



AFFILIATED AGENCIES

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*Service Authority for
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*Consolidated
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*Congestion Management
Agency*

April 29, 2026

California High-Speed Rail Authority
Attn: Draft 2026 Business Plan
770 L Street, Suite 1180
Sacramento, CA 95814

Via email: BusinessPlan2026@hsr.ca.gov

Subject: **California High-Speed Rail Authority 2026 Draft Business Plan**

To Whom It May Concern:

The California High-Speed Rail Authority (CHSRA) released its Draft 2026 Business Plan (2026 Plan) which outlines a framework for delivering high-speed rail in California. The Plan describes in further detail economic opportunities, the implementation approach, and long-term funding. The Orange County Transportation Authority (OCTA) has reviewed this document.

The 2026 Plan places an increased emphasis on phased and “right-sized” implementation strategies, including the use of shared corridors and incremental infrastructure improvements to advance early service, particularly within the Los Angeles to Anaheim project section. While OCTA recognizes the intent of accelerating implementation, these strategies introduce important considerations related to long-term system performance, operational feasibility, and consistency with the intent of providing true high-speed rail service.

Please see Attachment A for detailed comments on the 2026 Plan including specific technical, operational, and policy considerations. These comments build upon prior correspondence submitted by OCTA, including a letter dated April 8, 2024 regarding the CHSRA 2024 Draft Business Plan (Attachment B).

As noted in prior correspondences, OCTA continues to emphasize the importance of ensuring high-speed rail implementation:

- Provides service consistent with the intent of high-speed rail connectivity to the City of Anaheim;
- Would not adversely affect existing and planned passenger and freight rail operations within shared corridors; and
- Reflects the operational, capacity, and institutional constraints associated with use of existing rail infrastructure in Southern California.

California High-Speed Rail Authority
April 29, 2026
Page 2

As the railroad owner and Orange County's transportation planning agency and transit operator, OCTA appreciates CHSRA's continued coordination in advancing planning efforts for the Los Angeles to Anaheim project section. OCTA remains committed to working collaboratively with CHSRA to ensure that impacts to Orange County are fully understood and appropriately addressed.

We look forward to continuing to work with CHSRA. Should you have any questions or comments, please contact me at (714) 560-5907 or at dphu@octa.net.

Sincerely,

A handwritten signature in black ink, appearing to read "Dan Phu", with a long horizontal flourish extending to the right.

Dan Phu
Director, Transportation Planning and Analysis

DP:pv
Attachments

Letter Dated April 29, 2026

Attachments Include:

A: Comments on the 2026 Plan

B: Letter to California High Speed Rail Authority

Clarify the Transition from Interim to Full High-Speed Rail Operations

The California High-Speed Rail Authority (CHSRA) 2026 Draft Business Plan (2026 Plan) places significant emphasis on phased and “right-sized” implementation strategies, including interim use of shared corridors and incremental upgrades to existing infrastructure. While the Orange County Transportation Authority (OCTA) recognizes the value of phased delivery, the 2026 Plan should:

- More clearly define the transition path from interim/blended operations to fully dedicated high-speed rail infrastructure, particularly within the Los Angeles–Anaheim segment.
- Identify specific triggers, performance thresholds, or funding milestones that would advance the system from interim service to full high-speed rail operations.

As presented, the phased approach could create uncertainty regarding whether interim operating conditions could extend beyond initial expectations, which may affect long-term service outcomes that do not reflect true high-speed rail performance.

Maintain Consistency with Prior Commitments Related to Service and Performance

OCTA has previously expressed concern that shared or blended service approaches may not provide true high-speed rail service and may rely on reduced speeds or service levels. The 2026 Plan’s emphasis on phased and blended implementation strategies in Southern California should:

- Remain consistent with the legislative intent of providing high-speed rail connectivity to the City of Anaheim (Anaheim).
- Ensure that service assumptions would not reduce performance relative to true high-speed rail service.

