ATTACHMENT C

AFFILIATED AGENCIES

Orange County Transit District

Local Transportation Authority

Service Authority for Freeway Emergencies

Consolidated Transportation Service Agency

Congestion Management Agency

February 3, 2026

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

Via email: Los.Angeles_Anaheim@hsr.ca.gov

Subject: **Los Angeles to Anaheim Section Draft Environmental Impact Report/Environmental Impact Statement**

Dear Ms. DiCamillo,

Thank you for the opportunity to review the Los Angeles to Anaheim Project Section Draft Environmental Impact Report/Environmental Impact Statement (EIR/EIS). Orange County Transportation Authority (OCTA) is an owner of the rail line in Orange County and a member of the Southern California Regional Rail Authority (SCRRA, also known as Metrolink) Joint Powers Authority. OCTA previously provided comments on the Administrative Draft EIR/EIS (Draft EIR/EIS), Preliminary Engineering for Project Definition, Supplemental Alternatives Analysis, the Revised Notice of Preparation, and the Notice of Intent for the Environmental Impact Report/Statement for the Los Angeles to Anaheim Project Section of the California High-Speed Rail Authority (CHSRA) Project. (See Attachment A).

Unfortunately, CHSRA has not addressed any of OCTA's prior concerns to date, and this letter reiterates those comments. OCTA appreciates the opportunity to review the Draft EIR/EIS. We have coordinated our review of the Draft EIR/EIS with local and regional agencies, including the Los Angeles County Metropolitan Transportation Authority, Metrolink, Los Angeles-San Diego-San Luis Obispo (LOSSAN) Rail Corridor Agency, Sothern California Association of Governments, California Department of Transportation District 12, and the cities of Anaheim and Fullerton. Below is a summary of our comments, with additional detail provided in Attachment B.

The Shared Passenger Track Alternative, as proposed, would not provide true high-speed rail service to Anaheim and would not align with the intent of CHSRA's enabling legislation. Relying on slower speeds and reduced service levels to address impacts undermines the purpose of a statewide high-speed rail system and is redundant with existing passenger rail service. Alternatives

should not be dismissed at this stage based on cost or constructability without fully evaluating all reasonable options and their long-term impacts. It is also important to consider service enhancement opportunities in heavily urbanized areas, such as the segment from Los Angeles Union Station to Anaheim Regional Transportation Intermodal Center (ARTIC). These may include facilitating and supporting higher-frequency service for Metrolink and/or Amtrak (funded by the LOSSAN Rail Corridor Agency).

- The project proposes the use of OCTA-owned rail right-of-way without clearly defined agreements and does not fully evaluate the long-term loss of flexibility resulting from permanent infrastructure (i.e., overhead catenary systems and storage tracks). Construction phasing for grade separations must ensure uninterrupted rail service and clearly address temporary access needs, including California Public Utilities Commission requirements, prior to project approval.

- Station-related impacts at ARTIC, Buena Park, and Fullerton stations have not been fully addressed, including passenger circulation, platform access, Americans with Disabilities Act compliance, emergency access, parking loss, and construction impacts. The Draft EIR/EIS should also demonstrate coordination with City of Anaheim initiatives, such as the Building Bridges to Transit program. The analysis should demonstrate how station changes will maintain or improve passenger safety, accessibility, and convenience.

- OCTA is a “responsible agency” under the California Environmental Quality Act (CEQA) and a “cooperating agency" under the National Environmental Act (NEPA) for the Project. Accordingly, OCTA must be designated as a responsible agency and cooperating agency under CEQA and NEPA, respectively.

- The Draft EIR/EIS does not fully disclose the cumulative impacts of facilitating freight rail traffic through north Orange County communities, including interactions with port-related freight growth and potential shifts to truck traffic. In addition, the early action project list appears inconsistent with prior commitments, including the 2012 Memorandum of Understanding, and does not clearly address key grade separations such as Ball Road, Orangethorpe Avenue, and State College Boulevard. Greater clarity is needed regarding how these projects will be environmentally cleared and coordinated as part of the broader corridor strategy.

- The Draft EIR/EIS does not sufficiently analyze how the proposed service would affect existing and future Metrolink and Amtrak services, as well as OCTA's planned investments, including the Southern California Optimized Rail Expansion Program and station improvements such as the Placentia Station. Key assumptions related to train frequencies, dispatching priority, and shared corridor capacity must be clearly explained and validated to ensure existing and future services are not negatively affected, particularly at Fullerton Junction.

- City of Anaheim – State College Grade Separation: previous lead and current responsible lead.

    - OCTA initially led the project through approximately 2015 at the conceptual engineering phase. Following that period, the City of Anaheim (City) assumed responsibility for the preliminary design phase and advanced the project to approximately 30 percent design. During this phase, the City began rescoping the project to support a multi-staged construction approach intended to maintain traffic flow along State College Boulevard during construction.

    - Despite these efforts, the project was ultimately paused due to its high overall cost and the lack of identified funding. Given the magnitude of the project cost and the need to coordinate closely with CHSRA's Los Angeles Union Station to Anaheim section, it was determined that CHSRA would be best positioned to lead the project moving forward.

    - It is our understanding that CHSRA is expected to complete the environmental clearance and construction of this grade separation component as part of the Los Angeles Union to Anaheim section.

- The Draft EIR/EIS does not fully assess how the proposed alignment and operational changes affect disadvantaged communities, including increased freight activity and cumulative health and environmental impacts. Additional Title VI and environmental justice analyses are needed to fully disclose potential impacts to disadvantaged communities. Similar to the air quality analysis performed for automobile and truck traffic, an air quality analysis of freight and passenger rail is warranted to determine appropriate mitigation for operational impacts.

OCTA appreciates the opportunity to provide meaningful input, and we look forward to working with CHSRA to address the comments above. OCTA also looks forward to continuing as an active participant in the development of the Los Angeles to Anaheim Project Section so that impacts to Orange County are adequately analyzed, addressed, and mitigated. If you have any questions or would like to discuss further, please contact me at 714-560-5729 or rcasey@octa.net, or Dan Phu, Director of Transportation Planning and Analysis at 714-560-5907 or dphu@octa.net.

Sincerely,

Rose Casey
Executive Director, Planning

RC:tc
Attachments

c: Dan Phu, OCTA

Attachment A

OCTA

AFFILIATED AGENCIES

Orange County Transit District

Local Transportation Authority

Service Authority for Freeway Emergencies

Consolidated Transporation Service Agency

Congestion Management Agency

March 17, 2025

Attn: Mr. Simon Tse and Mr. Amit Joshi
Los Angeles-Anaheim
California High Speed Rail Authority
770 L Street, Suite 620, MS-2
Sacramento, CA 95814

Via email: simon.tse@hsr.ca.gov and amit.joshi@hsr.ca.gov

Subject: Los Angeles to Anaheim Project Section Administrative Draft Environmental Impact Report/Environmental Impact Statement

Dear Mr. Tse and Mr. Joshi:

On February 3, 2025, the California High Speed Rail Authority (CHSRA) provided the Orange County Transportation Authority (OCTA) with the Administrative Draft Environment Impact Report/Statement (EIR/EIS) for the Los Angeles to Anaheim Project Section. OCTA plays an important role in Orange County as it relates to ownership of the railroad Right-of-Way (ROW) and funding of intercity passenger service. OCTA is a Joint Powers Authority member of the Southern California Regional Rail Authority operated by Metrolink. OCTA previously provided comments on the Supplemental Alternatives Analysis, the Revised Notice of Preparation, the 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, as well as the Preliminary Engineering for Project Definition documents (see attached September 24, 2020, January 22, 2024, and November 15, 2024 letters). In addition, OCTA has reviewed the Administrative Draft EIR/EIS; below is a synopsis of our review including recommendations pertaining to the approach of the Draft EIR/EIS (See Attachment A for more details).

- The roles and responsibilities of OCTA as a Responsible Agency as currently presented are vague and should be clearly defined.
- The roles, responsibilities, and relationships of Metrolink, Los Angeles – San Diego – San Luis Obispo (LOSSAN), Amtrak, Metro, BNSF Railway, and OCTA are also vague and not consistently described, particularly with the role of the LOSSAN not clearly defined.
- There should be discussion of the mechanism(s) that allow for high-speed rail operations on OCTA-owned ROW, future improvements or expansion

plans of the corridor, such as a licensing agreement, or another document both agencies deem appropriate.

- Previous comments and concerns expressed by OCTA and the City of Fullerton on the proposed Fullerton station option modifications and improvements and proposed use (i.e., how passenger access to Metrolink station amenities will be impacted based on proposed station reconfiguration) should be addressed prior to public circulation of the Draft EIR/EIS.
- There should be consistency in reference to station options description (e.g., Fullerton) between Alternatives A and B.
- There is inconsistency in describing what safety improvements will be incorporated into existing Anaheim crossings that will remain as part of the ultimate project. For example, Chapter 3 states that various safety enhancements will be included in the project and refers to Chapter 2 for details, which states grade crossings will not be modified.
- There is insufficient information pertaining to resolving and defining various Operations and Maintenance issues/responsibilities with existing rail operators and the potential impact to passenger rail operations and required collaboration. There appears to be more emphasis on freight rail and other transportation modes.
- While certain chapters identify Metrolink and LOSSAN growth plans, it is not clear if these plans have been incorporated into the 2040-year impact analysis.
- An Impact Avoidance Minimization Features review should be conducted to ensure each measure specifies which entity is responsible for the actions described therein.
- The potential impact of stationary sources affecting air quality should be revised to increase enforceability.
- Construction noise and vibration mitigation measures should be more specific to include criteria for monitoring locations and a range of options to achieve desired performance standards.
- Recommend that a specific menu of options be identified to achieve desired standards for the “Limit Use of Extremely Hazardous Materials near Schools during Construction” and “Remediation of Areas Associated with Superfund Sites or other Contaminated Properties Prior to Construction” sections.
- Confirm that existing and travel demand projections used to determine operational parameters within the existing public transportation framework have been reviewed to capture travel pattern changes resulting from the pandemic.

In addition to these comments, OCTA notes the need for further engagement on future subjects that may result in potential development of agreements and/or memorandums of understanding, as well as a potential amendment to the existing Shared Use Agreement. As the underlying track owner, it is imperative that OCTA fully captures how it would be impacted by the construction and launch of high-speed rail service and what mechanisms may be needed to memorialize roles and responsibilities as it relates to high-speed rail operations within its ROW. Subjects of interest include, but are not limited to:

- Roles and responsibilities of entities involved in high-speed rail operations (i.e. OCTA, CHSRA, potential operator and maintenance, etc.)
- Track ownership
- Modification to the existing Shared Use Agreement
- Electrification infrastructure
- Construction agreement(s)
- Operations and maintenance
- Utility relocation and costs

OCTA appreciates the opportunity to provide meaningful input, and we look forward to working with the CHSRA to address the aforementioned comments. Furthermore, OCTA looks forward to continuing to be an active participant in the development of the Los Angeles to Anaheim final EIR/EIS so that any impacts to Orange County will be adequately analyzed, addressed, and mitigated. If you have any questions or comments, please contact me at 714-560-5729 or rcasey@octa.net, or reach out to Dan Phu at 714-560-5907 or dphu@octa.net.

RC:rs

Sincerely,

Rose Casey, P.E.
Executive Director, Planning

CALIFORNIA HIGH-SPEED RAIL PROJECT

Los Angeles to Anaheim Project Section

RESPONSIBLE AGENCY COMMENT & RESPONSE LOG

Project: High-Speed Rail - Los Angeles to Anaheim (LA-A) Project Section			Updated	2/7/2025					
Agency: Orange Country Transportation Authority (OCTA)		Submittal: Administrative Draft EIR/EIS for Responsible Agency Review							
Comments					**Responses** Disposition Code: A = Have Incorporated / Will Incorporate; B = Have Clarified / Will Clarify; C = Delete Comment; D = Will Incorporate in Next Submittal; E = Discuss / Clarify with Authority				
Comment Number	Page/Sect Number	Comments	Reviewers Name	Date	Disposition	Response	Respond Initials	Date	Verification (QC name/date)
	Summary / Table S-1 p. S-13	Both alternatives A and B have same station configurations; “HSR station option to be in either Norwalk/Santa Fe Springs or Fullerton.” This is stated more clearly on page S-16. It is possible that neither High-Speed Rail (HSR) station is included in the project.	R. Vandenberg	2/25/2025					
	Ch 2 / 2.1 p.2-2	*"The Authority continued to refine the design and coordinate with stakeholders and determined that, in order to maintain existing passenger rail and freight operations, additional BNSF Railway (BNSF) and intermodal facilities would be needed in Lenwood and Colton."* The discussion of efforts required to maintain existing passenger and freight rail operation does not mention the additional coordination and collaboration required with the Los Angeles-San Diego-San Luis Obispo Corridor Agency (LOSSAN), Southern California Regional Rail Authority (SCRRA) and their respective member agencies to assure that planned shared use track configurations avoid impacts to planned intercity and regional rail service expansion in the shared corridor.	R. Vandenberg	2/25/2025					

