvement Project between Interstate 5, State Route 14, and Interstate 15, and encourage the participation of private enterprise and capital. The Los Angeles County Board of Supervisors held a public hearing on the proposed project (Town & Country – Antelope Valley Area Plan Update) on November 12, 2014 and after hearing testimony from the public, unanimously indicated its intent to approve the Area Plan Update and certify its Final EIR. In addition, Policy CI 2.10 of the San Bernardino County 2007 General Plan states: Identify important long-range transportation corridors, in conjunction with plans of regional transportation agencies (e.g., Southern California Association of Governments [SCAG] and San Bernardino Associated Governments [SANBAG]) to protect sufficient ROW for the development of long-range corridors. The HDC is recognized by SCAG and SANBAG as a significant regional transportation corridor.
SC-43-56 (Traffic)	The land use assumptions are addressed in Section 3.2 of the Traffic Study Technical Report. Nineteen pages of text, graphics and tables review SCAG, local and the California State Department of Finance (DOF) forecasts of population and employment. Discussion covers the influence of SB 375 on the forecasting process and the effects of the Great Recession. Given the wide range of population forecasts, the mid-ground assumptions are utilized, those being the SCAG 2008 Regional Transportation Plan Adopted Growth Forecast. While higher than the subsequent SCAG 2012 forecasts, issued late in the forecasting process for the HDC, these 2008 RTP forecasts were generally lower than locally based forecasts. Consistent with FHWA's "Interim Guidance on the Application of Travel and Land Use Forecasting in NEPA", issued in March 2010, all of these issues were addressed at length. In the final assessment of the Project Development Team, use of the 2008 RTP year 2035 growth forecasts for the 2040 design year was determined to reasonably account for the economic effects of the Great Recession. The SCAG 2012 regional growth forecast was heavily influenced by the effects of SB 375, a law passed in 2008 by the California legislature that requires each Metropolitan Planning Agency to demonstrate, through the development of a Sustainable Community Strategy, how its region will integrate transportation, housing, and land use planning to meet the greenhouse gas reduction targets set by the State. In general, SCAG has

Comment Code (Topic)	Response
	based its 2012-2035 Regional Transportation Plan/Sustainable Community Strategy (RTP/SCS) on encouraging infill development and development near existing transportation corridors as well as mixed use and transit oriented development within existing urbanized areas. To further reduce the potential for increases in Vehicle Miles Traveled (VMT), SCAG has targeted areas within the core of the Los Angeles Metropolitan Area for population growth, with a commensurate reduction in outlying growth forecast for the High Desert's Antelope Valley and Victor Valley areas. While reducing the population growth projections for these two High Desert metropolitan areas, SCAG has also increased their estimates of jobs per capita located within these same two areas, with the intent being to further reduce VMT occurring between the High Desert and the Los Angeles basin. Insofar as the latest State of California Department of Finance population forecasts, these forecasts are based on recent housing and population trends which fully reflect the effects of the Great Recession. Economic conditions are recovering, and future forecasts prepared by the Department of Finance will reflect growth conditions existing at the time the new forecasts are issued. Evidence indicates that housing construction is rebounding, and while not yet at a pace of pre-recession construction, growth will nevertheless resume. SCAG's institutional goals which respond to SB 375 and the Department of Finance population forecasts do not limit or affect local entities land use approval authority whatsoever. If developers want to build all or a portion of the Desert Gateway Specific Plan, for example, which identifies the potential for a development comprised of some 26,100 housing units with 82,900 residents, and Victorville entitles this development, then growth will occur when the market materializes for purchasing these houses. What is most certain is that home buyers and cities are not influenced or constrained by SB 375, SCAG's 2012 SCS growth projections, or the State DOF's population forecasts.
SC-43-57 (Traffic)	Please see the response to comment SC-43-56.
SC-43-58 (Traffic)	The SCAG 2008 RTP Travel Forecast Model was utilized to prepare the traffic forecasts for the HDC Traffic Study. The model is a tool for comparing land use and transportation network scenarios, and, with additional investigation, for defining project requirements, such as the number of traffic lanes needed to address forecast volumes on freeways and highways. Under the no build scenario, and even the build scenarios, the roadways serving the High Desert region, and Southern California in general, are in many cases operating at or over capacity. Traffic exceeds the capacity of roadways and overflows and cascades from one parallel facility to the next in search of roadway capacity. Such is the nature of the "traffic assignment" sub-models which are used to assign traffic forecast by the regional travel demand model. Recalling the observation that regional forecast models are tools to inform, the forecasts reported in the table should be viewed as representational, and not literal.

Comment Code (Topic)	Response
SC-43-59 (Traffic)	Figure 3-22 of the Traffic Study illustrates that the daily forecast volume on I-15 to the south of its junction with US 395 is 268,000 vehicles per day. Table 3-33 indicates that the forecast volume on SR-14 to the south of Avenue S in Palmdale is nearly 169,000 vehicles per day.
SC-43-60 (Traffic)	The quoted text is taken from Section 3.11, Comparison of Build versus No-Build System-wide Traffic Performance, found on page 3-68 of Volume I of the Traffic Study. The quoted text continues as, "and on arterial streets, and more miles on the High Desert Corridor. Under the no-build alternative, traffic cascades across the highway network seeking available capacity; hence, traffic volume impacts are regional in addition to the study area." (Next Paragraph) "To provide a regional comparison of the High Desert Corridor freeway build versus no-build traffic related impacts, Parsons calculated regional benefits using the SCAG 2008 RTP (model) and STEAM 2.0, a system-wide analysis tool." (Page 3-70 text continues, new paragraph) "Table 3-18 reports measures of effectiveness computed with STEAM 2.0 ..." Data reported in Table 3-18, found on page 3-71, indicates that under 2040 travel demand conditions, Travel time (million person hours/year) are 9,575.9 for the no-build alternative, 9,559.2 for the build freeway/expressway alternative, and 9,560.1 for the freeway with tolls alternative. Comparing the build freeway/expressway alternative with the no-build alternative produces 16.7 million person hours per year of travel time savings.

Comment SC-44

SC-44-1

dont build the high desert corridor

Response to Comment SC-44

Comment Code (Topic)	Response
SC-44-1 (Other)	Your support for the no build alternative is noted.

Comment SC-45

SC-45-1

We loved the original cover. Hopes were dashed when it was taken away. Never shrink from the creative, even in the public sector.

Response to Comment SC-45

Comment Code (Topic)	Response
SC-45-1 (Other)	Comment noted.

Comment SC-46

SC-46-1

Unmanageable traffic congestion on already overcrowded two-lane highway. No alternate parallel routes in case of emergencies, continual resurfacing of road due to increased loads and hours of construction delay, decline in adjacent land values and significant increase in road noises in a small rural community setting. Would be impossible to access or egress from cross streets and businesses. Already substantial semi traffic using existing two lane road to avoid weigh stations and potentially other illegal activities or equipment. On holiday weekends, traffic is already at a standstill. Expansion of Highway 14 should terminate at 215 and traffic can use freeway to travel either north, south and then east when they reach Highway 210, 10, 40 or 66.

Response to Comment SC-46

Comment Code (Topic)	Response
SC-46-1 (Traffic)	The comment is very unclear and a number of assumptions will need to be made in order to respond. Based on the address of the commenter, the unmanageable traffic congestion on the two-lane highway is assumed to be referencing SR-18 between the intersection of Happy Trails Highway with Central Road in Apple Valley and Lucerne Valley. The expansion of Highway 14 is assumed to be referring to the proposed High Desert Corridor realignment of SR-18 around the northern and eastern sides of the Town of Apple Valley. The termination of the route at 215 is assumed to be I-15, and the reference to traveling east on 66 is assumed to be SR 60. Based on this assumed clarification, the response is as follows. The volume of traffic on SR-18 between Lucerne Valley and the Bear Valley Road cutoff in Apple Valley is currently approximately 9,400 vehicles per day according to traffic counts collected by Caltrans. At a planning level (not based on a detailed operational analysis), this volume of traffic would ordinarily be associated with providing a "Level of Service" of "B". LOS B provides a condition where speeds are typically 50 miles per hour on two-lane highways which are primarily commuter routes. On highways which are both commuter routes and scenic or recreational routes, the percent time following a slower moving vehicle, such as a truck, is typically 40 to 55 percent. The latter condition is assumed to be the basis of the unmanageable traffic congestion on an overcrowded two-lane highway remark. The situation is expected to get far worse in the future, with or without the construction of the High Desert Corridor and the realignment of SR-18 around the northern and eastern side of Apple Valley. According to forecasts produced with the SCAG Regional Travel Demand Model, traffic volumes on SR-18 between Lucerne Valley and Bear Valley Road are expected to increase to 26,000 to 28,000 vehicles per day by 2040. At this level of traffic, motorists can expect to spend more than 85% of their time following a slower moving vehicle. Given these traffic volumes,

Comment Code (Topic)	Response
	consideration of widening the conventional two-lane highway to four lanes, or constructing a four-lane expressway running parallel to the existing roadway would be warranted. Citizens interested in advancing the case for widening SR-18 should express their concerns to SANBAG, for nomination of a widening project to Caltrans, and eventually to SCAG for inclusion in the Regional Transportation Plan. The planning, environmental study, and construction of major highway widening projects takes many years, and the widening would appear warranted by the year 2040 or before, with or without the High Desert Corridor project.

Comment SC-47

SC-47-1

WHY MUST THE HIGHWAY TERMINATE AT DEADMANS POINT?? FROM THERE THE ROAD IS A TWO LANE ROAD THAT CONTINUES EAST TO ANOTHER TWO LANE ROAD TO YUCCA VALLEY.. WHY NOT TERMINATE THE NEW HIGHWAY AT THE 15 FREEWAY?

TO END AT THE JUNCTION AT DEADMANS POINT WOULD IMPACT THOSE TOWNS DOWNSTREAM TO THE EAST WITH EXASPERATING TRAFFIC WITH NO END. THOSE RESIDENTS WOULD NEVER BE ABLE TO GET ONTO THE HIGHWAY

Response to Comment SC-47

Comment Code (Topic)	Response
SC-47-1 (Design)	The HDC will serve as an alternate route through Apple Valley from I-15 to the communities and recreation areas to the East of Apple Valley. The two main existing routes through Apple Valley (State Route 18 and Bear Valley Rd) are congested. Also, the HDC east of I-15 will serve truck traffic from the warehouse facilities north of HDC, as well as traffic serving the Apple Valley Airport. The traffic volumes on SR-18 to the east of the Bear Valley cutoff to Lucerne Valley are forecast to more than double by 2040 according to the SCAG Regional Travel Demand Model, with or without the HDC Project. Given a doubling of traffic volume, the two lane section of SR-18 extending east to Lucerne Valley will warrant consideration of widening to a four lane facility, either as a conventional highway or as an expressway. Since it takes many years for widening projects to advance through the development process (project nomination, funding, environmental review and design), interested parties should consult with SANBAG to explore nominating this portion of SR-18 for inclusion in future work programming.

Comment SC-48

SC-48-1

I'm trying to figure how close this track will be to hwy 18 in apple valley

Response to Comment SC-48

Comment Code (Topic)	Response
SC-48-1 (Design)	The rail component of the HDC Project would run from approximately Sierra Highway (just east of SR-14) in Palmdale to Interstate 15 in Victorville. It would be approximately 2 miles northwest of SR-18. Also refer to Chapter 2, Figure 2-10, for a map showing the location of the rail relative to State Route 18.

Comment SC-49

SC-49-1

I am making a comment about the Sheep Creek Rd. offramp alternative routes. It seems to me that the direct route saves time, money and gasoline. Also, Alternative B has the natural gas pipeline running along Rancho Rd. which would add significantly to the construction costs.

Response to Comment SC-49

Comment Code (Topic)	Response
SC-49-1 (Design)	You are correct that Variation B is substantially longer than either the main alignment or Variation B1, which are approximately the same length. This was one factor that leads the project team to select Variation B1 as part of the preferred alignment.

Comment SC-50

SC-50-1

After studying the maps and touring the Sheep Creek Rd. offramp area by car on more than one occasion, clearly the proposed Main Route would be the least expensive and less-time consuming to build. There is a natural gas pipeline running along Rancho Rd. which would complicate greatly whatever construction needed to be done.

Response to Comment SC-50

Comment Code (Topic)	Response
SC-50-1 (Topic)	The Main Alignment and Variation B1 are approximately the same length and are substantially shorter than Variation B. The project team selected Variation B1 to be part of the preferred alternative because it shifts the main alignment to avoid impacts on a former dairy facility and nearby agricultural parcels. Please see Section 2.7 of the Final EIR/EIS for the rationale behind that selection.

Comment SC-51

SC-51-1

I do not believe that this corridor would be an asset to Lucerne Valley and it's residents.

SC-51-2

Please do not disrupt any more Historical sites where Native Americans have existed for centuries.

SC-51-3

The noise level would be hideous and detrimental to this area.

SC-51-4

We do not need any more of our beautiful, natural desert lands impacted.

Response to Comment SC-51

Comment Code (Topic)	Response
SC-51-1 (Community)	Your comment in opposition to the proposed HDC Project is noted.
SC-51-2 (Cultural)	To the greatest extent practicable, it is Caltrans' policy to avoid and/or minimize impacts to significant historic resources and archaeological sites that reflect the long and important history of Native American culture. Because archaeological sites represent non-renewable resources, Caltrans goes to great lengths to avoid having adverse effects on such properties. As detailed in Section 3.18, Cultural Resources, a number of Avoidance, Minimization, and Mitigation measures have been identified to address project impacts; these have been developed in consultation with the California State Historic Preservation Officer, Tribal governments and organizations, and other stakeholders. Continuous efforts to avoid or minimize impacts to cultural resources by utilizing all practical techniques will be made through final design.
SC-51-3 (Noise)	There will be noise impacts associated with this project. Chapter 3.2.7 provides a summary of the noise evaluation prepared for this project. Tables 3.2.7-9 through 3.2.7-13 list the locations where noise levels are projected to increase to levels where a soundwall is proposed; Table 3.2.7-19 shows those locations where a wall was considered to be reasonable and feasible based on criteria established by the Federal Highway Administration. Most of these walls are located in the Palmdale area.
SC-51-4 (Biology)	CEQA requires the project proponent to evaluate potential impacts to the existing natural resources caused by the implementation of the proposed project and mitigate any impacts to a level that is less than significant. Impacts and related mitigation measures are presented in the Final EIR/EIS.

Comment SC-52

SC-52-1

After studying the maps and touring the Sheep Creek Rd. offramp area by car on more than one occasion, clearly the proposed Main Route would be the least expensive and less-time consuming to build. There is a natural gas pipeline running along Rancho Rd. which would complicate greatly whatever construction needed to be done, if Alternative B was chosen.

Response to Comment SC-52

Comment Code (Topic)	Response
SC-52-1 (Design)	The Main Alignment and Variation B1 are approximately the same length and are substantially shorter than Variation B. The project team selected Variation B1 to be part of the preferred alternative because it shifts the main alignment to avoid impacts on a former dairy facility and nearby agricultural parcels. Please see Section 2.7 of the Final EIR/EIS for the rationale behind that selection.

Comment SC-53

SC-53-1

As a general comment regarding design I want to encourage you to consider scope and long term growth possibilities / probabilities so that the design can "grow" as our region grows. This includes the plan for acquisition of more Right of Way as well.

SC-53-2

Land use and zoning should allow for plenty of Buffer Zones of higher density or commercial/industrial zoned properties to protect our rural communities that are not compatible with a significant East/West Corridor as State Hwy. 138 was originally planned to be.

I know it's hard for our rural residents to envision a fully built out State Hwy. out here in Antelope Acres, but if this Valley is going to grow jobs to support our workforce we must have safer roads to travel on, that means 138 has got to be improved and widened.

SC-53-3

Please accommodate for all modes of transportation (safely) that may make use of this corridor's footprint.

SC-53-4

Safety should be top of mind and first priority.

SC-53-5

This State Hwy., once built out to it's orginal, planned capacity is absolutely going to impact the rural atmosphere and tranquility of our community. Unfortunately, our community has grown up along the convenience of this State Hwy...the plans for this State Hwy. have been here for a very, very long time and the residents can't be "shocked" now by the promise or prospect of expansion.

SC-53-6

I grew up along the Hwy. 14 "Right of Way" in Lancaster in the 1960's and experienced first hand what "construction impacts" were. But, it was the progress this region needed and the eventual expansion of the NW 138 Corridor is the same thing...we must have it so that we can continue to progress as a viable market for jobs, our workforce and our entrepreneurs and business owners to succeed.

SC-53-7

The NW Hwy 138 Corridor is a major east/west logistics asset for our region. In order for us to be market competitive we have got to provide a safe way for goods movement in and out of the Antelope Valley. By expanding the 138 Corridor to a safe

and viable thoroughfare, we can work to encourage the creation of more jobs in manufacturing, distribution and logistics. Better, high paying jobs will go a long way in turning around the local economy! Not to mention the shorter term construction related jobs that go with the expansion of a major transportation project such as this...YAY!

Response to Comment SC-53

Comment Code (Topic)	Response
SC-53-1 (Design)	The proposed corridor is being designed to accommodate the anticipated growth in population and traffic into the year 2040 and beyond.
SC-53-2 (Land use)	Zoning districts are established by the municipality or county with the purpose of promoting compatible patterns of land use. Caltrans is not a land use planning agency and, therefore, has no authority over local land use or zoning designations or limiting incompatible land uses adjacent to a transportation facility. It is Caltrans' responsibility to plan, design, and maintain the state highway system, and set the standards for facility development. However, Caltrans and Metro have committed to coordinating and working with the cities and counties to integrate the High Desert Corridor into their existing and future land use plans to the maximum extent practicable. As you expressed, and as the EIR/EIS Chapters 1, 2 and 3 indicate, improved east-west regional connectivity is generally anticipated by the various local governments to bring about economic benefits, including employment opportunities.
SC-53-3 (Traffic)	Enhancing transportation safety and reliability of the corridor are key objectives of the proposed project as noted under Chapter 1 - Proposed Project on pages 1-16 through 1-19 of the draft environmental document.
SC-53-4 (Traffic)	Please see response to comment SC-53-3.
SC-53-5 (General)	Your comment is noted.
SC-53-6 (Construction)	Your support for the project is noted. The EIR/EIS identifies numerous measures that will be in place to reduce construction impacts as much as possible.
SC-53-7 (General)	Your support is appreciated.

Comment SC-54

SC-54-1

HDC #80

While reviewing the alternatives in the Sheep Creek off ramps I noticed on the link below that alternative B1 is not on the map. (see below)

http://www.dot.ca.gov/dist07/sync/cpimages/file/Aerial of San Bernardino.pdf.

Does this mean it is no longer up for consideration? Or is the map outdated? Please advise.

My understanding is that there are three routes in consideration. #1.What I consider the main highway that would include the Water Treatment facility, #2. Alternative B1 which includes Krey private airfield and #3. Alternative B.

The shortest distance between two objects is a straight line. The straightest line would seem to be the most cost effective. What does the cost analysis indicate when reviewing the three routes? Please advise.

Alternative B1, if it is still up for consideration would involve a private airfield. My understanding is that there are plans to build an International airfield as a part of the overall development. Is this still in the plan? If so, the private airfield would become obsolete?

Which brings us to Alternative B. Alternative B is the furthest route from point A to point B. A few things come to mind. It would cost more to construct, it would add miles and cost in fuel to every driver using the highway for generations to come. It would add additional cost and dependency on oil while adding more travel time commuting.

I vote for the main highway or Alternative B1.

Response to Comment SC-54

Comment Code (Topic)	Response
SC-54-1 (Design)	All of your points are valid and were considered by the project team in their selection of Variation B1 to be part of the preferred alternative.

Comment SC-55

SC-55-1

Please extend the comment period for review of this Draft EIR. Sixty days is not enough time for normal people with jobs and families to evaluate the entire document. Nor does it seem that you have provided sufficient notification to local communities and residents. My self and many other neighbors did not know about the project or the comment period until less than a month before it ended. We just purchased our home here in July, no disclosure from the seller, sellers agent or our buying real estate agent was made. Without accusing them of negligent disclosure, this clearly appears to be your failure to properly inform the affected communities of this project. What are your obligations per CEQA, CA state law or any regulations regarding giving notice to communities, residents and important pathways or agents therein to best inform the public? Wouldn't informing local real estate brokerages be a logical and important point of notice to the public?

Response to Comment SC-55

Comment Code (Topic)	Response
SC-55-1 (General)	We thank you for participating in the HDC environmental review process. Caltrans and Metro have cast a wide net to involve the public in the HDC Project from the outset, but we understand that despite these efforts, it is not a perfect process. As discussed in the environmental document's Chapter 5, Section 5.2 Scoping Process, the HDC Project has included extensive outreach efforts with federal, state, and local agencies and the general public extending over many years. Section 5.4, Public Participation, further identifies innovative approaches that were used to keep the public informed of the Project. These included use of social media (e.g., Facebook and Twitter), media briefings, e-mail blasts to residents and property owners and a visible presence at local conferences and local events, held at such diverse venues as the Los Angeles Air Show and the Poppy Seed Festival. The scoping process (CEQA Guidelines, Article 7 Section 15083 "Early Public Consultation") started with early consultation with government (federal, state, and local) agencies and the general public. Information about the environmental document, public review periods, and public meetings was distributed to the surrounding community via publication notices in local newspapers with a Notice of Intent (NOI)/Notice of Preparation (NOP) announcing the start of work on an Environmental Impact Report/Environmental Impact Statement (EIR/EIS) and Notice of Availability for review of a Draft (EIR/EIS). In addition to the legally required scoping and public hearing meetings required as part of CEQA and NEPA, four rounds of public information meetings were held in High Desert communities during preparation of the environmental studies. The time-frame for NEPA, established by the Council on Environmental

Comment Code (Topic)	Response
	Quality, calls for a minimum 45-day public review and comment period. As you note, the HDC comment period was 60 days. Comments received after the close of the period are considered to the extent practicable. The Final EIR/EIS that supports decision making reflects consideration of all comments received during the public comment period and provides responses to those comments as well as any necessary revisions based on those comments. We encourage you to stay active and involved in this important transportation project.

Comment SC-56

SC-56-1

The excess traffic will be overwhelming for the 247. Have the corridor start at Palmdale and end at I-15.

Response to Comment SC-56

Comment Code (Topic)	Response
SC-56-1 (Traffic)	The SCAG Regional Travel Demand Model used for the High Desert Corridor Traffic Study forecasts daily traffic volumes on SR-18 west of Lucerne Valley to be in the range of 26,000 to 28,000 vehicles per day in year 2040, with or without the High Desert Corridor project. Construction of the High Desert Corridor will not adversely affect traffic conditions on SR-18 east of Apple Valley or on SR-247.

Comment SC-57

SC-57-1

Please end the corridor at 1-15 or that Hwy 18 and 247 be widened to four lanes

SC-57-2

As home owners and residents who live right off the Hwy 247 in Yucca Valley, we will be greatly impacted and not for the better by your plan for the new highway. The additional traffic, especially trucks and large vehicles will create congestion and commute time and interfere with our peace and quiet.

Response to Comment SC-57

Comment Code (Topic)	Response
SC-57-1 (Design)	The SCAG Regional Travel Demand Model used for the High Desert Corridor Traffic Study forecasts daily traffic volumes on SR-18 west of Lucerne Valley to be in the range of 26,000 to 28,000 vehicles per day in year 2040, with or without the High Desert Corridor project. Construction of the High Desert Corridor will not adversely affect traffic conditions on SR-18 east of Apple Valley or on SR-247.
SC-57-2 (Traffic)	Please see the response to comment SC-57-1.

Comment SC-58

SC-58-1

Please limit the proposed freeway from Palmdale to the I 15. Highway 247 cannot handle the influx of traffic through the high desert into Yucca Valley.

SC-58-2

Please limit the proposed freeway from Palmdale to the I 15. Highway 247 cannot handle the influx of traffic through the high desert into Yucca Valley.

Response to Comment SC-58

Comment Code (Topic)	Response
SC-58-1 (Traffic)	Comment noted. The realignment of SR-18 around the east and north sides of the Town of Apple Valley is an adopted element of the Town's General Plan Circulation Element. Happy Trails Highway (the existing alignment of SR -18) is forecast to operate at Level of Service D by year 2020 under no build conditions. The congestion is forecast to increase over time. In recognition of this potential, SANBAG sponsored the "Victor Valley Area Transportation Study" which was published in March 2008. This study evaluated roadway system options for addressing the sub-regions mobility needs. The realignment of SR-18 was a key recommendation of the study. The SCAG Regional Travel Demand Model used for the High Desert Corridor Traffic Study forecasts daily traffic volumes on SR-18 west of Lucerne Valley to be in the range of 26,000 to 28,000 vehicles per day in year 2040, with or without the High Desert Corridor project. Construction of the High Desert Corridor will not adversely affect traffic conditions on SR-18 east of Apple Valley or on SR-247.
SC-58-2 (Traffic)	Please see the response to comment SC-58-1.

Comment SC-59

SC-59-1

There is already an existing "corridor" between Palmdale/Lancaster and Victorville/Apple Valley which is Highways 138 and 18. The better alternative for this project would be to improve this existing corridor, rather than spending so much money on the proposed plan.

SC-59-2

There is already an existing "corridor" between Palmdale/Lancaster and Victorville/Apple Valley which is Highways 138 and 18. The better alternative for this project would be to improve this existing corridor, rather than spending so much money on the proposed plan.

SC-59-3

This project seems to be focused on "growth" however, there are many in the community where the proposed corridor will traverse through that feel as I do, that we do NOT want growth, we want to maintain our current rural lifestyle and not have this community become overrun with traffic, noise and pollution. In this particular case the "No Build" alternative is the best alternative for those communities of Little Rock, Lake Los Angeles, etc to maintain their rural lifestyle.

SC-59-4

Please do not approve any phases of this project as this project represents a detriment to our local famers. Many of our local farmers would be put out of business and this is in my opinion unacceptable. I moved to this area to enjoy the rural nature of this community and local farmers are an essential part of the rural component of our community.

SC-59-5

Where the proposed corridor is marked out, would destroy the local rural lifestyle that residents of Lake Los Angeles and the surrounding areas enjoy. Had I wanted to live near a highway, I would have bought a house in the City of Palmdale. not in the unincorporated area of Lake Los Angeles. Please preserve the local community as is and approve the "No Build" option, or look into improving the already existing "corridor" which is Highway 138 and Highway 18.

SC-59-6

The already existing "corridor" which is Highway 138 and Highway 18 is underutilized currently. Rather than build a whole new "corridor" please improve the existing transportation facilities available.

SC-59-7

This project will DESTROY the wonderful local desert that to many residents is the reason that we moved out here to the desert in the first place. No one here wants to look at a highway running through the desert. please leave the local landscape alone.

SC-59-8

The local Lake Los Angeles area is one that is rich in the history of the filming of the old TV westerns as well as it currently provides a back drop for many current TV, movie and other projects. Building a "corridor" through the middle of it destroys the history as well as makes it less desirable for future projects in the entertainment industry.

SC-59-9

We do NOT want this area to become another "Los Angeles" famous for its smog and air pollution. "No Build" will help us to continue to enjoy clean quality air.

SC-59-10

This "corridor" will make what was once a quiet peaceful desert into a noisy loud urban landscape. "No Build" will help to maintain this rural lifestyle.

SC-59-11

There are many local plants, animals and insects that would be impacted by building this corridor. This area is unique in that it is the home to the Joshua Tree, and building another highway will necessitate the removal of this precious plant. "No Build" is the only way to preserve the Joshua Tree. The other alternative is to improve and expand the existing Highways 138 and 18, so that there is a lesser impact to the Joshua Tree.

SC-59-12

I am asking those of you who are involved in this project to please consider the reason that many of us moved to this desert area in the first place. We moved here to escape the urban lifestyle and now you are proposing to destroy the desert that we call our home. How many of those in the project actually live in the areas that would be impacted by this project? Or are all of you, city folk and do not understand the value of the desert? The best alternative is "No Build" and to instead improve the existing Highway 138 and Highway 18.

Response to Comment SC-59

Comment Code (Design)	Response
SC-59-1 (Design)	One of the purposes of the project is to increase capacity of east-west transportation facilities to accommodate existing and future transportation demand. The lack of route continuity along SR-138 and SR-18 contributes to traffic congestion and reduced Level of Service on adjoining highways and local streets. In addition, the corridor is increasingly unable to accommodate the existing and projected traffic demand attributed to residential and commercial growth in the Antelope and Victor valley areas. This growth is resulting in inadequate capacity along the existing west-east roadways. The alternative to improve the existing State Route 138 and 18 was evaluated in the Alternative Analysis in 2011 as a transportation system management (TSM) option, but was eliminated because it does not meet the purpose and need of the project.
SC-59-2 (Design)	The comment is duplicative of SC-59-1. Please see response to SC-59-1 above.
SC-59-3 (Growth)	Your support to the No Build Alternative is noted. The purpose of the proposed project is to improve east-west mobility through the High Desert region of Southern California. The lack of route continuity along SR-138 and SR-18 contributes to traffic congestion and reduces the Level of Service (LOS) on adjoining highways and local streets. In addition, the corridor is increasingly unable to accommodate the existing and projected traffic demand attributed to residential and commercial growth in the Antelope and Victor valley areas. This anticipated and planned growth is resulting in inadequate capacity along the existing west-east roadways. Note also that this project is planned and developed to accommodate anticipated and planned growth, and will not directly induce growth. Shifting of growth to the proposed interchange locations along the corridor could be anticipated, but development of the rural desert area in between would not result from this project.
SC-59-4 (Farmland)	The EIR/EIS determined that the project would likely result in unavoidable and significant impacts to farmland and agricultural resources, but a number of measures are proposed to avoid, minimize and mitigate the impacts to the extent feasible. These measures include the minimization of right-of-way take, fair market value payment to property owners, relocation assistance, funding a California Department of Conservation "Farmland Conservation Program" within the region, and funding a research project for farmland restoration. However, the project will also improve mobility and accessibility for all users, including goods movement, thereby supporting the economic viability and access to existing or future farm products and services.