OCTA notes the increased emphasis on phased and incremental implementation strategies in Southern California and encourages CHSRA to ensure that interim or phased approaches do not result in long-term service limitations or outcomes that are inconsistent with the intent of providing high-speed rail service to Anaheim.

Provide More Clarity on Service Assumptions in Shared Corridors

Since the 2026 Plan identifies shared corridor operations as a key component of early implementation in Southern California, OCTA encourages CHSRA to include additional clarity regarding:

- Assumed service frequencies, travel times, and operating speeds under shared-use conditions.
- How mixed-service operations (high-speed, commuter, intercity, and freight) will be prioritized and managed.
- The extent to which capacity constraints in existing corridors may influence service reliability and schedule adherence.

Given the complexity of operating multiple service types within constrained corridors, additional transparency in these assumptions would improve understanding of how performance expectations are being evaluated and maintained over time.

Recognize Operational and Capacity Considerations in Shared Corridors

Prior OCTA comments have emphasized the need to clearly understand how shared operations will function, including impacts to service levels, dispatching, and capacity. Therefore, the 2026 Plan should:

- Acknowledge that shared corridor operations will require careful coordination among multiple rail operators.
- Recognize that operational and capacity considerations will need to be addressed through continued planning and coordination.

Given the 2026 Plan's increased emphasis on shared use of existing rail infrastructure in Southern California, these considerations are particularly important to ensure compatibility with existing and planned passenger and freight services.

Recognize the Role of Shared-Use Agreements in Defining Service Feasibility

OCTA notes that implementation of proposed service concepts within shared corridors in Southern California will be dependent on existing shared-use and operating agreements governing those corridors. While the 2026 Plan emphasizes phased and blended service strategies, it could further address the role these agreements play in defining:

- Allowable service levels
- Operational priorities and dispatching protocols
- Achievable performance outcomes

Given the 2026 Plan's reliance on shared corridor operations, OCTA recommends that CHSRA:

- Clearly acknowledge that implementation of proposed service concepts will require coordination with, and potential modification of, existing shared-use agreements.
- Recognize that these agreements will be a key factor in determining the feasibility, timing, and performance characteristics of service in the Los Angeles–Anaheim segment.

Providing additional clarity on this relationship would improve understanding of how proposed service assumptions align with the existing operating framework and the steps necessary to support implementation.

Work within the Constraints of Existing Agreements and Property Rights

OCTA has previously noted the importance of existing agreements, including shared-use and right-of-way arrangements, and the need to ensure that the project adheres to them. Hence, the 2026 Plan should:

- Acknowledge that implementation of high-speed rail in the Los Angeles–Anaheim corridor will require coordination with existing agreements and property rights.
- Recognize that use of OCTA-owned right-of-way will require continued coordination and agreement with OCTA.

Preservation of Existing and Future Passenger Rail Services

OCTA has consistently emphasized that high-speed rail must not negatively affect existing intercity and commuter rail services, including Metrolink and Amtrak Pacific Surfliner. Consistent with prior comments, OCTA recommends that the 2026 Plan:

- Reaffirm that implementation in shared corridors will maintain or improve the reliability and performance of existing services.
- Acknowledge the importance of preserving capacity for planned service expansions, including those associated with Metrolink and the Los Angeles – San Diego – San Luis Obispo Rail Corridor (LOSSAN).

Strengthening Discussion of Corridor-Level Capacity and Constraints

While the 2026 Plan acknowledges the use of existing infrastructure in Southern California, it would benefit from additional discussion of the physical and operational limitations of these corridors, particularly within the LOSSAN corridor and the Orange Subdivision. OCTA recommends the 2026 Plan:

- More explicitly acknowledge that existing corridor capacity is finite and already supports multiple passenger and freight services.
- Recognize that introducing additional service layers will require careful evaluation of trade-offs between service expansion, reliability, and operational flexibility.

A clearer articulation of these constraints would support more informed discussions regarding feasibility, sequencing, and long-term corridor performance.