	Ch 2 / 2.4 p. 2-4	*"Operational planning would support and optimize coordinated HSR, freight, and conventional passenger service. Currently, the Metrolink Orange County and 91/Perris Valley Lines, National Railroad Passenger Corporation (Amtrak) Pacific Surfliner, and Burlington Northern Santa Fe Railway (BNSF), and Union Pacific Railroad (UPRR) freight trains operate within the LOSSAN Corridor. Because the proposed Shared Passenger Track Alternatives are within the active LOSSAN passenger and freight rail corridor, existing operators may have to change their operational patterns. New and re-aligned tracks would change the tracks on which the various users operate. Rail operators (HSR, Metrolink, Amtrak, BNSF, and UPRR) would coordinate train schedules and storage and maintenance needs to ensure efficiency and safety of the shared use of the corridor."* Pacific Surfliner is a State-sponsored route operated by Amtrak under contract to LOSSAN Rail Corridor Agency. Amtrak also operates the Southwest Chief route on the LOSSAN corridor between Los Angeles Union Station (LAUS) and Fullerton as part of its national network. The document does not describe/proscribe how this operational planning would happen or if required as part of the Environmental Impact Statement/Environmental Impact Report (EIS/EIR) adoption.	R. Vandenberg	2/25/2025					
	Ch 2 / 2.4.2 p. 2-6 & 2-7	The document does not identify the regulatory approvals that will allow HSR trainsets to operate on shared track without temporal separation from rolling stock that is required to comply with 49 Code of Federal Regulations (CFR) 238. Reference or elaborate on discussion of Federal Railroad Administration (FRA) safety standards included in Chapter 3, section 3.11.	R. Vandenberg	2/25/2025					
	Ch 2 / 2.4.4.1 p.2-11	Where operating within shared tracks, confirm that HSR profile is above 200-year floodplain within the Los Angeles-Anaheim limits (all urbanized), or measures taken to protect Right-of-Way (ROW) where it profile is within 200-year floodplain.	R. Vandenberg	2/25/2025					
	Ch 2 / 2.4.6.2 p. 2-20	End of section describes Shared Passenger Track Alternatives to include parallelling station at Fullerton. Please clarify how what is elsewhere described as an optional station is covered the EIS/EIR if the Preferred Alternative is adopted.	R. Vandenberg	2/25/2025					
	Ch 2 / 2.4.7 p. 2-21 & p-22	The document does not describe the means to assure the integration of Positive Train Control (PTC) with existing rail operators. Perhaps further description of the existing Metrolink PTC system is warranted.	R. Vandenberg	2/25/2025					
	Ch 2 / 2.4.9.1 p. 2-22	The document acknowledges that a Memorandum of Understanding(s) (MOU) with other rail operators will detail the maintenance activities and responsibilities of the California High Speed Rail Authority (CHSRA) and other rail operators within the corridor. How is this memorialized in the EIS/EIR requirements? This will need to include requirements for movement of HSR maintenance equipment and materials from its planned Maintenance of Infrastructure Facility (MOIF) in Bakersfield.	R. Vandenberg	2/25/2025					

	Ch 2 / 2.6.1.4 p. 2-52 thru 2-54	This section acknowledges the plans by LOSSAN and Metrolink to increase train service within the project corridor, among a full range of fixed guideway rail and transit improvements across Southern California and the Southwest. Because of the unique importance of the future planned regional and intercity rail service with which the HSR trains will share operating tracks, a table describing current and proposed passenger rail frequencies (Metrolink, Pacific Surfliner, Southwest Chief) between the Los Angeles-Fullerton and Fullerton-Anaheim segments would provide greater clarity of the operational context within which the HSR trains would operate. This will need to include current/planned Metrolink Orange County Line and 91/Perris Valley Line trains that operate through the Fullerton Junction.	R. Vandenberg	2/25/2025					
	Ch 2 / 2.6.1.5 p. 2-55	In describing the Southern California Association of Governments (SCAG) rail strategy as part of planned freight rail improvements, the document should acknowledge that the BNSF-owned portion of the Los Angeles-Anaheim alignment between Redondo Junction (Alameda Corridor) and Fullerton Junction is a critical component of the intermodal rail connection between the Port of Los Angeles (POLA) and Port of Long Beach (POLB) and the rest of the country.	R. Vandenberg	2/25/2025					
	Ch 2 / 2.6.2.1 p. 2-59	Freight or Passenger Railroad Modifications - Because of its critical importance in rail capacity, the modifications to the Fullerton Junction should be identified in the narrative. Table 2-10 should also clarify that rail yards to be modified are freight rail yards.	R. Vandenberg	2/25/2025					
	Ch 2 / 2.6.2.1 p. 2-60	Roadway Modifications - the alternatives are described to "maintain 8 existing at-grade crossings." What crossing improvements are proposed as part of the project?	R. Vandenberg	2/25/2025					
	Ch 2 / 2.6.3.1 p. 2-87	Fullerton alignment - This section describes that under Shared Passenger Track Alternative A, HSR trains would not stop at Fullerton (implying that a HSR station at Fullerton is part of Alternative B); however, other sections of the documents state that the Fullerton station is included only as an option under each of the shared track alternatives. Please clarify.	R. Vandenberg	2/25/2025					
	Ch 2 / 2.6.3.1 p. 2-87	Fullerton alignment - the document acknowledges that Fullerton Junction is a critical node in the Southern California rail network.	R. Vandenberg	2/25/2025					
	Ch 2 / 2.6.3.2 p. 2-94	Signaling and Train-Control Elements - this section should acknowledge the coordination and interface (including dispatch) with shared rail operations.	R. Vandenberg	2/25/2025					
	Ch 2 / 2.6.3.3 p. 2-105	Fullerton Metrolink/Amtrak Station Modifications - This section describes that under Shared Passenger Track Alternative A, HSR trains would not stop at Fullerton (implying that a HSR station at Fullerton is part of Alternative B); however, other sections of the documents state that the Fullerton station is included only as an option under each of the shared track alternatives. Please clarify.	R. Vandenberg	2/25/2025					

	Ch 2 / 2.6.3.3 p. 2-105	Fullerton Metrolink/Amtrak Station Modifications - the second paragraph describes passenger services at this station. The Pacific Surfliner service would more accurately be described as LOSSAN Pacific Surfliner or Amtrak California Pacific Surfliner.	R. Vandenberg	2/25/2025					
	Ch 2 / 2.6.3.3 p. 2-113	HSR Station Option: Fullerton - The opening paragraph requires clarification about what improvements are included in Alternative A and Alternative B, with and without the Fullerton Station option.	R. Vandenberg	2/25/2025					
	Ch 2 / 2.6.3.6 Table 2-14 p. 2-135	Modifications to Roadway Crossings - validate that no modifications are required at the Anaheim grade crossings that will remain including Orangethorpe Avenue, La Palma Avenue, Sycamore Street, Broadway, Santa Ana Street, South Street, Vermont Avenue, and Ball Road with proposed train operating speeds and frequencies. Chapter 3.11 section 3.11.5.2 identifies that the 5 railroad operational incidents on the LOSSAN Corridor in Orange County occurred in Anaheim, including one at South Street and one at Orangethorpe Avenue.	R. Vandenberg	2/25/2025					
	Ch 2 / 2.6.3.6 p. 2-142	State College Boulevard Grade Separation - validate that project footprint is consistent with plans developed by City of Anaheim in consultation with project stakeholders.	R. Vandenberg	2/25/2025					
	Ch 2 / 2.6.5.2 p. 2-158	Metrolink Station Relocations - OCTA bus service should be mentioned for coordination regarding bus routes and service to the new Buena Park station. How is the specific action for transit coordination memorialized in the EIR/EIS requirements?	R. Vandenberg	2/25/2025					
	Ch 2 / 2.8.2 p. 2-164	Other Rail Services in the Shared Corridor - this section should acknowledge the difference between national Amtrak service and State-supported Amtrak service, which require coordination with different stakeholders.	R. Vandenberg	2/25/2025					
	Ch 2 / 2.8.2 p. 2-164	Other Rail Services in the Shared Corridor - in this section, the document identifies train volumes established in 1992 shared use agreement, but does not acknowledge the proposed service frequencies for Metrolink and Pacific Surfliner services that were described in section 2.6.1.4. The requirement for further coordination with existing rail operators should be identified here.	R. Vandenberg	2/25/2025					
	Ch 2 / 2.8.3 p. 2-164	Maintenance Activities - As in section 2.4.9.1, this section should Acknowledges that MOU(s) with other rail operators will be required to define maintenance responsibilities of CHSRA and other rail operators within the corridor. How is this memorialized in the EIS/EIR requirements?	R. Vandenberg	2/25/2025					
	Ch 3 / 3.1.5.6 p. 3.1-14	Operational Impacts - this introductory section does not specifically mention the potential for HSR impacts on existing rail service that are a key consideration in the shared corridor/shared track alternatives.	R. Vandenberg	2/25/2025					
	Ch 3 / 3.2.4.5 p. 3.2-41	Significance of impacts to Transit - consistent with definition of transit to include passenger rail operations, this should add passenger rail operations to this description (similar to Freight Rail Service in section below).	R. Vandenberg	2/25/2025					

	Ch 3 / 3.2.5.6 p. 3.2-50	Passenger Rail Service - this section does not identify other owners of the railroad ROW (BNSF and OCTA) and also the role of LOSSAN (Pacific Surfliner) as compared to Amtrak (Southwest Chief)	R. Vandenberg	2/25/2025					
	Ch 3 / 3.2.5.7 p. 3.2.51 & 52	Freight Rail Service - The discussion of existing passenger rail seems to belong in section above. Or perhaps the discussions should be segregated by ownership since passenger and freight rail operate in a shared environment within the project limits. OCTA ownership of the LOSSAN corridor between Fullerton and Anaheim is not acknowledged. The title of Table 3.2-13 seems incorrect.	R. Vandenberg	2/25/2025					
	Ch 3 / 3.2.6.2 p. 3.2-66 & 67	The initial focus on LAUS (not part of this Draft EIR/EIS) and emphasis of Metro Rail services and portal access over Metrolink and Amtrak services is somewhat confusing.	R. Vandenberg	2/25/2025					
	Ch 3.1 / 3.1.7 p. 3.1-17	Legal Authority to Implement Off-Site Mitigation - this is the introductory section that identifies ownership of the corridor (Los Angeles Metropolitan Transportation Authority (LACMTA), BNSF, and OCTA) and acknowledges that this ownership will not change. Is clarification needed to memorialize the EIS/EIR requirement to enter into necessary agreements to allow for construction and operation of the project?	R. Vandenberg	2/25/2025					
	Ch 3.11	Does not reference existing safety and security plans of rail operators and ROW owners within shared corridor and how HSR will coordinate with those plans.	R. Vandenberg	2/25/2025					
	Ch 3.11	Mitigation measures regarding rail operations and station operations are focused on mitigating construction-related and emergency response access on public roadways rather than railroad operations-related security and safety impacts.	R. Vandenberg	2/25/2025					
	Ch 3.11 / 3.11.1 p. 3.11-1	Intro to analysis of safety impacts describes analysis of construction and operational changes on safety of automobile, pedestrian, and bicycle traffic but does not mention safety of existing passenger and freight rail operations.	R. Vandenberg	2/25/2025					
	Ch 3.11 / 3.11.2.1 p. 3.11-4	Discussion of FRA safety standards includes reference to Caltrain emergency preparedness plan, which appears to be remnant of another environmental document.	R. Vandenberg	2/25/2025					
	Ch 3.11 / 3.11.2.2 p. 3.11-11	Technical Memorandum 2.8.1 is referenced for provisions to ensure safety and security related to access control adjacent railroad, and intrusion protection. This memorandum was not part of the review materials.	R. Vandenberg	2/25/2025					
	Ch 3.11 / 3.11.5.2 p. 3.11-60	Railroad Operations - would be useful to reference this more comprehensive discussion of railroad operations in other related sections. Amtrak operation of Southwest Chief should also be added here.	R. Vandenberg	2/25/2025					

	Ch 3.11 / 3.11.5.2 p. 3.11-60 & 61	Railroad Operation - A table describing current and proposed passenger rail frequencies (Metrolink, Pacific Surfliner, Southwest Chief) and freight train forecasts between Los Angeles-Fullerton and Fullerton-Anaheim would provide greater clarity of the operational context within which the HSR trains would operate. This will need to include current/planned Metrolink Orange County Line and 91/Perris Valley Line trains that operate through Fullerton Junction.	R. Vandenberg	2/25/2025					
	Ch 3.11 / 3.11.6.3 p. 3.11-96	Impact SS-13 / Collisions between HSR train and objects entering rail corridor - how will proposed intrusion detection systems and barriers be implemented in this shared corridor?	R. Vandenberg	2/25/2025					
	Ch 3.11 / 3.11.6.3 p. 3.11-96	Impact SS-13 / Train Derailment - please clarify how safety considerations related impacts of potential derailment have been incorporated into project design.	R. Vandenberg	2/25/2025					
	Ch 3.11 / 3.11.6.3 p. 3.11-97	Impact SS-13 / At-Grade Train Collisions - this section describes incidents that have occurred at existing at-grade crossings in Anaheim that are to remain (Orangethorpe, La Palma, South Street, Sycamore). The narrative refers to safety improvements such as quad gates, median barriers and pedestrian safety features that will be implemented as part of the project, with reference to Chapter 2; however Chapter 2 states that no modifications are planned at the existing at-grade crossings to remain.	R. Vandenberg	2/25/2025					
	Ch 3.13 / 3.13.5.2 p. 3.13-44	Zoning and Planned Uses, Anaheim - the document notes the plans for OC VIBE, but does not acknowledge that this plan also includes the ARTIC station site and may affect proposed HSR station area investments.	R. Vandenberg	2/25/2025					
	Ch 3.19	Consideration of cumulative operational impacts for Transportation does not address/discuss potential impacts to existing passenger rail operations and coordination/analysis/agreements that would mitigate those impacts.	R. Vandenberg	2/25/2025					
	Ch 3.19 / 3.19.3.5 Table 3.19-3 p. 3.19-18	This table includes physical improvements but does not include important passenger rail operational expansion (Metrolink, LOSSAN) that are reasonably expected to occur prior to 2040.	R. Vandenberg	2/25/2025					
	Ch 3.8	This section identifies and evaluates hazards related to flooding within 100-year floodplain (1% chance); however, Chapter 2 section 2.4.4.1 states that HSR profile within urbanized areas will be established above 200-year floodplain.	R. Vandenberg	2/25/2025					
	Ch 7	There are no mitigation measures that memorialize the need for critical MOUs and additional engagement with existing rail operators to validate schedules and operational and maintenance requirements and responsibilities.	R. Vandenberg	2/25/2025					