Comment Code (Design)	Response
SC-59-5 (Community)	Your support for the No Build Alternative is noted. However, population growth in the High Desert will continue to occur, with or without the HDC. The HDC will merely help facilitate the transportation needs of this growing population.
SC-59-6 (Traffic)	There are already plans to improve the existing SR-138 and SR-18. Even with these improvements, however, traffic projections indicate worsening traffic conditions and a reduction in mobility as the population in the High Desert region continues to grow.
SC-59-7 (Visual)	The Proposed HDC is a large project and will certainly be visible to residents in the area. However, the Chapter 3.1.7 identifies several measures that will be implemented to help reduce the visual impact of the project.
SC-59-8 (Cultural)	Your concern is noted. However, the project is proposed to run south of Lake Los Angeles rather than through the middle of it.
SC-59-9 (General)	Your support for the No Build Alternative is noted.
SC-59-10 (General0	Your support for the No Build Alternative is noted.
SC-59-11 (Biology)	There are already plans to improve the existing SR-138 and SR-18. It is true that a large number of Joshua trees will need to be removed to allow construction of the High Desert Corridor. Caltrans is committed to reducing impacts to Joshua trees as much as possible and has identified a number of steps that will be taken to minimize and/or mitigate project impacts to this species. These steps are identified in measure BNC-3 in the Environmental Commitment Record (Appendix F).
SC-59-12 (General)	Your comment in support of the No Build Alternative is noted.

Comment SC-60

SC-60-1

Land is already in use for roads. There is not enough evidence to suggest that an new road would solve any of the problems on the old roads. The old roads should be upgraded before a new road is built on undisturbed desert habitat. This new project would negatively impact the old roads (decay) and cause new 'sprawl' development along the new road.

SC-60-2

This project will have negative impacts on the communities in the high desert and will not do much for the local residents. The need for this project is overestimated.

SC-60-3

Traffic congestion on I-15 is horrendous. There is no carpool lane. There is no metro link from Victorville to Rancho Cucumonga or San Bernardino. As far as I know none is projected. This Sunday, the I-15 freeway was bumper to bumper traffic from at least Barstow and the congestion continued on the I-210 west. The High Desert Corridor freeway project would not help with that traffic congestion. A high speed train from Victorville To Vegas would not help that traffic congestion. There is much greater need for additional improvements to the I-15.

SC-60-4

Air quality is not improved with new roads. You end up getting more traffic and more emissions. Old roads need to be redesigned and upgraded. We are generating our own pollution now in the High Desert. Improving the smog situation down the hill by providing for more traffic on the High Desert Corridor will increase smog for the High Desert Area. San Bernardino county is already "non-compliant" with ozone pollution.

SC-60-5

Noise in the Mojave Desert travels great distances. We can hear I-15 for miles and miles. Another freeway will provide more noise.

SC-60-6

Before new roads and alignments are built the old roads must be maintained and upgraded. Once you disturb the habitat you lose it forever. The desert will never be the same if this new road is built.

SC-60-7

Maintenance and upgrades to old roads in our area have not kept up with growth. There is no money for this new project. Toll roads in all parts of the country are going bankrupt, which shows that a different solution should be found.

Response to Comment SC-60

Comment Code (Topic)	Response
SC-60-1 (Land use)	The Growth Impact Study, summarized in Section 3.1.2, has concluded that the proposed project will not contribute to sprawl beyond what will occur naturally due to population growth. Maintenance of existing roads is the responsibility of the local cities and counties. The High Desert Corridor will remove some traffic from the local roads which should result in less maintenance being required. Following construction of the HDC, the existing SR-138 and SR-18 will be placed in a state of "good repair" by Caltrans before being relinquished to the local agencies.
SC-60-2 (Community)	A thorough and accurate discussion of the project's purpose and need is contained in Chapter 1 of the EIR/EIS. The impacts identified in the EIR/EIS will play a key role in the selection of the Preferred Alternative.
SC-60-3 (Traffic)	The High Desert Corridor is intended to facilitate east-west movement across the high desert. The need for additional north-south improvements along I-15 has been forwarded to the appropriate project team members.
SC-60-4 (Air quality)	Current air quality is described in Section 3.2.6 of the EIR/EIS, and summarized in Tables 3.2.6-2, 3.2.6-3, 3.2.6-4, and 3.2.6-5. In general, the Study Area is in attainment of the State of California and National Ambient Air Quality Standards (NAAQS) for carbon monoxide and nitrogen oxides, and not in attainment of the ozone and particulate standards. In general, current air quality is fair to good, with ozone concentrations reaching their peaks on sunny summer afternoons and particulate emissions reaching their peaks on windy days. Future air quality with the project also is summarized in Section 3.2.6. Estimated emissions of air pollutants, other than carbon monoxide, would increase moderately with the proposed project. Under any of the Build Alternatives, auto and truck traffic would be diverted from local streets onto the High Desert Corridor, resulting in higher concentrations of air pollutants along the HDC alignment and lower concentrations in other portions of the Study Area, as stated in Section 3.2.6. Overall, however, the project is not expected to cause or substantially contribute to violations of state or national standards in the future. Thus, it cannot be concluded that the project would be responsible for a substantial loss of air quality in the area. Because the project is not anticipated to result in significant impacts on long-term air quality, no mitigation measures were identified to avoid,

Comment Code (Topic)	Response
	offset, or reduce project emissions of air pollutants. In regards to the PM10, both Los Angeles and San Bernardino counties are already in non-attainment of the state standard. There are no conformity processes for state standards and the violation for federal annual PM2.5 is addressed based on an evaluation of the area-wide monitor. Instead, diesel particulate matter (DPM) can be discussed in a regional sense. Regional DPM emissions decrease from 288 lbs/day in 2010 to 120.0 lbs/day for the FWY/Toll/HSR in 2020 and 118.9 lbs/day in 2040 (also for the FWY/Toll/HSR) (Table 19 of the Air Quality Technical Report).
SC-60-5 (Noise)	Your comment is noted. There will be additional noise generated as a result of this project. However, with a few exceptions (see Section 3.2.7), the additional noise will not reach levels where it is considered an adverse impact, based on guidance established by the Federal Highway Administration and Federal Railroad Administration.
SC-60-6 (Biology)	Your comment is noted.
SC-60-7 (Other)	Maintenance of local roads is the responsibility of the local jurisdictions. Constructing the High Desert Corridor will not reduce the money available for the local agencies to maintain their roads. The sources of funds for construction are not known at this time. It is likely that funding of construction and property acquisition will be from a combination of state, federal and private sources.

Comment SC-61

SC-61-1

We love being in a rural part of town. It is quiet and would like it to stay that way.

Response to Comment SC-61

Comment Code (Topic)	Response
SC-61-1 (Other)	Your comment is noted.

Comment SC-62

SC-62-1

Due to the obvious negative impacts to the communities through which this project is proposed I object to this project as is and support a NO BUILD option.

SC-62-2

Due to the obvious negative impacts to the communities through which this project is proposed I object to this project as is and support a NO BUILD option.

SC-62-3

Due to the obvious negative impacts to the communities through which this project is proposed I object to this project as is and support a NO BUILD option.

Response to Comment SC-62

Comment Code (Topic)	Response
SC-62-1 (Other)	Your support for the No Build Alternative is noted.
SC-62-2 (Other)	Your support for the No Build Alternative is noted.
SC-62-3 (Other)	Your support for the No Build Alternative is noted.

Comment SC-63

SC-63-1

As a property owner in El Mirage, I am very excited to see the potential for growth in our community with three off ramps. My comments are specific to the alternate locations at Sheep Creek Road.

The alternate going through the old dairy, I understand is no longer viable due to the PPHCSD acquisition and those wells being converted to municiple water in the very near future. That is good as water is too valuable a resource to risk contamination.

I find the alternate that dips down almost to Ranch Rd puzzling. Why incur additional millions to the project for the extra few miles this will require? It makes no fiscal sense. I have my suspicions that the PPHCSD has lobbied for this route as I know they have approached at least one local business in our community.

Alternate B-1 makes the most sense. Old man Kray has passed and I hear his son has no interest in preserving the air strip, the reason we have been given in meetings for the additional alternate mentioned above. It appears the most fiscally conservative alternate.

Please use B-1 alternate for the Sheep Creek off ramp.

Response to Comment SC-63

Comment Code (Topic)	Response
SC-63-1 (Design)	Your support for Variation B-1 is noted. For a variety of reasons, including those you discuss, Variation B-1 has been selected as part of the Preferred Alternative.

Comment SC-64

SC-64-1

What are the projected costs per tax payer at the present time?

Response to Comment SC-64

Comment Code (Topic)	Response
SC-64-1 (Other)	Please refer to Chapter 2, Project Alternatives, to view the anticipated project cost associated with each of the alternatives discussed. However, the sources of funds for construction are not known at this time. It is likely that funding of construction and property acquisition will be from a combination of state, federal and private sources.

Comment SC-65

SC-65

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

From: John Smith
23171 Esaws Rd.
Apple Valley, CA 92356

December 2, 2014

Ref: High Desert Corridor - Project #80 – Draft EIS/EIR

Impact of "High Desert Corridor Project" on Apple Valley, and eastward through the Lucerne/Johnson/Morongo Valleys.

Under the current project description – which includes the Apple Valley link between the I-15 and St Hwy 18; the Corridor's eastern terminus, with its four (4) to six (6) lanes, dumps traffic onto the two (2) lane St Hwy 18. This incursion will have a significant impact upon the Town of Apple Valley's planned and zoned rural-residential/agricultural/equestrian area that makes up the eastern region of the Town of Apple Valley, for the reasons enumerated below.

1. This is not, freeway country. The residents of this area made specific investments in the area because of the Town's zoning ordinances which are designed to protect the area against just this type of incursion.

2. This entire project is the long time brainchild of a Los Angeles County Supervisor, who, desiring a legacy name plate, has chosen to impose the majority of the project upon the territory of an adjacent county, namely, the County of San Bernardino. This act is intolerable. SC-65-1

3. The environmental consulting firms and engineering teams selected by Los Angeles County offices of Caltrans, who are psychologically distant from the nature of the high desert communities by in large. For the Caltrans office, located in urban Los Angeles, to impose its urban values upon others, not of like mind, is egregious.

The year 2010 population growth projections used to determine the need for this project ... with its basis in increased traffic volume including St Hwy 138 ... are at least four years old. As of year end 2014, that projected growth has not materialized. The premature expenditure of public funds based on invalid projections, is not in keeping with the proper administration of public funds and government accountability. Inconsistancies open the project to future litigation.

4. The chosen and cherished rural living values and amenities afforded the local Apple Valley residents, be they Town or County, are aggrieved and will consider any such incursion as actionable, to whatever extent that may entail.

5. The peaceful and quiet nature of eastern Apple Valley will suffer the complete destruction of that element of desirability so cherished by the existing residents and those who would chose to take up residence in this region.

6. It can be assured that the real estate values of the area will be heavily impacted, and diminished. The residents of the area will, without question, address those grievances to the fullest extent and means.

7. The extremely low incidence of crime in the desirable eastern reaches of the area will suffer the same impact as has been imposed upon the City of Victorville, with its ease of access to I-15 as a rapid escape route.

SC-65-2

8. The Town of Apple Valley has designated the northern region of the Town, north of Stoddard Wells Road/Bell Mountain/Corwin Road, specifically for industrialization. It is designated, NAVIS (North Apple Valley Industrial Specific). That area is to the east side of, and adjacent to I-15. Because of that specific plan, at best, the HDC (High Desert Corridor) should terminate at the I-15. Access to the NAVIS would be full served by a north south I-15 interchange at that point.

SC-65-3

9. The proposition that sound walls will resolve traffic noise is preposterous. Eastward of
I-15, the planned route -- should it go forward -- will be bounded on the east by the Granite Mountains! While these mountains are not composed of 'granite' per se, the reverberation of sound off of those monoliths is well known to the area residents. Caltrans dogged reliance on 'sound walls', is at best, a joke, under these conditions.

Not only will sound walls be ineffective, they will disrupt the visual reaches that are desired by those residents who have immeasurable emotional, social, and monetary investment in their natural community living choice. If we, the residents, wanted to live in the concrete block wall and asphalt labyrinth of 'Urbania', we would have chosen to do so ... plain and simple.

SC-65-4

10. A portion of St Hwy 18 between Apple Valley and Lucerne Valley and Big Bear is designated as a State Scenic Route. State Hwy 247 is under consideration as a State Scenic Highway, and will most likely achieve that designation in the very near future. Thus, a 'freeway' connection between I-15 and St Hwy 18 at the proposed easternmost terminus will not afford any additional traffic mitigation (as there is none to mitigate), such as; creating a high desert bypass between I-10 near Palm Springs and the I-15 near Victorville, or the I-15 at Barstow.

In matter of fact, such a corridor would encourage additional traffic and as such would only serve to create significant congestion and safety hazards on St Hwy 18, 247 and 62, that must be directly considered and addressed in it's entirely.

SC-65-5

11. As a 'trade corridor', significant increases in truck traffic will be directly imposed upon the existing St Hwy 18 from the proposed Apple Valley terminus, eastward. CEQA requires that a project's impacts - even outside a project's boundaries – must be assessed and mitigated. SC-65-6

12. The draft EIR doesn't even reference these, obvious, impacts – which will make it vulnerable to litigation.

The Corridor's EIR's "off-site" analysis for segments of St Hwy 18, eastward of the proposed Apple Valley terminus generates a "significant adverse environmental impact" that will be impossible to ignore with "findings of overriding consideration".

Furthermore, the existing east-west traffic issues present on St Hwy 18 between the interior Apple Valley and the I-15 in Victorville are being addressed by the new Yucca Loma bridge, connecting the I-15 at Nisqually Road. SC-65-7

The traffic issues are also being addressed by planned Rock Springs Rd. bridge, connecting the I-15 to interior Apple Valley via Ranchero Rd through Hesperia and Oak Hills.

13. The only proper, logical and cost effective solution is to eliminate the proposed Apple Valley segment between I-15 and St Hwy 18, as it's purported purpose cannot be supported as necessary.

Inquires conclude that the Town of Apple Valley's planning agency and elected representatives cannot express of define a necessity ... question the reasons for its inclusion ... which rendeers the HDC Apple Valley extension vulnerable to litigation. SC-65-8

Response to Comment SC-65

Comment Code (Topic)	Response
SC-65-1 (Other)	After the freeway passes I-15 into Apple Valley there will be insufficient traffic to warrant construction of a full freeway. Instead, the facility will become an at-grade expressway with the number of lanes tapering down from 4 to 3 to 2 in each direction before it merges with SR-18 at the Bear Valley Cutoff. The proposed alignment of the High Desert Corridor is consistent with what is shown in the Town of Apple Valley's General Plan. Only the Town can change the zoning within the Town's boundaries. Although a Los Angeles County Supervisor is a strong proponent of this project, he is far from the only one. The High Desert Corridor Joint Powers Authority, which was formed to advocate for the project and help move it forward, has representatives from both counties and the four cities and town along its path. The environmental analysis and preliminary engineering reflected in the EIR/EIS are a fair and accurate accounting of the environmental resources/impacts and the engineering solution to solve the transportation need. As far as growth is concerned, based on projections by the Southern California Association of Governments (SCAG), the population of the Antelope Valley is expected to increase by 103% between 2010 and 2040; the population in the Victor Valley is expected to grow by 97% over the same period. The High Desert Corridor is not proposed as a way to stimulate growth but rather to accommodate the growth that we know is coming. The Growth Impact Study prepared for the project bears this out, concluding that the project will not stimulate growth but will concentrate the growth that comes near freeway interchanges and near the rail stations. By providing the infrastructure ahead of time, disruption to the local communities can be minimized (fewer developed properties will need to be acquired) and it can be incorporated into the regional/local land use planning strategies to facilitate growth in a smart and sustainable manner.
SC-65-2 (Community)	The Town of Apple Valley General Plan Exhibit II-6 illustrates the Street System adopted on August 11, 2009 by Town Council Resolution 2009-21, and amended on June 12, 2012 by Town Council Resolution 2012-25. Both the original Street System map, and the amended Street System map, illustrates the alignment of the High Desert Corridor along with the locations of proposed interchanges with local streets. As this graphic reflects a "build-out" street system, an interim definition of the High Desert Corridor facility as an expressway within a freeway right of way footprint, with access control and signalized intersections in lieu of grade separated interchanges is consistent with the Town's general plan. Additional exhibits in the Circulation Element of the General Plan (i.e. Truck Routes, Transit, Bicycle Routes) also illustrate the proposed alignment of the High Desert Corridor. This evidence indicates that the Town Council is fully aware of the High Desert Corridor alignment, and the proposed High Desert Corridor facility has been fully integrated with the General Plan Land Use Map (Exhibit II-2).

Comment Code (Topic)	Response
SC-65-3 (Traffic)	The northern region of the Town, north of Stoddard Wells Road, is north of the proposed alignment of the High Desert Corridor freeway/expressway. The North Apple Valley Industrial Specific Plan area will be served by interchanges along the HDC at Choco Road and Dale Evans Parkway; and interchanges along I-15 at Stoddard Wells Road and Dale Evans Parkway. A request to construct a future interchange (as illustrated on the Town of Apple Valley General Plan Street System map Exhibit II-6) at I-15 and Quarry Road has not yet been formally initiated by Caltrans for California Transportation Commission and FHWA approval.
SC-65-4 (Noise)	The Traffic Noise Study Report for The High Desert Corridor Project (March 2016) evaluates the entire area within the project limits, including the urban and rural areas. Preliminary noise abatement measures necessary for the proposed project to comply with state and federal noise abatement regulations are also analyzed and presented in that document. No soundwalls are being recommended within the Town of Apple Valley.
SC-65-5 (Traffic)	The existing traffic volume on SR-18 between Lucerne Valley and the Bear Valley Road cutoff is approximately 9,400 vehicles per day, on average (annual average daily traffic), according to traffic counts and estimates prepared by Caltrans. Based on the SCAG Regional Travel Demand Model, the volume of traffic on SR-18 will double by 2040, with or without the proposed HDC freeway/expressway project. Given an expected doubling of traffic volume on SR-18 between the Bear Valley Road cutoff and Lucerne Valley, it would be appropriate to widen the roadway from two lanes to four lanes once traffic volumes exceed a 16,000 vehicles per day threshold. As widening projects take many years to plan, design, fund and construct, requests to initiate the planning for such widening should be advanced through SANBAG.
SC-65-6 (Traffic)	The Trade Corridor aspect of the High Desert Corridor project primarily relates to the portion of the alignment stretching from I-15 to SR-14. Regarding SR-18 to the east of the Bear Valley Road cutoff to Lucerne Valley, that segment of roadway currently experiences traffic volumes of approximately 9,400 vehicles per day, on average (Annual Average Daily Traffic) according to traffic counts and estimates prepared by Caltrans. Of this volume of traffic, just under 1,000 of the vehicles are heavy trucks, defined as trucks having four or more axles. Traffic forecasts, prepared using the SCAG Regional Travel Demand Model, indicate overall traffic volumes will more than double on this segment of SR-18 by 2040, with or without the proposed HDC freeway/expressway project. Assuming a doubling of truck traffic by 2040, for the sake of discussion, this volume of heavy truck traffic would not be considered to constitute a "trade corridor."

Comment Code (Topic)	Response
SC-65-7 (Traffic)	Segments of SR-18 east of the proposed project, between the Bear Valley Road cutoff and Lucerne Valley, are forecast to carry approximately the same volume of traffic under the no build and build alternative conditions. The proposed HDC Project does not therefore lead to impacts on the portion of SR-18 lying to the east of Bear Valley Road cutoff. The Town of Apple Valley Street System map (General Plan Exhibit II-6), includes and illustrates the HDC alignment. A "Future Bridge" is illustrated on the system map along Yucca Loma Road at the river crossing. The continuation of Yucca Loma Road, across the bridge and to the west, is illustrated on other circulation element maps (see Exhibit II-8 for example which illustrates truck routes.) These improvements are all assumed in the circulation element of the general plan, including the HDC freeway/expressway.
SC-65-8 (Other)	Your comment is noted.

Comment SC-66

SC-66-1

Comments regarding the High Desert Corridor. The proposed freeway from Palmdale through to highway 18 would be a mistake. It is an excellent idea to the 15 freeway from Palmdale. The cities of Victorville, Hesperia and Apple Valley need to deal with their own "in-house" traffic.

BUT--highway 18 and 247 should be widened to 4 lanes. Tractor Trailers are using those tiny roads at freeway speeds connecting Yucca Valley and Barstow and Yucca Valley and Victorville

Response to Comment SC-66

Comment Code (Topic)	Response
SC-66-1 (Other)	Your comment supporting the HDC segment from State Route 14 in Palmdale to Interstate 15 in Victorville is noted. However, traffic is a regional problem. The HDC is proposed as a regional solution.

Comment SC-67

SC-67-1

What will be done to address the offsite impacts to local communities' traffic and adverse effects to property values? This is not adequately addressed in the EIR.

Response to Comment SC-67

Comment Code (Topic)	Response
SC-67-1 (Community)	This project has been proposed, and is being designed, to improve traffic conditions in the local communities. Section 3.1.6 provides documentation that the proposed project will improve traffic conditions at most local intersections under existing and future conditions when compared to the No Build scenario. Regarding the effects on property values: There are no recent research studies nor does existing transportation economic literature seem to support the view that new freeways create an adverse effect to property values. Case study examples involving new freeways in Southern California such as the I-210 in the eastern San Gabriel Valley and 1-15 in Riverside/San Diego, to name two, appear to demonstrate the opposite conclusion. Past studies conducted by the Transportation Research Board and the Federal Highway Administration consistently conclude that transportation infrastructure investments improve regional economies.

Comment SC-68

SC-68-1

Blank comment

SC-68-2

High Desert Corridor Project

Due to the obvious negative impacts to the communities through which this project is proposed I object to this project as is and support a NO BUILD option.

Please extend the comment period for review of this Draft EIR. Sixty days is not enough time for normal people with jobs and families to evaluate the entire document. Nor does it seem that you have provided sufficient notification to local communities. Myself and many others did not know about the project or the comment period until less than a month before it ended.

Response to Comment SC-68

Comment Code (Topic)	Response
SC-68-1 (Other)	There was no comment entered by this commenter.
SC-68-2 (Community)	Your comment in support of the No Build Alternative is noted. The legally required comment period for an EIS is 45 days. Caltrans voluntarily extended that to 60 days; that is deemed to be sufficient. Caltrans has provided extensive notification to the public, above and beyond what is legally required, concerning the review of this document. To encourage public participation, Metro and Caltrans implemented an outreach program; this is discussed in detail in Chapter 5. Some of the outreach methods used for notification included: • Local newspapers and online advertisements • Bilingual direct mail • e-mail invitations • Project partner coordination • web site postings and links • e-newsletters • e-mails to constituent mailing lists • Facebook and Twitter postings to share meeting invitations

Comment SC-69

SC-69-1

Due to the obvious negative impacts to the communities through which this project is proposed I object to this project as is and support a NO BUILD option.

Please extend the comment period for review of this Draft EIR. Sixty days is not enough time for normal people with jobs and families to evaluate the entire document. Nor does it seem that you have provided sufficient notification to local communities. Myself and many others did not know about the project or the comment period until less than a month before it ended.

Residents like our family bought property and live here wanting a rural quiet clean air open space for animals residence This project does not take the adjacent communities' property owners into consideration and is entirely opposite why we and others chose to buy and live here

Response to Comment SC-69

Comment Code (Topic)	Response
SC-69-1 (Community)	Your comment in support of the No Build Alternative is noted. The legally required comment period for an EIS is 45 days. Caltrans voluntarily extended that to 60 days; that is deemed to be sufficient. Caltrans has provided extensive notification to the public, above and beyond what is legally required, concerning the review of this document. To encourage public participation, Metro and Caltrans implemented an outreach program; this is discussed in detail in Chapter 5. Some of the outreach methods used for notification included: • Local newspapers and online advertisements • Bilingual direct mail • e-mail invitations • Project partner coordination • web site postings and links • e-newsletters • e-mails to constituent mailing lists • Facebook and Twitter postings to share meeting invitations

Comment SC-70

SC-70-1

The HDC project is ill conceived and fatally flawed, as reviewed in these comments. It is not meant to, nor does it, as presented in the EIR/EIS, serve local high desert planning needs, nor even Southern California regional needs. Its purpose is to serve the interstate reach and economic base of Nevada interests. The physical impacts of the HDC on the high desert and the several communities therein are significant and without adequate mitigation if any. It lacks proper needs analysis and, therefore, planning. As such, the HDC has been a moving target without the comprehensive candor and public participation required of California planning and land use entities.

SC-70-2

The HDC carves up land use and any consistency of land use in high desert communities, especially Adelanto. It determines and undermines the characteristic of land use patterns in the city of Adelanto without any recognition of local needs and without adequate coordination with local plans, as presented in the EIR/EIS, albeit with a record of some appeasement of local officials, otherwise charged with meeting and protecting local communities. Adelanto 2035 planning was dead silent of the HDC and its probable impact on the city and its future.

SC-70-3

Adelanto is a growing community with economic and intergovernmental political and planning challenges. Residential areas have yet to be planned and built, roads and pedestrian walkways have yet to be planned and built, commercial and industrial activities have yet to be attracted into the community. The HDC will negatively impact, determine, influence and direct, and control planning and growth options for Adelanto. The EIR/EIS does not adequately address these profound impacts nor offer mitigation if any. The EIR/EIS process fails to recognize and coordinate with and much less fulfill local plans and the needs of local communities addressed in those plans.

SC-70-4

Aside from severe impacts on ecological communities, the lower income communities and residents of the HD, who are most vulnerable to the massive intervention and intrusion into their lives that is the HDC, stand to be greatly and severely impacted. The EIR/EIS does not adequately address these significant impacts in their many dimensions, as reviewed herein.

SC-70-5

As testified during EIR/EIS hearings, in the case of most Adelanto areas, health and safety community services and facility vehicular access will be severed by the HDC,

increasing response times and available vehicular circulation options for emergency vehicular response for both initial response and emergency travel to medical facilities. Every minute counts for cardiac related services which the HDC will compromise. The EIR/EIS does not adequately address this impact.

SC-70-6

HDC project planning is not adequately coordinated with current and future traffic loads on HWY 395 and local High Desert (HD) streets and highways which now operate above saturation levels and which will be adversely impacted by HDC generated traffic. Dangerous roadway and soft shoulder use by HD pedestrians will be further exposed to danger and probable tragedy. Local areas suffer from lack of sidewalks and street lighting for pedestrians, dangers from which the HDC project will exacerbate, especially during evening and nighttime hours. North-South pedestrian travel and bicycle travel in eastern HD communities which include a substantial percentage of lower income families who must walk and/or take bus transit will be adversely impacted if not stopped altogether. Cal Trans is responsible for administration and management of federal HWY 395 which the HDC will adversely impact, creating conditions that will require significant planning (re-planning) and budgetary responses. The EIR/EIS does not adequately deal with these realities and potential impacts. The proposal for east-west bicycle travel along the HDC is not realistic and, during summer months, can be dangerous if not deadly since the EIR/EIS does not include adequately spaced, shaded and fully serviced rest areas along its 40-plus mile course. It appears offered only for appeasement of HD communities.

SC-70-7

The HDC will permanently alter and forever change the fundamental character of the natural environment and adjacent HD communities. The raised roadway of the HDC would disturb and impose a permanent physical and visual scar along the very center of the HD, irreparably impacting ecological and human communities. Mitigation, however massive, will not correct this adverse impact. The visually offensive and noisy HDC area in front of Adelanto City Hall will symbolically represent and display the extent that this project tramples over the high desert community.

SC-70-8

Highest rated air quality of all Southern California regional communities enjoyed within the HD will be lost, especially in residential areas along the HDC which are within newly-recognized unhealthy, linear air-sheds along highly travelled vehicular corridors including along the HDC without adequate mitigation measures addressed in the EIR/EIS. Negative conditions along corridors such as the HDC include air and particulate pollution.

SC-70-9

Extreme noise levels and their mitigation with sound walls and other measures from personal and commercial vehicular travel and transit uses, is not adequately addressed in the EIR/EIS. Adelanto will be impacted significantly with or without sound walls from trucks down-shifting when transitioning onto north-south bound travel along HWY 395. Adequate sound walls and other measures are not addressed in the EIR/EIS.