Further Define the Role of Shared Infrastructure in Long-Term System Performance

The 2026 Plan identifies shared corridor improvements as part of a broader strategy to accelerate implementation. However, the 2026 Plan would benefit from further clarification of:

- The long-term role of shared infrastructure within the fully built system.
- Whether shared segments are intended as permanent operating conditions or transitional solutions.

This distinction is particularly important in Southern California, where shared corridor operations could significantly influence ultimate system performance, reliability, and travel time competitiveness.

Clarify Assumptions Related to Revenue-Positive Operations

The 2026 Plan places strong emphasis on achieving early revenue-positive operations as a mechanism to support future system expansion. While OCTA acknowledges the importance of financial sustainability, the 2026 Plan should:

- Provide additional detail on the assumptions underlying projected ridership, farebox recovery, and ancillary revenue generation, especially given changes to ridership patterns/trends in the post-coronavirus pandemic environment.
- Clarify how these assumptions account for real-world operating conditions within shared corridors, including potential impacts to travel time and reliability.

Given that revenue projections are closely tied to service performance, further clarity would strengthen confidence in the financial strategy supporting phased system delivery.

Address Risks Associated with Reliance on Future Funding and Financing Mechanisms

The 2026 Plan outlines a funding strategy that includes Cap-and-Invest revenues, future federal funding opportunities, and potential private-sector participation. OCTA recommends that the 2026 Plan:

- More clearly identify the risks associated with reliance on future, not-yet-secured funding sources.
- Provide additional discussion on how project phasing, scope, or timelines may be affected if anticipated funding does not materialize as expected.

While the 2026 Plan includes a risk framework, a more direct linkage between funding uncertainty and potential impacts to Southern California implementation would provide more clarity.

Emphasize the Need for Continued Coordination and Active Participation

OCTA has consistently requested to be an active participant in project development, particularly where alternatives, design decisions, or operational concepts affect the Orange County segment. Therefore, the 2026 Plan should:

- Reinforce the role of regional agencies, including OCTA, in advancing the Southern California segment.
- Acknowledge that ongoing coordination will be necessary as project concepts are further refined.

This is particularly important given the 2026 Plan's increased reliance on shared corridor operations and multi-operator coordination in Southern California.

Align Phased Implementation with Regional Planning and Investments

OCTA has previously highlighted the importance of coordinating with regional investments and programs, including Metrolink service changes and corridor improvements. As the 2026 Plan advances a phased implementation strategy, OCTA recommends that it:

- Emphasize alignment with existing and planned regional improvements.
- Recognize the importance of ensuring that high-speed rail implementation supports, rather than constraints, future corridor enhancements.

As the 2026 Plan identifies early investments in shared corridors, OCTA emphasizes the importance of coordinating these investments with existing corridor plans and priorities to ensure that near-term improvements support long-term system integration and do not preclude future service enhancements.

Enhance Discussion of Interface with Existing Regional Rail Investments

While the 2026 Plan references coordination with regional and local systems, additional detail would be beneficial regarding:

- How high-speed rail investments will interface with ongoing and planned improvements to Metrolink and LOSSAN services.
- How project implementation will be structured to avoid redundancy, conflict, or unintended constraints on existing capital programs.

Given the scale of regional investments already underway, it is important that high-speed rail implementation is complementary and additive, rather than duplicative or limiting.

Continue Coordination on Station Planning and Multimodal Integration

OCTA has previously requested coordination on station design and integration, including the Anaheim Regional Transportation Intermodal Center and Fullerton station, to ensure accessibility, connectivity, and compatibility with local projects. Therefore, the 2026 Plan should:

- Continue to recognize the importance of multimodal integration at key stations, including Anaheim.
- Emphasize the need for coordination with local jurisdictions and ongoing station-area planning efforts.



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April 8, 2024

California High Speed Rail Authority
Draft 2024 Business Plan
770 L Street, Suite 1180
Sacramento, CA 95814

Via Email: BusinessPlan2024@hsr.ca.gov

Subject: California High Speed Rail Authority 2024 Draft Business Plan

To Whom It May Concern:

The California High Speed Rail Authority (CHSRA) released the Draft 2024 Business Plan which describes the progress of major programs across California, and provides updates on federal funding, ridership, and construction status. The Orange County Transportation Authority (OCTA) has reviewed this document.