	Ch 7 / 7.1.1 p.7-3	Station Planning, Land Use, and Development - LU-MM#1 general guidelines are intended to minimize potential to cause substantial change in land use patterns. Validate that plans for ARTIC are consistent with adopted development plans (e.g. OC VIBE, OC River Walk).	R. Vandenberg	2/25/2025					
	Ch 8 / 8.1 p. 8-1	List of users should identify that users include both national Amtrak long-distance service and State-supported Pacific Surfliner intercity rail service, for which Amtrak is the contracted operator.	R. Vandenberg	2/25/2025					
	Ch 8 / 8.2.6 p. 8-9	OCTA has not been included in list of regional and other public agencies with an important interest in the Project.	R. Vandenberg	2/25/2025					
	Ch 8 / 8.4.1.1 p. 8-29	In executive summary, both Norwalk/Santa Fe Springs and Fullerton are identified as optional stations. Here the Preferred Alternative is defined as excluding those two stations. Is the Fullerton HSR alternative being included here for environmental clearance? Or would a supplemental EIR/EIS be required should that optional station be implemented?	R. Vandenberg	2/25/2025					
	Ch 8 / 8.2 Table 8-1 p. 8-5	Common Comments Considered - this table acknowledges the concerns that have been voiced about Metrolink's planned service expansion and HSR compatibility with Amtrak and Metrolink train schedules, but it is unclear how those comments have been incorporated into the project planning/design.	R. Vandenberg	2/25/2025					
	Ch 8 / 8.4.1.1 p. 8-29 & 8-30	Discussion of ARTIC site does not recognize or acknowledge ongoing development and pedestrian circulation planning underway to enhance connectivity of ARTIC to existing and planned development and OC River Walk (Santa Ana River Trail). These projects are identified in Chapter 3.19 Table 3.19-2	R. Vandenberg	2/25/2025					
	Appendix 2-E / 6.1 p. 13	Operations Control Center - the means for coordinated train dispatch in a shared corridor is not identified.	R. Vandenberg	2/26/2025					
	Appendix 2-E	This high-level, statewide discussion of HSR operations does not address the specific requirements of the Los Angeles-Anaheim shared corridor.	R. Vandenberg	2/27/2025					
	Appendix 3.1-A / Transportation p. 3.1-A.3 thru A.25	Tabular listing of consistency with various transportation policies does not include Metrolink and LOSSAN plans that are referenced elsewhere in the document.	R. Vandenberg	2/28/2025					

CALIFORNIA HIGH-SPEED RAIL PROJECT

Los Angeles to Anaheim Project Section

RESPONSIBLE AGENCY COMMENT & RESPONSE LOG

Project: HSR - Los Angeles to Anaheim (LA-A)		Updated	2/28/2025					
Agency: Orange Country Transportation Authority (OCTA)	Submittal: Administrative Draft EIR/EIS for Responsible Agency Review							
Comments				**Responses** Disposition Code: A = Have Incorporated / Will Incorporate; B = Have Clarified / Will Clarify; C = Delete Comment; D = Will Incorporate in Next Submittal; E = Discuss / Clarify with Authority				
Comment Number	Page/Sect Number	Comments	Reviewers Name	Date	Disposition	Response	Respond Initials	Date	Verification (QC name/date)
1	Impact avoidance and minimization features (IAMFs)	Suggest IAMF review to ensure each measure specifies which entity is responsible for the actions described therein.	Legal	2/24/2025					
2	California Environmental Quality Act (CEQA) Mitigation	Please confirm that all feasible mitigation has been imposed.	Legal	2/24/2025					
3	CEQA Mitigation Measures: Enforceability and Documenting Compliance with Mitigation Measures	Some mitigation measures include strong enforceability and documentation requirements. Others do not. Suggest a comprehensive review of mitigation measures for enforceability and documentation requirements.	Legal	2/24/2025					
4	CEQA Mitigation Measures: Review for internal consistency	Example: Page 7-9, Significant and Unavoidable Cultural Resources Impacts. Refers to CUL-MM #13, but the Cultural Resources section does not include mitigation measure #13 (at least in the end of chapter summary)?	Legal	2/25/2025					
5	CEQA Mitigation Measures: Mitigation Measures Calling for the Development of a Future Plan	To avoid CEQA deferral arguments, these types of mitigation measures should each have: (1) specific performance standard(s); and (2) a menu of options to achieve those standards.	Legal	2/26/2025					
6	CEQA Mitigation Measures: Incorporation of IAMF requirements or other contractual agreements	Suggest including minimum criteria/requirements from other sources to make the mitigation measure understandable without reverting to the appendices or other documents, such as who is responsible for compliance, when compliance is required, what are the applicable performance standards, what are the options to achieve the performance standards.	Legal	2/27/2025					

7	Station Options	OCTA should provide feedback on the proposed Fullerton station option and any concerns about its proposed use in the document.	Legal	2/28/2025					
8	AQ-MM#1: Offset Project Construction Emissions in the SCAB through SCAQMD Emissions Offsets Program	Would any local, offsite mitigation be feasible? If possible, define "equivalent emissions reductions." Add requirements to maintain offset records and documentation.	Legal	3/1/2025					
9	AQ-MM#2: Requirements for Use of Zero-Emission or Near-Zero-Emission Vehicles and Off-Road Equipment to Reduce Construction Emissions	"Goals" create enforceability issues under CEQA. Can this measure be made more specific? (Acknowledged that emissions from this mitigation measure have not been quantified and do not appear to be relied on in the analysis).	Legal	3/2/2025					
10	AQ-MM#3: Reduce the Potential Impact of Stationary Sources	Revise to increase enforceability – who will verify that best industry practices have been implemented and when would such verification occur? Prior to construction?	Legal	3/3/2025					
11	N&V-MM#1: Construction Noise Mitigation Measures	Specify criteria for monitoring locations, personnel qualifications, frequency of monitoring and equipment to be used, and a requirement to maintain monitoring records and equipment logs. Specify actions to be taken if the noise limitations are exceeded.	Legal	3/4/2025					
12	N&V-MM#4: Implement Operational Vibration Mitigation Measures	Add wheel maintenance and inspection requirements, add performance criteria if possible, and specify corrective actions.	Legal	3/5/2025					
13	Section 3.6.7.1: PUE-MM#2: Water Demand Analysis for Water Supplies at Stations for Operation	Is 6 months prior to commencement of operations sufficient to permit coordination with water sources as described in the balance of the mitigation measure?	Legal	3/6/2025					
14	GEO-MM#1: Geologic and Geotechnical Investigation	Specify by when the investigation must be completed.	Legal	3/7/2025					

15	HMW-MM#1: Limit Use of Extremely Hazardous Materials near Schools during Construction	Specify a menu of options to achieve the performance standard. Training? Verification procedures? Auditing / monitoring?	Legal	3/8/2025					
16	HMW-MM#2: Remediation of Areas Associated with Superfund Sites or other Contaminated Properties Prior to Construction	Specify a menu of options for “potential controls to ensure protection of human health and the environment”	Legal	3/9/2025					
17	PR-MM#1: Temporary Restricted Access to Park Facilities during Construction	Require documentation of pre-construction trail conditions and restoration to same post-construction. Suggest adding public notice of detours and outreach.	Legal	3/10/2025					
18	PR-MM#2: Providing Park Access	Require documentation of pre-construction park conditions and restoration to same post-construction. A menu of options to achieve the performance standard should be provided. Suggest adding public notice of detours and outreach. Suggest adding coordination with park operators / managers for permanent access changes.	Legal	3/11/2025					
19	AVQ-MM#1: Minimize Visual Disruption from Construction Activities	Require pre-construction documentation. Specify monitoring requirement for plant survival / replacement.	Legal	3/12/2025					
20	AVQ-MM#2: Minimize Light Disturbance during Construction	Consider maximum light levels at property boundaries (taking into account pre-construction ambient lighting and whether in a residential area, industrial area etc.), lighting height limitations. Shielding options should be provided.	Legal	3/13/2025					
21	Same AVQ-MM#3: Incorporate Design Aesthetic Preferences into Final Design and Construction of Nonstation Structures	How is compliance measured / enforced? How would conflicts be resolved?	Legal	3/14/2025					

22	AVQ-MM#4: Provide Vegetation Screening along At-Grade and Elevated Guideways Adjacent to Residential Areas	Specify when partial screening is sufficient as opposed to full screening. Or remove “partially.” Specify monitoring requirement for survival / replacement.	Legal	3/15/2025					
23	AVQ-MM#5: Replant Unused Portions of Land Acquired for the Los Angeles to Anaheim Project Section	Require pre-construction documentation of vegetation to be removed. Require irrigation system monitoring. Specify a minimum setback from infrastructure? Minimum vegetative coverage?	Legal	3/16/2025					
24	AVQ-MM#7: Incorporate Design Criteria for Elevated Guideways and Station Elements that Can Adapt to Local Context	Suggest including timeframes for consultation process.	Legal	3/17/2025					
25	TRAN-MM#1: Modify Traffic Signal Controls; TRAN-MM#2: Restripe Intersections; TRAN-MM#4: Add Exclusive Turn Lanes to Intersections; TRAN-MM#5: Add New Lanes to Roadway	Specify when restriping would occur / when completion would be required if the mitigation measure is ultimately implemented under the National Environmental Policy Act (NEPA).	Legal	3/18/2025					
26	CUL-MM#4: Minimize Adverse Effects through Relocation of Historic Buildings and Structures	Specify a menu of options to achieve the stated performance standards.	Legal	3/19/2025					
27	CUL-MM#8: Repair of Inadvertent Damage	Suggest adding pre and post construction documentation requirements. Specify a menu of options to achieve the stated performance standards.	Legal	3/20/2025					

28	CUL-MM#12: Design Review for Intrusion-Protection Barriers	Specify a menu of options to achieve the stated performance standards.	Legal	3/21/2025					
29	CUM-N&V-MM#1: Consult with Agencies Regarding Construction Activities	Specify a minimum advance consultation timeframe. Include monitoring requirements. If possible, state a performance standard and a menu of options to achieve the standard.	Legal	3/22/2025					

AFFILIATED AGENCIES

Orange County Transit District

Local Transportation Authority

Service Authority for Freeway Emergencies

Consolidated Transportation Service Agency

Congestion Management Agency

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.

- 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

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

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.

OCTA

AFFILIATED AGENCIES

Orange County Transit District

Local Transportation Authority

Service Authority for Freeway Emergencies

Consolidated Transportation Service Agency

Congestion Management Agency

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.

- 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

AFFILIATED AGENCIES

Orange County Transit District

Local Transportation Authority

Service Authority for Freeway Emergencies

Consolidated Transportation Service Agency

Congestion Management Agency

November 15, 2024

Attn: Simon Tse and Amit Joshi
Los Angeles-Anaheim
California High Speed Rail Authority
770 L Street, Suite 620, MS-2
Sacramento, CA 95814

Via email: simon.tse@hsr.ca.gov and amit.joshi@hsr.ca.gov

Subject: Los Angeles to Anaheim Section Updated Preliminary Engineering for Project Definition

Dear Mr. Tse and Mr. Joshi,

On October 7, 2024, the California High Speed Rail Authority (CHSRA) provided the Orange County Transportation Authority (OCTA) with the updated Preliminary Engineering for Project Definition (PEPD) documents. OCTA is a Joint Powers Authority member of the Southern California Regional Rail Authority, operated by Metrolink. OCTA previously provided comments on the Supplemental Alternatives Analysis, the Revised Notice of Preparation (NOP), and the Notice of Intent (NOI) for the Environmental Impact Report/Statement (for the Los Angeles to Anaheim Project Section of the California High-Speed Rail Authority Project (see attached September 24, 2020, and January 22, 2024 letters). In addition, OCTA has reviewed the PEPD; see below for a summary of our comments. See Attachment A for more details.

- The Fullerton train station is the busiest passenger rail station in Orange County. OCTA would like to better understand how the station would be modified and addressed in the Draft Environmental Impact Report/Statement.
- Various XO (crossover) configurations appear to limit operational flexibility for Metrolink trains. OCTA requests further coordination with Metrolink to minimize potential impacts.
- Please confirm that Metrolink minimum clearance requirements will be met for the shared track concepts.
- Several concepts involve the demolition of existing railroad bridges and modifications of grade separations, such as those located at Beach Boulevard, Brea Creek, Dale Street, Gilbert Street, and Harbor Boulevard. Clarification is needed on provisions for temporary parapets or other measures to retain the California Public Utility Commission walkway during construction. Additionally, construction phasing should be considered to minimize impacts to passenger rail operations.
- Discuss and negotiate with OCTA on the shared use and right of way impacts south of Fullerton Junction to Anaheim Regional Transportation Intermodal Center (ARTIC) station.

- Evaluate the Fullerton Station passenger path of travel from the amenities on the north side of the station to the new proposed platform on the south side to compare the additional time and distance burden on the passengers, if any.
- Coordination should be conducted for the ARTIC site plan, as needed, with ongoing final design efforts by the City of Anaheim for the "Building Bridges to Transit" project which includes new active transportation connections, pedestrian bridges, and riverbank trail realignment.

OCTA appreciates the opportunity to provide meaningful input, and we look forward to working with the CHSRA to address the aforementioned comments. Furthermore, OCTA looks forward to continuing to be an active participant in the development of the Los Angeles to Anaheim updated PEPD so that any impacts to Orange County will be adequately analyzed, addressed, and mitigated. If you have any questions or comments, please contact me at 714-560-5729 or rcasey@octa.net or Dan Phu at 714-560-5907 or dphu@octa.net.

Sincerely,

Rose Casey
Planning, Executive Director

Attachments: Attachment A: PEPD Comments
Attachment B: Revised NOP and NOI for the EIR/EIS for the Los Angeles to Anaheim Project Section of the CHSRA Project dated September 24, 2020
Attachment C: Los Angeles to Anaheim Project Section Supplemental Alternative Analysis Report dated January 22, 2024

OCTA

COMMENT-RESPONSE LOG

Project: A4205 CHSRA LA to Anaheim
Submittal: Preliminary Engineering for Project Definition
Contract Reference: A4205-F18

Response Codes: **A**=Agreed and will comply/take action. **B**=Will investigate. **C**=Disagree for reasons noted in Response/Status Column. **D**=Will address in next phase.