SC-70-10

Western High Desert communities including Palmdale and Lancaster have and still are experiencing deadly soils-born spores called "Valley Fever." It originated in the San Joaquin Valley, heavily impacting Bakersfield, and spreading into western High Desert communities. HDC threatens central and eastern High Desert communities from Lake Los Angeles to Adelanto to Victorville and Apple Valley. Condition can spread from construction of HDC to vehicular use, transporting spores. Palmdale construction projects have served as catalyst for spread. Contamination in autos has survived sale, infecting new owners. See a recent LA Times article on Valley Fever, its deadly characteristics and potential for spread. EIR/EIS does not adequately address this grave health risk for eastern HD people and mitigation measures if any.

SC-70-11

The cumulative impacts of the HDC project are tantamount to the building of the Great Wall of China right down the idle of the High Desert, trampling over desert communities in several dimensions without serving local needs and without local planning coordination. Measured cumulatively, the proposed HDC project is without remediation or mitigation.

SC-70-12

Noticing of EIR/EIS proceedings and submission deadlines was fatally flawed with several HD residents being told by recent emails that comments were due by mid-night of December 1, 2014, thus effectively reducing the apparent time for comment, and discouraging their submission altogether.

Response to Comment SC-70

Comment Code (Topic)	Response
SC-70-1 (Design)	It is incorrect to say that the proposed project does not serve the local planning needs of the high desert communities. The HDC has been identified in the planning documents (General Plans) of many of the cities and counties through which it passes. In addition, every city/town and county that the HDC passes through is represented by members of the High Desert Corridor Joint Powers Authority, a major driving force behind this project. The HDC is also included in the Southern California Associated Government's (SCAG - a regional planning agency) 2012-2035 Regional Transportation Plan/Sustainable Communities Strategy (RTP/SCS). The HDC is being designed to avoid impacts as much as possible. In cases where avoidance is not possible, numerous minimization and mitigation measures have been proposed (see Appendix F). Chapter 5 discusses the extensive public outreach that has been conducted for this project.
SC-70-2 (Land use)	Thank you for your comments. The Adelanto North 2035 Comprehensive Sustainable Plan was adopted by the City of Adelanto on August 27, 2014. Though the planning document was principally focusing on the implementation of livable community design principles, it clearly identifies the proposed linear footprint outline of the High Desert Corridor on its land use map figures and also specifically identifies the HDC in several of its goals and policies. The plan states, "A new multi-modal corridor, High Desert Corridor (220), is proposed to run east/west through the City just south of Air Expressway with three interchanges within Adelanto." And Mobility Policy 1.10 directs the City to "Consult with Caltrans and other agencies to design the HDC consistent with the values and goals of the City." Moreover, in discussing participation with external government agencies, the Adelanto 2035 Plan directs the City also to "consult with Caltrans regarding the potential desert freeway corridor alternative route alignments and placement of on/off ramps and interchange with US 395." Too, under the heading of Economic Development, it states, "The proposed High Desert Corridor (HDC) and the US 395 improvements will provide better regional traffic circulation for the City of Adelanto. These proposed routes can bring potential economic growth along the routes of the HDC and US 395 with the development of commercial centers forming nodes, bringing in increased economic activity from passing motorists and goods movement transportation." The Adelanto North 2035 Comprehensive Sustainable Plan further expresses that, "The proposed improvements will assist in facilitating mobility for the City and the region, especially with improvements to US 395 and the High Desert Corridor (HDC) project. Although these facilities will improve mobility for vehicles, the HDC may create a 'barrier' within the City that could divide the City into two. Special care will need to be taken when the HDC Project is designed to ensure local connectivity so that Adelanto can access the new facility, and ensure that safety along the

Comment Code (Topic)	Response
	corridor enhances the City's quality of life." As indicated, the City of Adelanto has deliberately recognized with its recent adoption of the 2035 Comprehensive Sustainable Plan that the High Desert Corridor is an important component of its future and it has identified several necessary steps to assure consistency between the proposed new transportation facility and its local land use planning goals.
SC-70-3 (Growth)	Thank you for your comments. Your general view that Adelanto is not prepared to accommodate the HDC Project and that it will negatively impact community planning is noted. However, it is important to note that the Adelanto North 2035 Comprehensive Sustainable Plan, adopted by the City of Adelanto on August 27, 2014, clearly delineates the proposed linear outline of the HDC on its land use map figures and the proposed multimodal corridor is specifically mentioned in several of the City's goals and policies. The importance of coordination between the City and Caltrans is underscored, including expressing that the design of the HDC facility and placement of the alignment and three interchanges located within Adelanto to be consistent with the City's values and goals. Moreover, the City's Comprehensive Sustainable Plan identifies that the HDC is a component of local planning improvements in that it "will provide better regional traffic circulation for the City of Adelanto," and bring with it "increased economic activity from passing motorists and goods movement transportation." By statute, California's General Planning Law functions as the "constitution for all future development" (52 Cal3d 531, 533 1990) and requires cities and counties to regulate land use by means of a general plan. The State's General Plan Guidelines further require that "the general plan must reflect both the anticipated level of land development and the road system necessary to serve that level." These local plans, which undergo review as any other projects under CEQA, are designed to identify and provide a long-range framework for growth and focus development in a planned and orderly manner. Section 3.1.1.2, Consistency with State, Regional and Local Plans, and Tables 3.1.1-1 to 3.1.1-6 of the HDC Draft EIR/EIS analyzed and compared each of the project alternatives with the local community plans and policies of each of the affected jurisdictions to ensure consistency. This process promotes consistency between proposed transportation improvements and local and regional planned growth and economic development. 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 development. Furthermore, it is important to note that Caltrans has no authority over land use outside of the State's right-of-way. Such matters fall under the jurisdiction of the local units of government (cities and counties) along the corridor. Furthermore, in order for development to occur, those projects must be consistent with local zoning ordinances and meet both local and state environmental requirements under CEQA, and other laws and regulations.

Comment Code (Topic)	Response
SC-70-4 (Community)	The issue of the project effects on low-income residents was discussed in the Draft EIR/EIS in Section 3.1.4.4 under the topic heading of Environmental Justice. The conclusion was that the HDC would not cause disproportionately high and adverse effects on low-income populations as discussed in Executive Order 12898 regarding environmental justice. In addition, the Community Impact Assessment (March 2016) prepared to support the environmental document is considered an adequate study of land use, demographics, housing, community cohesiveness, and all other social and economic issues required to be studied under NEPA and CEQA regulations and statutes. However, Caltrans will continue to seek ways to minimize impacts on the human environment during final design of the project when avoidance is not possible.
SC-70-5 (Emergency Services)	The HDC would affect local traffic circulation patterns in the Study Area, as discussed in the Traffic section; the overall objective of the HDC is to improve local traffic conditions by diverting east-west traffic from the local road network to the HDC. In general, the project would reduce traffic congestion on local roads and improve intersection and road segment levels of service, especially during peak morning and evening traffic periods. These improvements would indirectly affect the response times of emergency services in the Study Area. On balance, these effects would be beneficial. The project would eliminate approximately 48 existing or planned north-south roads in the Study Area out of a total of approximately 100 existing and planned north-south roads, terminating them in cul-de-sacs. In the Palmdale and Victorville urban areas, few north-south streets would be terminated and interchange spacing would be approximately 1 to 2 miles. The terminated roads would mostly be located along undeveloped portions of the HDC alignment, resulting in interchange spacing of approximately 3 to 5 miles. The roads to be terminated are generally minor roads, whereas over-crossings (26), under-crossings (9), interchanges (18), and grade separations (12) are planned for major roads. As noted in the EIR/EIS, additional over-crossings and under-crossings would be added in the future as new development and future traffic conditions warranted. The termination of numerous existing and planned north-south minor roads in undeveloped areas could require emergency services to travel a more circuitous route to reach some portions of their service areas. However, the substantially reduced east-west travel times and generally improved intersection levels of service in developed portions of their service areas would reduce average travel times to other portions of their service areas, especially during peak traffic periods. The overall effect on emergency services response times is expected to be neutral or beneficial at project build-out. The changes in local circulation patterns resulting from the project could cause emergency service providers to adjust their service areas or to shift staff and equipment from one service facility to another. Local services operating out of several facilities likely would make more such adjustments than larger, sub-regional facilities such as hospitals. Any such adjustments

Comment Code (Topic)	Response
	would likely occur gradually over time, and would also be influenced by changing and intensifying patterns of development in the Palmdale and Victorville urban areas.
SC-70-6 (Traffic)	Current and future traffic conditions on US 395 and other local roads and highway were included in the traffic modeling for the HDC. The traffic study indicates that traffic conditions on the majority of these roads will improve as a result of the HDC being built. Your concerns regarding dangerous conditions on US 395 and the proposed bike path have been shared with the project development team members. You should address your concerns about conditions on local roads directly with the communities in which they are located.
SC-70-7 (Visual)	Visual mitigation cannot replace the existing visual qualities that would be lost by the project. That said, proposed mitigation measures are described in the Draft EIR/EIS for Avoidance, Minimization, and/or Mitigation Measures section on pages 3-232 through 3-234.
SC-70-8 (Air quality)	Current air quality is described in Section 3.2.6 of the EIR/EIS, and summarized in Tables 3.2.6-2, 3.2.6-3, 3.2.6-4, and 3.2.6-5. In general, the Study Area is in attainment of the State of California and National Ambient Air Quality Standards (NAAQS) for carbon monoxide and nitrogen oxides, and not in attainment of the ozone and particulate standards. In general, current air quality is fair to good, with ozone concentrations reaching their peaks on sunny summer afternoons and particulate emissions reaching their peaks on windy days. Future air quality with the project also is summarized in Section 3.2.6. Estimated emissions of air pollutants, other than carbon monoxide, would increase moderately with the proposed project. Under any of the Build Alternatives, auto and truck traffic would be diverted from local streets onto the HDC, resulting in higher concentrations of air pollutants along the HDC alignment and lower concentrations in other portions of the Study Area, as stated in Section 3.2.6. Overall, however, the project is not expected to cause or substantially contribute to violations of state or national standards in the future. Thus, it cannot be concluded that the project would be responsible for a substantial loss of air quality in the area. Because the project is not anticipated to result in significant impacts on long-term air quality, no mitigation measures were identified to avoid, offset, or reduce project emissions of air pollutants. In regards to the PM_{10}, both Los Angeles and San Bernardino counties are already in non-attainment of the state standard. There are no conformity processes for state standards and the violation for federal annual PM2.5 is addressed based on an evaluation of the area-wide monitor. Instead, diesel particulate matter (DPM) can be discussed in a regional sense. Regional DPM emissions decrease from 288 lbs/day in 2010 to 120.0 for the FWY/Toll/HSR in 2020 and 118.9 in 2040 (also for the FWY/Toll/HSR) (Table 19 of the Air Quality Technical Report).

Comment Code (Topic)	Response
SC-70-9 (Noise)	The Traffic Noise Study Report for The High Desert Corridor Project (June 9, 2014) evaluates the entire area within the project limits. Preliminary noise abatement measures necessary for the proposed project to comply with state and federal noise abatement regulations are also analyzed and presented in that document. Soundwalls that are found to be feasible and reasonable based on the Caltrans' criteria will be constructed. Based on the results of the study, there are three impacted receptors (exceed Noise Abatement Criteria noise level and has substantial noise increase) that 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 (Receptors B5, 3, and M4).
SC-70-10 (Air quality)	Valley Fever is addressed in Section 3.6 (Construction Impacts) of the Final EIR/EIS. Air Quality measures to minimize the generation of airborne particulates during construction would serve to prevent or limit the dispersal of *Coccidioides immitis* spores, and thus limit the potential for the public to be exposed to Valley Fever as a result of project construction. The Final ED includes a more thorough discussion of Valley Fever and the potential for the project to affect the spread of this condition temporarily during construction.
SC-70-11 (Coordination)	Chapter 1 discusses the purpose and need for the project, including the rationale and intended benefits to the local communities. Chapter 5 discusses community outreach, including the extensive coordination with local planning agencies.
SC-70-12 (Coordination)	The public comment period was extended from the legally required 45 days to 60 days (ending December 2, 2014) to give the public additional time to review and comment on the document. This time period was noted in all newspaper ads and public notices concerning circulation of the Draft EIR/EIS.

Comment SC-71

SC-71-1

I am against this project in its entirety. The EIR did not adequately study the water demand impact that would result from increased industrial, commercial and residential development spurred by the proposed High Desert Corridor. I understand that Victorville and Apple Valley city and town officials, respectively, along with area developers, are hoping that the HDC will promote further commercial and industrial development, particularly in and around the Southern California Logistics Airport. Moreover, developers are proposing an entirely new city called the Gateway to the High Desert, which would hinge on development of the HDC and further draw on water resources. In sum, the desert's *water resources* alone do not sustain this development. This impact was not adequately studied, nor are there plans to effectively mitigate it in order to preserve water for current residents and future generations.

Secondly, the EIR did not study the offsite impact of increased freight and passenger vehicle traffic on surrounding roads and highways in and around Apple Valley as a result of the Apple Valley segment required by CEQA, nor propose a plan to mitigate it.

Third, the EIR did not adequately model the physical, psychological and financial impact on residents located directly adjacent to - but not bought out by - the HDC project. My family would be harmed financially, physically and emotionally by this project. I would not subject my young children to airborne pollutants caused by this project in any phase of development or use, nor should I be expected to. This project would leave my family and others no choice but to breathe polluted air directly resulting from this project. The air quality report did not adequately model the impact of airborne pollutants caused by the construction phase of the project on adults and children located adjacent to the HDC. Moreover, simply stating that the lifetime impact on human health cannot be modeled due to the likelihood of changing emission standards is not adequate. The impact of airborne pollutants on human health should be studied assuming emission standards remain the same or worsen. The impact of airborne pollutants on newborns and young children should also be specifically modeled. In a worst-case scenario, families located within a half mile or less of the project, at a bare minimum, should be provided the buyout option to move along with those whose homes would be demolished by the project due to these and other health concerns.

Response to Comment SC-71

Comment Code (Topic)	Response
SC-71-1 (Water quality, traffic, community, air quality)	**Water Demand** The Water Quality Assessment Report (Parsons 2014) prepared for the proposed 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 California Urban Water Planning Act (California Water Code § 10610 et seq.) requires urban water suppliers to describe and evaluate sources of water supply, efficient uses of water, demand management measures, implementation strategy and schedule, and other relevant information and programs. This information is used by the water agencies to carry out their long term resource planning responsibilities. Urban Water Management Plans (UWMPs) are completed in accordance with the UWMP Act and UWMPs are updated every 5 years. The Water Quality Assessment Report evaluated all of the UWMPs applicable to the proposed Project corridor and summarized existing and potential water supplies within the proposed Project area. The environmental document prepared for the proposed Project summarizes the UWMP information in Section 3.2.2. The water agencies within the proposed Project corridor rely on either State Water Project or ground water 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 transportation facility and back to the environment. All onsite water from the proposed transportation corridor would be treated and then released into the environment via the proposed infiltration basin treatment facilities. 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. Regarding cumulative impacts to water resources in the proposed Project area, the water quality analysis considered known projects identified within the proposed Project area, including the Adelanto Gateway Logistics Center and the Southern California Logistics Airport. The potential cumulative impacts to groundwater recharge within the proposed Project corridor were

Comment Code (Topic)	Response
	analyzed in the environmental document and were found to be less than significant with implementation of the proposed Project. Although implementation of the proposed Project would not have a cumulatively considerable contribution to adverse effects on groundwater recharge within the Project area, the overall growth and development that would take place throughout the groundwater basins would directly and/or indirectly result in the loss of groundwater recharge areas. This loss would be mitigated through implementation of the UWMPs prepared by all of the water agencies within the HDC corridor in accordance with the Urban Water Management Plan Act (California Water Code § 10610 et seq.). Any loss in groundwater would also be mitigated by the Victor Valley Wastewater Reclamation Authority's project which 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. Implementation of the two sub-regional water reclamation facilities would increase groundwater supplies and may reduce reliance on water currently imported through the State Water Project from the Bay-Delta. Thus, impacts associated with groundwater from implementation of the proposed Project would be less than significant and the proposed Project would not have a cumulatively considerable contribution to the cumulative effects related to groundwater. **Traffic Impacts** Traffic impacts were analyzed for the identified traffic study intersections. In Apple Valley, the analysis was concentrated along the existing alignment of SR-18, on Happy Trails Highway. Traffic impacts were not analyzed for the area to the east of Apple Valley, in Lucerne Valley, as there would be no change in traffic volumes east of the Bear Valley cutoff. **Economic Impacts** Independent scholarly research conducted in the past using before-and-after case studies on the effects of introducing new transportation facilities indicate that while there may be a slight percentage decline in residential property values in the short-term, over a longer period of time property values rise. This especially holds true in California. As a result, substantial adverse impacts to residential property values are not anticipated from the HDC Project implementation. **Air Quality Impacts** Hot-spot analyses and emissions analyses were conducted for criteria pollutants in accordance with the available federal and state guidance, i.e., EPA's Transportation Conformity Guidance for Quantitative Hot-Spot Analyses in $PM_{2.5}$ and PM_{10} Non-attainment and Maintenance Areas; FHWA's Interim Guidance on Mobile Source Air Toxic Analysis in NEPA documents; and Caltrans' Project-Level Carbon Monoxide Protocol. The hot-spot analyses evaluated impacts from the project in terms of the latest ambient air quality standards and emissions analyses evaluated impacts based on the total burden of emissions from the proposed project Alternatives; these are summarized in Section 3.2.6 under the subsection of

Comment Code (Topic)	Response
	Environmental Consequences and are provided in detail in the Air Quality Report for the proposed project Alternatives. As discussed in the project environmental documents, analyses conducted at the hot-spots in Los Angeles and San Bernardino Counties indicated that the proposed project Alternatives would result in concentrations less than the federal and state ambient air quality standards for carbon monoxide. Hot-spot analyses conducted throughout the alignment of the proposed project corridor resulted in concentrations less than the federal ambient air quality standards for 24-hour PM2.5 and 24-hour PM_{10}. The hot-spot analyses also resulted in concentrations higher than the federal and state annual $PM_{2.5}$ ambient air quality standard in unpopulated areas at 1 meter away from the Caltrans right-of-way line (fence line) in San Bernardino County, north of the proposed interchange with I-15. Based on the EPA Guidance, the levels of annual $PM_{2.5}$ from the proposed project Alternatives were evaluated in terms of an "area-wide" location at which annual $PM_{2.5}$ is required to be monitored. Based on the evaluation, the unpopulated areas along the fence line at which the hot-spot analyses results indicated higher concentrations than ambient air quality standards, are not appropriate "area-wide" locations representative of neighborhood, urban, regional scales as well as micro- or middle-scale monitors as defined in 40 CFR 58.1. The analyses indicated that all other locations within 250 meters of the hot-spots in Los Angeles and San Bernardino Counties resulted in concentrations less than the $PM_{2.5}$ ambient air quality standards.

Comment SC-72

SC-72-1

Reference to the Adelanto-to-Victorville Segment of the High Desert Corridor. Why does alternative still under consideration go directly through recognized and named Native American prehistoric village sites, especially just to the west of Lower Narrows area of the Mojave River Corridor. Ethnographically named village area "Topiabit" is listed by ethnographers and recognized by archaeologists as extremely important areas and Eligible for Listing on the National Register of Historic Places. The same locations also have historical importance and are similarly Eligible to NRHP (e.g., Lane's Crossing). What kind of Tribal consultation and historical society consultations with appropriate Native American Federally Recognized Tribes and Non-Federally Recognized Tribes of the area (as definited by the Native American Heritage Commission of the State of California, as well as Records Search efforts, could have led to overlooking the historical significance of planned alternative routes in this area? This citizen is extremely concerned that Section 106 of the Historic Preservation Act was neither followed nor implemented and that federal tax funding will pay for destruction of very important Cultural Resources along the route of the High Desert Corridor.

Response to Comment SC-72

Comment Code (Topic)	Response
SC-72-1 (Cultural)	Caltrans thanks you for participating in the environmental process for the HDC. Your comment has two parts; one part addresses the impact to the significant sites near the Mojave River, and the other deals with the adequacy of the Native American (NA) consultation. For the first concern, an alternate route was considered that would have avoided the sensitive sites; however, the City of Victorville rejected this alternative due to their concerns about city property that would have been traversed by the project. Without the City's support, this alternative was removed from consideration. At this point we cannot minimize impacts and only mitigation through data recovery is viable. A treatment plan and Memorandum of Agreement (MOA) have been developed to address this mitigation. The San Manuel Band of Mission Indians has participated in this process. As for the second concern, extensive Native American consultation took place on this project (as documented in Chapter 3.1.8). Minimally, four separate mailings to all concerned groups were sent out, and numerous follow-up calls were made. A meeting was held on September 20, 2014 at the San Manuel Reservation to discuss potential concerns and issues. Representatives from the San Manuel Band of Mission Indians have made two separate field visits to observe excavation and are in receipt of all cultural resources technical reports to date.

Chapter 8 Responses to Oral Comments from the November 5, 2014 Public Hearing

This section provides responses to oral comments received on the draft environmental document from persons attending the public hearing held on November 5, 2014. A total of 9 oral comments were recorded and are summarized below. Transcripts of the oral comments and responses to topics of concern are provided on the pages that follow.

Table 8.1. Summary of Oral Comments Received at the November 5, 2014 Public Hearing

Comment Code	Commenter Name	Comment Topics
1P-1	D. Queen	Project design and alternatives
1P -2	Ignacio Oliveros	Project design and alternatives, community impacts
1P -3	Shirley Harriman	Land use
1P -4	Greg Allossery	Community impacts
1P -5	Jim Alexander	Project design and alternatives, traffic and transportation
1P -6	Bruce Burch	Community impacts, project design and alternatives
1P -7	Frank Villareal	Noise
1P -8	Mary Hanna	Biological environment, hydrology floodplain, visual, project design and alternatives
1P -9	Steve Miller	Growth

Comment 1P-1

1 people. First we're going to start with D. Queen, then
2 Shirley Harriman, and then Greg Allossery -- Allossery.
3 Okay. So those will be the first three speakers.
4 So, Mr. Queen.
5 MR. QUEEN: Good evening. Thank for coming
6 down. My name is Denard Queen (Phonetic), and I've
7 been here in the desert now for about ten years.
8 Before that I was in San Francisco, and I developed a
9 transportation system and a ballpark system that are a
10 hundred percent privately funded.
11 I raised 650 million dollars privately, and --
12 however, stopped me -- I brought my banker over from
13 Europe, and they wouldn't even met with us. So now
14 we've gone full circle.
15 25 years I've been asking this than an
16 alternative plan is vastly superior to this one. In
17 fact, until -- like you mentioned, until 2010 -- in
18 1990 I presented my credentials for the 650 million,
19 and it wasn't five months later Senator Cot (Phonetic)
20 came up and created the authority here to stop me from
21 doing anything.
22 I took it all the way up to the feds -- this
23 was against BART, my train -- the Cal train to the
24 airport to BART to the airport. It took them 11 years
25 plus 15 years actually and over six billion dollars to

Page 35

Veritext National Deposition & Litigation Services
866 299-5127

1 go seven miles.
2 I could have had the whole bay area with a
3 train from downtown San Francisco and the ferry
4 building to the ballpark, a loop into San Francisco
5 airport going across the bridge over the east bay, to
6 the airport in Oakland and on to Sacramento. Likewise,
7 when I got to San Jose, would be Gilroy to essentially
8 the system they're talking about here.
9 And so my plan is they didn't have a clue --
10 they've been trying -- since I raised the money,
11 they've been trying since 1990 here to come up with a
12 plan for a east/west Corridor. They can't do it
13 because they're just trying to do a highway.
14 Well, in 2010 I got involved with a friend
15 fighting Caltrans regarding eminent domain, and back
16 then I published the same plan I have here now, and no
17 later than two weeks later, the county comes up with my
18 plan for having a rail part of their highway. They
19 couldn't raise a dime without the rail.
20 The problem is they're going between nowhere
21 and nowhere, and my argument is that they shouldn't
22 build a dimes worth here until they go through the
23 standard process of making all the money necessary for
24 the whole rote or you'll have -- what do they call
25 it -- a white elephant.

Page 36

Veritext National Deposition & Litigation Services
866 299-5127

1 You know, I don't have -- I only learned about
2 this meeting three days ago. So I got a couple of
3 handouts here, and I have some business cards, and if
4 you'd like to see what my plan really is with the
5 details -- because I put the meat on the table.
6 You guys are all speaking in generalities if
7 you notice, and I'm saying I can build this system in
8 roughly three years, 100 percent privately funded,
9 won't cost a taxpayer a dime, and it supports the small
10 business middle class community just like I originally
11 wanted to do in San Francisco.
12 Because I can flat tell you, if it hadn't been
13 for the intellectual property, every ballpark built --
14 ballpark, and I'm talking major league baseball,
15 football, basketball -- every stadium built since 1990
16 was my design.
17 I've out engineered these guys something silly
18 every time. Every time. And if you take the time to
19 read what I've got -- you'll see that, when I had my
20 team together, I had a nationally recognized
21 architecture firm, nationally recognized engineering
22 firm, and a senior rail engineer. I had raised the
23 money, et cetera, et cetera.
24 I even had people lined up for every job I
25 needed to build everything. I can do that again, and

Page 37

Veritext National Deposition & Litigation Services
866 299-5127

so raising 650 million back then was a lot harder than it is today. I'm not worried about raising the money. I'm worried about getting the right right-of-way and doing it so that it is functionally useful.

This whole thing about high-speed rail, if you look into it, go check out what they're really doing in Europe. They don't have as much high-speed rail as they thought they did. When they built the BART -- BART system, they're only moving 6,000 people. 6,000 trips. It's a joke.

And the other thing I'd say is hopefully you'll ask me for a card and get this out to your friends, particularly farmers and ranchers, you know, west of here.

I think you -- figure you folks know people out there -- right -- and I can built a train that'll get you to where you want to go at a pretty good rate of speed, 125, and if necessary we can go faster.

The trains can go faster -- they pass by law back 1860 I think it was, the trains can't go any faster than 80 miles an hour. That locomotive can go an awful lot faster than 80 miles an hour let me tell you.

I happen to know a lot about trains. I know about laying track, and I'll say one last thing is that

Page 38

Veritext National Deposition & Litigation Services
866 299-5127

when I went to this process, it's called a new rail start process. It's how you get these kind of projects into the funding system at the county, state, national transportation people, and Congress is that you go through a process called a new rail start.

And they have a -- a series criteria that you got a certain number of points for each thing, which is using existing rail track and dada, dada, dada. On every point that I did mine, I beat the plan they had for San Francisco.

And I did such a good job, I got it all the way to up tot he Interstate Commerce Commission. The only way they could beat me is what they did. They cut down and shut down the ICC after a hundred years just because of me.

So that's because I come up with plans that work, and so I got kind of a cold, and so I can't even speak very well tonight, but I've taken enough time, and I appreciate you listening, and I'm going to be here hanging around, and I'll give you a business card.

And if you have an e-mail, send it to me, and my address is on there. If you don't have an e-mail, send me a note, and I'll send -- I'll show you a real plan that will work.

Thank you for your time.

Page 39

Veritext National Deposition & Litigation Services
866 299-5127

Response to Comment 1P-1

Comment Code (Topic)	Response
1P-1 (General)	Thank you for your comment.

Comment 1P-2

MR. KOSINKSI: Thank you, Mr. Queen.
Shirely Harriman is next. Shirley?
MR. OLIVEROS: My name is Ignacio Oliveros. I got a property in Palmdale Boulevard, 147th. I'd like to know -- because I have -- I'm going to retire in that property and build a ranch for myself.
I don't mind having progress go forward, but what's going to happen the impact on the land that I have today. Because like I said, I had agreement on that property. 1P-2-1
They said it's not going to impact anything else and not going to be what -- I forgot what they, but I like my grandsons to grow here because I moved 24 years ago. I bought the property about 50 years ago.
I don't mind progress. Progress got to go forward. What's going -- what is it going to create all this problem here, and who is going to protect our kids for the future because I like this community a lot.
And this is going to be included in the bullet train, whatever they are talking about? I don't mind progress like I said, but I want this community to be like it was 24 years ago. We can have progress without disturbing our community the way it was. Okay? 1P-2-2
Thank you.

Page 40

Veritext National Deposition & Litigation Services
866 299-5127

Response to Comment 1P-2-1

Comment Code (Topic)	Response
1P-2-1 (Design)	The list of properties that are expected to require either full or partial acquisition for this project can be found in Appendix I of the Final EIR/EIS. This list might change due to minor alignment adjustments made during the final design phase. Interactions with property owners will be in accordance with California Relocation Assistance Law (Government Code §7260et seq.) or the Uniform Relocation Assistance and Real Property Acquisition Policies Act of 1970, as amended (42 U.S. Code Chapter 61 et seq.). Property owners will be notified in writing of right of way acquisitions once project alternatives and designs are finalized and when project funding is available. If the property cannot be avoided, law provides for fair market value to the property owner. Relocation assistance, if applicable, will help the displaced family move to a replacement location within 50 miles of the displacement location. Many costs associated with a move are eligible for reimbursement.
1P-2-2 (Community)	The CHSRA is currently studying the possibility of constructing a HSR system from San Francisco/Sacramento to Los Angeles with a possible stop in Palmdale at or near the Palmdale Transportation Center. Another high-speed train project, XpressWest, proposes to build a HSR line between Victorville and Las Vegas. These projects are separate and independent from the HDC. However, the HSR Feeder Service proposed as part of the HDC would provide a connection between them and the HDC Project team has coordinated with the sponsors of these two projects to ensure compatibility and interoperability. Progress inevitably brings change to communities. The HDC has been proposed and will be designed in a way that integrates it into the local communities as much as possible so that adverse impacts are minimized.