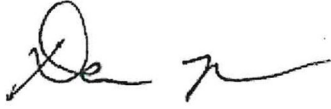
The CHSRA Supplemental Alternatives Analysis (SAA) released in November 2023 which studied the Los Angeles to Anaheim project section is discussed in the Draft Business Plan. The Draft Business Plan confirms that the environmental clearance for this project section is expected to be complete by the end of 2025. Please see Attachment A for comments on the Draft Business Plan. OCTA sent comments to the Southern California Regional Director regarding the SAA on January 22, 2024 (Attachment B) which followed a letter sent to CHSRA on September 24, 2020 (Attachment C).

To reiterate one salient comment made in the January 2024 letter: Due to the high volume of rail traffic that occurs on the segment from Los Angeles Union Station to Fullerton, the Shared Passenger Track Alternative would not offer high-speed service, thereby conflicting with legislative requirements. Compared to other alternatives, relying on reduced speeds and service levels would not be consistent with the purpose of high-speed rail connectivity.

As the railroad owner and County Transportation Commission, we appreciate CHSRA's willingness to coordinate with OCTA in developing alternatives for the Los Angeles to Anaheim project section. In addition, as one of five joint powers authority members that provide funding to the Southern California Railroad Authority for regional passenger rail service, OCTA needs to be assured that CHSRA service will complement both existing and future rail service in Orange County. This will ensure that impacts to Orange County are analyzed and

addressed. We look forward to working with you. Please contact me at (714) 560-5907 or dphu@octa.net.

Sincerely,

A handwritten signature in black ink, appearing to read 'Dan Phu', with a stylized flourish at the end.

Dan Phu
Sustainability Manager, Planning

Attachments

Letter Dated April 8, 2024

Attachments Include:

A: Comments on the Draft Business Plan

B: Letter to Southern California Regional Director re: Los Angeles to Anaheim Project Section Supplemental Alternatives Analysis Report on January 22, 2024

C: Letter sent to California High-Speed Rail Authority on September 24, 2020

Attachment A

- On page 5 of the 2024 Draft Business Plan, the capital estimate for the Los Angeles to Anaheim project section does not match the 2018 estimate of \$9.17 Billion or their proposed new alternative of \$6.65 to \$6.91 Billion.
- On page 12 of the 2024 Draft Business Plan, the ridership projections from Los Angeles to San Francisco estimates 32.5 million riders annually by 2050. In 2020 there were 2.2 million passengers who traveled from Los Angeles International Airport to San Francisco International Airport. Even accounting for passenger car trips between Los Angeles to San Francisco, the projected numbers are high.



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January 22, 2024

Ms. LaDonna DiCamillo
Southern California Regional Director
California High Speed Rail Authority
Attn: Los Angeles-Anaheim
770 L Street, Suite 620, MS-2
Sacramento, CA 95814

Subject: **Los Angeles to Anaheim Project Section Supplemental Alternatives Analysis Report**

Dear Ms. DiCamillo:

The California High Speed Rail Authority (CHSRA) recently released the Los Angeles to Anaheim Project Section Supplemental Alternatives Analysis (SAA) Report proposing the Shared Passenger Track Alternative without sufficient consultation with the Orange County Transportation Authority (OCTA). OCTA, as the railroad owner and County Transportation Commission, has several concerns with the lack of coordination, the adequacy of the analysis, and inconsistent justifications used to support this alternative as described below.