REVIEWER RESPONSIBILITY								RESPONDER RESPONSIBILITY			
NO.	Reviewer	Agency	SPEC	DWG	REPORT	REF. PAGE	DISCIPLINE	COMMENT	RESPONDER	RESPONSE CODE	RESPONSE	RESOLUTION-ACTION ITEM
1	R. Vandenberg	Rheia Consulting				Transmittal Letter	NA	Preferred alternative does not include HSR Station at Fullerton. How will HSR Fullerton Station and Modified Metrolink Fullerton Station be addressed in the DEIS/DEIR?				
PEDP VOLUME 3.1												
2	A. Shah	HDR Engineering		X		GE-D0101	General	Suggest having sheet after symbols because it is unclear what the blue linework is				
3	A. Shah	HDR Engineering		X		GE-B0101	General	Metrolink design criteria requires 15' minimum track spacing. Need to review and file RFSDCs for where Metrolink commuter tracks are shown with reduced track spacing.				
4	A. Shah	HDR Engineering		X		GE-B0101	General	Max design speed for this corridor is 110mph				
5	R. Vandenberg	Rheia Consulting		X		GE-D6101	General	Fullerton Junction - viability of overall configuration needs to be confirmed with simulations that incorporate future Metrolink service plans for OC, IEOC, and Riverside Lines, allowing for normal variations in train operations				
6	R. Vandenberg	Rheia Consulting		X		GE-D6101	General	Certain XO configurations appear to limit operational flexibility for Metrolink trains, including: • No XO are provided on the north side of the Relocated Metrolink Commerce Station • XO configuration south of Relocated Buena Park Station • At CP Santa Fe Springs (MP 155.0), SB operation on M3 (if required) does not have access to the west Norwalk/Santa Fe Springs Metrolink Station platform • 2 LH XO rather than universal configuration north of Fullerton Station • CP Orangethorpe (MP 166.2) includes 2 LH crossovers rather than universal configuration				
7	R. Vandenberg	Rheia Consulting		X		GE-D6101	General	26th St LMF yard lead configuration could affect shared passenger track operations as: • NB access into 26th St LMF would require NB HSR trains to operate on M4 from CP Bandini (MP 148.9) to the LMF lead (approx MP 146) • NB access out of the 26th St LMF would require NB HSR trains to operate on M4 from the LMF lead (approx MP 144.5) to CP Olympic, north of the Redondo Jcn Flyover.				
8	R. Vandenberg	Rheia Consulting		X		TT-D3001	Track Alignment	In Section C-C, please demonstrate that proposed 10' horizontal clearance between M1 track and OCS poles will meet Metrolink's minimum clearance standards, in consideration of increased clearance required at curves.				
9	R. Vandenberg	Rheia Consulting		X		TT-D3003	Track Alignment	How will ROW access be controlled at industry sidings?				
10	R. Vandenberg	Rheia Consulting		X		TT-B3001, TT-D3005, TT-D3006, TT-D3015, TT-D3016, TT-D3029. TT-D3030, TT-D3031	Track Alignment	On aerial structure, please demonstrate that proposed min. 10.67' horizontal clearance to OCS poles will meet Metrolink's minimum clearance standards, in consideration of increased clearance required at curves.				
11	R. Vandenberg	Rheia Consulting		X		TT-D3008	Track Alignment	Section L-L: identify which station this is (Commerce Station)				
12	R. Vandenberg	Rheia Consulting		X		TT-D3011	Track Alignment	Section R-R at 605 Fwy: please clarify what 10' horizontal clearance is to… if to bridge pier, demonstrate that there is adequate clearance for pier protection that will be required for Caltrans structure				
13	R. Vandenberg	Rheia Consulting		X		TT-D3023	Track Alignment	At retained fill sections through Buena Park, can east (left) walkway be moved outside OCS poles (like at west/right)?				
14	A. Shah	HDR Engineering		X		TT-D3027	Track Alignment	Need a dimension to the intertrack fence from the CL of track				
15	R. Vandenberg	Rheia Consulting		X		TT-D3028	Track Alignment	Section NN-NN at Fullerton Jct: please explain clearance between BNSF M3 and SCRRA MT1 which is shown as 0' to 108'. Where 0', is this a shared track?				
16	R. Vandenberg	Rheia Consulting		X		TT-D1503, TT-D1603	Track Alignment	It would be useful to show in Plan and Profile sheets which tracks are intended solely for passenger train operations, which tracks are dedicated for freight use, and which tracks would support shared passenger / freight operations.				

COMMENT-RESPONSE LOG

Project: A4205 CHSRA LA to Anaheim
Submittal: Preliminary Engineering for Project Definition
Contract Reference: A4205-F18

Response Codes: **A**=Agreed and will comply/take action. **B**=Will investigate. **C**=Disagree for reasons noted in Response/Status Column. **D**=Will address in next phase.

REVIEWER RESPONSIBILITY								RESPONDER RESPONSIBILITY			
NO.	Reviewer	Agency	SPEC	DWG	REPORT	REF. PAGE	DISCIPLINE	COMMENT	RESPONDER	RESPONSE CODE	RESPONSE	RESOLUTION-ACTION ITEM
17	G. Jennings	Mott MacDonald		X		TT-D1581	Track Alignment	NW end of new station platforms have horizontal/vertical curvature for New Metrolink Buena Park Station. Depending on train stopping positions, the risk to platform train interface (PTI) could be minimal but is there opportunity to remove curvature for a new station and de-risk construction and PTI? Note the platform location is not shown on the profile which would aid understanding (platforms are identified in other drawings)				
18	G. Jennings	Mott MacDonald		X		TT-D1584, TT-D1592, TT-D1621, TT-D1622	Track Alignment	There are a number of turnout/crossover units in a complex arrangement which are located on (or are in close proximity) to the underpasses. This imparts a risk in terms of differential track stiffness (due to the stiff bridge structure) for operationally critical assets with impacts on maintenance and the risk/consequence of derailment. How has the risk been considered/assessed/mitigated, as additonal landtake may be required to relocate the complex turnout/crossover units? Also relates to grade separation drawings ST-K1271, ST-K3301, ST-K1571 in volume 3.3 and drawing B-1 in volume 3.3A				
19	G. Jennings	Mott MacDonald		X		TT-D1599	Track Alignment	No.11 and No. 20 Turnout are located in close proximity to the Fullerton station platform ends. Noted that train control systems are not part of this contract but this distance may be a challenge for signal standback and overlaps, has this be considered?				
20	A. Shah	HDR Engineering		X		TT-D1599	Track Alignment	Will the existing ped bridge be protected in place or removed?				
21	R. Vandenberg	Rheia Consulting		X		TT-D1619	Track Alignment	Operational implications of shared use of proposed HST overnight storage lead with UPRR local freight movement needs to be better understood (connection to UP Tustin Branch)				
22	R. Vandenberg	Rheia Consulting		X		TT-D1604	Track Alignment	100-ft min. is required between #20 TO PS and Orangethorpe Ave GC				
23	R. Vandenberg	Rheia Consulting		X		TT-D1604	Track Alignment	Show PS to existing Metrolink storage track south of Orangethorpe Ave				
24	J. Lee	OCTA		X		General	Track Alignment	OCS poles shown throughout the plans will reduce the overall usable ROW for OCTA and the ability for expansion in the future				
25	J. Lee	OCTA		X		General	ROW	The dedicated HSR storage tracks proposed will occupy most of OCTA's ROW and prevent the owner from future service expansion and other uses				
26	J. Lee	OCTA		X		General	ROW	Use of OCTA's ROW for HSR as shared use including new improvements should be discussed and agreed upon				
27	J. Lee	OCTA		X		General	ROW	ROW discussions and negotiations between HSR and BNSF only apply to the corridor north of Fullerton Junction; need to add a note to discuss and negotiate with OCTA on the corridor south of Fullerton Junction to ARTIC Station				
28	I. Watkins	Mott MacDonald		X		RW-M1598-1560	ROW	Note that agreements will be required for rail and public ROW area adjustments around modified Metrolink Fullerton Station with OCTA. Who will be the lead agency for such agreements?				
29	I. Watkins	Mott MacDonald		X		RW-M1598-1623	ROW	Note that agreements will be required for rail ROW area adjustments around proposed HSR Anaheim Station with OCTA. Who will be the lead agency or such agreements?				
PEDP VOLUME 3.3												
30	A. Evans	Mott MacDonald		X		CV-T0266	Grade Sep	The new alignment near Buena Park Station will move HSR lines closer to residential properties to the south. What mitigation is anticipated in terms of acoustic treatment and/or potential purchase of some of the properties to provide credible offset between residents and the rail corridor?				
31	R. Vandenberg	Rheia Consulting		X		CV-T1267, CV-T1271, CV-T1302	Grade Sep	Beach Blvd / Dale St / Commonwealth Ave grade separation - min. vertical clearance for roadway below RR bridge matches existing (15.5 ft) but would be reduced by falsework during construction. What would vertical clearance be during construction?				
32	R. Vandenberg	Rheia Consulting		X		ST-K1266	Grade Sep	Buena Park Station Platform extends onto Beach Blvd grade separation structure - how will emergency egress be achieved?				

OCTA

COMMENT-RESPONSE LOG

Project: A4205 CHSRA LA to Anaheim
Submittal: Preliminary Engineering for Project Definition
Contract Reference: A4205-F18

Response Codes: **A**=Agreed and will comply/take action. **B**=Will investigate. **C**=Disagree for reasons noted in Response/Status Column. **D**=Will address in next phase.

REVIEWER RESPONSIBILITY								RESPONDER RESPONSIBILITY			
NO.	Reviewer	Agency	SPEC	DWG	REPORT	REF. PAGE	DISCIPLINE	COMMENT	RESPONDER	RESPONSE CODE	RESPONSE	RESOLUTION-ACTION ITEM
33	R. Vandenberg	Rheia Consulting		X		ST-K3266	Grade Sep	Proposed construction at Beach Blvd grade separation requires demolition of existing bridge parapet wall adjacent to track M1. This would need to be accomplished while maintaining existing M1 track in place until new M1 alignment is constructed to minimize impacts to train operations. What provisions are being taken for temporary parapet or other measures to retain CPUC walkway during construction?				
34	R. Vandenberg	Rheia Consulting		X		ST-K1269	Grade Sep	Proposed construction at Break Creek requires demolition of existing bridge parapet wall and raised walkway adjacent to track M3. This would need to be accomplished while maintaining existing M3 track in service to minimize impacts to train operations. What provisions are being taken for temporary parapet or other measures to retain CPUC walkway during construction?				
35	R. Vandenberg	Rheia Consulting		X		ST-K1271	Grade Sep	Proposed construction at Dale St grade separation requires demolition of existing bridge parapet and walkway adjacent to M1 (LA-A SB). This would need to be accomplished while maintaining existing LA-A SB track in place to minimize impacts to train operations. What provisions are being taken for temporary parapet or other measures to retain CPUC walkway during construction?				
36	R. Vandenberg	Rheia Consulting		X		CV-T3281	Grade Sep	What intrusion protection or other measures are being taken to avoid people/objects getting into trench section adjacent to Artesia Ave?				
37	R. Vandenberg	Rheia Consulting		X		ST-K1291	Grade Sep	Proposed construction at Gilbert St grade separation requires demolition of existing bridge parapet and walkway adjacent to M4. This would need to be accomplished while maintaining existing track in place to minimize impacts to train operations. What provisions are being taken for temporary parapet or other measures to retain CPUC walkway during construction?				
38	R. Vandenberg	Rheia Consulting		X		ST-K1291, ST-K1541	Grade Sep	Is 2' clearance sufficient for seismic interactions between two RR bridges? Provide relevant codes.				
39	R. Vandenberg	Rheia Consulting		X		ST-K3301	Grade Sep	Commonwealth Ave Section B and Section E - verify no ballast retainer is needed between M3 and LA-A NB due to difference in profile elevation				
40	R. Vandenberg	Rheia Consulting		X		ST-K1311	Grade Sep	Proposed construction at Euclid St requires demolition of existing single-track RR bridge to allow for construction of new 2 track shared bridge. While 5 tracks still available during construction, some of these are used by BNSF for storage. Storage of trains should be precluded during construction to minimize impacts to passenger train operations				
41	R. Vandenberg	Rheia Consulting		X		CV-T1322	Grade Sep	Walnut Ave grade separation proposes 15.67 ft min clearance. Point of measurement in cross section is at roadway crown, clearance at corner of RR bridge soffit should be verified/shown on drawing				
42	R. Vandenberg	Rheia Consulting		X		CV-T1351	Grade Sep	Highland Ave grade separation - min. 15.67 ft clearance matches existing but will be reduced by falsework during construction				
43	R. Vandenberg	Rheia Consulting		X		ST-K1361	Grade Sep	Proposed construction at Harbor Blvd grade separation requires removal of existing bridge fence/barrier next to existing m3 track and walkway next to existing m1 track. Provisions for temporary parapet or other measures to retain CPUC walkway during construction?				
44	R. Vandenberg	Rheia Consulting		X		ST-K1361	Grade Sep	Harbor Blvd grade separation typical section -- is HSR platform cantilevered over existing structure? What is interaction between two bridges?				
45	R. Vandenberg	Rheia Consulting		X		ST-K1571, ST-K1572	Grade Sep	Proposed construction Katella Ave requires construction of half of new RR bridge, demolition of existing RR bridge, then construction of second half of new RR bridge. Verify constructability and clearances between first half of new RR bridge and existing RR bridge. First half of new RR bridge would need to be able to support operation of two tracks but current construction staging concept only provides 6'10" horizontal clearance between M2 and temporary parapet wall.				
46	R. Vandenberg	Rheia Consulting		X		CV-T1583	Grade Sep	Douglass Service Rd proposes 13' minimum clearance under new RR bridge. Does that agree with Metrolink standards?				

COMMENT-RESPONSE LOG

Project: A4205 CHSRA LA to Anaheim
Submittal: Preliminary Engineering for Project Definition
Contract Reference: A4205-F18

Response Codes: **A**=Agreed and will comply/take action. **B**=Will investigate. **C**=Disagree for reasons noted in Response/Status Column. **D**=Will address in next phase.