Comment 1P-3

MR. KOSINKSI: Okay. Shirley? There you are. And then Greg's next.

MS. HARRIMAN: Finally. My name is Shirley Harriman. My question is in the reform of a request. I'd like to be assured that there is an advocate or a watchdog that, during the construction and during the use of this project, that the trails are protected. 1P-3-1

And if you ever prepare a deck (SIC) online, I'd like to be notified of that so I can download it and read it. Thank you. 1P-3-2

MR. ALLOSSERY: Good evening. My name is Greg Allossery. My wife and I, we purchased a home out here in 1985 for the beauty and the serenity of the desert.

Now, I'm for the no build part of this. We're in the school right here. We have 500 children in this school. There's three other schools right along Palmdale Boulevard here. We have all these children. We don't need them to have anymore health problems.

Now, all this freeway is going to bring is a bunch of pollution, air, water, noise, light. It's not going to do our community one bit of good. It might help Palmdale. It might help Victor valley. Might help the rich billionaires in Las Vegas, but it will totally ruin our community.

And if anybody here has any sense and wants

Page 41

Veritext National Deposition & Litigation Services
866 299-5127

Response to Comment 1P-3

Comment Code (Topic)	Response
1P-3-1 (Land use)	One of the objectives of the environmental review process is to ensure that all environmental impacts are addressed and avoidance and mitigation measures to minimize the impacts are identified. As part of the final environmental document certification, an environmental commitment record (ECR) has been prepared and will be adopted for implementation. The ECR describes the mitigation measures for each affected environmental resource, identify responsible parties to implement respective mitigation measures, and outline the time frame for each mitigation measure implementation. Once each mitigation measure is implemented, a designated agency or agencies will review and sign-off on the ECR form. Since the ECR is a part of the final environmental document, the general public will have an opportunity to review and comment on the form. At project construction and implementation, the ECR will be used to guide the mitigation implementation. ECR measures LU-1 through LU-7 will be used to ensure that the project complies with the local land use policies concerning the preservation of trails. The completed form will be kept at Caltrans District 7 (Los Angeles) and District 8 (San Bernardino).
1P-3-2 (Other)	The Final Environmental Document, including the Environmental Commitment Record, will be available online at the Caltrans District 7 and Metro websites.

Comment 1P-4

MR. KOSINKSI: Okay. Shirley? There you are. And then Greg's next.

MS. HARRIMAN: Finally. My name is Shirley Harriman. My question is in the reform of a request. I'd like to be assured that there is an advocate or a watchdog that, during the construction and during the use of this project, that the trails are protected.

And if you ever prepare a deck (SIC) online, I'd like to be notified of that so I can download it and read it. Thank you.

MR. ALLOSSERY: Good evening. My name is Greg Allossery. My wife and I, we purchased a home out here in 1985 for the beauty and the serenity of the desert.

Now, I'm for the no build part of this. We're in the school right here. We have 500 children in this school. There's three other schools right along Palmdale Boulevard here. We have all these children. We don't need them to have anymore health problems. 1P-4-1

Now, all this freeway is going to bring is a bunch of pollution, air, water, noise, light. It's not going to do our community one bit of good. It might help Palmdale. It might help Victor valley. Might help the rich billionaires in Las Vegas, but it will totally ruin our community.

And if anybody here has any sense and wants

Page 41

Veritext National Deposition & Litigation Services
866 299-5127

1 our children to be able to grow up in a -- in a good
2 environmental, which we came out here for, you will go 1P-4-1
3 for the no build alternative.
4 Thank you.
5 MR. KOSINKSI: Thank you. And the next
6 speaker would be Jim Alexander and then Bruce Burch.
7 Jim?
8 MR. ALEXANDER: Hello, my name is Jim
9 Alexander. I'm a lifelong resident of the Antelope
10 Valley and actually a lifelong resident of the house
11 that I currently live in.
12 The alignment that they propose goes within
13 200 yards of the side of my house. Obviously, I'm for
14 the -- the no build. I don't know if it's for the
15 kids; I don't know if it's for me. I like the desert.
16 I've stayed here my entire life. I intend to, if given
17 the opportunity, stay here the rest of my life.
18 My parents both died here. Three of my
19 grandparents died here. My aunt, my uncle, numerous
20 members of my family have lived here and died here.
21 I'm a fan of progress, but I don't really see
22 a freeway and a train doing anything positive for the
23 desert. It may do something positive for businesses.
24 I -- I can see that absolutely, but that's at multiple
25 different places other than here.

Page 42

Veritext National Deposition & Litigation Services
866 299-5127

Response to Comment 1P-4

Comment Code (Topic)	Response
1P-4-1 (Community)	Thank you for your comments. Your support of the No Build Alternative is noted. This project was proposed as a way of meeting the current and future traffic demands in this growing region. Regarding the proximity of schools, the health and well-being of students, as it is for all members of the public, is of paramount importance to Caltrans and Metro. Every effort has been made to develop the four High Desert Corridor build alternatives to the highest engineering design and environmental standards, while still meeting the overall purpose and need of the project. A locally preferred alternative has been selected after weighing the benefits and potential impacts identified in the EIR/EIS along with all the public comments that have been received. The project will be built and operated in a way that avoids environmental impacts where possible; when that is not possible, the impacts will be minimized or mitigated in accordance with measures identified in the Environmental Commitment Record located in Appendix F of the Final EIR/EIS.

Comment 1P-5

our children to be able to grow up in a -- in a good environmental, which we came out here for, you will go for the no build alternative.

Thank you.

MR. KOSINKSI: Thank you. And the next speaker would be Jim Alexander and then Bruce Burch.

Jim?

MR. ALEXANDER: Hello, my name is Jim Alexander. I'm a lifelong resident of the Antelope Valley and actually a lifelong resident of the house that I currently live in.

The alignment that they propose goes within 200 yards of the side of my house. Obviously, I'm for the -- the no build. I don't know if it's for the kids; I don't know if it's for me. I like the desert. I've stayed here my entire life. I intend to, if given the opportunity, stay here the rest of my life.

My parents both died here. Three of my grandparents died here. My aunt, my uncle, numerous members of my family have lived here and died here.

I'm a fan of progress, but I don't really see a freeway and a train doing anything positive for the desert. It may do something positive for businesses. I -- I can see that absolutely, but that's at multiple different places other than here. 1P-5-1

Page 42

Veritext National Deposition & Litigation Services
866 299-5127

1 Originally when I heard about the plan, I was
2 almost ready to say if they change the alignment, move
3 it farther south, move it closer to the 18. That
4 wouldn't be a bad place to go, but I -- I reached a
5 point where I just don't see anything real that's going
6 to benefit the Antelope Valley at least for a hundred
7 years.
8 By then the Antelope Valley will be the San
9 Fernando Valley. All of us will be dead. Everything
10 will be worse unless you like the San Fernando Valley,
11 the San Gabriel Valley, that kind of life.
12 So I understand the -- I haven't had a chance
13 actually to read the whole document, the EIR and EIS,
14 but there are a number of discrepancies from my
15 experience to what they have shown on the EIR and the 1P-5-2
16 EIS.
17 I'm hoping to get an opportunity to find out
18 how they did some of the research because they're
19 findings are so different from what I know from my
20 day-to-day life.
21 But you'll see me at all of the -- of the
22 future meetings. Any opportunity I get I'm going to
23 send some -- some comments online, and -- but, again, I
24 -- I hope that even the communicators that hope to 1P-5-3
25 benefit from this freeway, I hope they understand that

Page 43

Veritext National Deposition & Litigation Services
866 299-5127

1 all they're going to do is they're going to have a
2 faster trip to the 14.
3 And the 14 is such an inadequate freeway and
4 has been for many, many years that it'll just speed the
5 initial part of their trip up. It wont speed the
6 overall trip, and then once they get to Los Angeles,
7 they have to deal with the 5, which is a horrible
8 freeway, the 405, which is an even worse freeway.
9 So there -- there truly is no benefit in
10 destroying the desert for nothing. So, anyway, thank
11 y'all for your time. I hope to see y'all again in the
12 future.
13 MR. KOSINKSI: You must be Bruce.
14 MR. BURCH: I'm Bruce. I'm Dr. Bruce Burch,
15 and I'm a local resident. In fact, the main alignment
16 heads right through my house.
17 I've been all through my comments. I have
18 written down here some stuff I don't want to cover, but
19 I -- I appreciate the courage of the last two speakers,
20 and I want to actually say, "but that's what I really
21 think."
22 I believe this will help people, but it's not
23 going to help the High Desert. It may help the High
24 Desert cities but not the High Desert.
25 Anyway, my original point was, that according

1P-5-3 cont.

Page 44

Veritext National Deposition & Litigation Services
866 299-5127

Response to Comment 1P-5

Comment Code (Topic)	Response
1P-5-1 (Design)	The HDC will provide residents with easier access to emergency services, shopping, higher education, and work opportunities.
1P-5-2 (Other)	Numerous technical studies were prepared for this project and the results of those studies are summarized in the Draft EIR/EIS. Despite our best efforts, it is not uncommon for errors to occur when dealing with a project as large and complicated as this one. Caltrans has worked to improve the document in response to input and comments from the public.
1P-5-3 (Traffic)	Comment noted. The travel time between I-15 and SR-14, as well as intermediate locations in the High Desert, will be roughly cut in one-half as a result of the proposed freeway or tollway project. Traffic conditions on SR-14 and other Los Angeles area freeways will be addressed via separate projects as needed and as funding becomes available.

Comment 1P-6

all they're going to do is they're going to have a faster trip to the 14.

And the 14 is such an inadequate freeway and has been for many, many years that it'll just speed the initial part of their trip up. It wont speed the overall trip, and then once they get to Los Angeles, they have to deal with the 5, which is a horrible freeway, the 405, which is an even worse freeway.

So there -- there truly is no benefit in destroying the desert for nothing. So, anyway, thank y'all for your time. I hope to see y'all again in the future.

MR. KOSINKSI: You must be Bruce.

MR. BURCH: I'm Bruce. I'm Dr. Bruce Burch, and I'm a local resident. In fact, the main alignment heads right through my house.

I've been all through my comments. I have written down here some stuff I don't want to cover, but I -- I appreciate the courage of the last two speakers, and I want to actually say, "but that's what I really think."

I believe this will help people, but it's not going to help the High Desert. It may help the High Desert cities but not the High Desert. 1P-6-1

Anyway, my original point was, that according 1P-6-2

Page 44

Veritext National Deposition & Litigation Services
866 299-5127

1 to the draft EIR choosing variation D, which is the one
2 that would spare my house, will dramatically reduce the
3 domiciles affected and destroyed by this project
4 including mine.
5 So I urge that, should you not choose the no 1P-6-2 (cont.)
6 build, that you would do choose variation D. Our
7 property is in a unique situation, including 12 and a
8 half acres including our primary residence and
9 commercial business.
10 We have a commercial vineyard, a lavender
11 farm, and the corporate headquarters for our licensed
12 bonded winery, and I'd like to thank the supervisor
13 Antanovich's offices for helping pass laws making Los
14 Angeles County now more favorable for wineries, and we 1P-6-3
15 had hoped to, kind of, build this up from here.
16 Changing the legal location of our
17 headquarters is costly and bureaucratically tedious.
18 So that was not something we're looking forward to if
19 we have to move.
20 And I just want to say that, if you don't
21 choose variation D, you're going to have a fight on
22 your hands from us. 1P-6-4
23 We will fight in any way we can. We'll have
24 lawyers involved. We'll try and make it as expensive
25 as possible for you guys. So know ahead of time that

Page 45

Veritext National Deposition & Litigation Services
866 299-5127

1 at least one person is going to be trouble for you. I
2 hope you'll choose the no build.
3 Thank you.
4 MR. KOSINKSI: Okay. We have one more
5 speaker. Ignacio Oliveros? Ignacio?
6 (Crowd speaking.)
7 MR. KOSINKSI: Oh, he spoke already. Oh. He
8 filled out a card because he spoke. Oh, that's right.
9 Okay.
10 Well, I have no more cards. Does anybody have
11 anything else that they'd like to add? We have some
12 additional time, and don't forget we have the laptops
13 again for those people who are too shy to come up and
14 speak.
15 You can go there in the privacy of the
16 computer with our friends and fill out the various
17 comments and suggestions that you have, and --
18 (Crowd speaking.)
19 MR. KOSINKSI: You're going to have to -- if
20 you want to speak, you are going to have to -- do you
21 want to speak? Okay.
22 If you promise to give me a comment card, I'll
23 hand you the microphone and you don't have to get up.
24 Is that all right? Okay. Here you go.
25 MR. VILLAREAL: Well, my name is Frank

1P-6-4 (cont.)

Page 46

Veritext National Deposition & Litigation Services
866 299-5127

Response to Comment 1P-6

Comment Code (Topic)	Response
1P-6-1 (Community)	The build alternatives are intended to satisfy the project's purpose and need as discussed in Chapter 1 of the Final EIR/EIS. In doing so, it is believed that the High Desert region as a whole will benefit. However, your comment and concerns are noted and appreciated.
1P-6-2 (Design)	Your comment is appreciated and will be considered during the selection of the preferred alternative.
1P-6-3 (Community)	The impact to your winery business is noted. This will be used in consideration of a preferred alternative selection.
1P-6-4 (Design)	Your comments are appreciated.

Comment 1P-7

at least one person is going to be trouble for you. I hope you'll choose the no build.

Thank you.

MR. KOSINKSI: Okay. We have one more speaker. Ignacio Oliveros? Ignacio?

(Crowd speaking.)

MR. KOSINKSI: Oh, he spoke already. Oh. He filled out a card because he spoke. Oh, that's right. Okay.

Well, I have no more cards. Does anybody have anything else that they'd like to add? We have some additional time, and don't forget we have the laptops again for those people who are too shy to come up and speak.

You can go there in the privacy of the computer with our friends and fill out the various comments and suggestions that you have, and --

(Crowd speaking.)

MR. KOSINKSI: You're going to have to -- if you want to speak, you are going to have to -- do you want to speak? Okay.

If you promise to give me a comment card, I'll hand you the microphone and you don't have to get up. Is that all right? Okay. Here you go.

MR. VILLAREAL: Well, my name is Frank 1P-7-1

Page 46

Veritext National Deposition & Litigation Services
866 299-5127

1 Villareal, and I came here in 1990. I bought my first
2 house that I have ever owned in my life, and me and my
3 two children and my wife have been here, and they are
4 gone and married, but we sure plan to stay here.
5 And we don't need no freeways or things like
6 that making noise for us. So I think that the Lord can
7 help us do things better.
8 MR. KOSINKSI: Okay. Thank you.
9 If you please fill that card out for the
10 record, then we have your name officially, and then
11 when we respond, you'll get a response. Otherwise
12 you're -- you're just an anonymous person.
13 Anybody else wish to speak? Here we go.
14 MS. HANNA: This is a very different crowd
15 than last time. My name is Mary Hanna, and I've lived
16 here since '92. You always have to predicate that
17 whenever you talk in the Antelope Valley.
18 I wish you all well. I moved here because
19 there -- I can see the stars. Saying I'm a bit of a
20 realist as well and people are dieing on the 138 left
21 and right.
22 I would like you to ensure that one of the
23 things that all of us who live here find is that we
24 become conservators of the critters that live here and
25 the wildlife that's here because the deserts such a

1P-7-1 (cont.)

Page 47

Veritext National Deposition & Litigation Services
866 299-5127

Response to Comment 1P-7

Comment Code (Topic)	Response
1P-7-1 (Noise)	Your comment and concern are appreciated. While the project will result in an increase in noise levels, abatement measures (i.e., soundwalls) have been proposed in those areas where the increase is considered to be substantial. With the inclusion of these walls, the overall increase in noise levels is not considered significant.

Comment 1P-8

Villareal, and I came here in 1990. I bought my first house that I have ever owned in my life, and me and my two children and my wife have been here, and they are gone and married, but we sure plan to stay here.

And we don't need no freeways or things like that making noise for us. So I think that the Lord can help us do things better.

MR. KOSINKSI: Okay. Thank you.

If you please fill that card out for the record, then we have your name officially, and then when we respond, you'll get a response. Otherwise you're -- you're just an anonymous person.

Anybody else wish to speak? Here we go.

MS. HANNA: This is a very different crowd than last time. My name is Mary Hanna, and I've lived here since '92. You always have to predicate that whenever you talk in the Antelope Valley.

I wish you all well. I moved here because there -- I can see the stars. Saying I'm a bit of a realist as well and people are dieing on the 138 left and right.

I would like you to ensure that one of the things that all of us who live here find is that we become conservators of the critters that live here and the wildlife that's here because the deserts such a 1P-8-1

Page 47

Veritext National Deposition & Litigation Services
866 299-5127

1 brutal place to live.
2 I like the idea of the culverts. They need to
3 be truly wide with no lights, and they need to have a
4 dirt floor. The east side of the Antelope Valley is
5 the recharge of the entire Antelope Valley. If
6 anything messes up the recharge, our valley floor 1P-8-2
7 drops, and we have less water.
8 So do not channel the washes. Make the span
9 broad enough so that the wash stays a wash. Make the
10 span wide enough so that the creatures can move
11 through.
12 After that, as much as possible remove the
13 lights. We don't need them. Got really good lights on 1P-8-3
14 my car. I can find my way.
15 The lights will impede not only the
16 four-legged critters, but it also does quite brutal 1P-8-4
17 behavior on the raptors. This is a raptor land, and
18 the raptors are annihilated on the roads.
19 I would love for the freeway to be raised in
20 some way where it doesn't get involved with us. Where
21 it leaves the desert alone, and it leaves the people
22 alone. 1P-8-5
23 I don't know how you're going to ever do this
24 without really damaging us, but if anyone's driven down
25 O, it's already damaged. We have an awful, awful time

Page 48

Veritext National Deposition & Litigation Services
866 299-5127

1P-8-5 (cont.)

with it.

Thank you.

MR. KOSINKSI: Thank you.

Okay. Does anybody else wish to speak? We still have some time. This gentleman. You got to fill out one of those papers. Promise me. Okay.

Thank you.

MR. MILLER: My name is Steve Miller. I'm your neighborhood chief of staff for international and national coalition of motorcycles.

I've lived out here in the desert between Barstow, Mojave, and out here in Lake LA since about 1966. I used to run dummy dumps, bottom tops, I helped the 14 freeway.

I'm sorry I ever did, but we used to have nice little communities out here. Now what do I see? Gang invested, graffiti-covered hell holes. That's what I see. Progress my friends? What next? Another state, federal prison joint, you know, out here?

Oh, geez. That way everybody from South Central can move on in and be next to daddy or mommy in the joint going to be spending 20, 30 years, bringing the little gangbanging kids?

Sorry, folks. I'm 60 years old. I didn't fall off the turnip truck yesterday. I've seen what

Page 49

Veritext National Deposition & Litigation Services
866 299-5127

Response to Comment 1P-8

Comment Code (Topic)	Response
1P-8-1 (Biology)	Caltrans conducted numerous general and focused studies to understand the flora and fauna that occur within the vicinity of the proposed project. The impacts of the project on these resources are described in Sections 3.3.1 through 3.3.6 of the Final EIR/EIS. Measures will be implemented to minimize and offset those impacts on natural resources to ensure that plants and animals, especially species with special-status (i.e., threatened, endangered), are protected as much as possible.
1P-8-2 (Hydrology)	Your comment in support of the dual purpose culverts for use in water conveyance and as wildlife crossings is noted. Please refer to the HDC Final EIR/EIS Chapter 2 (Section 2.4.4 Bridges and Culverts) for a discussion on culverts proposed for wildlife crossings. Also please refer to Chapter 3 (Section 3.2.1 Hydrology and Floodplain) for a discussion on potential impacts to floodplains and measures to minimize floodplain impacts.
1P-8-3 (Visual)	The project will incorporate measures to avoid, minimize, and/or mitigate the effects of lighting on the surrounding environment. Please see measures V-2, V-3 and V-4 in Chapter 3.1.7 of the EIR/EIS. These measures will guide the final design of the project to reduce the amount of lighting and ensure that it complies with dark-sky guidelines which will minimize glare and light pollution.
1P-8-4 (Biology)	Lighting will only occur in areas where necessary for safety precautions. Lighting will use full-cutoff fixtures and be dark-sky compliant, illuminating only those areas of the roadway as required. As such, impacts from lighting to raptors and other wildlife is expected to be minimal or none.
1P-8-5 (Design)	Your comment is noted but your reference to Ave. O is unclear. Any project that is built will inevitably affect the people and the environment nearby. This document has been prepared to asses and document those impacts, and develop ways to minimize them, so that an educated and informed decision can be made.

Comment 1P-9

with it.

Thank you.

MR. KOSINKSI: Thank you.

Okay. Does anybody else wish to speak? We still have some time. This gentleman. You got to fill out one of those papers. Promise me. Okay.

Thank you.

MR. MILLER: My name is Steve Miller. I'm your neighborhood chief of staff for international and national coalition of motorcycles.

I've lived out here in the desert between Barstow, Mojave, and out here in Lake LA since about 1966. I used to run dummy dumps, bottom tops, I helped the 14 freeway.

I'm sorry I ever did, but we used to have nice little communities out here. Now what do I see? Gang invested, graffiti-covered hell holes. That's what I see. Progress my friends? What next? Another state, federal prison joint, you know, out here? 1P-9-1

Oh, geez. That way everybody from South Central can move on in and be next to daddy or mommy in the joint going to be spending 20, 30 years, bringing the little gangbanging kids?

Sorry, folks. I'm 60 years old. I didn't fall off the turnip truck yesterday. I've seen what

Page 49

Veritext National Deposition & Litigation Services
866 299-5127

1 progress has done did, and I'm sorry to say that I
2 brought it here. I wished to God I could change that. 1P-9-1
3 I wish to God I was hauling turnips and not asphalt.
4 Maybe we still have a nice community out here.
5 Thank you so very much.
6 MR. KOSINKSI: Thank you. Okay. Does anybody
7 else wish to speak? There's still some time here.
8 Going once? All right. I think I'm wrapping this up.
9 Nobody else wants to speak? Okay.
10 Well, first of all, thank you for all of the
11 insights from the community. Everything that we've
12 heard is helpful, gives us an indication of what people
13 feel like out here, and it is important to hear from
14 you.
15 What we've identified in the environmental
16 document so far reflects some of this -- some of these
17 issues but not all of them, but we'll make sure that
18 the final environmental document reflects these
19 comments. Your comments will be in the final
20 environmental document and will influence the decision
21 making process.
22 As you leave today and you go home, if you
23 think of something else that you'd like to say or
24 write, please send it to us. Keep in mind that you
25 have until December 2nd to give us comments. So you

Page 50

Veritext National Deposition & Litigation Services
866 299-5127

Response to Comment 1P-9

Comment Code (Topic)	Response
1P-9-1 (Growth)	Your concerns are noted. The HDC will improve access to, and mobility within, the High Desert region. However, what facilities are built there (i.e., prisons, housing) will be determined by each local jurisdictions.

Chapter 9 Responses to Oral Comments from the November 6, 2014 Public Hearing

This section provides responses to oral comments received on the draft environmental document from persons attending the public hearing held on November 6, 2014. A total of six oral comments were recorded and are summarized below. Transcripts of the oral comments and responses to topics of concern are provided on the pages that follow.

Table 9.1. Summary of Oral Comments Received at the November 6, 2014 Public Hearing

Comment Code	Commenter Name	Comment Topics
2P-1	Andrew Wang	Project design and alternatives
2P -2	Bryan Baker	Project design and alternatives, traffic and transportation, cumulative impacts
2P -3	D. Queen	Project design and alternatives
2P -4	Marla Stanfield	Project design and alternatives, visual, noise, biological environment
2P -5	Cindy Lazenbee	Traffic and transportation
2P -6	Chester	Project design and alternatives

Comment 2P-1

1 make the corridor more porus and allow wildlife to move a little
2 bit more freely. And so we don't anticipate -- or we do
3 anticipate that by doing that, we will reduce our impact
4 substantially.
5 And I'm gonna have Ron come back up, and he'll finish off
6 the presentation.
7 RON KOSINSKI: Thank you, Karl. Just wanted to remind
8 people that this is being streamed lived to various people that
9 are watching on the computer. If those individuals would like
10 to send us some comments, we have -- Robert's volunteered to
11 read them here so that we can communicate that information to
12 the people that are here. We also have computers here for those
13 people that are maybe a little shy and would like to just go to
14 the computer and fill out the information on their general
15 issues dealing with this corridor and study. So that's in the
16 back of the room over there, so keep that in mind.
17 And, basically, now we're gonna sit back and listen to you.
18 I've got a couple of comment cards already. And if you think of
19 something that is generated by the presentation, please feel
20 free to fill this out and hand it to one of our staff. Raise
21 your hand and we'll get you on the list here.
22 We're gonna start with Debra Masterson and then go to
23 Andrew Wang. So Debra, come on up. Debra Masterson? I think
24 she might be afraid to be on TV. What about Andrew Wang?
25 ANDREW WANG: Good morning -- evening. I'm Andrew Wang. I 2P-1-1

Page 22

Veritext National Deposition & Litigation Services
866 299-5127

1 am -- drove a really long drive to get out here just to listen
2 to this presentation and to know about this. And of these
3 alternatives that I heard today, I find that the one with the
4 freeway and the tollroad is the most viable option and pretty
5 much also the rail service as well. And -- Oh, I forgot to 2P-1-1
6 mention that I'm representing LACBC today, which stands for Los
7 Angeles County Bicycle Coalition. And speaking of LACBC, I find
8 that this project does play a really good role in cycling as
9 well. And all I'm here for today is just to get the information
10 and listen to this interesting presentation, and that's about
11 it.
12 RON KOSINSKO: Thank you, Andrew
13 So Bryan Baker, do we have Bryan Baker? Then we'll have D
14 "Green."
15 BRYAN BAKER: Thank you. So apparently Caltrans hasn't
16 really got the message that the (inaudible) freeways in
17 California. If you look at the L.A. Times last week, there's a
18 really good map of proposed freeways for the L.A. area back in
19 the 50s and 60s. And they were going to build all kinds of new
20 freeways, Beverly Hills freeway, Rio Hondo freeway, which
21 would've been between the 605 and 710, certain freeways in the
22 San Fernando Valley, Pacific Coast Highway freeway. And
23 something happened down there. People got up in an arms about
24 it and said, "We don't want anymore freeways." Why is this one
25 still alive? This one has refused to die. It keeps coming up.

Page 23

Veritext National Deposition & Litigation Services
866 299-5127

Response to Comment 2P-1

Comment Code (Topic)	Response
2P-1 (Design)	Comment in support of the Freeway/Tollway Alternative with HSR Feeder Service and bicycle option is noted.

Comment 2P-2

am -- drove a really long drive to get out here just to listen to this presentation and to know about this. And of these alternatives that I heard today, I find that the one with the freeway and the tollroad is the most viable option and pretty much also the rail service as well. And -- Oh, I forgot to mention that I'm representing LACBC today, which stands for Los Angeles County Bicycle Coalition. And speaking of LACBC, I find that this project does play a really good role in cycling as well. And all I'm here for today is just to get the information and listen to this interesting presentation, and that's about it.

RON KOSINSKO: Thank you, Andrew

So Bryan Baker, do we have Bryan Baker? Then we'll have D "Green."