- OCTA was not adequately consulted on the development of the Shared Passenger Track Alternative despite being Orange County's transportation planning agency and railroad owner.
- The Shared Passenger Track Alternative does not offer high-speed service, conflicting with legislative requirements. Compared to other alternatives, relying on reduced speeds and service levels contradicts the purpose of high-speed rail connectivity.
- Given the proximity of the Shared Passenger Track Alternative to disadvantaged communities, potential community and environmental impacts require more analysis. Changes in freight operations to accommodate the proposed alternative suggest consideration of cumulative impacts with emphasis on sensitive communities.
- Implications of the proposal on existing shared track agreements and current and planned passenger rails services must be more clearly analyzed and described.
- More detail is needed on the Buena Park station relocation, track reconfiguration, staging tracks, shared maintenance costs, and modeling assumptions.
- CHSRA appears to have delegated the Fullerton station improvements to the Southern California Regional Rail Authority (SCRRA) as part of the

Ms. LaDonna DiCamillo
January 22, 2024
Page 2

Fullerton Interlocker Project that is currently led by SCRRA. The proposed changes require more discussion so impacts to current passenger rail services due to relocation of the platform can be better understood by OCTA and the City of Fullerton.

Please refer to the attachments for more details on OCTA's primary concerns. OCTA requests involvement as an active participant in developing alternatives. This will ensure that impacts to Orange County are fully analyzed and addressed. We look forward to meeting with you to discuss the rationale for the Shared Passenger Track Alternative and rejection of the other alternatives. Please contact me at (714) 560-5741 or kmortazavi@octa.net for follow-up. Thank you.

Sincerely,



Kia Mortazavi
Executive Director, Planning

KM:dp
Attachments

- The Orange County Transportation Authority (OCTA) was not adequately consulted on the development of the Shared Passenger Track Alternative. As the railroad owner and designated County Transportation Commission, OCTA is a key stakeholder who has sponsored commuter rail service in the corridor for more than three decades as well as the railroad owner for the Orange County portion of the Fullerton to Anaheim segment. We understand the California High Speed Rail Authority (CHSRA) and the Southern California Regional Rail Authority (SCRRA) have been in discussion regarding the project elements. OCTA must be directly involved in discussions of project alternatives that impact the Fullerton to Anaheim segment owned by OCTA.
- The proposed Shared Passenger Track Alternative does not offer high-speed service to Los Angeles. CHSRA staff has suggested a one-seat ride to the Bay Area as a substitute and indicated that CHSRA is not obligated to provide high-speed service to Anaheim. However, the enabling CHSRA statutes call for “constructing a high-speed train system that connects the San Francisco Transbay Terminal to Los Angeles Union Station and Anaheim.” Therefore, the proposed alternative does not meet the legislative requirements.

The stated reasons for eliminating the Freeway Tunnel and the Union Pacific Railroad alternatives include cost, construction challenges, and short-term construction impacts related to tunneling. Cost should not be a factor to eliminate an alternative under the California Environmental Quality Act (CEQA) process. The purpose of CEQA analysis is to assess the potential environmental impacts. In this respect, the short-term and long-term environmental impacts of the Shared Passenger Track Alternative should be given equal consideration prior to any decision on a preferred alternative.

- Given the proximity of the Shared Passenger Track Alternative to disadvantaged communities, potential community and environmental impacts require more analysis. Without the proper community impacts assessment and environmental justice, and related Title VI analyses, the introduction and elimination of alternatives would not meet the spirit and intent of the CEQA public disclosure process. Furthermore, implementing the Shared Passenger Track Alternative has the potential to induce additional rail freight traffic as stated in the Supplemental Alternatives Analysis (SAA). This raises important questions about potential cumulative environmental, health, and community impacts, particularly to disadvantaged communities. Consequently, it is crucial to examine how these communities have been engaged in the public participation process to ensure their voices are heard and their concerns are adequately addressed. Please provide more information on how the Shared Passenger Track Alternative would mitigate the cumulative impacts of the induced rail freight traffic impacts in north Orange County.
- The analysis in the SAA fails to demonstrate how it would mitigate potential impacts to the shared use agreement between BNSF, OCTA, and the Riverside County Transportation Commission, which are part of the San Bernardino Subdivision Shared Use Agreement.