REVIEWER RESPONSIBILITY									RESPONDER RESPONSIBILITY			
NO.	Reviewer	Agency	SPEC	DWG	REPORT	REF. PAGE	DISCIPLINE	COMMENT	RESPONDER	RESPONSE CODE	RESPONSE	RESOLUTION-ACTION ITEM
47	R. Vandenberg	Rheia Consulting		X		ST-K1582	Grade Sep	Please check vertical clearance labels and notes				
48	J. Lee	OCTA		X		General	Grade Sep	Construction phasing should be considered for grade separations to maintain full passenger operations during construction and minimize service disruptions				
PEDP VOLUME 3.4												
49	G. Jennings			X		UT-C1585, UT-C1597, UT-C1604, UT-C1621	Utilities	Utilities in close proximity to turnouts/crossovers. Potential for differential track stiffness leading to dynamic forces, voiding and subsequent component failures; and therefore to increased maintenance activity. Risk may be mitigated by utility depth (not indicated on plan) but how has the risk been considered/assessed/mitigated, as additional landtake may be required to relocate the turnout/crossover units?				
50	A. Shah	HDR Engineering		X		UT-C1599	Utilities	Need to detail with retaining wall				
51	J. Lee	OCTA		X		General	Utilities	Utilities under license proposed to be relocated should include relocation costs and potential ROW needed if relocation cannot stay within OCTA's ROW				
52	J. Lee	OCTA		X		General	Utilities	Confirm utility impacts from grade separations are also defined within the utility plans				
53	A. Evans	Mott MacDonald		X		UT-C1599	Utilities	Note largest utility for coordination is City of Fullerton 36" Storm Drain which will need asset protection during the works but not necessarily diversion. Provide guidance on how this line will be protected?				
PEDP VOLUME 3.5												
54	R. Vandenberg	Rheia Consulting		X		AR-B0201	Stations	Commerce Station - proposed orientation of Metrolink platform and station plaza/parking creates a long path of travel for Metrolink riders, with platform accessible only from one end. This does not seem to meet the standard. Metrolink criteria calls for access to be provided at the center of the platform or as close as possible to mini-high platform. Explain how HSR will meet the standard and what the provisions are for emergency egress from the far end of the platform.				
55	I. Watkins	Mott MacDonald		X		AR-B0601	Stations	Proposed relocation of Buena Park Station will include a 680' platform with accessible entrance to the transit plaza (via. pedestrian tunnel) and Beach Bvd (via. stair and lift). What ammenities will be provided at this relocated station similar to those provided at the existing Buena Park Station (including number of parking stalls, transit plaza, etc.)?				
56	I. Watkins	Mott MacDonald		X		AR-B0601	Stations	What phase of construction will the entrance to Beach Blvd. be completed as part of the station relocation? This entrance would be complex to retrofit once the station is operational.				
57	I. Watkins	Mott MacDonald		X		AR-B0601	Stations	Provide details for potential pedestrian connection to Tulare Street. What phase of construction will the underpass be completed as a part of the station relocation? This element would be complex to retrofit once the station is operational.				
58	I. Watkins	Mott MacDonald		X		AR-B0601	Stations	Provide details how staging of works between relocated station and existing station will be arranged to minimize disruption to the public across all transit modes. Details of staging for Metrolink operations, OCTA Buses and transit plaza amenities etc. to be agreed.				
59	J. Lee	OCTA		X		AR-B0601	Stations	With a planned year of construction, the parking capacity needs to be increased to accommodate the service improvements with the station relocation				
60	R. Vandenberg	Rheia Consulting		X		AR-B0601	Stations	What are provisions for emergency egress from south end of Buena Park station platform at Beach Blvd grade separation?				
61	R. Vandenberg	Rheia Consulting		X		AR-B0701	Stations	Offset of two Metrolink platforms creates a very long path of travel for SB Metrolink/Amtrak riders. More direct access should be provided between parking structure and SB platform.				
62	A. Shah	HDR Engineering		X		AR-B0701	Stations	Will there be any connection from the parking structure to the Amtrak/Metrolink center platform? What is the ped routing from the parking structure?				

COMMENT-RESPONSE LOG

Project: A4205 CHSRA LA to Anaheim
Submittal: Preliminary Engineering for Project Definition
Contract Reference: A4205-F18

Response Codes: **A**=Agreed and will comply/take action. **B**=Will investigate. **C**=Disagree for reasons noted in Response/Status Column. **D**=Will address in next phase.

REVIEWER RESPONSIBILITY									RESPONDER RESPONSIBILITY			
NO.	Reviewer	Agency	SPEC	DWG	REPORT	REF. PAGE	DISCIPLINE	COMMENT	RESPONDER	RESPONSE CODE	RESPONSE	RESOLUTION-ACTION ITEM
63	A. Shah	HDR Engineering		X		AR-B0701	Stations	Will passenger trains be on the BNSF Main Tracks to be able to utilize the existing platform?				
64	A. Shah	HDR Engineering		X		AR-B0701	Stations	Will any of the existing station parking lot on the south side of the station be salvaged?				
65	J. Lee	OCTA		X		AR-B0701	Stations	How will the enhanced sidewalk be accessed from Walnut? It appears there is a retaining wall along Walnut to support the track structure				
66	J. Lee	OCTA		X		AR-B0701	Stations	Loss of station and street parking with direct access from Walnut should be mitigated				
67	J. Lee	OCTA		X		AR-B0701	Stations	Should evaluate the passenger path of travel from the amenities on the north side to the new platform for added time and degradation of convenience. Mitigate as needed.				
	J. Lee	OCTA		X		AR-B0701	Stations	The new platform length should accommodate both future Amtrak and Metrolink services				
68	A. Shah	HDR Engineering		X		AR-B0701	Stations	What are the exit points off of the center platform? Need to consider NFPA 130				
69	A. Evans	Mott MacDonald		X		AR-B0701	Stations	Realignment to Fullerton Station configuration and termination of existing lines get connected through the new proposed 800' station length will require reconfiguration of Walnut Ave also required. Provide details of how this will be addressed.				
70	A. Evans	Mott MacDonald		X		AR-B0701	Stations	Enhancing the interface with the TOD neighborhood area, is there any consideration for additional infrastructure (e.g. parking) for increased ridership as a consequence of High Speed? What improvements and parking encroaches partially in OTCA land will require purchase from other land owners?				
71	A. Evans	Mott MacDonald		X		AR-B0701	Stations	Changes to overpass bridge for passengers to an underpass will require works during track realignment phase. How will HSR ensure existing service will be protected during construction works?				
72	A. Evans	Mott MacDonald		X		AR-B0701	Stations	Note large new bridging structures required over Harbor Rd. to support track and new platform.				
73	A. Evans	Mott MacDonald		X		AR-B0701	Stations	Anticipate that loss of parking for current revenue service will be required to support construction site in the temporary case. How will HSR mitigate this issue?				
74	A. Evans	Mott MacDonald		X		AR-Y9901	Stations	Note, all minimum public areas are met through proposed design for HSR requirements. However, it is unclear whether this includes interchange and/or increased ridership from Metrolink passengers as a consequence of the scheme, i.e. Will HSR improve current platform space/ticketing/amenties for the Metrolink ridership?				
75	A. Evans	Mott MacDonald		X		AR-Y9903	Stations	Parking set at 608 spaces. Is this current or forecasted to what year? Also, is there any consideration for increased ridership as a consequence of the interchange?				
76	A. Evans	Mott MacDonald		X		AR-B0901	Stations	Clarity required on pedestrian modelling for pedestrian link between existing Artic Station, new HSR/Metrolink/Amtrak parking structure and HSR Station facility. How will HSR ensure sufficient space to allow anticipated cross movements between assets?				
77	A. Evans	Mott MacDonald		X		AR-B0901	Stations	Proposed HSR alignment will require additional land purchase from adjacent stakeholders most noteably Angel Stadium. While consideration has been made to HSR drop off zone and assocaited road works, the environmental footprint terminates at North West corner of the site. What other road improvements are expected in order to complete the connection to E Katella Ave? Will HSR cover the cost for land acquisition?				
78	A. Evans	Mott MacDonald		X		AR-B0901	Stations	New HSR platform will require extensive works over Douglass Road and beneath the Orange Fwy 57. Provide explanation for how removal of ~15No support columns can be achieved whilst also maintaining the operation of the Fwy. Any additional bracing structure would likely reduce headrooms beneath the Fwy to both the HSR platforms and potentially existing Metrolink/Amtrak platform.				

OCTA

COMMENT-RESPONSE LOG

Project: A4205 CHSRA LA to Anaheim
Submittal: Preliminary Engineering for Project Definition
Contract Reference: A4205-F18

Response Codes: **A**=Agreed and will comply/take action. **B**=Will investigate. **C**=Disagree for reasons noted in Response/Status Column. **D**=Will address in next phase.

REVIEWER RESPONSIBILITY								RESPONDER RESPONSIBILITY			
NO.	Reviewer	Agency	SPEC	DWG	REPORT	REF. PAGE	DISCIPLINE	COMMENT	RESPONDER	RESPONSE CODE	RESPONSE	RESOLUTION-ACTION ITEM
79	A. Evans	Mott MacDonald		X		AR-B0901	Stations	Creation of new platform (including new bridge over Douglass Rd) will likely have impact on existing Metrolink / Amtrak infrastructure. Can HSR provide asset protection to ensure stability of line? If so, how? If not, any loss of revenue until reinstatement of existing infrastructure must be compensated.				
80	A. Evans	Mott MacDonald		X		AR-B0901	Stations	Scheme appears to show curtailment of existing Metrolink/Amtrak platform. Provide possible mitigation efforts for potential impact on services based on this proposal.				
81	A. Evans	Mott MacDonald		X		AR-B0901	Stations	Extended pedestrain undercrossings to serve HSR platform. The proposal offers new elevator access which is seen as a benefit, but also requires new access ramps to be integrated within existing platform width. How will this impact the remaining width of the platforms to ensure safe operational width? Note that during construction this will likely also limit the available length of platform for passengers.				
82	A. Evans	Mott MacDonald		X		AR-B0901	Stations	New Station location will sever existing at grade access to Metrolink/Amtrak platforms (via stairs/ramps) from the south. How will HSR mitigate length of passenger travel routes to reach the new HSR platforms?				
83	A. Evans	Mott MacDonald		X		AR-B0901, AR-C1901	Stations	How will existing underpass between Artic bus terminal site for new station south of tracks be maintained to avoid excessive passenger travel routes for interchange?				
84	R. Vandenberg	Rheia Consulting		X		AR-B0901, AR-C1901, AR-J8901, AR-J8903	Stations	Coordinate ARTIC site plan as needed with ongoing final design efforts by City of Anaheim for "Building Bridges to Transit" project that includes new active transportation connections, ped bridges, and riverbank trail realignment. These ongoing improvements are not reflected in these drawings.				
PEDP VOLUME 3.6												
85	I. Watkins	Mott MacDonald		X		TT-D1598A	Track Alignment	What options other than the track alignment and ROW Impact have been considered? Provide details of those options and scoring criteria if implemented for review.				
86	I. Watkins	Mott MacDonald		X		TT-D1598A	Track Alignment	It is assumed that a new station entrance will be provided on to Highland Avenue if the Fullerton Station option is implemented. Provide details of secondary means of escape to the west (if required for fire egress). Also provide details of interchange between Metrolink and the proposed HSR station option.				
87	R. Vandenberg	Rheia Consulting		X		AR-B0701A	Stations	Site plan for "unpreferred" alternative at Fullerton Station includes new ped bridge from existing parking structure that improves access to SB Metrolink/Amtrak station as compared to the preferred site plan.				

OCTA

AFFILIATED AGENCIES

Orange County Transit District

Local Transportation Authority

Service Authority for Freeway Emergencies

Consolidated Transporation Service Agency

Congestion Management Agency

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.

- 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

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

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.

AFFILIATED AGENCIES

Orange County Transit District

Local Transportation Authority

Service Authority for Freeway Emergencies

Consolidated Transporation Service Agency

Congestion Management Agency

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.

- 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

AFFILIATED AGENCIES

Orange County Transit District

Local Transportation Authority

Service Authority for Freeway Emergencies

Consolidated Transportation Service Agency

Congestion Management Agency

November 15, 2024

Attn: Simon Tse and Amit Joshi
Los Angeles-Anaheim
California High Speed Rail Authority
770 L Street, Suite 620, MS-2
Sacramento, CA 95814

Via email: simon.tse@hsr.ca.gov and amit.joshi@hsr.ca.gov

Subject: Los Angeles to Anaheim Section Updated Preliminary Engineering for Project Definition

Dear Mr. Tse and Mr. Joshi,

On October 7, 2024, the California High Speed Rail Authority (CHSRA) provided the Orange County Transportation Authority (OCTA) with the updated Preliminary Engineering for Project Definition (PEPD) documents. OCTA is a Joint Powers Authority member of the Southern California Regional Rail Authority, operated by Metrolink. OCTA previously provided comments on the Supplemental Alternatives Analysis, the Revised Notice of Preparation (NOP), and the Notice of Intent (NOI) for the Environmental Impact Report/Statement (for the Los Angeles to Anaheim Project Section of the California High-Speed Rail Authority Project (see attached September 24, 2020, and January 22, 2024 letters). In addition, OCTA has reviewed the PEPD; see below for a summary of our comments. See Attachment A for more details.

- The Fullerton train station is the busiest passenger rail station in Orange County. OCTA would like to better understand how the station would be modified and addressed in the Draft Environmental Impact Report/Statement.
- Various XO (crossover) configurations appear to limit operational flexibility for Metrolink trains. OCTA requests further coordination with Metrolink to minimize potential impacts.
- Please confirm that Metrolink minimum clearance requirements will be met for the shared track concepts.
- Several concepts involve the demolition of existing railroad bridges and modifications of grade separations, such as those located at Beach Boulevard, Brea Creek, Dale Street, Gilbert Street, and Harbor Boulevard. Clarification is needed on provisions for temporary parapets or other measures to retain the California Public Utility Commission walkway during construction. Additionally, construction phasing should be considered to minimize impacts to passenger rail operations.
- Discuss and negotiate with OCTA on the shared use and right of way impacts south of Fullerton Junction to Anaheim Regional Transportation Intermodal Center (ARTIC) station.

- Evaluate the Fullerton Station passenger path of travel from the amenities on the north side of the station to the new proposed platform on the south side to compare the additional time and distance burden on the passengers, if any.
- Coordination should be conducted for the ARTIC site plan, as needed, with ongoing final design efforts by the City of Anaheim for the "Building Bridges to Transit" project which includes new active transportation connections, pedestrian bridges, and riverbank trail realignment.

OCTA appreciates the opportunity to provide meaningful input, and we look forward to working with the CHSRA to address the aforementioned comments. Furthermore, OCTA looks forward to continuing to be an active participant in the development of the Los Angeles to Anaheim updated PEPD so that any impacts to Orange County will be adequately analyzed, addressed, and mitigated. If you have any questions or comments, please contact me at 714-560-5729 or rcasey@octa.net or Dan Phu at 714-560-5907 or dphu@octa.net.