BRYAN BAKER: Thank you. So apparently Caltrans hasn't really got the message that the (inaudible) freeways in California. If you look at the L.A. Times last week, there's a really good map of proposed freeways for the L.A. area back in the 50s and 60s. And they were going to build all kinds of new freeways, Beverly Hills freeway, Rio Hondo freeway, which would've been between the 605 and 710, certain freeways in the San Fernando Valley, Pacific Coast Highway freeway. And something happened down there. People got up in an arms about it and said, "We don't want anymore freeways." Why is this one still alive? This one has refused to die. It keeps coming up. 2P-2-1

Page 23

Veritext National Deposition & Litigation Services
866 299-5127

1 Well, I guess people have the idea that there's nothing really
2 out here. The desert is just empty. It's there to be paved
3 over with and be a motor crossing. Well, I'm here to tell you
4 that that's not true. And I'm sure that most of you who are 2P-2-1 (cont.)
5 residents of the area already know that. There's people out
6 there. There's wildlife and plant communities out there. It's
7 a vibrant community. Now, this would be a huge footprint across
8 our desert. I was at the DRECP, the Desert Renewable Energy
9 Conservation meeting last week. And I would also open lots of
10 land in this area to huge solar farms. So before you know it, 2P-2-2
11 there won't be much desert left out here because of freeways and
12 solar farms and all of that. So just be aware of that. But I
13 don't think this freeway's going to be built, and I hope it
14 won't be built. Several reasons: First of all, there's really
15 no demand for it. I've looked at the traffic study. It's
16 something like an 800-page document. It's a huge document.
17 It's pretty vague about the assumptions that are used in the
18 modeling. But I tell you, I've looked at the few statistics out
19 here, and the roads that are traveled between the Victor Valley
20 and Palmdale area -- really there's only three, right? There's 2P-2-3
21 El Mirage and Phelan Road. Those roads carry about 15,000 cars
22 a day, both directions. The study predicts that there will be
23 something like 120,000 trips per day with no build, with no
24 freeway, and something like 170,000 trips with the freeway. So
25 that -- can you imagine? That many people -- more people going

Page 24

Veritext National Deposition & Litigation Services
866 299-5127

1 between these two communities than there are. That would be as
2 many as ten times people, ten times as many trips. Does that
3 make sense to you? Something wrong with the assumptions in the
4 study. They're assuming people would be deverdent from LA
5 County freeways instead of taking the 210, you'd take the High
6 Desert Corridor. Well, if you look at Google, take Google out,
7 and measure the distances from various places in the LA County
8 area up to, say, Barstow. It's about 50 miles further from the 2P-2-3 (cont.)
9 City of Industry taking the High Desert Corridor than it is just
10 to go up the 15. It's about 40 miles further from the port of
11 Long Beach. People are not going to take that road,
12 particularly if it's a Tollway. And, in fact, there probably
13 will be a tollway because there's no other way to fund this
14 thing. Oh, and by the way, they're going to have their hand
15 out, whoever is going to build this thing is going to have their
16 hand out to the public to fund the building of this.
17 Vegas train is not going to be built. The proposal for
18 that was really (inaudible) criticized by (inaudible). And that
19 caused the Republicans and Congress to basically cut off funding
20 for the train. So there's not going to be a $6 billion dollar
21 loan and guarantee a funding by the federal government, which is
22 what they need to get that train built. So that's not going to
23 happen.
24 And finally, do you know that this road will 'cause both of 2P-2-4
25 the current Highway 18 and Highway 138 to be dropped from the

Page 25

Veritext National Deposition & Litigation Services
866 299-5127

1 state highway system? Those roads will no longer be state
2 highways. They will be funded by your local county government.
3 So Sacramento, tax payers of the State will no longer fund those
4 roads. So all of those people going up the 138 up to Phelan to
5 Little Rock on the commute home, they're going to be driving on 2P-2-4 (cont.)
6 a local road. That's what's in the EIR, that they're going to
7 drop it. And you and I will have to fund those roads. Those
8 are the roads that people really use, not the tollroad that's
9 proposed in this.
10 Tragically, the ironic thing about this proposal is that
11 the alternative, it should have been built. It was called the
12 TSM. That was the proposal to improve the current existing
13 Palmdale Road across the 138. That's the road that everybody
14 drives. It would cost a fraction of the $6 billion dollar
15 freeway, and it would have helped the people who are actually
16 traveling across the desert get across the desert. I guess what
17 happened was with this road that the transportation planners
18 just can't seem to give it up. And they figured that if they 2P-2-5
19 give us enough goodies, you know, you put in the bike way and
20 some solar generation and some other things and a rail, that
21 we'll all go for it. There's something in it for everybody. So
22 just food for thought, I think that maybe they should add some
23 horse trails and hiking trail and put a canal. Wouldn't a canal
24 be good across to the Mojave River? I think they have put
25 enough things. Maybe if there were enough of those, I would put

Page 26

Veritext National Deposition & Litigation Services
866 299-5127

2P-2-5 (cont.)

support it.

RON KOSINSKI: Thank you, Mr. Baker. And then we have Mr. Queen. And Marla Standfield will be next.

D QUEEN: Good evening, folks. Thanks for coming out. My first question before I speak is, how many of you want it to stay rural here? How many of you folks like to keep this place rural? And that's an indicator because it won't be. Now, the reason I came here today is I'm involved in developing train systems for over 25 years now. I did it in San Francisco and had an element that came down here towards Victorville. And as it turns out, I came to move to Lucerne Valley. And I've been active there. But what happened in San Francisco has to do with here. But before I get there, my plan comes from San Francisco, comes down to the same place in Palmdale and then comes over to Lucerne Valley and then goes to north of Lucerne Valley and brings the rail system and a road back up to Barstow and it just continues on. What I do is I take the rail freight that comes from the ports as well as the trucks to and from the ports as well as the trucks locally off of highway I-15, because the biggest hang up is on the Victorville route. That's the problem. And so I take that away. And I can build it in roughly three years. It's not going to cost $6 billion dollars and etcetera. There's more to it than that is that I recently planned my transportation system in San Francisco. I took seven years of my life and did that. And I had a plan that takes

Page 27

Veritext National Deposition & Litigation Services
866 299-5127

Response to Comment 2P-2

Comment Code (Topic)	Response
2P-2 -1 (Design)	Numerous studies have been conducted and the project team is aware that the high desert is not "just empty" and contains numerous resources and attributes that are of great value to local residents. To ensure that these resources are respected, the project will be designed in a context-sensitive manner and with the local communities in mind. As stated in the EIR/EIS, the project will incorporate numerous measures to reduce (avoid, minimize or mitigate) impacts to the communities and the surrounding environment.
2P-2-2 (Cumulative)	The HDC has the support of all the local communities and is included in the General Plan for most of them. This project has, therefore, been incorporated into the land use planning of these communities. The HDC will improve access and mobility within the area, but any proposed solar projects will have to undergo the review and approval process of the respective planning departments to ensure they are consistent with the current and future land use plans. These projects will also have to go through the standard environmental review process under CEQA and, possibly, NEPA.
2P-2-3 (Traffic)	The traffic forecasts reported in the draft environmental documents are based on the SCAG 2008 Regional Travel Demand Model and its adopted growth forecasts. The land use assumptions reflected by the forecasts are reported in the Traffic Study Technical Report. Based on the growth forecasts, the population of the High Desert region is expected to approximately double to 1.4 million persons, by 2040. The increased population and employment within the High Desert region will significantly increase the interaction of travelers between Antelope Valley, the High Desert, and Victor Valley, with traffic volumes on the east-west connecting roadways increasing from a total of approximately 20,000 vehicles per day for all facilities combined in 2010 to a forecast of 133,500 vehicles per day crossing the Los Angeles/San Bernardino county line in 2040, assuming no construction of the High Desert Corridor freeway or tollway. While that volume appears to be a huge increase, similarly large increases in traffic volumes are forecast for I-15 traversing the Cajon Pass. Construction of the HDC freeway would increase the volume of traffic crossing the county line to 171,000 vehicles per day, with the freeway carrying approximately two-thirds of the total traffic demand. Examining where the traffic comes from and is going to, over one-half of the eastbound traffic using the HDC freeway (64.1%) would originate in Palmdale or Lancaster (Antelope Valley) and slightly under 20 percent (19.7%) would come from origins served by SR-14 to the south of Palmdale. This eastbound traffic is forecast to be destined to Victor Valley (55.5%), I-15 to the north (21.6%), I-15 to the south (14.4%) and Lucerne Valley or points east (8.5%). Similar patterns exist for the westbound traffic.

Comment Code (Topic)	Response
2P-2-4 (Traffic)	Widening Pearblossom Highway and Palmdale Road, currently signed as State Routes 138 and 18 respectively, will be completed before the construction of the HDC freeway or tollway. Along with widening the roadways from two lanes to four lanes, the vertical alignment will be flattened to eliminate the up and down rolling pavement which currently exists, particularly along SR-18 between its junction with SR-138 and US 395. A determination regarding the disposition of existing SR-138 south from its junction with SR-18, following construction of the HDC, has not been determined at this time; this section of SR-138 may be renumbered as a different state route or relinquished to the local agencies. Relinquishment of all or part of these routes would need to be authorized by the California Transportation Commission and they would need to be brought to a "state of good repair" prior to being turned over to the local agencies.
2P-2-5 (Design)	The TSM alternative was considered and rejected for not adequately satisfying the purpose and need for the project. The rationale for dismissing this alternative is included in Chapter 2.7.

Comment 2P-3

support it.

RON KOSINSKI: Thank you, Mr. Baker. And then we have Mr. Queen. And Marla Standfield will be next.

D QUEEN: Good evening, folks. Thanks for coming out. My first question before I speak is, how many of you want it to stay rural here? How many of you folks like to keep this place rural? And that's an indicator because it won't be. Now, the reason I came here today is I'm involved in developing train systems for over 25 years now. I did it in San Francisco and had an element that came down here towards Victorville. And as it turns out, I came to move to Lucerne Valley. And I've been active there. But what happened in San Francisco has to do with here. But before I get there, my plan comes from San Francisco, comes down to the same place in Palmdale and then comes over to Lucerne Valley and then goes to north of Lucerne Valley and brings the rail system and a road back up to Barstow and it just continues on. What I do is I take the rail freight that comes from the ports as well as the trucks to and from the ports as well as the trucks locally off of highway I-15, because the biggest hang up is on the Victorville route. That's the problem. And so I take that away. And I can build it in roughly three years. It's not going to cost $6 billion dollars and etcetera. There's more to it than that is that I recently planned my transportation system in San Francisco. I took seven years of my life and did that. And I had a plan that takes

2P-3-1

Page 27

Veritext National Deposition & Litigation Services
866 299-5127

1 transit -- are you familiar with Cal-train up there? I raised
2 $650 million dollars in 1990 to do my plan. I had a team second
3 to none. I had a nationally recognized architecturally firm,
4 engineering firm, railroad firm, a short rail operator and
5 some -- about thousand people who will do the work. And of the
6 $650 million, $550 million was to build a ballpark for the
7 Giants as well as a local swimming pool and a whole bunch of
8 things. I have a hand out if you would like to see all the
9 elements. And $150 million was to buy the Cal-train
10 right-of-way from San Francisco that goes down a little bit past 2P-3-1
11 Gilroy. But I fought with Bart all the way up to Interstate
12 Congress Commission. The reason I fought with them is their
13 plan to get from Coleman out towards the airport, they said
14 they'd do it in 11 years and it's a lot longer than that. It
15 cost over $60 billion dollars to go something like 6 miles --
16 60 miles. And so I came up with a plan to take Cal-train in an
17 underground route from the foot of market where the ferrie
18 building and add a direct connect to Bart, come down to where
19 the current ballpark sits right now, the new one. (Inaudible)
20 That would should have been called the small (inaudible), and
21 then it goes past the existing rail terminal. It comes along
22 the existing right-of-way to the airport of San Francisco. And
23 I had it so it looped into the airport and came back out on the
24 track, goes down to San Jose, stops at that airport. And they
25 have a bridge across the Bay and crossed another rail and it

Page 28

Veritext National Deposition & Litigation Services
866 299-5127

1 crossed the bridge and get Oakland and go on to Sacramento. An
2 alternative was -- and I proved it could be done. And they
3 actually build it strong enough to do it. They used to have
4 trains going across the Bay Bridge. All I was going to do was
5 put -- take two of the lanes and put two tracks, one in each
6 direction, and I can move a lot of people. I can move 80,000
7 people an hour with my system, 80,000 people an hour. Can't do
8 that with these things. So the point of it is, I could build
9 that in three years. Bart took 11 years. And the process that
10 you go through is called a New Start Program where you go 2P-3-1
11 through the Federal process, both local state, county, etcetera,
12 etcetera, up through Congress, and you also go into a Department
13 of Transportation, both the State level, Caltrans and everything
14 else through the Federal transportation. And the railroad
15 starts is where they have a system where they have points
16 assigned based a whole bunch of elements. They're using
17 existing rights-of-way, blah, blah, blah, blah, in fact, on the
18 neighborhood, etcetera. On every point, comparing mine to Bart,
19 I won them all, every one by bigger points. And so when it
20 finally got to the ICC under law, I should have won. But what
21 they is they just closed the ICC in 1995. So here I am again,
22 I'm up against it. But I can do my plan 100 percent privately
23 funded. Won't cost me a dime. Won't have a tollroad. And it
24 will also provide freight for small business. Try putting
25 freight on a big train. Can't do it, it's too small. I can do

Page 29

Veritext National Deposition & Litigation Services
866 299-5127

it. And I figured it all out how to do this. And you'll see I'm fairly particular with this. And I had a team that took this whole business plan -- I'm the one who introduced the business plan, this whole process, by the way. They didn't have them before me. And they had studies and this and that and the other, but I had a business plan that looks like this. And it showed the dollars and cents, what it's gonna do and how it's going to do it. It tied to all the ferries and the trains and the buses. It went across the Bay Bridge, the Golden Gate Bridge. The whole thing was put together. And I want to do the same thing here that's good for the middle class, because we're hurting. And I'm going to be here for a while and I have some business cards. If you want a picture, I have a few of these. I'll be here. If you're interested, I'd like to talk to you and give you a card. And thanks for your time. 2P-3-1

RON KOSINSKI: Marla Stanfield?

MARLA STANFIELD: First off, I'd like to thank you all for giving us the opportunity to speak tonight for specially those of us who have concerns. I am against Variation E. Variation E puts the rail line right through my house. It goes right down the middle of my street. So I'm against Variation E. In addition, I'm concerned with the extra light pollution in the desert. And I don't know how -- I don't really understand the mitigation factors that would be used. So I guess I would have to learn more about that. But I am against the light pollution.

Page 30

Veritext National Deposition & Litigation Services
866 299-5127

Response to Comment 2P-3

Comment Code (Topic)	Response
2P-3-1 (Other)	Thank you for your comments. However, they are general in nature and not specifically related to the Draft EIR/EIS for this project. Therefore, no specific response is provided.

Comment 2P-4

it. And I figured it all out how to do this. And you'll see I'm fairly particular with this. And I had a team that took this whole business plan -- I'm the one who introduced the business plan, this whole process, by the way. They didn't have them before me. And they had studies and this and that and the other, but I had a business plan that looks like this. And it showed the dollars and cents, what it's gonna do and how it's going to do it. It tied to all the ferries and the trains and the buses. It went across the Bay Bridge, the Golden Gate Bridge. The whole thing was put together. And I want to do the same thing here that's good for the middle class, because we're hurting. And I'm going to be here for a while and I have some business cards. If you want a picture, I have a few of these. I'll be here. If you're interested, I'd like to talk to you and give you a card. And thanks for your time.

RON KOSINSKI: Marla Stanfield?

MARLA STANFIELD: First off, I'd like to thank you all for giving us the opportunity to speak tonight for specially those of us who have concerns. I am against Variation E. Variation E puts the rail line right through my house. It goes right down the middle of my street. So I'm against Variation E. 2P-4-1

In addition, I'm concerned with the extra light pollution in the desert. And I don't know how -- I don't really understand the mitigation factors that would be used. So I guess I would have to learn more about that. But I am against the light pollution. 2P-4-2

Page 30

Veritext National Deposition & Litigation Services
866 299-5127

1 In addition, I am concerned about the added noise that's coming
2 to this desert. It's not just the roads. But when you put an
3 eight-light highway into the desert, it's going to add a lot
4 more noise, and specially with my house being right there. 2P-4-3
5 Also, I am concerned with the destruction and/or the
6 environmental impact of the wildlife and plant life all along
7 the corridor. I don't think that the culverts, the animals are
8 going to necessarily know to go into a culvert and cross the 2P-4-4
9 road and instead will go into the road and cause accidents or
10 they may not survive that. So thank you very much.
11 RON KOSINSKI: Thank you Marla. And is Debra Masterson
12 decide that she'd like to speak or not? Well, I don't have any
13 more comment cards. And if anybody else would like to speak.
14 You want to come up and speak and have your husband fill that
15 out. What do you think? We'll move things along that way.
16 Thank you.
17 CINDY LAZENBEE: My name is Cindy Lazenbee, and I've lived
18 here over four years in the high desert. And my concern is not
19 only the things that she said, but also when you look at the
20 map, it ends on Highway 18. Anyone who's lived in the high
21 desert and traveled between Lucerne Valley and Apple Valley, our
22 road is getting very congested as it is. And you're going to
23 dump this additional traffic at the end. And what are you going
24 to do for our roads and the impact that you're going to make for
25 additional traffic on our roads? So that's something that I

Page 31

Veritext National Deposition & Litigation Services
866 299-5127

Response to Comment 2P-4

Comment Code (Topic)	Response
2P-4-1 (Design)	Your opposition to Variation E is noted.
2P-4-2 (Visual)	The project will incorporate measures to avoid, minimize, and/or mitigate the effects of lighting on the surrounding environment. Please see measures V-2, V-3 and V-4 in Chapter 3.1.7 of the EIR/EIS. These measures will guide the final design of the project in order to reduce the amount of lighting and ensure that it complies with dark-sky guidelines which will minimize glare and light pollution.
2P-4-3 (Noise)	The potential noise impacts of the proposed project have been evaluated and are summarized in Chapter 3.2.7 of the EIR/EIS. There will be an increase in noise levels in some areas. However, appropriate noise abatement measures have been proposed at some locations to ensure that the project complies with state and federal noise regulations.
2P-4-4 (Biology)	Caltrans conducted numerous general and focused studies to understand the flora and fauna that live within the vicinity of the proposed project. The impacts on these resources are addressed in Sections 3.3.1 through 3.3.6 of the Final EIR/EIS. Measures will be implemented to minimize and offset those impacts on natural resources to protect special-status flora and fauna. The HDC alignment will be fenced to prevent wildlife from crossing the highway. The fencing will funnel wildlife into soft-bottomed culverts to facilitate wildlife movement. Studies have shown that wildlife will use such culverts if they are of an appropriate height and width.

Comment 2P-5

In addition, I am concerned about the added noise that's coming to this desert. It's not just the roads. But when you put an eight-light highway into the desert, it's going to add a lot more noise, and specially with my house being right there. Also, I am concerned with the destruction and/or the environmental impact of the wildlife and plant life all along the corridor. I don't think that the culverts, the animals are going to necessarily know to go into a culvert and cross the road and instead will go into the road and cause accidents or they may not survive that. So thank you very much.

RON KOSINSKI: Thank you Marla. And is Debra Masterson decide that she'd like to speak or not? Well, I don't have any more comment cards. And if anybody else would like to speak. You want to come up and speak and have your husband fill that out. What do you think? We'll move things along that way. Thank you.

CINDY LAZENBEE: My name is Cindy Lazenbee, and I've lived here over four years in the high desert. And my concern is not only the things that she said, but also when you look at the map, it ends on Highway 18. Anyone who's lived in the high desert and traveled between Lucerne Valley and Apple Valley, our road is getting very congested as it is. And you're going to dump this additional traffic at the end. And what are you going to do for our roads and the impact that you're going to make for additional traffic on our roads? So that's something that I 2P-5-1

Page 31

Veritext National Deposition & Litigation Services
866 299-5127

1 haven't heard anyone address, and maybe it's in something else. 2P-5-1
2 But I'd like to have an answer to that one.
3 RON KOSINSKI: Thank you. That will be in the public
4 information. Those kind of questions are what we're looking
5 for. And that way we'll have documentation on that. And then
6 when we make our final decision, we'll provide that response to
7 that issue in the environmental final document. So does anybody
8 else have lots -- wants to get up and make a statement? There
9 you go. We have another one here, Chester.
10 UNIDENTIFIED SPEAKER: Hi. Can you hear me? So I was
11 born, raised up here in the desert. You know, I love the
12 desert. I swore when I moved away, I would never come back.
13 But I did. So here I am. You know, I have my own family and
14 they're all still here. But I commute a 100 miles a day, and it
15 sucks. And, you know, with all the construction going through
16 the 15 right now, I drive 20 miles out of my way both ways every
17 day. So whether or not we put a rail system or another freeway
18 system, whatever, I feel we need something. If there's a fire
19 on the pass, where are you going to go? There's no way. You go
20 up and over the mountain or up and over the mountain. Isn't
21 there a better way? I mean that rail project could bring jobs
22 closer to us so we don't have to drive so far. We have a better
23 life, spend time with our family. So I think it's just -- we
24 got to find a better way. And I think this would bring more
25 jobs. Not only building it, but maintaining the buildings,

Page 32

Veritext National Deposition & Litigation Services
866 299-5127

Response to Comment 2P-5

Comment Code (Topic)	Response
2P-5-1 (Traffic)	The proposed High Desert Corridor project location is many miles away from Lucerne Valley and other communities to the east, north and south of Lucerne Valley. A detailed traffic analysis has been done and no change in traffic volume or patterns is forecast to occur in Lucerne Valley or points north, east, or south of Lucerne Valley as a result of construction of the proposed project.

Comment 2P-6

1 haven't heard anyone address, and maybe it's in something else.
2 But I'd like to have an answer to that one.
3 RON KOSINSKI: Thank you. That will be in the public
4 information. Those kind of questions are what we're looking
5 for. And that way we'll have documentation on that. And then
6 when we make our final decision, we'll provide that response to
7 that issue in the environmental final document. So does anybody
8 else have lots -- wants to get up and make a statement? There
9 you go. We have another one here, Chester.
10 UNIDENTIFIED SPEAKER: Hi. Can you hear me? So I was
11 born, raised up here in the desert. You know, I love the
12 desert. I swore when I moved away, I would never come back. 2P-6-1
13 But I did. So here I am. You know, I have my own family and
14 they're all still here. But I commute a 100 miles a day, and it
15 sucks. And, you know, with all the construction going through
16 the 15 right now, I drive 20 miles out of my way both ways every
17 day. So whether or not we put a rail system or another freeway
18 system, whatever, I feel we need something. If there's a fire
19 on the pass, where are you going to go? There's no way. You go
20 up and over the mountain or up and over the mountain. Isn't
21 there a better way? I mean that rail project could bring jobs
22 closer to us so we don't have to drive so far. We have a better
23 life, spend time with our family. So I think it's just -- we
24 got to find a better way. And I think this would bring more
25 jobs. Not only building it, but maintaining the buildings,

Page 32

Veritext National Deposition & Litigation Services
866 299-5127

2P-6-1

1 maintaining the railways, maintaining the train cars. So
2 there's a lot of work. So thank you.
3 RON KOSINSKI: Anybody else that would like to speak? I
4 think with that, I'm going to -- if we don't have any other
5 people that want to speak dealing with the project itself, I
6 think I'm going to close this public hearing. But, basically,
7 keep in mind, that we're asking for your help in identifying
8 critical issues that need to be evaluated as a part of this
9 decision-making process. So you're contributing this
10 decision-making process with the comments you made here today.
11 If we've missed something -- if you go home, and in the next
12 couple of days you'd think of anything else you'd like to give
13 us information on, please fill out that comment card, mail it
14 in. We'd be happy to take it. Or you can go on to the computer
15 and send us your comments in that way too. There's a variety of
16 ways you can get the information to us. Keep in mind that
17 December 2nd is the end our comment period. And this is kind of
18 an important piece of the process. This is where you'll
19 officially provide your comments. We'd officially have to
20 address with them, deal with them and make changes for the
21 project that accommodates some of the issues that you're raising
22 and make hopefully an informed decision. Basically, do we
23 understand that it's your community? We are visitors to your
24 community. And that the final environmental document should be
25 a reflection of what your inputs were into this project. And

Page 33

Veritext National Deposition & Litigation Services
866 299-5127

Response to Comment 2P-6

Comment Code (Topic)	Response
2P-6-1 (Design)	Your comment in support of the proposed project is noted.

Chapter 10 Responses to Oral Comments from the November 12, 2014 Public Hearing

This section provides responses to oral comments received on the draft environmental document from persons attending the public hearing held on November 12, 2014. A total of 8 oral comments were recorded and are summarized below. Transcripts of the oral comments and responses to topics of concern are provided on the pages that follow.

Table 10.1. Summary of Oral Comments Received at the November 12, 2014 Public Hearing

Comment Code	Commenter Name	Comment Topics
3P-1	Michael Behen	Project design and alternatives
3P -2	Richard Polston	Project design and alternatives
3P -3	Jim Alexander	Project design and alternatives
3P -4	Dellhert Queen	Project design and alternatives
3P -5	Sam Wilson	Community impacts
3P -6	Ingrid Venderhope	Project design and alternatives
3P -7	Ginger Stout	Traffic and transportation, air quality
3P -8	Michael Spalding	Project design and alternatives

Comment 3P-1

MICHAEL BEHEN: Good afternoon. Thank you very much. Michael Behem from the City of Palmdale and Department of Public Works. First of all, we want to say thank you very much for having this meeting in Palmdale at the Larry Chimbole Cultural Center. Larry is our first mayor in Palmdale. He's actually sitting right there. So I'd like to pay respect to him. So the first comment, we have worked together over many years on this project. And I have to say, I've worked on a lot of projects in the public outreach, and the professionalism and the respect that we receive in Caltrans and Metro has been excellent. It's very important to mention that, because it's notable. So thank you for that.

One of the issues that we see that still needs to be worked on is the coordination for California high speed rail and the station location. So we would urge you to continue working on that. And, also, the funding is tied to the project, we know 3P-1-1

that this is a hearty project in terms of its goals and objectives. And, possibly, we can include this as part of the new measure or extent of the measure X. We hope that we would be able to leverage the funding for the construction project. 3P-1-2

So, again, thank you for the outreach. Thank you for coming up here to Palmdale. We appreciate it very much.

RON KOSINSKI: Thank you. Richard.

RICHARD: Good afternoon, ladies and gentlemen. I'm Rich Polston. I'm with NCTC. And one of my comments in regards to a

Page 6

Veritext National Deposition & Litigation Services
866 299-5127

Response to Comment 3P-1

Comment Code (Topic)	Response
3P-1-1 (Design)	There has been extensive coordination between the project team (Caltrans, Metro, City of Palmdale and others) and the CHSRA concerning the station location and how best to integrate the two rail systems. It is this coordination that led to the proposed rail connection options evaluated in the Draft EIR/EIS. Caltrans has continued working with these team members during the selection of the preferred option identified in this Final EIR/EIS.
3P-1-2 (Other)	Obtaining the funds to acquire right-of-way and construct the project is a high priority for the project team. Caltrans and Metro will continue to work very closely with all stakeholders to identify and pursue potential funding sources.

Comment 3P-2

MICHAEL BEHEN: Good afternoon. Thank you very much. Michael Behem from the City of Palmdale and Department of Public Works. First of all, we want to say thank you very much for having this meeting in Palmdale at the Larry Chimbole Cultural Center. Larry is our first mayor in Palmdale. He's actually sitting right there. So I'd like to pay respect to him. So the first comment, we have worked together over many years on this project. And I have to say, I've worked on a lot of projects in the public outreach, and the professionalism and the respect that we receive in Caltrans and Metro has been excellent. It's very important to mention that, because it's notable. So thank you for that.

One of the issues that we see that still needs to be worked on is the coordination for California high speed rail and the station location. So we would urge you to continue working on that. And, also, the funding is tied to the project, we know that this is a hearty project in terms of its goals and objectives. And, possibly, we can include this as part of the new measure or extent of the measure X. We hope that we would be able to leverage the funding for the construction project. So, again, thank you for the outreach. Thank you for coming up here to Palmdale. We appreciate it very much.

RON KOSINSKI: Thank you. Richard.

RICHARD: Good afternoon, ladies and gentlemen. I'm Rich Polston. I'm with NCTC. And one of my comments in regards to a 3P-2-1

Page 6

Veritext National Deposition & Litigation Services
866 299-5127

full intermodal system of a project will deal with the bike lanes. And right now, it terminates at 20th Street East. We'd like to see that to go ahead and extend into our Palmdale transit center. And as a result, our transit center may be built before this particular project comes into town. And we would like that to be considered as probably your phase one. So if you have -- if you're going to be doing any phases, we'd like to see that as phase one. So if it extends from the station out to 20th Street, that's fine. And then when the rest of the project continues, then we can pick it up from there. But we would like to see that as part of this project and to extend from either 20th Street or start from the station and take it out to Victorville. Thank you. 3P-2-1

RON KOSINSKI: Thanks a lot Rich. Jim Alexander. Then we have Mr. Queen next.

JIM ALEXANDER: Hi. My comments are partially for Caltrans. I also appreciate the fact that you've brought this to our attention and have given us an opportunity to speak on it. I am absolutely, positively in favor of the no build option. I'm a life-long resident in the Antelope Valley, born in Antelope Valley Hospital, lived every day except my first day in the same house. And freeway is going to go within about 200 yards above my house, so that more or less ruins what's left of my life. I don't know exactly where I stand among the public in Palmdale about the freeway. I kind of feel like a little bit of

Page 7

Veritext National Deposition & Litigation Services
866 299-5127

Response to Comment 3P-2

Comment Code (Topic)	Response
3P-2-1 (Design)	The Palmdale Transportation Center (PTC) is the multi-modal hub of the city. Providing connectivity between the High Desert Corridor bike path and the PTC is critical to the local cycling community and would provide the greatest benefit to cyclists. However, providing a direct connection would require a dedicated structure that would carry cyclists over Sierra Highway and the adjacent railroad tracks which would be prohibitively expensive. To mitigate this shortfall, the project partners (Caltrans, Metro and the City of Palmdale) have agreed that Metro will provide the necessary funding to provide bike lanes as specified in the City's General Plan along 20th Street East and Avenue Q, in its entirety, to the PTC or any future HSR Station. This funding would be considered a mitigation cost and would include money for both right-of-way acquisition and construction. Also, your comment regarding project phasing is noted. However, a final decision on phasing will not be made until much later in the process and will likely be dependent on how funding for construction is obtained.