- The SAA document relies on the reduction of HSR passenger service levels and speeds as a mitigation strategy. This appears to conflict with the primary purpose of the project to connect the megaregions of the state through a high-speed rail system.
- The report states that track reconfiguration may be considered at the Fullerton station (to ensure BNSF access and/or to reduce project footprint or costs). The SAA needs to provide more information and details about the impacts of the track reconfiguration to Fullerton Station and the assumed plans for using the existing tracks at that location.
- The SAA relies on additional staging tracks outside the project corridor (considered freight rail mitigation). CHSRA must better analyze the viability and impacts of the staging tracks before selecting the Shared Passenger Track Alternative as the preferred alternative.
- CHSRA reports identify the potential for shared maintenance costs with other passenger rail services as a feature of the Shared Passenger Track Alternative. OCTA must review the information that supports this statement and is concerned with the implications of this concept on the maintenance cost shares of the other rail operators.
- CHSRA has not provided the modeling assumptions for the Shared Passenger Track Alternative. This information will assist OCTA to better assess:
 - Assumed operating speeds in relation to the project's legislative intent;
 - Freight utilization and maintaining capacity for future increases in Metrolink and Surfliner passenger service levels;
 - Impacts to Metrolink's Southern California Optimized Rail Expansion (SCORE) Program implementation; and
 - The effects of electrification on OCTA-owned tracks and the impact on intracounty commuter rail service between Fullerton and south Orange County.



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September 24, 2020

Mr. Mark McLoughlin
Attn: Los Angeles-Anaheim
California High-Speed Rail Authority
770 L Street, Suite 620, MS-2
Sacramento, CA 95814

Subject: Revised Notice of Preparation and Notice of Intent for the Environmental Impact Report/Statement for the Los Angeles to Anaheim Project Section of the California High-Speed Rail Authority Project

Dear Mr. McLoughlin:

Thank you for providing the Orange County Transportation Authority (OCTA) with the Revised Notice of Preparation (NOP) under the California Environmental Quality Act (CEQA) and Notice of Intent (NOI) under the National Environmental Policy Act (NEPA) for the Environmental Impact Report/Statement (EIR/EIS) for the Los Angeles (Union Station) to Anaheim (Anaheim Regional Transportation Intermodal Center) Project Section (Project) of the California High-Speed Rail Authority (CHSRA) Project. OCTA is a joint powers authority (JPA) member of the Southern California Regional Rail Authority (SCRRA), operated by Metrolink. The Project's intent to provide high-speed intrastate ground transportation should not negatively affect local and intercounty rail services such as Metrolink that serve approximately 2.9 million (fiscal year 2019) trips annually. The following comments are provided for your consideration:

- Current passenger rail services - OCTA retains certain rights over the Burlington Northern Santa Fe (BNSF) corridor in the Fullerton to Los Angeles section. These rights enable OCTA to sponsor critical commuter rail service between Orange County and Los Angeles. The ability to fully retain and realize these rights is crucial as any impairment could result in reduced commuter rail service, diverting trips to highways, and result in increases in highway traffic and vehicle miles traveled with associated negative environmental impacts. Furthermore, the rights and related commuter rail services are critical elements of a multimodal expenditure plan funded by the local sales tax measure. Regionally, the ability to continue to offer balanced multimodal solutions is a critical element of the OCTA Long-Range Transportation Plan. The EIR/EIS should thoroughly evaluate and address these issues and acknowledge OCTA's ownership of the railroad right-of-way between Fullerton and Anaheim, which was acquired for the purposes of providing expanded Metrolink service. These property rights and our objectives should not be undermined as a result of the Project.