Sincerely,

Rose Casey
Planning, Executive Director

Attachments: Attachment A: PEPD Comments
Attachment B: Revised NOP and NOI for the EIR/EIS for the Los Angeles to Anaheim Project Section of the CHSRA Project dated September 24, 2020
Attachment C: Los Angeles to Anaheim Project Section Supplemental Alternative Analysis Report dated January 22, 2024

OCTA

COMMENT-RESPONSE LOG

Project: A4205 CHSRA LA to Anaheim
Submittal: Preliminary Engineering for Project Definition
Contract Reference: A4205-F18

Response Codes: **A**=Agreed and will comply/take action. **B**=Will investigate. **C**=Disagree for reasons noted in Response/Status Column. **D**=Will address in next phase.

REVIEWER RESPONSIBILITY								RESPONDER RESPONSIBILITY			
NO.	Reviewer	Agency	SPEC	DWG	REPORT	REF. PAGE	DISCIPLINE	COMMENT	RESPONDER	RESPONSE CODE	RESPONSE	RESOLUTION-ACTION ITEM
1	R. Vandenberg	Rheia Consulting				Transmittal Letter	NA	Preferred alternative does not include HSR Station at Fullerton. How will HSR Fullerton Station and Modified Metrolink Fullerton Station be addressed in the DEIS/DEIR?				
PEDP VOLUME 3.1												
2	A. Shah	HDR Engineering		X		GE-D0101	General	Suggest having sheet after symbols because it is unclear what the blue linework is				
3	A. Shah	HDR Engineering		X		GE-B0101	General	Metrolink design criteria requires 15' minimum track spacing. Need to review and file RFSDCs for where Metrolink commuter tracks are shown with reduced track spacing.				
4	A. Shah	HDR Engineering		X		GE-B0101	General	Max design speed for this corridor is 110mph				
5	R. Vandenberg	Rheia Consulting		X		GE-D6101	General	Fullerton Junction - viability of overall configuration needs to be confirmed with simulations that incorporate future Metrolink service plans for OC, IEOC, and Riverside Lines, allowing for normal variations in train operations				
6	R. Vandenberg	Rheia Consulting		X		GE-D6101	General	Certain XO configurations appear to limit operational flexibility for Metrolink trains, including: • No XO are provided on the north side of the Relocated Metrolink Commerce Station • XO configuration south of Relocated Buena Park Station • At CP Santa Fe Springs (MP 155.0), SB operation on M3 (if required) does not have access to the west Norwalk/Santa Fe Springs Metrolink Station platform • 2 LH XO rather than universal configuration north of Fullerton Station • CP Orangethorpe (MP 166.2) includes 2 LH crossovers rather than universal configuration				
7	R. Vandenberg	Rheia Consulting		X		GE-D6101	General	26th St LMF yard lead configuration could affect shared passenger track operations as: • NB access into 26th St LMF would require NB HSR trains to operate on M4 from CP Bandini (MP 148.9) to the LMF lead (approx MP 146) • NB access out of the 26th St LMF would require NB HSR trains to operate on M4 from the LMF lead (approx MP 144.5) to CP Olympic, north of the Redondo Jcn Flyover.				
8	R. Vandenberg	Rheia Consulting		X		TT-D3001	Track Alignment	In Section C-C, please demonstrate that proposed 10' horizontal clearance between M1 track and OCS poles will meet Metrolink's minimum clearance standards, in consideration of increased clearance required at curves.				
9	R. Vandenberg	Rheia Consulting		X		TT-D3003	Track Alignment	How will ROW access be controlled at industry sidings?				
10	R. Vandenberg	Rheia Consulting		X		TT-B3001, TT-D3005, TT-D3006, TT-D3015, TT-D3016, TT-D3029. TT-D3030, TT-D3031	Track Alignment	On aerial structure, please demonstrate that proposed min. 10.67' horizontal clearance to OCS poles will meet Metrolink's minimum clearance standards, in consideration of increased clearance required at curves.				
11	R. Vandenberg	Rheia Consulting		X		TT-D3008	Track Alignment	Section L-L: identify which station this is (Commerce Station)				
12	R. Vandenberg	Rheia Consulting		X		TT-D3011	Track Alignment	Section R-R at 605 Fwy: please clarify what 10' horizontal clearance is to… if to bridge pier, demonstrate that there is adequate clearance for pier protection that will be required for Caltrans structure				
13	R. Vandenberg	Rheia Consulting		X		TT-D3023	Track Alignment	At retained fill sections through Buena Park, can east (left) walkway be moved outside OCS poles (like at west/right)?				
14	A. Shah	HDR Engineering		X		TT-D3027	Track Alignment	Need a dimension to the intertrack fence from the CL of track				
15	R. Vandenberg	Rheia Consulting		X		TT-D3028	Track Alignment	Section NN-NN at Fullerton Jct: please explain clearance between BNSF M3 and SCRRA MT1 which is shown as 0' to 108'. Where 0', is this a shared track?				
16	R. Vandenberg	Rheia Consulting		X		TT-D1503, TT-D1603	Track Alignment	It would be useful to show in Plan and Profile sheets which tracks are intended solely for passenger train operations, which tracks are dedicated for freight use, and which tracks would support shared passenger / freight operations.				

COMMENT-RESPONSE LOG

Project: A4205 CHSRA LA to Anaheim
Submittal: Preliminary Engineering for Project Definition
Contract Reference: A4205-F18

Response Codes: **A**=Agreed and will comply/take action. **B**=Will investigate. **C**=Disagree for reasons noted in Response/Status Column. **D**=Will address in next phase.

REVIEWER RESPONSIBILITY								RESPONDER RESPONSIBILITY			
NO.	Reviewer	Agency	SPEC	DWG	REPORT	REF. PAGE	DISCIPLINE	COMMENT	RESPONDER	RESPONSE CODE	RESPONSE	RESOLUTION-ACTION ITEM
17	G. Jennings	Mott MacDonald		X		TT-D1581	Track Alignment	NW end of new station platforms have horizontal/vertical curvature for New Metrolink Buena Park Station. Depending on train stopping positions, the risk to platform train interface (PTI) could be minimal but is there opportunity to remove curvature for a new station and de-risk construction and PTI? Note the platform location is not shown on the profile which would aid understanding (platforms are identified in other drawings)				
18	G. Jennings	Mott MacDonald		X		TT-D1584, TT-D1592, TT-D1621, TT-D1622	Track Alignment	There are a number of turnout/crossover units in a complex arrangement which are located on (or are in close proximity) to the underpasses. This imparts a risk in terms of differential track stiffness (due to the stiff bridge structure) for operationally critical assets with impacts on maintenance and the risk/consequence of derailment. How has the risk been considered/assessed/mitigated, as additonal landtake may be required to relocate the complex turnout/crossover units? Also relates to grade separation drawings ST-K1271, ST-K3301, ST-K1571 in volume 3.3 and drawing B-1 in volume 3.3A				
19	G. Jennings	Mott MacDonald		X		TT-D1599	Track Alignment	No.11 and No. 20 Turnout are located in close proximity to the Fullerton station platform ends. Noted that train control systems are not part of this contract but this distance may be a challenge for signal standback and overlaps, has this be considered?				
20	A. Shah	HDR Engineering		X		TT-D1599	Track Alignment	Will the existing ped bridge be protected in place or removed?				
21	R. Vandenberg	Rheia Consulting		X		TT-D1619	Track Alignment	Operational implications of shared use of proposed HST overnight storage lead with UPRR local freight movement needs to be better understood (connection to UP Tustin Branch)				
22	R. Vandenberg	Rheia Consulting		X		TT-D1604	Track Alignment	100-ft min. is required between #20 TO PS and Orangethorpe Ave GC				
23	R. Vandenberg	Rheia Consulting		X		TT-D1604	Track Alignment	Show PS to existing Metrolink storage track south of Orangethorpe Ave				
24	J. Lee	OCTA		X		General	Track Alignment	OCS poles shown throughout the plans will reduce the overall usable ROW for OCTA and the ability for expansion in the future				
25	J. Lee	OCTA		X		General	ROW	The dedicated HSR storage tracks proposed will occupy most of OCTA's ROW and prevent the owner from future service expansion and other uses				
26	J. Lee	OCTA		X		General	ROW	Use of OCTA's ROW for HSR as shared use including new improvements should be discussed and agreed upon				
27	J. Lee	OCTA		X		General	ROW	ROW discussions and negotiations between HSR and BNSF only apply to the corridor north of Fullerton Junction; need to add a note to discuss and negotiate with OCTA on the corridor south of Fullerton Junction to ARTIC Station				
28	I. Watkins	Mott MacDonald		X		RW-M1598-1560	ROW	Note that agreements will be required for rail and public ROW area adjustments around modified Metrolink Fullerton Station with OCTA. Who will be the lead agency for such agreements?				
29	I. Watkins	Mott MacDonald		X		RW-M1598-1623	ROW	Note that agreements will be required for rail ROW area adjustments around proposed HSR Anaheim Station with OCTA. Who will be the lead agency or such agreements?				
PEDP VOLUME 3.3												
30	A. Evans	Mott MacDonald		X		CV-T0266	Grade Sep	The new alignment near Buena Park Station will move HSR lines closer to residential properties to the south. What mitigation is anticipated in terms of acoustic treatment and/or potential purchase of some of the properties to provide credible offset between residents and the rail corridor?				
31	R. Vandenberg	Rheia Consulting		X		CV-T1267, CV-T1271, CV-T1302	Grade Sep	Beach Blvd / Dale St / Commonwealth Ave grade separation - min. vertical clearance for roadway below RR bridge matches existing (15.5 ft) but would be reduced by falsework during construction. What would vertical clearance be during construction?				
32	R. Vandenberg	Rheia Consulting		X		ST-K1266	Grade Sep	Buena Park Station Platform extends onto Beach Blvd grade separation structure - how will emergency egress be achieved?				

OCTA

COMMENT-RESPONSE LOG

Project: A4205 CHSRA LA to Anaheim
Submittal: Preliminary Engineering for Project Definition
Contract Reference: A4205-F18

Response Codes: **A**=Agreed and will comply/take action. **B**=Will investigate. **C**=Disagree for reasons noted in Response/Status Column. **D**=Will address in next phase.

REVIEWER RESPONSIBILITY								RESPONDER RESPONSIBILITY			
NO.	Reviewer	Agency	SPEC	DWG	REPORT	REF. PAGE	DISCIPLINE	COMMENT	RESPONDER	RESPONSE CODE	RESPONSE	RESOLUTION-ACTION ITEM
33	R. Vandenberg	Rheia Consulting		X		ST-K3266	Grade Sep	Proposed construction at Beach Blvd grade separation requires demolition of existing bridge parapet wall adjacent to track M1. This would need to be accomplished while maintaining existing M1 track in place until new M1 alignment is constructed to minimize impacts to train operations. What provisions are being taken for temporary parapet or other measures to retain CPUC walkway during construction?				
34	R. Vandenberg	Rheia Consulting		X		ST-K1269	Grade Sep	Proposed construction at Break Creek requires demolition of existing bridge parapet wall and raised walkway adjacent to track M3. This would need to be accomplished while maintaining existing M3 track in service to minimize impacts to train operations. What provisions are being taken for temporary parapet or other measures to retain CPUC walkway during construction?				
35	R. Vandenberg	Rheia Consulting		X		ST-K1271	Grade Sep	Proposed construction at Dale St grade separation requires demolition of existing bridge parapet and walkway adjacent to M1 (LA-A SB). This would need to be accomplished while maintaining existing LA-A SB track in place to minimize impacts to train operations. What provisions are being taken for temporary parapet or other measures to retain CPUC walkway during construction?				
36	R. Vandenberg	Rheia Consulting		X		CV-T3281	Grade Sep	What intrusion protection or other measures are being taken to avoid people/objects getting into trench section adjacent to Artesia Ave?				
37	R. Vandenberg	Rheia Consulting		X		ST-K1291	Grade Sep	Proposed construction at Gilbert St grade separation requires demolition of existing bridge parapet and walkway adjacent to M4. This would need to be accomplished while maintaining existing track in place to minimize impacts to train operations. What provisions are being taken for temporary parapet or other measures to retain CPUC walkway during construction?				
38	R. Vandenberg	Rheia Consulting		X		ST-K1291, ST-K1541	Grade Sep	Is 2' clearance sufficient for seismic interactions between two RR bridges? Provide relevant codes.				
39	R. Vandenberg	Rheia Consulting		X		ST-K3301	Grade Sep	Commonwealth Ave Section B and Section E - verify no ballast retainer is needed between M3 and LA-A NB due to difference in profile elevation				
40	R. Vandenberg	Rheia Consulting		X		ST-K1311	Grade Sep	Proposed construction at Euclid St requires demolition of existing single-track RR bridge to allow for construction of new 2 track shared bridge. While 5 tracks still available during construction, some of these are used by BNSF for storage. Storage of trains should be precluded during construction to minimize impacts to passenger train operations				
41	R. Vandenberg	Rheia Consulting		X		CV-T1322	Grade Sep	Walnut Ave grade separation proposes 15.67 ft min clearance. Point of measurement in cross section is at roadway crown, clearance at corner of RR bridge soffit should be verified/shown on drawing				
42	R. Vandenberg	Rheia Consulting		X		CV-T1351	Grade Sep	Highland Ave grade separation - min. 15.67 ft clearance matches existing but will be reduced by falsework during construction				
43	R. Vandenberg	Rheia Consulting		X		ST-K1361	Grade Sep	Proposed construction at Harbor Blvd grade separation requires removal of existing bridge fence/barrier next to existing m3 track and walkway next to existing m1 track. Provisions for temporary parapet or other measures to retain CPUC walkway during construction?				
44	R. Vandenberg	Rheia Consulting		X		ST-K1361	Grade Sep	Harbor Blvd grade separation typical section -- is HSR platform cantilevered over existing structure? What is interaction between two bridges?				
45	R. Vandenberg	Rheia Consulting		X		ST-K1571, ST-K1572	Grade Sep	Proposed construction Katella Ave requires construction of half of new RR bridge, demolition of existing RR bridge, then construction of second half of new RR bridge. Verify constructability and clearances between first half of new RR bridge and existing RR bridge. First half of new RR bridge would need to be able to support operation of two tracks but current construction staging concept only provides 6'10" horizontal clearance between M2 and temporary parapet wall.				
46	R. Vandenberg	Rheia Consulting		X		CV-T1583	Grade Sep	Douglass Service Rd proposes 13' minimum clearance under new RR bridge. Does that agree with Metrolink standards?				