Comment 3P-3

full intermodal system of a project will deal with the bike lanes. And right now, it terminates at 20th Street East. We'd like to see that to go ahead and extend into our Palmdale transit center. And as a result, our transit center may be built before this particular project comes into town. And we would like that to be considered as probably your phase one. So if you have -- if you're going to be doing any phases, we'd like to see that as phase one. So if it extends from the station out to 20th Street, that's fine. And then when the rest of the project continues, then we can pick it up from there. But we would like to see that as part of this project and to extend from either 20th Street or start from the station and take it out to Victorville. Thank you.

RON KOSINSKI: Thanks a lot Rich. Jim Alexander. Then we have Mr. Queen next.

JIM ALEXANDER: Hi. My comments are partially for Caltrans. I also appreciate the fact that you've brought this to our attention and have given us an opportunity to speak on it. I am absolutely, positively in favor of the no build option. I'm a life-long resident in the Antelope Valley, born in Antelope Valley Hospital, lived every day except my first day in the same house. And freeway is going to go within about 200 yards above my house, so that more or less ruins what's left of my life. I don't know exactly where I stand among the public in Palmdale about the freeway. I kind of feel like a little bit of 3P-3-1

Page 7

Veritext National Deposition & Litigation Services
866 299-5127

an outsider in Palmdale. I know that potentially it brings growth to Palmdale. It brings money to the entire Antelope Valley. But my experience with growth and money in the Antelope Valley is that it really ruins life in Antelope Valley. The only beneficial thing that I've seen in the last 40 years really is the growth of the schools, not high schools, not grammar schools but upper level schools, junior colleges in the Antelope Valley. And part of the reason I think that we have so much problem with education in the Antelope Valley, kindergarten through 12th grade is there's just too many people here. I understand that, according to the surveys, we're not supposed to really see that much of a growth of population in the Antelope Valley. I watched it and watched it and watched it, and the limited growth that we currently, the growth with the governmental funded -- or current governmental funded recession, the growth that preceded that -- really did ruin a significant amount of character in the high desert. And certainly, it ruined the economy of Lancaster, Palmdale, all of the area of the high desert. I don't really see how this freeway is going to make that any better. It will probably bring low paying jobs. I don't really see upper, $100,000-plus jobs coming in in any significant number. Of course, that's probably normal. Poor people generally go to the places wherever low paying jobs are. So we're gonna drag those people up here and continue to drag the area down. So, again, I'm completely against this.

3P-3-2

3P-3-3

Page 8

Veritext National Deposition & Litigation Services
866 299-5127

1 Not just because of the environmental impact but because of the
2 negative financial impact. Traffic will be worse in Palmdale.
3 It's always worse in Palmdale. I don't know why the Palmdale --
4 the people that control the lights in Palmdale can't keep things
5 rolling, but Palmdale Boulevard is a parking lot most of the
6 time. Anytime there's rush hour, you can't make through 3P-3-4
7 Palmdale Boulevard. Avenue P is good. Avenue S is fair. But
8 Palmdale Boulevard is horrible. And that will just continue to
9 get worse. So, again, absolutely no build as far as I'm
10 concerned. Thank you for your time.
11 RON KOSINSKI: Mr. Queen.
12 DELLHERT QUEEN: Good afternoon. My name is Dellhert
13 Queen. I live in Apple Valley now. I came here today because I
14 have an alternative to raise some points here. First of all,
15 I'd like to say (inaudible) tell me how I got five minutes?
16 I'll do the best I can. What I done is -- back in 2010, in
17 another project, I realized that traffic between, say, Apple
18 Valley and Lucerne Valley, etcetera is impossible because of
19 Highway I-15. That's because the truck traffic and the rail
20 traffic coming from ports roll through here. So back in 2010, I
21 put together an alternative plan, because of the deal about
22 going to Las Vegas as well. And I did a plan up in San
23 Francisco. I raised $650 million dollars, did a (inaudible)
24 project. And I don't have time to tell you about it. But I
25 have some questions here. When you do an EIR, you have to do

Page 9

Veritext National Deposition & Litigation Services
866 299-5127

Response to Comment 3P-3

Comment Code (Topic)	Response
3P-3-1 (Design)	Your support for the No Build Alternative is noted.
3P-3-2 (Growth)	Based on projections by the Southern California Association of Governments (SCAG), the population of the Antelope Valley is expected to increase by 103% between 2010 and 2040. The High Desert Corridor is not proposed as a way to stimulate growth but rather to accommodate the growth that we know is coming. The Growth Impact Study prepared for the project bears this out, concluding that the project will not stimulate growth but will concentrate the growth that comes near freeway interchanges and near the rail stations. By providing the infrastructure ahead of time, disruption to the local communities can be minimized (fewer developed properties will need to be acquired) and it can be incorporated into the regional/local land use planning strategies to facilitate growth in a smart and sustainable manner.
3P-3-3 (Community)	Two recent publications prepared by the National Academy of Science's Transportation Research Board (TRB) address economic effects of new transportation projects and can help frame the issue concerning job creation. These are: *Interactions Between Transportation Capacity, Economic Systems, and Land Use* (2012) and *Development of Tools for Assessing Wider Economic Benefits of Transportation* (2014). Transportation projects lead to multifaceted forms of economic impacts, including effects on job creation. The form of impact varies by the type and setting of the particular project. Broadly speaking, improved mobility and access can lead to a better pairing of specialized business needs and worker skills, which can improve wages. Transportation projects that improve travel times or shrink distances for commuters can enhance the reach of employment centers to additional specialized labor pools, which would tend to have an uplifting effect on labor rates. Large-scale highway transportation projects such as the High Desert Corridor were found to sometimes support job increases of 40,000–50,000 or more, though the analysis did not distinguish between high-paying and low-paying jobs or break them down by occupation. The employment increase can also be viewed in terms of overall income (wages associated with the employment). The TRB analysis concluded there was a positive economic benefit on jobs in 85 percent of the project case studies analyzed; the remaining 15 percent of studies showed no net economic stimulus. While recognizing how difficult it can be to precisely measure the impact of a transportation project on job creation that provides interregional economic benefits in a growing corridor such as the High Desert Corridor, the TRB studies stress that the overall economy and business climate of a local project area are key and independent factors which can affect the magnitude of the transportation facility's economic effects. Transportation projects located in economically robust areas with complementary infrastructure and

Comment Code (Topic)	Response
	land use policies tend to generate more long-term jobs than when compared to projects located in areas without those influences. Economic activity tends to be greater when a transportation project is part of a broader and coordinated community planning process. Factors the recent TRB literature identified that increased economic opportunities include intergovernmental agency coordination and other supportive local government actions that may involve the creation of economic enterprise zones, business development incentive programs, water/sewer infrastructure development, and parcel assembly and site preparation, and so forth, all the responsibility of local governments, not that of either Caltrans or Metro. In some of the cases TRB analyzed, these types of multiple factors helped to create a positive economic development climate that led to additional job creation beyond those that could be strictly attributed to transportation investments.
3P-3-4 (Traffic)	Traffic congestion on local streets such as Palmdale Boulevard is exactly the sort of problem the High Desert Corridor has been proposed to address. Pulling traffic off of Palmdale Boulevard (and other streets) and on to the HDC will ease congestion, facilitate traffic flow and improve the Level of Service even if no improvements are made to Palmdale Boulevard itself. However, the City of Palmdale, in cooperation with Caltrans and Metro, is sponsoring a project to widen Palmdale Boulevard from four lanes to six lanes between 6th Street East and 10th Street East, the center of traffic congestion along this roadway in Palmdale. Following the completion of the environmental studies, Measure R funding will be utilized for construction, which is scheduled to be completed in 2018. As part of this same project, Sierra Highway will be widened from four lanes to six lanes between Avenue Q and Avenue R. The additional capacity on these two roadways will reduce congestion on Palmdale Boulevard at this busy intersection.

Comment 3P-4

Not just because of the environmental impact but because of the negative financial impact. Traffic will be worse in Palmdale. It's always worse in Palmdale. I don't know why the Palmdale -- the people that control the lights in Palmdale can't keep things rolling, but Palmdale Boulevard is a parking lot most of the time. Anytime there's rush hour, you can't make through Palmdale Boulevard. Avenue P is good. Avenue S is fair. But Palmdale Boulevard is horrible. And that will just continue to get worse. So, again, absolutely no build as far as I'm concerned. Thank you for your time.

RON KOSINSKI: Mr. Queen.

DELLHERT QUEEN: Good afternoon. My name is Dellhert Queen. I live in Apple Valley now. I came here today because I have an alternative to raise some points here. First of all, I'd like to say (inaudible) tell me how I got five minutes? I'll do the best I can. What I done is -- back in 2010, in another project, I realized that traffic between, say, Apple Valley and Lucerne Valley, etcetera is impossible because of Highway I-15. That's because the truck traffic and the rail traffic coming from ports roll through here. So back in 2010, I put together an alternative plan, because of the deal about going to Las Vegas as well. And I did a plan up in San Francisco. I raised $650 million dollars, did a (inaudible) project. And I don't have time to tell you about it. But I have some questions here. When you do an EIR, you have to do

3P-4-1

Page 9

Veritext National Deposition & Litigation Services
866 299-5127

the whole project or it's not legal. You can't just do a portion of 63 miles. Because if you take the $6.245 billion and you divide it by 63 miles, that's $100 million dollars a mile. $100 million dollars a mile. Where is it going? It is going to go from Apple Valley to Palmdale. I'm saying, you need to have a plan. My plan is to go from Las Vegas to Victorville, stop in each of the cities, go to 14 down to L.A. That way, we have a complete road. And I can do it for a lot less than $6 billion dollars. And it won't take till 2023 to do it. So with those alone, I would say this plan isn't well settled down. It's all in the future. It's all big bucks and no plan. When I get -- 3P-4-1
I'm supposed to have my Website up today but there's been some technical problems. It's not easy doing it. And so if anybody's interested, I have a business card. And I can give it to you and you can give me your business card or call me, and I'll put you on my lise so I can send you my Website. And you'll see on two pages, I'll have my plan laid out. I have a pretty good handle on the dollars and how it's going to be done. I already have a major team. I already have an architect and engineer. I did all that years ago. And so just one last comment is over these years, I've been a computer professional for 30 years. (Inaudible) guys and I started a professional club for entrepreneurs. We helped them for six years. And I had my transit system for a ballpark, and I had a transit system 100% privately funded, takes $650 million to do it by the

Page 10

Veritext National Deposition & Litigation Services
866 299-5127

1 Cal-train right-of-way. I would operate that. I had a plan to
2 come down to L.A. I would've had it built in 1995. Built in
3 1995, privately, 100% funded. Same with this project. I will
4 do this project 100% privately funded. And you'll see that my
5 mine will be for the middle class. It's going to create jobs
6 instead of just going between cities that doesn't make any 3P-4-1
7 money. That's not -- even with a toll, it's not going to raise
8 $100 million dollars -- $6 billion. If you're going to borrow
9 $6 billion, you got to pay back $12 billion. Doesn't make
10 sense. So if anybody would like my card. Thank you.
11 RON KOSINSKI: Sam Wilson. Mr. Wilson.
12 SAM WILSON: I've been listening to everything that's said.
13 And it's nice to be able to say this project phase is going to
14 start here, phase one, phase two. But what we're talking about
15 are homes, people's homes, in the Antelope Valley. Now, a lot
16 of people that will be affected will be people that lived here
17 their whole life, 40, 50 years. They've already paid off their
18 home. And because of -- I can't say reason, because it's been
19 happening for the last five to ten years -- the bringing of low
20 income housing HUD or whatever, section 8 into the area has
21 decreased the value of their homes significantly. So if you
22 come in with one of your phases is imminent domain by taking
23 control of their homes and sending in an appraiser, your
24 appraiser, to appraise their home at fair market value, it will
25 not even come close to enough money to just put down on another

Page 11

Veritext National Deposition & Litigation Services
866 299-5127

Response to Comment 3P-4

Comment Code (Topic)	Response
3P-4-1 (Design)	Thank you for your comments. The EIR/EIS fully evaluates the alternatives proposed along the 63 mile long corridor. Your other comments, however, are general in nature and not specifically related to the Draft EIR/EIS for this project. Therefore, no additional response is provided.

Comment 3P-5

Cal-train right-of-way. I would operate that. I had a plan to come down to L.A. I would've had it built in 1995. Built in 1995, privately, 100% funded. Same with this project. I will do this project 100% privately funded. And you'll see that my mine will be for the middle class. It's going to create jobs instead of just going between cities that doesn't make any money. That's not -- even with a toll, it's not going to raise $100 million dollars -- $6 billion. If you're going to borrow $6 billion, you got to pay back $12 billion. Doesn't make sense. So if anybody would like my card. Thank you.

RON KOSINSKI: Sam Wilson. Mr. Wilson.

SAM WILSON: I've been listening to everything that's said. And it's nice to be able to say this project phase is going to start here, phase one, phase two. But what we're talking about are homes, people's homes, in the Antelope Valley. Now, a lot of people that will be affected will be people that lived here their whole life, 40, 50 years. They've already paid off their home. And because of -- I can't say reason, because it's been happening for the last five to ten years -- the bringing of low income housing HUD or whatever, section 8 into the area has decreased the value of their homes significantly. So if you come in with one of your phases is imminent domain by taking control of their homes and sending in an appraiser, your appraiser, to appraise their home at fair market value, it will not even come close to enough money to just put down on another

3P-5-1

Page 11

Veritext National Deposition & Litigation Services
866 299-5127

home somewhere else in California at this point. People will own their homes now for 10 to 20 years will be basically have enough money to put down on a house. And they're retired and they don't have enough money to pay the monthly payments on a house. So how are you going to adjust that? How are you going to bring up -- give them an adequate amount of money to be able to replace their home or actually pick up their home and move it if they a property nearby that they would like to move it to? Because you will be affecting peoples lives in that way. And bringing in freeway -- I mean to be honest, I've driven the freeways of California. I've driven the freeways of all over the United States. I've never seen an area where it has become a wonderful place to live near a freeway. It's always devaluated. It's always become kind of a real low income area. And it's just -- so I'd like to know how you're going to fix that for them. 3P-5-1

RON KOSINSKI: Are you done?

SAM WILSON: Yeah.

RON KOSINSKI: Thank you, Mr. Wilson. And I would just like to point out that we have right-of-way specialists that can explain the entire right-of-way appraisals, acquisitions and relocation process. Certainly, we're very confident that there is plenty of houses in this entire core that people can be relocated to. Ingrid Vanderhope. This is the last comment card I have, by the way.

Page 12

Veritext National Deposition & Litigation Services
866 299-5127

Response to Comment 3P-5

Comment Code (Topic)	Response
3P-5-1 (Community)	Federal property acquisition law provides for payment of just (fair) compensation for residences displaced for a federally-funded transportation project (Uniform Relocation Assistance and Real Property Acquisition Policies Act of 1970, as amended). Acquisition price, replacement dwelling costs, moving expenses, increased rental or mortgage payments, closing costs, and other relocation costs are considered for compensation. When a property is required for the HDC Project, an appraisal will be performed to determine the fair market value. A professional appraiser will inspect the property. Property owners will be invited to accompany the appraiser to ensure that full information about the property is taken into consideration. Property owners may also obtain an independent appraisal (paid for by Caltrans). Based on the appraisal, the value of the property will be determined and offered to the owner. In addition to offering fair market value, every effort will be made to provide the full extent of benefits and services provided through the Caltrans Relocation Assistance Program. Caltrans policy is that displaced persons shall not suffer unnecessarily as a result of programs designed to benefit the public as a whole. Displaced individuals, families, businesses, farms, and non-profit organizations may be eligible for relocation advisory services and payments. Additionally, displacees who may face difficulty finding suitable relocation resources would be eligible for assistance from Caltrans through the State's relocation program or Last Resort Housing (LRH) Program options, including LRH payments. Before initiation of property acquisition, Caltrans provides information explaining the acquisition process and Caltrans relocation staff will interview each owner and renter to be relocated to determine their needs, desires, and unique situations associated with relocating. The authorized relocation agent will explain the relocation benefits and services each owner/renter may be eligible to receive and guide them through the process. Regarding freeways devaluing the surrounding area, there are no recent studies that conclude, nor does existing transportation economic literature indicate, that new freeways create low-income areas. Indeed, case study examples involving new freeways in Southern California, such as the I-210 in the eastern San Gabriel Valley and the I-15 in Riverside/San Diego, to name two, appear to demonstrate quite the opposite conclusion. Past studies conducted by the Transportation Research Board and the Federal Highway Administration (FHWA) consistently conclude that transportation infrastructure investments improve regional economies.

Comment 3P-6

INGRID VANDERHOPE: Hi. I'm just a resident, a plain little resident in this area. It has nothing to do with the amount of years I've lived here. Although, I've lived up here for probably over 40 years. I've ridden my bike in parts of the valley here and also along the aqueduct where it goes east to north -- from west to northeast. And it's extremely windy. And unless you ride early in the morning, really just talking about a bike path, I'm not putting a bike path down, it will be a wonderful thing. But the climate out here -- I mean a bike path is just an added thing that I think it's -- would not be worth it because of the climate. 3P-6-1

Number two -- well, first of all, I'm a no build alternative. My opinion is to no build, absolutely not. And the main reason is that we already have a main highway, 138 from Palmdale from the east, Palmdale all the way across the desert to Victorville 138 that and then that runs into 18. So we have an adequate road if it needs to be expanded. And that might be an alternative. Another thought that I had is all of your information and the pretty pictures and all this material here is very impressive. And I hope that no one gets -- has a setback thinking, "Oh, look at how impressive this is. They've got the money. And let them go ahead and do it and so let's just back off and let them do it." I say don't. I say stand up. And the Valley has been worse with the influx of people. Not to say I'm against people moving in. But mainly, I'm saying we already have a very good highway 3P-6-2

Page 13

Veritext National Deposition & Litigation Services
866 299-5127

that runs -- and which was extended and expanded on just recently. And it runs from the east/west, west/east directly across the Valley. So why put another one in? And then you're talking about moving the Palmdale Transportation Center. I mean you're just going to pick it up and move it a few thousand feet? It sounds ridiculous. I don't understand that. And I think that's all I have to say. I just say to the public, don't be intimidated by these pretty brochures that you're seeing. And you just mentioned that you don't have any money -- really anything to get started. And another thing I definitely would disagree with is a toll fee. The public pays enough already. So thank you very much.

3P-6-2 (cont.)

3P-6-3

RON KOSINSKI: Thank you. We have Ginger. Is it Straight or Stewart? Ginger.

GINGER STOUT: Hello. My name is Ginger Stout, and I am -- in looking through the EIR documents as much as you can -- it's quite a document -- some of the things that I would like to see more clearly addressed is that it's -- from everything that I've been able to hear, one of the main purposes for this corridor is to facilitate the movement of trucks from Long Beach Ports up through the here, through the new inlands ports and to funnel them across. I mean there's already -- Caltrans put in a huge -- not a huge, but a very extensive Mohave truck crossing to take it out of the town of Mohave. So that they could go through to Tehachipi, Highway 58 and the trucks seem to not want

Page 14

Veritext National Deposition & Litigation Services
866 299-5127

Response to Comment 3P-6

Comment Code (Topic)	Response
3P-6-1 (Design)	Your comment against the proposed bike path is noted.
3P-6-2 (Other)	Your support for the No Build Alternative is noted. The purpose of the proposed project is to improve east-west mobility through the High Desert region of southern California. The lack of route continuity along SR-138 and SR-18 contributes to traffic congestion and reduces the Level of Service (LOS) on adjoining highways and local streets. In addition, the corridor is increasingly unable to accommodate the existing and projected traffic demand attributed to residential and commercial growth in the Antelope and Victor valley areas. This anticipated and planned growth is resulting in inadequate capacity along the existing west-east roadways. The HDC will provide an alternate, more direct route across the High Desert. Studies indicate that the proposed HDC will accommodate the anticipated growth but not directly induce growth.
3P-6-3 (Design)	Your opposition to the HDC toll option is noted. The possibility of relocating the Palmdale Transportation Center has been looked at as a way of integrating the proposed HDC HSR Feeder Service with the proposed California HSR system to provide a seamless connection between the two.

Comment 3P-7

that runs -- and which was extended and expanded on just recently. And it runs from the east/west, west/east directly across the Valley. So why put another one in? And then you're talking about moving the Palmdale Transportation Center. I mean you're just going to pick it up and move it a few thousand feet? It sounds ridiculous. I don't understand that. And I think that's all I have to say. I just say to the public, don't be intimidated by these pretty brochures that you're seeing. And you just mentioned that you don't have any money -- really anything to get started. And another thing I definitely would disagree with is a toll fee. The public pays enough already. So thank you very much.

RON KOSINSKI: Thank you. We have Ginger. Is it Straight or Stewart? Ginger.

GINGER STOUT: Hello. My name is Ginger Stout, and I am -- in looking through the EIR documents as much as you can -- it's quite a document -- some of the things that I would like to see more clearly addressed is that it's -- from everything that I've been able to hear, one of the main purposes for this corridor is to facilitate the movement of trucks from Long Beach Ports up through the here, through the new inlands ports and to funnel them across. I mean there's already -- Caltrans put in a huge -- not a huge, but a very extensive Mohave truck crossing to take it out of the town of Mohave. So that they could go through to Tehachipi, Highway 58 and the trucks seem to not want 3P-7-1

Page 14

Veritext National Deposition & Litigation Services
866 299-5127

to use that for whatever reason. If it's going to be mainly truck traffic, it's going to really change, you know, the whole aspect of this area, bringing huge trucks through there. And one of the things is -- how many truck trips will be expected should the inland port really be built? That really wasn't addressed. And to me, that is a major component. I think people really need to know about that. And number two, if trucks come, that means diesel and particulate matter, which is a problem along the Long Beach Highway. They talk about that all the time and the effects of the people that live across there who have to live with the diesel particulate matter. I haven't seen anything said in there that how many truck trips will it take before before -- I mean -- before we have a particulate PM-10 or particulate matter. Problem areas is already out of containment for that. And I don't see anything int there that addresses that. And those are some of the areas that I think weren't very clear to the people that are actually going to be living near that and exactly what's going to be coming up. And I'd like to see that clearly address and talked about. Thank you very much.

3p-7-1 (cont.)

3-7-2

3P-7-3

RON KOSINSKI: Thank you very much. And that's the last speaker card that I have. Is there anybody else that would like to speak? Going once. There we go.

MICHAEL SPALDING: For the record, my name is Michael Spaulding. I am here just because I'm a realist. I really

Page 15

Veritext National Deposition & Litigation Services
866 299-5127

Response to Comment 3P-7

Comment Code (Topic)	Response
3P-7-1 (Other)	Providing an alternate east-west route for goods movement (i.e., trucks) is just one need that this project is intended to serve. Additional needs include: increasing the general capacity and mobility to accommodate current and future needs; improving access to regional transportation facilities (airports and rail); improving travel safety and reliability, in part by providing a connection between I-15 and SR-14 in case either route is closed by an accident or winter storm; and contributing to the state's greenhouse gas reduction goals.
3P-7-2 (Traffic)	A sensitivity test was performed based on local projections of housing and employment, including increased employment adjacent to the Palmdale Regional Airport. For the purpose of the test, the employment was assumed to be associated with the "Antelope Valley Inland Port", which was assumed to be an aerospace economic cluster of development, or possibly a logistics center. Traffic forecasts were prepared using the local projections which increased employment by 55,498 jobs in Antelope Valley and 25,502 jobs in Victor Valley, while decreasing the number of households in Antelope Valley by 42,016 and increasing the number of households in Victor Valley by 1,332. Overall traffic volumes on the proposed HDC freeway increased by 23,000 vehicles per day (vpd) in the vicinity of 30th Street East, 12,000 more vpd in the vicinity of 70th Street East, and 6,500 more vpd in the vicinity of the Los Angeles/San Bernardino county line. Trucks are estimated to be roughly 10% of the daily traffic volume on the HDC at the county line.
3P-7-3 (Air quality)	With respect to truck volumes, under Year 2040 build HDC conditions, the freeway alternative is forecast to carry 113,750 vehicles per day at the Los Angeles/San Bernardino 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. If the HDC Project is built as a tollway between 100th Street East in Palmdale and US 395 in Adelanto, the tollway is forecast to carry 78,400 vehicles per day across the county line, of which 8,070 are expected to be medium and heavy trucks, equaling 10.3 percent of the total (Reference Table 3-6 and 3-16 of High Desert Corridor Traffic Study, Volume I). Regarding PM_{10}, both Counties are already in nonattainment of the state standard. There are no conformity processes for state standards and the violation for federal annual $PM_{2.5}$ is addressed based on an evaluation of the area-wide monitor. Diesel particulate matter (DPM), however, can be discussed in regional sense. Regional DPM emissions would decrease from 288 lbs/day in 2010 to 120.0 for the FWY/Toll/HSR in 2020 and 118.9 in 2040 (see Table 19 of the Air Quality Technical Report).

Comment 3P-8

to use that for whatever reason. If it's going to be mainly truck traffic, it's going to really change, you know, the whole aspect of this area, bringing huge trucks through there. And one of the things is -- how many truck trips will be expected should the inland port really be built? That really wasn't addressed. And to me, that is a major component. I think people really need to know about that. And number two, if trucks come, that means diesel and particulate matter, which is a problem along the Long Beach Highway. They talk about that all the time and the effects of the people that live across there who have to live with the diesel particulate matter. I haven't seen anything said in there that how many truck trips will it take before before -- I mean -- before we have a particulate PM-10 or particulate matter. Problem areas is already out of containment for that. And I don't see anything int there that addresses that. And those are some of the areas that I think weren't very clear to the people that are actually going to be living near that and exactly what's going to be coming up. And I'd like to see that clearly address and talked about. Thank you very much.

RON KOSINSKI: Thank you very much. And that's the last speaker card that I have. Is there anybody else that would like to speak? Going once. There we go.

MICHAEL SPALDING: For the record, my name is Michael Spaulding. I am here just because I'm a realist. I really 3P-8-1

Page 15

Veritext National Deposition & Litigation Services
866 299-5127

1 think that if you do not have the money, you should not build 3P-8-1 (cont.)
2 anything. And, also, you're being very unfair to the poor who
3 live within the corridor. Say, for example, they want to go to
4 the grocery store, either to Palmdale or to Victorville, right
5 now, their gas is $3.00 to get to the store. If the corridor is 3P-8-2
6 built, it's going to be $3.00, plus $3.00 to get to the store.
7 And you're only hurting the small people and the people that
8 really can't afford it. Another thing I wanted to mention
9 was -- I've seen projects like this all the time. I used to be
10 an appraiser for the Las Vegas area, big developers would blow
11 into town, build off the developments, bail out of town. And
12 they wouldn't use the crummy houses that they built. I know
13 that a lot of time and effort has been put into these studies.
14 And the people that have put a lot of time and effort into these
15 studies probably would not be using the east/west corridor. 3P-8-3
16 There was a picture plaque over here that says that Palmdale or
17 Victorville is going to be a destination. I've never known
18 anybody to take their honeymoon in Victorville or Palmdale. So
19 I don't know how this is going to be a destination city for
20 anyone. So those are just some comments that I want people to
21 think about. And I'm probably more on the no build than
22 anything else. Thank you very much.
23 RON KOSINSKI: Thank you. Anybody else who has a comments?
24 We have plenty of time here if somebody else wants to get up and
25 make a statement for the record.

Page 16

Veritext National Deposition & Litigation Services
866 299-5127

Response to Comment 3P-8

Comment Code (Topic)	Response
3P-8-1 (Design)	Nothing can or will be built if funding is not available. However, funding, especially private funding, cannot be obtained until after an approved environmental document and Record of Decision/Notice of Determination (ROD/NOD) is obtained.
3P-8-2 (Community)	As EIR/EIS Section 3.1.4.4 acknowledges, tolling involves environmental justice issues because low-income persons are least able to pay tolls. On the other hand, toll facilities can also provide unprecedented access to jobs and relieve congestion for the general public, including low-income populations. Nearby arterial and collector streets and roads will also experience less congestion for all groups using those facilities. If a tollway is selected as the preferred HDC alternative, consideration will be given to low-income poverty status populations when determining toll pricing options. As an environmental commitment and mitigation measure, an Equity Assessment Analysis will be conducted during final design. Depending on the results of that study, implementation of an Equity Program to offset the cost burdens on low-income commuters using the tollway will be duly considered. If the analysis finds that tolls would cause an undue burden, among options that may be considered are: allowing qualified individuals to pay reduced (deduction for HOVs) or no tolls (for transit users); having some proceeds from tolls being applied toward transit lines that serve the affected region; and having individuals without bank accounts be given an alternative to cashless tolling systems (e.g., FasTrak transponders) such as using Golden State Advantage, an Electronic Benefits Transfer (EBT) program card used in California for distributing public assistance benefits (which encompasses the former Food Stamps program). These and other measures to mitigate impacts on low-income populations will be considered.
3P-8-3 (Other)	The purpose of the proposed project is to improve east-west mobility through the High Desert region of southern California. People can and do travel across the high desert for purposes of business, shopping, or other leisure activities. The proposed project is intended to make such travel easier and faster. Your support to the No Build Alternative is noted.