Mr. Mark McLoughlin

September 24, 2020

Page 2

- OCTA previously provided comments on the preliminary engineering for project definition for the CHSRA Los Angeles to Anaheim segment. Although CHSRA provided responses to OCTA's comments, we look forward to a mutually satisfactory resolution to the concerns previously raised by OCTA.
- In addition, BNSF, OCTA, and the Riverside County Transportation Commission (RCTC) are part of the San Bernardino Subdivision Shared-Use Agreement (SUA), which generally grants OCTA and RCTC exclusive rights for "passenger transportation uses." Any third party wishing to utilize the segment between Redondo Junction and Fullerton must obtain approval from OCTA and RCTC in addition to BNSF. A memorandum of understanding between CHSRA and BNSF does not supersede the terms of the SUA. Any impacts to the SUA must be thoroughly analyzed in the EIR/EIS.
- OCTA is a "responsible agency" under CEQA and a "cooperating agency" under NEPA for the Project. OCTA owns the railroad right-of-way between south of Fullerton to the Orange/San Diego county line, is a JPA member of SCRRA, as well as a party to the SUA. Accordingly, OCTA must be designated as a responsible agency and cooperating agency under CEQA and NEPA, respectively.
- OCTA is formally requesting to be added to the notification and distribution lists for all CEQA notices, public meeting notices, and public meeting/hearing notices relating to the Los Angeles to Anaheim segment of the Project under CEQA and local and state law, including the Ralph M. Brown Act and the Bagley-Keene Act.
- As a JPA member, OCTA is also partnering with Metrolink to implement the Southern California Optimized Rail Expansion Program. The CHSRA EIR/EIS must assess any potential impacts to these planned improvements.
- Future passenger rail capacity - OCTA has made significant investments including the purchase of right-of-way for capacity, track and rail communication enhancements, turnaround facilities, stations, and rolling stock to allow OCTA to offer up to 76 daily Metrolink trains in Orange County. OCTA and Metrolink have invested heavily on a future Metrolink Placentia Station that has been environmentally cleared and ready to be constructed.
- In addition, OCTA has supported publicly-funded triple track improvements and grade separations beyond the Orange/Los Angeles county line that enable the future expansion capacity to be realized. The EIR/EIS should assess the environmental impacts of any compromises to OCTA's ability to offer this level of service. Lastly, the EIR/EIS should clarify that the reliability of Metrolink operations in the Fullerton to Los Angeles segment will not be negatively affected by any added burdens on the constrained shared passenger and freight corridor.
- Incremental freight rail impacts - The proposed Colton Facility is anticipated to accommodate added freight trains from the Los Angeles/Long Beach ports

to Colton, which could increase over time. The added BNSF freight traffic would likely be travelling through the communities of Buena Park, Fullerton, Anaheim, Placentia, and Yorba Linda. OCTA recently completed a \$650 million program consisting of seven grade separation projects that was partially necessitated to address the increase in freight movement related to the expansion of the Los Angeles/Long Beach ports. The EIR/EIS should thoroughly disclose, assess, and address any of the environmental impacts related to operation/queuing of additional freight trains through Orange County.

- Truck traffic – as noted by CHSRA, the purpose of the revised NOP/NOI was to solicit input on additional project components that would be required in Colton and Lenwood, which were not included when the project was initially scoped in 2007. The EIR/EIS should address the environmental effects of any potential for the shift from freight to truck traffic in Orange County that may be necessary to support the Project. It is not clear how existing truck freight traffic in Orange County would be affected as a result of the proposed changes to freight rail operations. Environmental impacts of any associated truck traffic movements shift should be studied and addressed.
- Throughout the construction of the Project, Metrolink will be expected to continue to provide uninterrupted service. Any impacts to Metrolink service during the construction or operation of the Project must be assessed and mitigated in the EIR/EIS.

OCTA appreciates the opportunity to provide meaningful input on the revised NOP/NOI scoping process, and we look forward to working with the CHSRA to integrate the aforementioned comments into the EIR/EIS analysis. Furthermore, OCTA looks forward to becoming a more active participant in the development of the EIR/EIS so that any impacts to Orange County will be adequately analyzed addressed and mitigated. OCTA understands our partner agencies, RCTC and the San Bernardino County Transportation Authority, have raised similar concerns regarding the Project. If you have any questions or comments, please contact Kia Mortazavi at (714) 560-5741 or at kmortazavi@octa.net.

Sincerely,



Darrell E. Johnson
Chief Executive Officer

DEJ:dp