COMMENT-RESPONSE LOG

Project: A4205 CHSRA LA to Anaheim
Submittal: Preliminary Engineering for Project Definition
Contract Reference: A4205-F18

Response Codes: **A**=Agreed and will comply/take action. **B**=Will investigate. **C**=Disagree for reasons noted in Response/Status Column. **D**=Will address in next phase.

REVIEWER RESPONSIBILITY									RESPONDER RESPONSIBILITY			
NO.	Reviewer	Agency	SPEC	DWG	REPORT	REF. PAGE	DISCIPLINE	COMMENT	RESPONDER	RESPONSE CODE	RESPONSE	RESOLUTION-ACTION ITEM
47	R. Vandenberg	Rheia Consulting		X		ST-K1582	Grade Sep	Please check vertical clearance labels and notes				
48	J. Lee	OCTA		X		General	Grade Sep	Construction phasing should be considered for grade separations to maintain full passenger operations during construction and minimize service disruptions				
PEDP VOLUME 3.4												
49	G. Jennings			X		UT-C1585, UT-C1597, UT-C1604, UT-C1621	Utilities	Utilities in close proximity to turnouts/crossovers. Potential for differential track stiffness leading to dynamic forces, voiding and subsequent component failures; and therefore to increased maintenance activity. Risk may be mitigated by utility depth (not indicated on plan) but how has the risk been considered/assessed/mitigated, as additional landtake may be required to relocate the turnout/crossover units?				
50	A. Shah	HDR Engineering		X		UT-C1599	Utilities	Need to detail with retaining wall				
51	J. Lee	OCTA		X		General	Utilities	Utilities under license proposed to be relocated should include relocation costs and potential ROW needed if relocation cannot stay within OCTA's ROW				
52	J. Lee	OCTA		X		General	Utilities	Confirm utility impacts from grade separations are also defined within the utility plans				
53	A. Evans	Mott MacDonald		X		UT-C1599	Utilities	Note largest utility for coordination is City of Fullerton 36" Storm Drain which will need asset protection during the works but not necessarily diversion. Provide guidance on how this line will be protected?				
PEDP VOLUME 3.5												
54	R. Vandenberg	Rheia Consulting		X		AR-B0201	Stations	Commerce Station - proposed orientation of Metrolink platform and station plaza/parking creates a long path of travel for Metrolink riders, with platform accessible only from one end. This does not seem to meet the standard. Metrolink criteria calls for access to be provided at the center of the platform or as close as possible to mini-high platform. Explain how HSR will meet the standard and what the provisions are for emergency egress from the far end of the platform.				
55	I. Watkins	Mott MacDonald		X		AR-B0601	Stations	Proposed relocation of Buena Park Station will include a 680' platform with accessible entrance to the transit plaza (via. pedestrian tunnel) and Beach Bvd (via. stair and lift). What ammenities will be provided at this relocated station similar to those provided at the existing Buena Park Station (including number of parking stalls, transit plaza, etc.)?				
56	I. Watkins	Mott MacDonald		X		AR-B0601	Stations	What phase of construction will the entrance to Beach Blvd. be completed as part of the station relocation? This entrance would be complex to retrofit once the station is operational.				
57	I. Watkins	Mott MacDonald		X		AR-B0601	Stations	Provide details for potential pedestrian connection to Tulare Street. What phase of construction will the underpass be completed as a part of the station relocation? This element would be complex to retrofit once the station is operational.				
58	I. Watkins	Mott MacDonald		X		AR-B0601	Stations	Provide details how staging of works between relocated station and existing station will be arranged to minimize disruption to the public across all transit modes. Details of staging for Metrolink operations, OCTA Buses and transit plaza amenities etc. to be agreed.				
59	J. Lee	OCTA		X		AR-B0601	Stations	With a planned year of construction, the parking capacity needs to be increased to accommodate the service improvements with the station relocation				
60	R. Vandenberg	Rheia Consulting		X		AR-B0601	Stations	What are provisions for emergency egress from south end of Buena Park station platform at Beach Blvd grade separation?				
61	R. Vandenberg	Rheia Consulting		X		AR-B0701	Stations	Offset of two Metrolink platforms creates a very long path of travel for SB Metrolink/Amtrak riders. More direct access should be provided between parking structure and SB platform.				
62	A. Shah	HDR Engineering		X		AR-B0701	Stations	Will there be any connection from the parking structure to the Amtrak/Metrolink center platform? What is the ped routing from the parking structure?				

OCTA

COMMENT-RESPONSE LOG

Project: A4205 CHSRA LA to Anaheim
Submittal: Preliminary Engineering for Project Definition
Contract Reference: A4205-F18

Response Codes: **A**=Agreed and will comply/take action. **B**=Will investigate. **C**=Disagree for reasons noted in Response/Status Column. **D**=Will address in next phase.

REVIEWER RESPONSIBILITY								RESPONDER RESPONSIBILITY			
NO.	Reviewer	Agency	SPEC	DWG	REPORT	REF. PAGE	DISCIPLINE	COMMENT	RESPONDER	RESPONSE CODE	RESPONSE	RESOLUTION-ACTION ITEM
63	A. Shah	HDR Engineering		X		AR-B0701	Stations	Will passenger trains be on the BNSF Main Tracks to be able to utilize the existing platform?				
64	A. Shah	HDR Engineering		X		AR-B0701	Stations	Will any of the existing station parking lot on the south side of the station be salvaged?				
65	J. Lee	OCTA		X		AR-B0701	Stations	How will the enhanced sidewalk be accessed from Walnut? It appears there is a retaining wall along Walnut to support the track structure				
66	J. Lee	OCTA		X		AR-B0701	Stations	Loss of station and street parking with direct access from Walnut should be mitigated				
67	J. Lee	OCTA		X		AR-B0701	Stations	Should evaluate the passenger path of travel from the amenities on the north side to the new platform for added time and degradation of convenience. Mitigate as needed.				
	J. Lee	OCTA		X		AR-B0701	Stations	The new platform length should accommodate both future Amtrak and Metrolink services				
68	A. Shah	HDR Engineering		X		AR-B0701	Stations	What are the exit points off of the center platform? Need to consider NFPA 130				
69	A. Evans	Mott MacDonald		X		AR-B0701	Stations	Realignment to Fullerton Station configuration and termination of existing lines get connected through the new proposed 800' station length will require reconfiguration of Walnut Ave also required. Provide details of how this will be addressed.				
70	A. Evans	Mott MacDonald		X		AR-B0701	Stations	Enhancing the interface with the TOD neighborhood area, is there any consideration for additional infrastructure (e.g. parking) for increased ridership as a consequence of High Speed? What improvements and parking encroaches partially in OTCA land will require purchase from other land owners?				
71	A. Evans	Mott MacDonald		X		AR-B0701	Stations	Changes to overpass bridge for passengers to an underpass will require works during track realignment phase. How will HSR ensure existing service will be protected during construction works?				
72	A. Evans	Mott MacDonald		X		AR-B0701	Stations	Note large new bridging structures required over Harbor Rd. to support track and new platform.				
73	A. Evans	Mott MacDonald		X		AR-B0701	Stations	Anticipate that loss of parking for current revenue service will be required to support construction site in the temporary case. How will HSR mitigate this issue?				
74	A. Evans	Mott MacDonald		X		AR-Y9901	Stations	Note, all minimum public areas are met through proposed design for HSR requirements. However, it is unclear whether this includes interchange and/or increased ridership from Metrolink passengers as a consequence of the scheme, i.e. Will HSR improve current platform space/ticketing/amenties for the Metrolink ridership?				
75	A. Evans	Mott MacDonald		X		AR-Y9903	Stations	Parking set at 608 spaces. Is this current or forecasted to what year? Also, is there any consideration for increased ridership as a consequence of the interchange?				
76	A. Evans	Mott MacDonald		X		AR-B0901	Stations	Clarity required on pedestrian modelling for pedestrian link between existing Artic Station, new HSR/Metrolink/Amtrak parking structure and HSR Station facility. How will HSR ensure sufficient space to allow anticipated cross movements between assets?				
77	A. Evans	Mott MacDonald		X		AR-B0901	Stations	Proposed HSR alignment will require additional land purchase from adjacent stakeholders most noteably Angel Stadium. While consideration has been made to HSR drop off zone and assocaited road works, the environmental footprint terminates at North West corner of the site. What other road improvements are expected in order to complete the connection to E Katella Ave? Will HSR cover the cost for land acquisition?				
78	A. Evans	Mott MacDonald		X		AR-B0901	Stations	New HSR platform will require extensive works over Douglass Road and beneath the Orange Fwy 57. Provide explanation for how removal of ~15No support columns can be achieved whilst also maintaining the operation of the Fwy. Any additional bracing structure would likely reduce headrooms beneath the Fwy to both the HSR platforms and potentially existing Metrolink/Amtrak platform.				

OCTA

COMMENT-RESPONSE LOG

Project: A4205 CHSRA LA to Anaheim
Submittal: Preliminary Engineering for Project Definition
Contract Reference: A4205-F18

Response Codes: **A**=Agreed and will comply/take action. **B**=Will investigate. **C**=Disagree for reasons noted in Response/Status Column. **D**=Will address in next phase.

REVIEWER RESPONSIBILITY								RESPONDER RESPONSIBILITY			
NO.	Reviewer	Agency	SPEC	DWG	REPORT	REF. PAGE	DISCIPLINE	COMMENT	RESPONDER	RESPONSE CODE	RESPONSE	RESOLUTION-ACTION ITEM
79	A. Evans	Mott MacDonald		X		AR-B0901	Stations	Creation of new platform (including new bridge over Douglass Rd) will likely have impact on existing Metrolink / Amtrak infrastructure. Can HSR provide asset protection to ensure stability of line? If so, how? If not, any loss of revenue until reinstatement of existing infrastructure must be compensated.				
80	A. Evans	Mott MacDonald		X		AR-B0901	Stations	Scheme appears to show curtailment of existing Metrolink/Amtrak platform. Provide possible mitigation efforts for potential impact on services based on this proposal.				
81	A. Evans	Mott MacDonald		X		AR-B0901	Stations	Extended pedestrain undercrossings to serve HSR platform. The proposal offers new elevator access which is seen as a benefit, but also requires new access ramps to be integrated within existing platform width. How will this impact the remaining width of the platforms to ensure safe operational width? Note that during construction this will likely also limit the available length of platform for passengers.				
82	A. Evans	Mott MacDonald		X		AR-B0901	Stations	New Station location will sever existing at grade access to Metrolink/Amtrak platforms (via stairs/ramps) from the south. How will HSR mitigate length of passenger travel routes to reach the new HSR platforms?				
83	A. Evans	Mott MacDonald		X		AR-B0901, AR-C1901	Stations	How will existing underpass between Artic bus terminal site for new station south of tracks be maintained to avoid excessive passenger travel routes for interchange?				
84	R. Vandenberg	Rheia Consulting		X		AR-B0901, AR-C1901, AR-J8901, AR-J8903	Stations	Coordinate ARTIC site plan as needed with ongoing final design efforts by City of Anaheim for "Building Bridges to Transit" project that includes new active transportation connections, ped bridges, and riverbank trail realignment. These ongoing improvements are not reflected in these drawings.				
PEDP VOLUME 3.6												
85	I. Watkins	Mott MacDonald		X		TT-D1598A	Track Alignment	What options other than the track alignment and ROW Impact have been considered? Provide details of those options and scoring criteria if implemented for review.				
86	I. Watkins	Mott MacDonald		X		TT-D1598A	Track Alignment	It is assumed that a new station entrance will be provided on to Highland Avenue if the Fullerton Station option is implemented. Provide details of secondary means of escape to the west (if required for fire egress). Also provide details of interchange between Metrolink and the proposed HSR station option.				
87	R. Vandenberg	Rheia Consulting		X		AR-B0701A	Stations	Site plan for "unpreferred" alternative at Fullerton Station includes new ped bridge from existing parking structure that improves access to SB Metrolink/Amtrak station as compared to the preferred site plan.				

OCTA

AFFILIATED AGENCIES

Orange County Transit District

Local Transportation Authority

Service Authority for Freeway Emergencies

Consolidated Transportation Service Agency

Congestion Management Agency

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.

- 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

OCTA

AFFILIATED AGENCIES

Orange County Transit District

Local Transportation Authority

Service Authority for Freeway Emergencies

Consolidated Transportation Service Agency

Congestion Management Agency

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

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.

AFFILIATED AGENCIES

Orange County Transit District

Local Transportation Authority

Service Authority for Freeway Emergencies

Consolidated Transporation Service Agency

Congestion Management Agency

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.

- 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

AFFILIATED AGENCIES

Orange County Transit District

Local Transportation Authority

Service Authority for Freeway Emergencies

Consolidated Transportation Service Agency

Congestion Management Agency

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

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.

OCTA

AFFILIATED AGENCIES

Orange County Transit District

Local Transportation Authority

Service Authority for Freeway Emergencies

Consolidated Transportation Service Agency

Congestion Management Agency

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.

- 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

AFFILIATED AGENCIES

Orange County Transit District

Local Transportation Authority

Service Authority for Freeway Emergencies

Consolidated Transportation Service Agency

Congestion Management Agency

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.

- 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

ATTACHMENT B

OCTA

COMMENT-RESPONSE LOG

Project: A4205 CHSRA LA to Anaheim
Submittal: EIR_EIS
Contract Reference: A4205-F18

Response Codes: **A**=Agreed and will comply/take action. **B**=Will investigate. **C**=Disagree for reasons noted in Response/Status Column. **D**=Will address in next phase.