Chapter 11 Responses to Oral Comments from the November 13, 2014 Public Hearing

This section provides responses to oral comments received on the draft environmental document from persons attending the public hearing held on November 13, 2014. A total of 14 oral comments were recorded and are summarized below. Transcripts of the oral comments and responses to topics of concern are provided on the pages that follow.

Table 11.1. Summary of Oral Comments Received at the November 13, 2014 Public Hearing

Comment Code	Commenter Name	Comment Topics
4P-1	Sandra Dicks	Traffic and transportation
4P -2	Ezekial Gutierrez	Project design and alternatives, traffic and transportation, noise
4P -3	Richard Ravana	Project design and alternatives
4P -4	Shirley Perez	Project design and alternatives, community impacts
4P -5	Ted Stimpfel	Project design and alternatives
4P -6	Chuck Bell	Traffic and transportation
4P -7	Matthew Ballmer	Community impacts, project design and alternatives
4P -8	Al Rice	Project design and alternatives, traffic and transportation, biological environment, community impacts, visual
4P -9	Bryan Baker	Traffic and transportation
4P-10	Mary Borden	Air quality
4P-11	Laverne Harley	Water quality
4P-12	Pam Robertson	Project design and alternatives, biological environment, community impacts
4P-13	Alfreda Dallavlle	Community impacts, traffic and transportation
4P-14	Jim Alexander	Project design and alternatives, noise

Comment 4P-1

hearing is done, again, we have all of the boards on the slideshow and staff to be able to answer questions. Like I said, there's no response tonight. So we're not going to be responding to you up here. And, also, if you could be respectful to all the speakers. So no booing or hissing. If you disagree with someone, just let them speak. It's a democracy. We'd like to have an orderly process tonight.

So with that, I'd like to open up the public hearing. We will have staff around if you didn't get a speaker card and we'll hold one up. And you can go ahead and fill one out. We try to take these in the order that we received them to be fair. So with that, I'd like to call up Sandra Dicks.

SANDRA DICKS: Hello. I'm Sandra Dicks. I'm a resident of Adelanto. And since I -- I live on the north side of your project. And my major concern is access to the rest of the valley. Because all the grocery stores, all the facilities, the fire engines, everything is south of where you're putting your corridor. And for those of us that are north of the corridor, I want to make sure there's enough access so that we don't get locked out of anything because ambulance, hospitals and everything are on the other side. And next. 4P-1-1

MARK DIERKING: The next speaker is Ezekial Gutierrez.

EZEKIAL GUTIERREZ: Hi. My name is Ezekial Gutierrez. I'm also a resident of Adelanto. I have a few points. One is there's a reference made to context, sensitive design. I'd like

Page 26

Veritext National Deposition & Litigation Services
866 299-5127

Response to Comment 4P-1

Comment Code (Topic)	Response
4P-1-1 (Traffic)	Maintaining traffic circulation on local streets is an important consideration for this project. With that in mind, the local access and interchange crossings of the proposed project are spaced every 1-2 miles in the Antelope Valley, 3-5 miles in the High Desert, and approximately every two miles in the Victor Valley area. In the vicinity of Adelanto, crossings, either an interchange or a grade separation without access to the freeway, are proposed at Caughlin Road, Koala Road, Bellflower Street, US 395, Adelanto Road, and Phantom Street West.

Comment 4P-2

hearing is done, again, we have all of the boards on the slideshow and staff to be able to answer questions. Like I said, there's no response tonight. So we're not going to be responding to you up here. And, also, if you could be respectful to all the speakers. So no booing or hissing. If you disagree with someone, just let them speak. It's a democracy. We'd like to have an orderly process tonight.

So with that, I'd like to open up the public hearing. We will have staff around if you didn't get a speaker card and we'll hold one up. And you can go ahead and fill one out. We try to take these in the order that we received them to be fair. So with that, I'd like to call up Sandra Dicks.

SANDRA DICKS: Hello. I'm Sandra Dicks. I'm a resident of Adelanto. And since I -- I live on the north side of your project. And my major concern is access to the rest of the valley. Because all the grocery stores, all the facilities, the fire engines, everything is south of where you're putting your corridor. And for those of us that are north of the corridor, I want to make sure there's enough access so that we don't get locked out of anything because ambulance, hospitals and everything are on the other side. And next.

MARK DIERKING: The next speaker is Ezekial Gutierrez.

EZEKIAL GUTIERREZ: Hi. My name is Ezekial Gutierrez. I'm also a resident of Adelanto. I have a few points. One is there's a reference made to context, sensitive design. I'd like 4P-2-1

Page 26

Veritext National Deposition & Litigation Services
866 299-5127

1 to really see that employ in and around intersection of 395 and
2 the new High Desert Corridor, probably within a mile radius, two
3 mail radius of that. Because that's a heavily traffic area for 4P-2-1 (cont.)
4 trucks. Trucks use that. I haven't commented how many times a
5 day. But there's a flood of trucks going through there all day
6 and probably all night. That's not going to change. You got 58
7 and 395 north of that, which is a major truck area. And I think
8 those trucks are probably coming and going to Mammoth and points 4P-2-2
9 north. That has to be taken care of. I'm also concerned about
10 the severing of our community for north/south circulation. I
11 think there's going to be two big circulations we have. One is
12 going to be the volume, both commercial and automobile. And
13 second is going to be the diminishment of circulation for all
14 the local folks. There's also going to be a big noise problem.
15 I would like to see some kind of sound walls or some kind of
16 diminishing noise that's going to be occurring in and around 4P-2-3
17 Adelanto. Because trucks are going to be gearing down and go on
18 to 395 or (inaudible) stop. And that's going to be a problem.
19 I know there is some consideration made to the area around the
20 transit station in Palmdale. I think there's equal or more need 4P-2-4
21 for context sensitive design and planning in and around that
22 Adelanto area. Thank you.
23 MARK DIERKING: Is that it? Thank you very much.
24 EZEKIAL GUTIERREZ: My time ran out.
25 MARK DIERKING: If you've got a couple seconds, if you

Page 27

Veritext National Deposition & Litigation Services
866 299-5127

1 really want to make another point.
2 EZEKIAL GUTIERREZ: I'm an attorney, so you're going to
3 give me a whole lot more time. You asked for it.
4 I would like to see Koala, the intersection with corridor,
5 as the east point of the toll road and not 395. Because there's
6 going to be a lot of activity on that intersection of 395 and
7 corridor. If you can just move the toll roads start point to
8 Koala and corridor, I think that might help. I'm just sort of
9 projecting ahead. Also, I saw where Palmdale Road is very close
10 to the corridor. Is that going to be supplanted? Is that going
11 to be maintained? Because some of us maybe who won't want to
12 pay the toll will want to still use Palmdale Road to go east and
13 west. Thank you.
14 MARK DIERKING: Thank you. With that, we move on to
15 Richard Revana who is representing the Alliance Group for Desert
16 Preservation.
17 RICHARD RAVANA: Gentlemen. Yeah, my name is Richard
18 Ravana. I'm with Alliance of Desert Preservation. And we have
19 some serious issues and concerns with your proposed corridor.
20 And we will be expressing those issues and concerns in a formal
21 letter. Thank you.
22 MARK DIERKING: Thank you very much. Speaker number four
23 is Shirley Perez.
24 SHIRLEY PEREZ: Hi. My name is Shirley Perez. I'm a
25 retired real estate agent. And I live in the area of where your

4P-2-5

Page 28

Veritext National Deposition & Litigation Services
866 299-5127

Response to Comment 4P-2

Comment Code (Topic)	Response
4P-2-1 (Design)	Your comment in support of context sensitive design for the proposed project, specifically near the intersection of the HDC and US 395, is noted. Every effort is being made to develop the HDC in a manner that is sensitive to community values and needs.
4P-2-2 (Traffic)	You are correct that there is, and will be, substantial truck traffic on US 395 and also on the proposed HDC. The 2040 daily traffic volume forecast for the HDC freeway in the vicinity of US 395 is 114,000 vehicles per day (vpd), while US 395 is forecast to carry approximately 39,000 vehicles per day. Medium and heavy trucks (4-axles or larger) will represent a significant component of these volumes, averaging 10 percent, depending on location. The section of the HDC immediately adjacent to the Southern California Logistics Airport will have a greater proportion of trucks. Regarding access to and across the HDC, every effort is being made to facilitate local street circulation. Interchanges or grade separations in the vicinity of Adelanto are proposed at the following locations: Caughlin Road, Koala Road, Bellflower Street, US 395, Adelanto Road, and Phantom Street West.
4P-2-3 (Noise)	The potential noise impacts of the proposed project have been evaluated and are summarized in Chapter 3.2.7 of the EIR/EIS. There will be an increase in noise levels in some areas. However, appropriate noise abatement measures have been proposed at some locations to ensure that the project complies with state and federal noise regulations.
4P-2-4 (Design)	Context sensitive design will be used on bridges and other structures to provide aesthetically pleasing features that express a sense of place for the High Desert Corridor communities, including Adelanto. Please see Avoidance, Minimization, and/or Mitigation Measure V-9 in Section 3.1.7 of the EIR/EIS.
4P-2-5 (Design)	The easterly limit of the tolled portion of the High Desert Corridor was identified as US 395 because US 395 is a state route as opposed to a local or county maintained route. Moving the end of the toll road from US 395 to Koala Road would not necessarily divert truck traffic from the existing US 395 to Koala Road. US 395 is already a major transportation corridor running north and south from the US/Canadian border to its junction with Interstate 15 south of Hesperia. US 395 also connects with State Route 58, which in turn links the high desert region with Bakersfield, State Route 99 and Interstate 5, all serving the San Joaquin Valley. The truck traffic will thus continue to remain on US 395, with or without the HDC Project, and it makes sense for the toll lanes to start/end at the junction of HDC and US 395. The tolled portion of the facility would work with a transponder, similar to the way it functions with the current High Occupancy Toll lanes on Interstate 10 and Interstate 110 in Los Angeles County. There will be no

Comment Code (Topic)	Response
	toll booth to create a stop and go traffic situation. Palmdale Road (State Route 18) will remain in place regardless if it will be maintained by Caltrans or relinquished to the local agencies. A separate project is envisioned to widen State Route 18 from two lanes to four lanes between US 395 and the SR-18 junction with SR 138. This widening project will also flatten out the roller coaster vertical alignment which currently exists along this portion of SR-18.

Comment 4P-3

really want to make another point.

EZEKIAL GUTIERREZ: I'm an attorney, so you're going to give me a whole lot more time. You asked for it.

I would like to see Koala, the intersection with corridor, as the east point of the toll road and not 395. Because there's going to be a lot of activity on that intersection of 395 and corridor. If you can just move the toll roads start point to Koala and corridor, I think that might help. I'm just sort of projecting ahead. Also, I saw where Palmdale Road is very close to the corridor. Is that going to be supplanted? Is that going to be maintained? Because some of us maybe who won't want to pay the toll will want to still use Palmdale Road to go east and west. Thank you.

MARK DIERKING: Thank you. With that, we move on to Richard Revana who is representing the Alliance Group for Desert Preservation.

RICHARD RAVANA: Gentlemen. Yeah, my name is Richard Ravana. I'm with Alliance of Desert Preservation. And we have some serious issues and concerns with your proposed corridor. And we will be expressing those issues and concerns in a formal letter. Thank you. 4P-3-1

MARK DIERKING: Thank you very much. Speaker number four is Shirley Perez.

SHIRLEY PEREZ: Hi. My name is Shirley Perez. I'm a retired real estate agent. And I live in the area of where your

Page 28

Veritext National Deposition & Litigation Services
866 299-5127

Response to Comment 4P-3

Comment Code (Topic)	Response
4P-3-1 (Design)	We did receive the letter from the Alliance of Desert Preservation. Please see comment letter L-5 for our responses to your comments.

Comment 4P-4

1 really want to make another point.
2 EZEKIAL GUTIERREZ: I'm an attorney, so you're going to
3 give me a whole lot more time. You asked for it.
4 I would like to see Koala, the intersection with corridor,
5 as the east point of the toll road and not 395. Because there's
6 going to be a lot of activity on that intersection of 395 and
7 corridor. If you can just move the toll roads start point to
8 Koala and corridor, I think that might help. I'm just sort of
9 projecting ahead. Also, I saw where Palmdale Road is very close
10 to the corridor. Is that going to be supplanted? Is that going
11 to be maintained? Because some of us maybe who won't want to
12 pay the toll will want to still use Palmdale Road to go east and
13 west. Thank you.
14 MARK DIERKING: Thank you. With that, we move on to
15 Richard Revana who is representing the Alliance Group for Desert
16 Preservation.
17 RICHARD RAVANA: Gentlemen. Yeah, my name is Richard
18 Ravana. I'm with Alliance of Desert Preservation. And we have
19 some serious issues and concerns with your proposed corridor.
20 And we will be expressing those issues and concerns in a formal
21 letter. Thank you.
22 MARK DIERKING: Thank you very much. Speaker number four
23 is Shirley Perez.
24 SHIRLEY PEREZ: Hi. My name is Shirley Perez. I'm a
25 retired real estate agent. And I live in the area of where your 4P-4-1

Page 28

Veritext National Deposition & Litigation Services
866 299-5127

1 current alignment comes within 12 to 1,500 feet of my property. 4P-4-1
2 And so I just want to state a formal opposition to that current (cont.)
3 alignment on Standing Rock just east of Sherwin. That whole
4 area, it's a beautiful area. We looked for two years, as a real
5 estate agent and myself, to find the property that we're in now.
6 And I'm concerned for the people who live in the area
7 considering the fallen market that we're just recovering from. 4P-4-2
8 And I know that the biggest investment that people make in their
9 lifetime is in their homes. It's a beautiful area, and it will
10 be sad to see that alignment go as planned come through here by
11 Granite Hills High School. So I'm looking up and down Central
12 Avenue, and I see that there's a lot of trucks that take that
13 route. And I'm just wondering -- I know it's all zoned there 4P-4-3
14 for commercial on eastside of Central. And it seems to me that
15 there's less homes there. And maybe that alignment can be
16 reconsidered.
17 MARK DIERKING: Thank you very much. The next speaker is
18 Ted Stimpfel with CHRC.
19 TED STIMPFEL: Good evening. First off, I'd like to say
20 this display up here I find very, very distracting. And I
21 apologize for the people who have to look at my bald head. I am
22 with the community of Newberry Springs. I'm also a board member
23 of the California Historic Route 66 Association. And quite
24 frankly, we are upset that, up to this point as under SEQA, we
25 are a stakeholder in this proposal because it process route 66.

Page 29

Veritext National Deposition & Litigation Services
866 299-5127

Response to Comment 4P-4

Comment Code (Topic)	Response
4P-4-1 (Design)	Your comment against the proposed project alignment at this location is noted.
4P-4-2 (Community)	There is currently no funding available for construction or property acquisition, and it may be several years before it is available. Property values will likely change between now and then. When funding is available, fair market value would be paid for any property that would need to be acquired for this project. The project will be designed in a context sensitive manner and in a way that fits into the surrounding area as much as possible. It will be located just over one mile from Granite Hills High School.
4P-4-3 (Design)	The alignment of the HDC in the vicinity of its intersection with Standing Rock Road is pushed as far as possible to the east without impacting the hills to the east of the alignment. Moving the alignment of the HDC any further to the west towards Central Road would impact more houses, Granite Hills High School, as well as the dry lake bed along the southern edge of the alignment between Central Road and Ocotillo Road.

Comment 4P-5

current alignment comes within 12 to 1,500 feet of my property. And so I just want to state a formal opposition to that current alignment on Standing Rock just east of Sherwin. That whole area, it's a beautiful area. We looked for two years, as a real estate agent and myself, to find the property that we're in now. And I'm concerned for the people who live in the area considering the fallen market that we're just recovering from. And I know that the biggest investment that people make in their lifetime is in their homes. It's a beautiful area, and it will be sad to see that alignment go as planned come through here by Granite Hills High School. So I'm looking up and down Central Avenue, and I see that there's a lot of trucks that take that route. And I'm just wondering -- I know it's all zoned there for commercial on eastside of Central. And it seems to me that there's less homes there. And maybe that alignment can be reconsidered.

MARK DIERKING: Thank you very much. The next speaker is Ted Stimpfel with CHRC.

TED STIMPFEL: Good evening. First off, I'd like to say this display up here I find very, very distracting. And I apologize for the people who have to look at my bald head. I am with the community of Newberry Springs. I'm also a board member of the California Historic Route 66 Association. And quite frankly, we are upset that, up to this point as under SEQA, we are a stakeholder in this proposal because it process route 66. 4P-5-1

Page 29

Veritext National Deposition & Litigation Services
866 299-5127

1 We have not been invited to participate. With that being put
2 aside -- because you will be receiving some communication from
3 us in the future. Just stepping out of that role with the
4 association, just myself, I'm seeing -- you know, I'm not
5 understanding how a -- sort of a Draft EIR can be done with this
6 at this point. Because you've got, basically, a wish bucket
7 going on here, and that you don't know if it's going to be three
8 lanes or six lanes, eight lanes or whatever. You don't know if
9 you're going to be having a high speed train, how it's going to
10 be entering into this corridor. You don't know as to whether or
11 not there's going to be a bicycle route involved. Now, with the
12 bicycle, how much is that going to cost? You know, how many
13 hundred of millions? What kind of dollar return are we going to
14 get on that? There just seems to be so many things being thrown
15 into this, trying to get something that might stick. That when
16 we're talking about what it might be a power corridor. I mean
17 there's just so much. How can you build a draft EIR on
18 something with is so wide open? And how is the public going to
19 understand or be able to input or in any way contribute with so
20 much that is unknown? It just -- to me, it just sort of boggles
21 the mind. Thank you.
22 MARK DIERKING: Thank you very much. The next speaker is
23 Chuck Bell with Lucerne Valley Economic Development Association.
24 CHUCK BELL: Thank you. Chuck Bell, president of the
25 Lucerne Valley Economic Development Association. We've been

4P-5-1 (cont.)

4P-5-2

Veritext National Deposition & Litigation Services
866 299-5127

Response to Comment 4P-5

Comment Code (Topic)	Response
4P-5-1 (Cultural)	The letter was sent on July 10, 2014 to cahistoricrt66@aol.com in an updated mailing/email specifically for groups concerned about Route 66. This and three other Route 66 groups were sent updated letters as a result of Route 66 feedback we received both from BLM and Caltrans District 8, which has a Route 66 liaison. A follow-up email was sent to cahistoricrt66@aol.com on 7/25/2014; there was no response received. The following is excerpted from the Historic Resources Evaluation Report (HRER) regarding this consultation: "Additional letters were mailed or emailed on July 10, 2014 to four groups focused on the preservation of Route 66, including the lead for the Bureau of Land Management (BLM) and the California Route 66 Museum. The BLM and the California Route 66 Association will be preparing a corridor management plan for the segment of historic Route 66 within the BLM California Desert District that extends from the western city limits of Barstow to the Colorado River. As noted above, a response had been received from Mr. Paul Chassey of the California Route 66 Museum in September. Follow-up phone calls or emails were made on July 25 or July 28, to the following four groups (Attachment B). • Doran Sanchez, Route 66 Project Lead, Bureau of Land Management, dasanche@blm.gov Doran Sanchez, the BLM Route 66 Project Lead, responded by telephone on July 30, 2014, stating that because the proposed project corridors would not be crossing or located on BLM land, the BLM had no comment regarding the project. Mr. Sanchez also stated that he had passed along the request for information to the California Route 66 Association, encouraging them to comment on the project. No other concerns have been raised as of the date of this document. Mail correspondence is included in Attachment B of the HPSR." Records indicate that the California Route 66 Association and the California Historic Route 66 Association are the same organization.
4P-5-2 (Design)	The ultimate purpose of the EIR/EIS is to assist decision makers in making an informed decision regarding the proposed transportation project, balancing the costs (the impacts to the community and environment, and financial) with the benefits (satisfying the project purpose and need). To that end, the project alternatives do include a number of different elements, all included to satisfy the project's Purpose and Need as described in Chapter 1. The alternatives and project elements, including the number of lanes, the rail alignment, the bike path and green energy corridor are all thoroughly discussed in Chapter 2.

Comment 4P-6

We have not been invited to participate. With that being put aside -- because you will be receiving some communication from us in the future. Just stepping out of that role with the association, just myself, I'm seeing -- you know, I'm not understanding how a -- sort of a Draft EIR can be done with this at this point. Because you've got, basically, a wish bucket going on here, and that you don't know if it's going to be three lanes or six lanes, eight lanes or whatever. You don't know if you're going to be having a high speed train, how it's going to be entering into this corridor. You don't know as to whether or not there's going to be a bicycle route involved. Now, with the bicycle, how much is that going to cost? You know, how many hundred of millions? What kind of dollar return are we going to get on that? There just seems to be so many things being thrown into this, trying to get something that might stick. That when we're talking about what it might be a power corridor. I mean there's just so much. How can you build a draft EIR on something with is so wide open? And how is the public going to understand or be able to input or in any way contribute with so much that is unknown? It just -- to me, it just sort of boggles the mind. Thank you.

MARK DIERKING: Thank you very much. The next speaker is Chuck Bell with Lucerne Valley Economic Development Association.

CHUCK BELL: Thank you. Chuck Bell, president of the Lucerne Valley Economic Development Association. We've been

4P-6-1

Page 30

Veritext National Deposition & Litigation Services
866 299-5127

1 doing this for years. Same issue. I keep hearing that the
2 stretch segment between 15 and the 18 is ever going to get
3 built, and that's fine. If it was, it still be affecting Paul
4 mayor great grandkids. But if it's there -- if it remains in
5 the segment, our project -- here is a problem you got. And this
6 is what we've been saying for years. Be dumping traffic on two
7 lane highway 18 with significant ADT increase in both directions 4P-6-1
8 due to the corridor's length between the 14 and I-10. Will
9 create congestion and safety hazards. Highway 18, 247 to 62.
10 This is a trade corridor and has to be addressed in its
11 entirety. A long-term solution would be to incorporate
12 improvements to this eastern segment for the planning and
13 funding that is included in the product description. As you
14 probably know, the environmental quality act requires that
15 impacts, railroad project that are affecting offsite, out of the
16 boundaries of the project have to be mitigated. So the cleanest
17 thing to do with this project is actually going through to 18
18 which it probably won't. What we're hearing from you guys every
19 year is this: Your concern regarding the farther east segments.
20 SR-247 and 62 is well noted. However, it is well outside the
21 projects in the area. But it's in the area of impact if, in
22 fact, this project jumps that traffic into what is right now
23 determined a fairly major corridor. You got two lane Highway
24 18. You got intersections in Lucerne Valley that can't handle
25 it. (Inaudible). And you got to think for the future. So

Page 31

Veritext National Deposition & Litigation Services
866 299-5127

4P-6-1

1 remember that the California Environmental Quality Act and your
2 obligations. Thank you.
3 MARK DIERKING: Thank you very much. Matthew Ballmer.
4 MATTHEW BALLMER: Thanks. So you don't have to look at my
5 backside.
6 MARK DIERKING: Over here. Comments to me.
7 MATTHEW BALLMER: Oh, comments to you.
8 MARK DIERKING: Yes. Thank you.
9 MATTHEW BALLMER: Oh, that's fine. I was trying to be
10 respectful of the rest of the audience. My name is Matthew
11 Ballmer, resident of Apple Valley, personally actually live
12 unincorporated in San Bernardino County just east of the Joshua.
13 And I'm representing the community out there as much as it is.
14 I actually was notified of a comment in the report that
15 described that area as insignificant community to really address
16 with the route as it's currently planned. There seems to be a
17 correlation between density and sense of community in some of
18 these studies. And one of the main things I felt was left out
19 of this was the impact to the human element. A lot of this
20 development, this project is predicated on the economic
21 development and better (inaudible) for the people. However, it
22 seems to forget how this road is going to impact peoples' lives,
23 quality of lives and why -- can't speak for everybody, but I
24 know why I moved up here. I grew up in Los Angeles. I just
25 moved here from New Mexico. I've lived in a lot of places. And

Page 32

Veritext National Deposition & Litigation Services
866 299-5127

Response to Comment 4P-6

Comment Code (Topic)	Response
4P-6-1 (Traffic)	The daily traffic volume on SR-18 west of Lucerne Valley to the Bear Valley cutoff is approximately 9,400 vehicles per day on average, over the course of the year. This volume of traffic is not sufficient to warrant widening of the roadway to four lanes; however, intersection and safety improvements could be warranted upon further investigation. In the future, by 2040, the traffic volume is forecast to more than double, with or without the proposed High Desert Corridor project. With a doubling of traffic volume, motorists will spend nearly 100% of their time following a slower moving vehicle, and speeds will average around 40 mph during peak travel hours of the day. These volumes would warrant consideration of widening SR-18 to four lanes as a conventional highway, or constructing a new 4-lane expressway running parallel to the existing facility, which would become a frontage road. The amount of time required to analyze, design and locate funding for a widening project such as this is at least 10 years, and possibly longer. To advance this project, a "Project Initiation Document" is required. A request for such a study effort should be advanced through SANBAG and Caltrans District 8.

Comment 4P-7

remember that the California Environmental Quality Act and your obligations. Thank you.

MARK DIERKING: Thank you very much. Matthew Ballmer.

MATTHEW BALLMER: Thanks. So you don't have to look at my backside.

MARK DIERKING: Over here. Comments to me.

MATTHEW BALLMER: Oh, comments to you.

MARK DIERKING: Yes. Thank you.

MATTHEW BALLMER: Oh, that's fine. I was trying to be respectful of the rest of the audience. My name is Matthew Ballmer, resident of Apple Valley, personally actually live unincorporated in San Bernardino County just east of the Joshua. And I'm representing the community out there as much as it is. I actually was notified of a comment in the report that described that area as insignificant community to really address with the route as it's currently planned. There seems to be a correlation between density and sense of community in some of these studies. And one of the main things I felt was left out of this was the impact to the human element. A lot of this development, this project is predicated on the economic development and better (inaudible) for the people. However, it seems to forget how this road is going to impact peoples' lives, quality of lives and why -- can't speak for everybody, but I know why I moved up here. I grew up in Los Angeles. I just moved here from New Mexico. I've lived in a lot of places. And 4P-7-1

Page 32

Veritext National Deposition & Litigation Services
866 299-5127

I like what the high desert has to offer and the quality of life. And I like being able to go to the city and not live in the city. I don't want Adelanto to be Ontario. If I wanted to live in Ontario and near that kind of development, I would live there. I think there's a lot of other alternative routes for what needs to be done. If we need to facilitate transportation freight, which this is really all about. And I think it's supported from a developer standpoint. If this eastern route is not to be built, then it should be taken out of the proposal. I don't know why it's even on paper. I guess that's an issue to take up with Apple Valley. They seem to want it.

4P-7-1 (cont.)

4P-7-2

MARK DIERKING: Anything else? Thank you. Al Rice.

AL RICE: My name is Al Rice, and I live in Apple Valley for 15 years. I have an obligation to make my comments in public. I work for MTA predecessor company for assistant director HR for 18 years during the expansion and creative time of the rail system and so forth. You can give my comments to (inaudible), supervisor in charge. I read the 1,300 page document and have watched the two videos you've held. Thank you very much for those. $45 million in sales tax and State money and four years developed with over four -- over 100 of parsons contributors is four years is too long a period of time and it's out of date. The draft project is considered no more than an average project. Some good. Some bad. No mention is mentioned of joint power authority responsibility and work contributions.

Page 33

Veritext National Deposition & Litigation Services
866 299-5127

Response to Comment 4P-7

Comment Code (Topic)	Response
4P-7-1 (Community)	It is unclear as to what section of the draft environmental document you are referring to when you say that an area was described as an insignificant community. We are not aware of any place in the EIR/EIS where that is stated or implied. In fact, the consideration of potential project effects on the human environment is a major component of the environmental analysis undertaken for the High Desert Corridor project. However, it is standard practice in community impact assessments to primarily focus on direct impacts that would occur to people and properties closest to the project, particularly those within or immediately adjacent to the footprint of the various build alternatives, but also to provide background environmental setting information and more generally discuss indirect and cumulative impacts that may occur within a larger study area. The EIR/EIS and Community Impact Assessment technical report follows the required FHWA and Caltrans guidance and contains the information required for decision makers to choose among alternatives, including the No-Build Alternative.
4P-7-2 (Design)	There are an infinite number of ways to move between two points. The alignment and variations that were included in the draft environmental document were selected through a screening process which attempted to minimize impacts as much as possible. As far as the "eastern route" is concerned, it will be built when funding becomes available if it is part of the selected alternative.

Comment 4P-8

I like what the high desert has to offer and the quality of life. And I like being able to go to the city and not live in the city. I don't want Adelanto to be Ontario. If I wanted to live in Ontario and near that kind of development, I would live there. I think there's a lot of other alternative routes for what needs to be done. If we need to facilitate transportation freight, which this is really all about. And I think it's supported from a developer standpoint. If this eastern route is not to be built, then it should be taken out of the proposal. I don't know why it's even on paper. I guess that's an issue to take up with Apple Valley. They seem to want it.

4P-7-1 (cont.)

4P-7-2

MARK DIERKING: Anything else? Thank you. Al Rice.

AL RICE: My name is Al Rice, and I live in Apple Valley for 15 years. I have an obligation to make my comments in public. I work for MTA predecessor company for assistant director HR for 18 years during the expansion and creative time of the rail system and so forth. You can give my comments to (inaudible), supervisor in charge. I read the 1,300 page document and have watched the two videos you've held. Thank you very much for those. $45 million in sales tax and State money and four years developed with over four -- over 100 of parsons contributors is four years is too long a period of time and it's out of date. The draft project is considered no more than an average project. Some good. Some bad. No mention is mentioned of joint power authority responsibility and work contributions.

4P-8-1

Page 33

Veritext National Deposition & Litigation Services
866 299-5127

A large amount of trucks, large trucks on 18, 138, 15. Solar farms are now in project's influence. What if Xpress and high speed rails don't occur? What if Burlington Northern doesn't build out the rail facility at Victorville? What happens to the trucks when the point of the poor to Victorville initiative? 4P-8-1 (cont.)

Here's the areas and flaws I picked up in reading it. Bart's asked separately their Xpressway are a problem. If you don't believe me, drive a bike down to the Cajon pass and try to avoid all that. We've had fatalities on bike pass here on major streets already. No one stops there now, watch the mountains or Bell Mountain. So I don't know why somebody put that in there. Negative impacts on property in values particularly outside your 500 foot, 300 foot radius right-of-way. Remember the 91 freeway? Caltrans has a record of problems. Took, what, ten years to do the combination of those? 4P-8-2

Use of culvert by wildlife is ridiculous. I don't know how they're going to use metal covers to protect wildlife. 4P-8-3

Population growth stopped a couple years ago. Your study is out of date. Study shows limited knowledge of the desert rural culture. There's a large number of acquisitions in Apple Valley in your report. But there's no APN's. But beyond that, we don't know where they are. Your project comes one mile from the airport. Give to the Horsemans Center as the High Desert Corridor goes directly in front of it. 4P-8-4

It's just a visibility problem, because you're gonna put a sound wall there. That's -- to me, that's goofy. 4P-8-5

Page 34

Veritext National Deposition & Litigation Services
866 299-5127

(Inaudible). Water doesn't drain easily up in the high desert. Your mitigation will not be sufficient. 13 technical studies. 4P-8-5 (cont.)

Oh, really? I'm sorry, Mr. Price, doesn't make sense. I was over here at the planning county. Here's what the Town of Apple Valley tell you. "Call Caltrans. They're not involved. Call Caltrans in L.A. 'cause the Town of Apple Valley is not involved." I just talked with the council people. "Town of Apple Valley is not involved. Go to Caltrans, they're the lead agency." No one is standing up in support, particularly the 4P-8-6 necessary elected officials. I heard of council person say (inaudible). So if anybody worked with the Palmdale Transportation Center plus supervisor (inaudible) recognition honors 30 years is down there. We currently have a lot of land grab up here with the BLM, SCE and the DRECP. Apple Valley's trying to do a water thing. You have no interest or support and may not -- even in 2030, the White House press security, local and community agencies are required to provide public safety and security. And you ain't got none.

MARK DIERKING: Thank you very much. Next speaker is Bryan Baker with the Sierra Club Mojave.

BRYAN BAKER: Thank you. Yes. I'm Bryan Baker. I'm an Apple Valley resident for about 15 years. I'm with the group preparing with the response this year with the local Mohave group. Shouldn't be regretted as an official response from this public hearing tonight. But this makes (inaudible) last week at

Page 35

Veritext National Deposition & Litigation Services
866 299-5127

Response to Comment 4P-8

Comment Code (Topic)	Response
4P-8-1 (Design)	Your comment is noted, but the comment was not specific enough to provide a response. This is a very large and complex project and it takes time to evaluate the potential impacts of the various project elements. The draft environmental document is current and up-to-date as of the day it was signed. Once we have a final environmental document and an approved Record of Decision, the project team will be able to secure funding for final design and construction. Because it is not known t know how long it will take to obtain funding, the project will be re-evaluated based on conditions that are current at that time. This will allow the team to address changes that occur between now and then and to answer the "what if" questions you ask.
4P-8-2 (Traffic)	Section 2.2.2 of the draft environmental document describes the bicycle access facility options that were considered for the High Desert Corridor. Figure 2-20 illustrates the typical cross section for the ultimate HDC Freeway/Expressway build project alternative(s). The graphic illustrates the provision of a Class I Bike Path running parallel to the roadway, located at the bottom of the freeway embankment. The bike path is separated from the freeway travel lanes to minimize the impact of high speed vehicle movement on the freeway affecting cyclists and pedestrians using the bike path.
4P-8-3 (Biology)	Reinforced concrete box culverts with soft bottoms will be used. Wildlife is known to use such culverts. These culverts will be designed with sufficient widths and heights to facilitate movement of the wildlife that occurs within the vicinity of the proposed project. In addition, fencing along the corridor will be used to guide wildlife to the culverts.
4P-8-4 (Community)	Our studies relied on the most recent population data available and will be updated as we get closer to construction. A list of property potentially to be acquired is presented in Appendix I of the Draft EIR/EIS. The right-of-way maps were made available at the four public hearings held during the public review period of the Draft EIR/EIS. Any interested individuals had a chance to view their property in reference to the proposed alignment alternatives and ask questions. Your other comments are not specific enough to provide responses.
4P-8-5 (Visual)	The commenter indicated that visibility to the Horseman's Center will be impaired by a soundwall. The Noise Study Report for the High Desert Corridor Project (June 9, 2014) did not indicate future traffic noise impacts at the Horseman’s Center due to this proposed project. Therefore, noise abatement (for example, a soundwall) was not considered at that location.

Comment Code (Topic)	Response
4P-8-6 (Other)	Although Caltrans is the lead agency under NEPA and CEQA, we have worked closely with the local jurisdictions, including the Town of Apple Valley, to accommodate their needs and desires. We have had numerous meetings with Town engineers and other staff. The Town is a member of the Joint Powers Authority (JPA) and representatives attend the JPA meetings as well as our quarterly Project Partners meetings. The official position of the Town of Apple Valley, as well as the cities of Victorville, Adelanto, Palmdale and Lancaster is in support the project.

Comment 4P-9

(Inaudible). Water doesn't drain easily up in the high desert. Your mitigation will not be sufficient. 13 technical studies. Oh, really? I'm sorry, Mr. Price, doesn't make sense. I was over here at the planning county. Here's what the Town of Apple Valley tell you. "Call Caltrans. They're not involved. Call Caltrans in L.A. 'cause the Town of Apple Valley is not involved." I just talked with the council people. "Town of Apple Valley is not involved. Go to Caltrans, they're the lead agency." No one is standing up in support, particularly the necessary elected officials. I heard of council person say (inaudible). So if anybody worked with the Palmdale Transportation Center plus supervisor (inaudible) recognition honors 30 years is down there. We currently have a lot of land grab up here with the BLM, SCE and the DRECP. Apple Valley's trying to do a water thing. You have no interest or support and may not -- even in 2030, the White House press security, local and community agencies are required to provide public safety and security. And you ain't got none.

MARK DIERKING: Thank you very much. Next speaker is Bryan Baker with the Sierra Club Mojave.

BRYAN BAKER: Thank you. Yes. I'm Bryan Baker. I'm an Apple Valley resident for about 15 years. I'm with the group preparing with the response this year with the local Mohave group. Shouldn't be regretted as an official response from this public hearing tonight. But this makes (inaudible) last week at 4P-9-1

Page 35

Veritext National Deposition & Litigation Services
866 299-5127

1 the Victorville meeting about some of the general issues with
2 the project. But I wanted to focus in on just one aspect of the
3 project which I think illustrates that a lot of the assumptions
4 that go into the needs of the project are grossly overstated.
5 The (inaudible) has a set of projections for traffic based on
6 whether or not the project will be build versus the
7 alternatives. I went through the sources in the county and
8 State traffic count databases and looked up those same roads for
9 occurring traffic. So there are five roads listed in the EIR
10 for traffic study out in G up in Palmdale. El Mirage Road, 4P-9-1
11 Palmdale Road, 138 and Angeles Crest Highway. Not sure how
12 Angeles Crest Highway will be affected by the freeway up there,
13 but, nevertheless, those are the four roads. So east Avenue G
14 is currently an unpaved dirt road road and meets up with
15 Mountain Road north of El Mirage Road. Traffic on that road is
16 16 vehicles per day. That's one-six. The traffic study or the
17 black box where they carry through numbers into the skag model
18 predicts that without any improvements whatsoever in the system,
19 that road in 2040 will carry 18,844 vehicles. I'd like some
20 explanation in the final EIR justifying that kind of number for
21 a dirt road. But we're at rope of over 2,400 to 33,000
22 vehicles. Palmdale Road will go through 5,400 vehicles to
23 20,000. Not sure why there will be fewer people here than El
24 Mirage. But 138 will go from about 9,000 to 45,000 vehicles.
25 So overall, the prediction is that the total traffic will go

Page 36

Veritext National Deposition & Litigation Services
866 299-5127

1 from you 19,000 vehicles average per day on those five roads to
2 133,000 vehicles per day on average. That's an increase of
3 seven times. Now, there's a prediction of it doubling in
4 population between the two valleys here. I think that's
5 overestimated. But even with the doubling of traffic -- I mean 4P-9-1
6 doubling of population, it stretches the imagination to say that
7 the traffic will exceed current volume by seven times, 600
8 percent increase of traffic. So I think you need to go back and
9 do some work on the traffic study here. And I think that will
10 have an impact on the estimates of need, the benefits of the
11 road and the other cost considerations. Thank you.
12 MARK DIERKING: Thank you for your time. The next speaker
13 is Mary Borden.
14 MARY BORDEN: Hi. I've been an Apple Valley resident for
15 16 years. And I wonder who's going to be paying for this with
16 our gasoline taxes going up? The council here that did the
17 trash, that specified what letter went out, had to have 50
18 percent of the residents, you know, not wanting to have that.
19 But what I'm wondering is how is this going to be paid? And the
20 local, the average, citizen here, isn't going to be able to
21 afford to have this luxury of the train. And these trucks are
22 going to -- a lot of dust, the cement trucks and the health of
23 the radiation of these electrical rigs that are going up the
24 middle pass station. That's huge. I don't know. Where are you
25 guys coming from? You're not thinking of the human being.

Page 37

Veritext National Deposition & Litigation Services
866 299-5127

Response to Comment 4P-9

Comment Code (Topic)	Response
4P-9-1 (Traffic)	The travel demand forecasts are based on the Southern California Association of Governments (SCAG) 2008 Regional Transportation Plan adopted growth forecast and regional travel demand model. The forecasts indicate that the population of the High Desert Region, which includes Antelope Valley, Victor Valley, and lands in between, will approximately double over the next 25 years to 1.4 million residents. The increase in population will strain the capacity of I-15 and SR-14 leading to the Los Angeles basin to the south of the San Gabriel Mountain range. As a result, demand to travel between Antelope Valley, Victor Valley, and intermediate population centers will dramatically increase. Current traffic volumes along east-west roads connecting the population centers are relatively low, approximately 20,000 vehicles per day. These low volumes are in part a function of the relatively poor condition of the highways and local roads which connect Antelope Valley with Victor Valley. In the future, these roadways will be improved, with or without the proposed HDC freeway or tollway, thereby permitting an increase in traffic volumes as forecasted.

Comment 4P-10

from you 19,000 vehicles average per day on those five roads to 133,000 vehicles per day on average. That's an increase of seven times. Now, there's a prediction of it doubling in population between the two valleys here. I think that's overestimated. But even with the doubling of traffic -- I mean doubling of population, it stretches the imagination to say that the traffic will exceed current volume by seven times, 600 percent increase of traffic. So I think you need to go back and do some work on the traffic study here. And I think that will have an impact on the estimates of need, the benefits of the road and the other cost considerations. Thank you.

MARK DIERKING: Thank you for your time. The next speaker is Mary Borden.

MARY BORDEN: Hi. I've been an Apple Valley resident for 16 years. And I wonder who's going to be paying for this with our gasoline taxes going up? The council here that did the trash, that specified what letter went out, had to have 50 percent of the residents, you know, not wanting to have that. But what I'm wondering is how is this going to be paid? And the local, the average, citizen here, isn't going to be able to afford to have this luxury of the train. 4P-10-1 And these trucks are going to -- a lot of dust, the cement trucks and the health of the radiation of these electrical rigs that are going up the middle pass station. That's huge. I don't know. Where are you guys coming from? You're not thinking of the human being. 4P-10-2

Page 37

Veritext National Deposition & Litigation Services
866 299-5127

Response to Comment 4P-10

Comment Code (Topic)	Response
4P-10-1 (Other)	The money used to prepare the preliminary engineering and environmental document has come from a combination of Los Angeles County Measure R and federal transportation funds. Refer to Table 1-1 for a discussion on funding and funding sources. It is not clear yet where the money for property acquisition and construction will come from but it will likely be from a combination of state, federal and private sources.
4P-10-2 (Air quality)	Air quality impacts have been analyzed, as presented in Section 3.2.6 of the EIR/EIS. This analysis demonstrated that the HDC Project conforms to an approved Regional Transportation Plan. The results of the air quality analysis indicated no substantial air quality impacts are anticipated as a result of the HDC implementation. Please refer to Section 3.6 of the EIR/EIS for analysis of construction impacts and evaluation of fugitive dust. Construction activities must adhere to Fugitive Dust Rules mandated by the South Coast Air Quality Management District and the Antelope Valley Air Quality Management District. As stipulated in Section 3.6, fugitive dust emissions generally must meet a "no visible dust" criterion either at the point of emission or at the right-of-way line. With regard to electromagnetic radiation (EMR) from the electrical rigs (overhead catenary system) running through the center of the HDC under the HSR alternatives, the Final EIR/EIS includes an analysis of the potential EMR effects of this system. The EMR analysis demonstrates that EMR levels beyond the edge of the HDC right-of-way would be near background levels, and these levels would be safe for the public.

Comment 4P-11

MARK DIERKING: Thank you. The next speaker is LaVerne Harley.

LAVERNE HARLEY: Hi. I'm LaVerne Harley, and I live in Apple Valley. And a couple of concerns that I thought about is the area that is east of Joshua where that north/south road is the XpressWay near Sherwin I believe. I'm concerned about the impact on the water quality. And there was a gentleman that spoke on the Environmental Quality Act, which I'm not real familiar with. But the water quality out there, as well as many of the homes, also have septic tanks. So I'm wondering how that is going to affect the sewage in that area. And I know there's a sealed landfill somewhere out in that area. So with this construction, you know, when it comes to pass, I'm just wondering if those issues -- and my guess would be that all of those issues were looked at. But from the human perspective, you know, for all of our health, that's something that I would like to at least have clarification on in the future. And thank you for allowing me to give my input. 4P-11-1

MARK DIERKING: We thank you for your input. Thank you. The next speaker is Pam Robertson. Any other speaker cards? If you want to fill one out.

PAM ROBERTSON: Hi. I'm Pam Robertson, and I live in Apple Valley. My husband and daughter moved up here six years ago. And we moved into a family home there on Sherwin Road. That was one of the original homes built in 1946 from Rock Spring

Page 38

Veritext National Deposition & Litigation Services
866 299-5127

Response to Comment 4P-11

Comment Code (Topic)	Response
4P-11-1 (Water quality)	Excavation activities may occur that would require removal of groundwater from excavations during construction. Dewatering activities for excavations below the water table could result in the discharge of unsuitable or untreated water if discharged directly into the environment. If temporary excavations require dewatering, there is the potential of discharging pollutants (primarily by entraining silt and clay, but also from encountering chemicals and other contaminants) through release of construction water directly to the environment. The effects to water quality from construction and operation of the proposed Project would be minimized by following applicable environmental guidelines, regulations and the terms and conditions that would be included on National Pollutant Discharge Elimination System (NPDES) permits issued by the Regional Water Quality Control Board for this project.

Comment 4P-12

MARK DIERKING: Thank you. The next speaker is LaVerne Harley.

LAVERNE HARLEY: Hi. I'm LaVerne Harley, and I live in Apple Valley. And a couple of concerns that I thought about is the area that is east of Joshua where that north/south road is the XpressWay near Sherwin I believe. I'm concerned about the impact on the water quality. And there was a gentleman that spoke on the Environmental Quality Act, which I'm not real familiar with. But the water quality out there, as well as many of the homes, also have septic tanks. So I'm wondering how that is going to affect the sewage in that area. And I know there's a sealed landfill somewhere out in that area. So with this construction, you know, when it comes to pass, I'm just wondering if those issues -- and my guess would be that all of those issues were looked at. But from the human perspective, you know, for all of our health, that's something that I would like to at least have clarification on in the future. And thank you for allowing me to give my input.

MARK DIERKING: We thank you for your input. Thank you. The next speaker is Pam Robertson. Any other speaker cards? If you want to fill one out.

PAM ROBERTSON: Hi. I'm Pam Robertson, and I live in Apple Valley. My husband and daughter moved up here six years ago. And we moved into a family home there on Sherwin Road. That was one of the original homes built in 1946 from Rock Spring 4P-12-1

Page 38

Veritext National Deposition & Litigation Services
866 299-5127

1 Mountains. And this XpressWay is going to run directly in front
2 of our home. And like has been said here, I know this sounds
3 like it's just all about me, me, me, but it is. I'm sorry. I'm 4P-12-1
4 just blown away by this project. I can't believe that it's even
5 being considered. Where are the owls going to go and the hawks
6 going to go and the rabbits and the coyotes and all the beauty 4P-12-2
7 that is there in front of us? And how can someone say that it's
8 okay for you to put an XpressWay in front of our home that may
9 be 3 to 500 feet away from us and expect us to live there? I
10 just -- I wish that you would really give the people aspect of
11 this some more consideration like it has been said earlier. We 4P-12-3
12 moved up here from Dana Pointe, God forbid, to get away from the
13 traffic. We don't really want anymore traffic. And we
14 certainly don't want an XpressWay in front of our house. Thank
15 you.
16 MARK DIERKING: Can I have the folks in the very back by
17 the boards to quiet down? We can't hear all the speakers. And
18 I want to make sure they have a chance to be heard. So the next
19 speaker is Alfreda Dallavalle. I hope I said that right.
20 ALFREDA DALLAVALLE: My name is Alfreda Dallavalle. And I
21 live at the north end of Joshua Road. And this map looks like
22 the same one I saw about four years ago. And it looks like your
23 XpressWay is going to run right through our living room. And I
24 think it's deplorable that no one has even approached people
25 that are going to be relocated or there's a chance that their

Page 39

Veritext National Deposition & Litigation Services
866 299-5127

Response to Comment 4P-12

Comment Code (Topic)	Response
4P-12-1 (Design)	Your concern is noted. The HDC Project is supported by the Town of Apple Valley and the cities along the corridor. The project footprint is consistent with the Town of Apple Valley's General Plan Land Use element.
4P-12-2 (Biology)	Wildlife will continue to exist in the surrounding areas. As indicated in Chapter 2 of the EIR/EIS, culverts for wildlife crossings will be provided to link habitat that would be separated by the freeway.
4P-12-3 (Community)	The population of the Victor Valley has grown substantially over the past 20 years and is projected to nearly double between the year 2010 and 2040. With population comes traffic, and a need to keep that traffic moving to avoid the kind of traffic jams that are so common in the Los Angeles Basin. This project is proposed as a way of addressing the growth in population and traffic before it reaches the levels you experienced in Dana Point. Other components of the "people aspect" of this project have been thoroughly evaluated and are discussed in Chapter 3.1 of the environmental document.

Comment 4P-13

Mountains. And this XpressWay is going to run directly in front of our home. And like has been said here, I know this sounds like it's just all about me, me, me, but it is. I'm sorry. I'm just blown away by this project. I can't believe that it's even being considered. Where are the owls going to go and the hawks going to go and the rabbits and the coyotes and all the beauty that is there in front of us? And how can someone say that it's okay for you to put an XpressWay in front of our home that may be 3 to 500 feet away from us and expect us to live there? I just -- I wish that you would really give the people aspect of this some more consideration like it has been said earlier. We moved up here from Dana Pointe, God forbid, to get away from the traffic. We don't really want anymore traffic. And we certainly don't want an XpressWay in front of our house. Thank you.

MARK DIERKING: Can I have the folks in the very back by the boards to quiet down? We can't hear all the speakers. And I want to make sure they have a chance to be heard. So the next speaker is Alfreda Dallavalle. I hope I said that right.

ALFREDA DALLAVALLE: My name is Alfreda Dallavalle. And I live at the north end of Joshua Road. And this map looks like the same one I saw about four years ago. And it looks like your XpressWay is going to run right through our living room. And I think it's deplorable that no one has even approached people that are going to be relocated or there's a chance that their 4P-13-1

Page 39

Veritext National Deposition & Litigation Services
866 299-5127

1 homes could be taken. And I think you better get on the stick
2 and start notifying us on what's going on. Because if I'm going 4P-13-1 (cont.)
3 to have to move, I don't want to make any improvements to my
4 home. Okay. I've been here 18 years, moved here from Chicago 4P-13-2
5 where I know what traffic is all about. And I didn't move here
6 to have the trucks passing my home. Thank you.
7 MARK DIERKING: Thank you. That's all the speaker cards I
8 have right now. There's one more. Jim Alexander.
9 JIM ALEXANDER: Thank you very much. My name is Jim
10 Alexander. I'm a life-long resident of the Antelope Valley. I
11 was born in Antelope Valley Hospital. I've lived every day of
12 my life except the first day of my life in the home that I
13 currently live in. With the current alignment, freeway is going
14 to go approximately 200 yards of my house. That's difficult for
15 me to take. I have three generations of my family that have
16 lived and died in the Antelope Valley. And effectively, by
17 putting a freeway that close, that will make living in my home
18 intolerable to me. Currently, my nearest neighbor is
19 approximately a mile away, the south side of my house. There
20 are absolutely no signs of civilization. The biggest thing I
21 see is Black Butte. Unfortunately, there's a rail line that
22 runs east/west. It is south of Black Butte about two miles.
23 And every night that thing wakes me up. So I can only imagine
24 how loud a freeway is going to be, how loud a potentially, a
25 dual, high speed train is going to go by my house any time of

Page 40

Veritext National Deposition & Litigation Services
866 299-5127

Response to Comment 4P-13

Comment Code (Topic)	Response
4P-13-1 (Community)	The project team has conducted extensive outreach to the communities along the corridor as summarized in Chapter 5 of the EIR/EIS. Throughout these meetings the possibility of property acquisitions has been discussed in general terms. The reason for this is that, until now, the exact footprint of the project has been subject to change; as we move forward into the final design process there is still a chance that refinements could be made that cause the alignment to further shift. Additionally, it is possible that the No-Build alternative could be selected and, for the build alternatives, it is uncertain when the properties would need to be acquired. Therefore, it is premature to notify property owners because the situation might change. Direct contact with the owners of property that needs to be acquired will be conducted in accordance with 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.C. Chapter 61 et seq.). Property owners will be notified in writing of right of way acquisitions once project alternatives and designs are finalized and when project funding is available.
4P-13-2 (Traffic)	The population of the Victor Valley has grown substantially over the past 20 years and is projected to nearly double between the year 2010 and 2040. With population comes traffic, and a need to keep that traffic moving to avoid the kind of traffic jams that are so common in the Los Angeles Basin (and Chicago). This project is proposed as a way of addressing the growth in population and traffic while it can still be managed effectively. Projects like this begin with an early concept and go through a lengthy process before ever getting built. This project has been in the planning stages since 1998.

Comment 4P-14

1 homes could be taken. And I think you better get on the stick
2 and start notifying us on what's going on. Because if I'm going
3 to have to move, I don't want to make any improvements to my
4 home. Okay. I've been here 18 years, moved here from Chicago
5 where I know what traffic is all about. And I didn't move here
6 to have the trucks passing my home. Thank you.
7 MARK DIERKING: Thank you. That's all the speaker cards I
8 have right now. There's one more. Jim Alexander.
9 JIM ALEXANDER: Thank you very much. My name is Jim
10 Alexander. I'm a life-long resident of the Antelope Valley. I
11 was born in Antelope Valley Hospital. I've lived every day of
12 my life except the first day of my life in the home that I
13 currently live in. With the current alignment, freeway is going
14 to go approximately 200 yards of my house. That's difficult for
15 me to take. I have three generations of my family that have
16 lived and died in the Antelope Valley. And effectively, by
17 putting a freeway that close, that will make living in my home
18 intolerable to me. Currently, my nearest neighbor is
19 approximately a mile away, the south side of my house. There
20 are absolutely no signs of civilization. The biggest thing I
21 see is Black Butte. Unfortunately, there's a rail line that
22 runs east/west. It is south of Black Butte about two miles.
23 And every night that thing wakes me up. So I can only imagine
24 how loud a freeway is going to be, how loud a potentially, a
25 dual, high speed train is going to go by my house any time of

4P-14-1

4P-14-2

Page 40

Veritext National Deposition & Litigation Services
866 299-5127

1 day, especially while I'm trying to sleep. This is the third 4P-14-2 (cont.)
2 one of these meetings that I've been to. And every time I come
3 to the meeting, it amazes me how many more things I see in your
4 presentation. And I would really love to have the opportunity
5 to pick apart. I know these meetings are limited on time.
6 You've set this up obviously ahead of time. And everybody has
7 constraints on their time. It will be really nice if we had an
8 opportunity to go page by page through the power point
9 presentation so somebody, if not me, had an opportunity to point
10 out some of the flaws in the plan. I'm sure we won't get that 4P-14-3
11 opportunity. One thing that really bothers me about the
12 meetings is there are some really smart people that come up
13 here, far more informed than I am. And you kind of rushed them
14 along. This is our lives that you're dealing with. So to rush
15 through something, it's very vital to us. To push people along
16 to basically shut them up absolutely is beyond approach. So I
17 hope that potentially, sometime in the future, we all get an
18 opportunity to see more information, where the information came
19 from. I really think the anybody that's like I am that is
20 interested in the no build aspect of this project -- I think we
21 need to create a group to try to stop the build. Sierra Club is
22 involved. Desert Preservation is involved. Both of those
23 organizations deserve our time. They deserve our donations.
24 Thank you all very much for having these meetings. And I hope
25 we actually get an opportunity to have more.

Page 41

Veritext National Deposition & Litigation Services
866 299-5127

Response to Comment 4P-14

Comment Code (Topic)	Response
4P-14-1 (Design)	Your concerns are noted.
4P-14-2 (Noise)	The existing setting for noise in the study area, the potential short- and long-term noise effects of the project as a result of freeway and rail operations, including measures to address those effects are detailed in Section 3.2.7, Noise, in the draft environmental document. The information is summarized from the Noise Study Report (August 2014) and the Noise Abatement Decision Report (August 2014). As part of the analysis, field investigations were conducted to determine existing noise levels and gather information to develop and calibrate the traffic noise model that was used for predicting future noise levels. Ambient noise levels were measured along the HDC main alignment area to assess new freeway traffic noise impacts for the HDC Project. Existing noise levels were recorded at 66 locations and modeled at 32 locations. Five long-term (24-hour) noise level readings were conducted to determine the noisiest hour within the project limits. These locations are acoustically representative of the noise environment and land uses within the limits of the project. The existing ambient noise levels measured were between 42 and 70 dBA. These existing noise levels, in addition to five other long-term noise measurements conducted along the project corridor, were also used in assessing the rail noise impacts. Existing noise levels at various receptor locations are presented in Tables 3.2.7-4 through 3.2.7-8 of the draft environmental document. Receptor locations are shown in Appendix N. The traffic noise analysis indicates that residential areas, a school, a park, and a church within the project limits would be impacted after project completion under the Freeway/Expressway and Freeway/Tollway alternatives including their variations (i.e., the noise level would approach or exceed FHWA Noise Abatement Criteria) as summarized in Tables 3.2.7-5 through 3.2.7-9 of the draft environmental document. Effects of noise from train operations were also studied. Results of the train noise analysis indicate that there would be no impact expected as a result of the HSR operation and the train noise contribution to the overall project noise levels would be insignificant throughout the entire project corridor. Noise impacts from the freeway operation will be abated through the use of sound walls. Based on the studies completed to date, Caltrans intends to incorporate noise abatement in the form of soundwalls that were found to be both feasible and reasonable. The recommended soundwalls would reduce the traffic noise levels by at least 5 dB at the impacted receivers, would meet the design goal by providing a 7-decibel reduction for at least one receiver, and would cost less than the reasonableness cost allowance. If during final design, conditions have substantially changed, noise abatement may not be necessary. The final decision of the noise abatement will be made upon completion of the project design and the public involvement processes.

Comment Code (Topic)	Response
4P-14-3 (Other)	Your comment in support of the No Build Alternative is noted. Caltrans and Metro have project web sites with additional project information. Please visit: www.dot.ca.gov/dist07/HDC/ and www.metro.net/projects/high-desert-corridor/.