REVIEWER RESPONSIBILITY								RESPONDER RESPONSIBILITY			
NO.	Reviewer	Agency	SPEC	DWG	REPORT	REF. PAGE	DISCIPLINE	COMMENT	RESPONDER	RESPONSE CODE	RESPONSE	RESOLUTION-ACTION ITEM
								This comment matrix is comprised of both new comments specific to the Draft EIR/EIS and the previously issued comments from prior reviews of the Administrative Draft EIR/EIS, PEPD, NOP, and NOI.				
1	E. Smith	Mott MacDonald			X	General	Service	The corridor is a critical goods/passenger artery. Coordination with OCTA/SCRRA/LOSSAN/BNSF will be needed to maintains minimum frequencies and time targets for Metrolink and Surfliner during HSR construction. Also, local plans and project related coordination (e.g., Santa Ana Boulevard Underpass, Coastal Rail Resiliency, OC Streetcar) must be continued to ensure compatibility between the construction, service, and future design plans.				
2	E. Smith	Mott MacDonald			X	General	Service	Confirm that the Preferred Alternative will not constrain the growth targets or future planning on the Orange County Line.				
3	R. Soto	OCTA			X	General	Operations	Shared Use Agreement Restrictions on Infrastructure Above Track The BNSF San Bernardino Subdivision Shared Use Agreement (SUA) defines Passenger Transportation Uses broadly to include multiple rail modes; however, it explicitly prohibits improvements constructed above the mainline tracks, with only narrow exceptions for two crossings less than 30 feet above rail. The Draft EIR/EIS does not explain how the proposed overhead catenary system (OCS), which constitutes infrastructure above the tracks, complies with this prohibition. The Draft EIR/EIS should clarify how CHSRA intends to reconcile the installation of OCS with the SUA's express limitations and identify the specific agreement amendments, waivers, redefinitions, or other contractual mechanisms that would be required to authorize OCS installation. In addition, the Draft EIR/EIS should clearly identify the corridor segments where such approvals are assumed. Absent this information, the environmental analysis relies on infrastructure that may not be contractually permissible.				
4	R. Soto	OCTA			X	General	Operations	Dispatching Rules and Blended Passenger/Freight Operations The Draft EIR/EIS states that the Shared Passenger Track Alternatives include blended operations and explicitly allow freight trains to operate on passenger rail tracks. However, the SUA limits the circumstances under which dispatching may delay a passenger train to permit freight movement during commuter periods, allowing such delays only in cases of defined "route conflict." The introduction of high-speed rail service would significantly increase the number of passenger train movements competing for dispatching priority. The Draft EIR/EIS does not explain whether CHSRA assumes that existing dispatching rules would be modified, nor does it describe how dispatching priority would be managed among high-speed rail, Metrolink/Amtrak, and freight trains during commuter periods. The Draft EIR/EIS should identify the assumed dispatching framework, clarify whether SUA provisions would be amended, and describe the pathway and timing for resolving these conflicts.				

5	R. Soto	OCTA			**X**	General	Operations	Electrification and Protection of Freight Service Quality The Draft EIR/EIS references corridor segments where existing tracks would be electrified for shared use, while the SUA repeatedly defines and protects the provision of "quality rail freight service." Even where freight can physically operate adjacent to electrified tracks, the presence of OCS introduces operational and maintenance constraints—such as clearance requirements, outage windows, work restrictions, and incident response limitations—that may materially affect freight reliability. The Draft EIR/EIS does not demonstrate how CHSRA would ensure no material impairment to freight or passenger service expectations protected under the SUA. The Draft EIR/EIS should identify the compatibility standards assumed for electrifying existing tracks, including clearances, maintenance and outage protocols, work windows, incident recovery times, and coordination procedures with freight operators.				
6	R. Soto	OCTA			**X**	General	Operations	Passenger Train Rights and Operating Slot Assumptions The Draft EIR/EIS assumes up to two high-speed rail trains per hour per direction and states that this level of service is necessary to maintain current and projected freight and passenger rail volumes. However, existing railroad agreements allocate passenger train rights contractually, and the construction of new infrastructure does not automatically confer the right to operate additional trains. The Draft EIR/EIS does not identify whether CHSRA would require new passenger train slots beyond those currently allocated, nor does it disclose the plan, schedule, or risk associated with renegotiating operating rights. Given the complexity and duration of such negotiations historically, the Draft EIR/EIS should identify when and how these discussions would occur and assess the associated implementation risk.				
7	R. Soto	OCTA			**X**	General	Operations	CHSRA's Contractual Role Under the Shared Use Agreement The SUA defines "Operator" as an entity appointed by the Agency or its assignees to operate Agency Trains and limits that role accordingly. The Draft EIR/EIS appears to presume that CHSRA would automatically qualify as an Agency Party and that high-speed rail service would therefore be included under the definition of Agency Trains. This presumption is not clearly supported by the current SUA language and presents a potential legal and operational mismatch. The Draft EIR/EIS should clarify under what contractual role CHSRA would operate—whether as an Agency Party, an Operator, or a new user requiring an amended or separate shared-use framework—and how that role would be formally established. If CHSRA is not an existing rights-holder, the Draft EIR/EIS must identify the mechanism by which operating rights would be obtained without violating the SUA principle that no rights exist beyond those expressly listed.				
8	R. Soto	OCTA			**X**	General	Operations	Maintenance and Outage Requirements The Draft EIR/EIS proposes major new systems, including overhead contact systems and traction power, as well as significant station and track reconfigurations. These systems will require routine and emergency maintenance and associated outages. The Draft EIR/EIS does not identify the maintenance or outage windows required by CHSRA, nor does it explain how those windows would align with freight and passenger train priority expectations and commuter-period dispatching rules under the SUA. This information is necessary to evaluate operational impacts and contractual feasibility.				
9	R. Soto	OCTA			**X**	General	Operations	Dispatching Authority and Cost Allocation The introduction of additional high-speed rail service would increase dispatching complexity and reliance on communications, signal systems, and interlockings, potentially triggering new cost allocation requirements. The Draft EIR/EIS does not disclose whether changes to dispatching authority boundaries are assumed (e.g., between Metro-, BNSF-, or OCTA-dispatched territory), nor does it explain the rationale for any such changes. Additionally, the Draft EIR/EIS does not identify CHSRA's assumed dispatching payment model for high-speed rail operations on shared territory, such as per-train-mile charges, flat fees, or bundled capital costs, or indicate when and how these issues would be resolved.				
10	R. Soto	OCTA			**X**	General	Operations	Contractual Compliance Versus Infrastructure Capacity The Draft EIR/EIS equates maintaining freight and passenger rail volumes with the ability to schedule those volumes; however, existing agreements impose limits on daily train movements and constrain passenger services beyond the listed rights. Maintaining volumes from an infrastructure standpoint does not equate to being contractually authorized to operate those volumes. The Draft EIR/EIS should identify where contractual compliance for train movement rights and operating slots—not merely physical capacity—is demonstrated. If such analysis exists in technical reports, it should be clearly referenced and summarized.				
11	R. Soto	OCTA			**X**	General	Operations	Freight Volume Assumptions The Draft EIR/EIS does not clearly disclose the freight volumes or time-of-day distributions assumed for BNSF operations on the shared corridor. If the assumed freight activity is lower than that analyzed in the LOSSAN PEIR, the Draft EIR/EIS should explicitly explain this assumption, as reduced freight baselines could have cascading implications for future passenger rail service expansion and operational reliability.				

12	R. Soto	OCTA			**X**	General	Operations	Definition of LOSSAN's Feeder Role The LOSSAN PEIR and Business Plan characterize corridor improvements as strengthening LOSSAN's role as a feeder network to the statewide high-speed rail system. The Draft EIR/EIS does not define this feeder role operationally. Specifically, the Draft EIR/EIS should clarify whether elements such as timed transfers, schedule coordination, fare integration, passenger wayfinding, platform adjacency, dwell times, and turnback strategies are binding commitments or aspirational concepts, and how CHSRA intends to implement and enforce these elements.				
13	R. Soto	OCTA			**X**	General	Operations	Grade Separations and Corridor-Wide Reliability The Draft EIR/EIS highlights five new full grade separations as a benefit of the Shared Passenger Track Alternatives. However, it is unclear whether these grade separations have been evaluated within a corridor-wide reliability framework or only in relation to the high-speed rail footprint. The Draft EIR/EIS should explain how the proposed grade separations align with LOSSAN PEIR and Metrolink corridor bottleneck priorities, particularly in areas where nighttime freight operations are expected, and whether they meaningfully improve overall corridor performance.				
EIR_EIS VOLUME 1												
14	E. Smith	Mott MacDonald			**X**	General	R/W Impacts	The project proposes five new grade separations, with eight existing crossings retained in Anaheim. OCTA will need to be involved in the discussions related to designs, traffic flow, and safety improvements from these changes.				
15	E. Smith	Mott MacDonald			**X**	General	Operations	Plans for light maintenance yards at 26th or 15th Street in Vernon must not interfere with freight or regional service operations nearby. Freight tracking, scheduling, and ensuring freight capacity is maintained alongside HSR will be critical during construction/operations.				
16	E. Smith	Mott MacDonald			**X**	General	Operations	Assess freight rail interoperability and the ability to maintain capacity during and after construction to avoid or mitigate access/service operation disruptions. The existing and future regional operations will need to maintain alignments with speed and frequency goals identified by OCTA.				
17	R. Vandenberg	Rheia Consulting			**X**	General, p. S-62	Operations	This should specifically address required coordination and analysis with respect to existing purchase and sale, shared use, railroad operating, and capital improvements agreements between and among BNSF, OCTA, RCTC, Metro, and SCRRA. Modification of these agreements terms would be required to allow for HSR train operation on shared tracks within the LOSSAN Corridor and through Fullerton Junction.				
18	R. Vandenberg	Rheia Consulting			**X**	General, p. S-77	Operations	This should acknowledge the potential impacts of HSR facilities at ARTIC with respect to the ongoing OC VIBE development, which includes the ARTIC site.				
19	R. Vandenberg	Rheia Consulting			**X**	Project Purpose, Need, and Objectives, p. 1-40	Operations	Add after last paragraph: This section should also acknowledge SCORE plans for increased service frequencies (30-minute headways) for OC Line and 91/Perris Valley Line that would be affected by the HSR operation.				
20	R. Vandenberg	Rheia Consulting			**X**	Project Purpose, Need, and Objectives, p. 1-41	Operations	Third bullet; edit to: "Expand Metrolink capacity and service to include 30-minute frequency, upgrade existing Metrolink station facilities.				
21	R. Vandenberg	Rheia Consulting			**X**	Project Purpose, Need, and Objectives, p. 1-24	Operations	Existing passenger rail operations are subject to existing railroad agreements that define rights and obligations with respect to passenger rail services along the LOSSAN Corridor. These should be acknowledged in the document.				
22	R. Vandenberg	Rheia Consulting			**X**	Alternatives, p. 2-2	Operations	The discussion of efforts required to maintain existing passenger and freight rail operation does not mention the additional coordination and collaboration required with LOSSAN, SCRRA and their member agencies to assure that planned shared use track configuration avoids impacts to planned intercity and regional rail service expansion in the shared corridor.				

23	R. Vandenberg	Rheia Consulting			**X**	Alternatives, p. 2-4	Operations	Add text following last paragraph: Existing railroad agreements establish rights and obligations of BNSF, RCTC, OCTA, and Metro in the operation of trains within defined rights of way and easements owned by these parties. The freight operator (BNSF) cannot unilaterally require changes to operational patterns outside of the parameters of these agreements. The document does not describe/proscribe how this operational planning and required modifications to existing agreements would happen. Also add footnote: Although freight rail would generally not operate on shared-track alignment, changes to operational patterns may be required by freight operators because of new and realigned tracks in the LOSSAN Corridor.				
24	R. Vandenberg	Rheia Consulting			**X**	Alternatives, p. 2-7	Operations	Operation of proposed HSR trainsets on shared tracks without temporal separation from conventional passenger and freight trains would require an exception from compliance with 49 CFR 238.				
25	R. Vandenberg	Rheia Consulting			**X**	Alternatives, p. 2-11	Operations	USDOT guidance calls for passenger rail facilities within urbanized areas to provide for 200-year flood protection.				
26	R. Vandenberg	Rheia Consulting			**X**	Alternatives, p. 2-21	Operations	Address how HSR PTC system will be integrated with the existing Metrolink PTC.				
27	R. Vandenberg	Rheia Consulting			**X**	Alternatives, p. 2-51	Operations	Because of the unique importance of the future planned regional and intercity rail service with which the HSR trains will share operating tracks, a table describing current and proposed passenger rail frequencies (Metrolink, Pacific Surfliner, Southwest Chief) between LA and Fullerton and Fullerton to Anaheim would provide greater clarity of the operational context within which the HSR trains would operate. This will need to include current/planned Metrolink OC Line and 92/Perris Valley Line trains that operate through Fullerton Junction.				
28	R. Vandenberg	Rheia Consulting			**X**	Alternatives, p. 2-59	Operations	Because of its critical importance in rail capacity, the modifications to the Fullerton Junction should be identified in the narrative.				
29	R. Vandenberg	Rheia Consulting			**X**	Alternatives, p. 2-91	Operations	Clarify how the HSR PTC and train control will be coordinated and interfaced with existing PTC system and train dispatch within the shared corridor.				
30	R. Vandenberg	Rheia Consulting			**X**	Alternatives, p. 2-143	Operations	The 2012 CHSRA MOU with So Cal Agencies also identified the following early action grade separations: Ball Road and Orangethorpe Ave.				
31	R. Vandenberg	Rheia Consulting			**X**	Alternatives, p. 2-143	Operations	MOU(s) and modification of standing agreements among existing rail operators will be required in the shared use corridor to define/update maintenance responsibilities of each rail operator.				
32	R. Vandenberg	Rheia Consulting			**X**	Alternatives, p. 2-156	Operations	Allowable train volumes in the SBS are also addressed in the subsequent Capital Improvements Agreement (2nd amendment in 2000) and Purchase and Sale Agreement (5th amendment in 1993). The Shared Used Agreement for the San Diego Sub & Olive Sub (1992) governs allowable train operations south of Fullerton Junction.				
33	R. Vandenberg	Rheia Consulting			**X**	Introduction, p. 3.1-14	Operations	Operational Impacts: Should also note potential impacts of HSR operations on other rail operators as this is a key consideration in the proposed shared track alternative.				
34	K. Khouri	OCTA				Transportation, p. 3.2-12-14	Operations	Many of the routes listed in Section 3.2, Transportation, in tables 3.2-12, 3.2-13, and 3.2-14 are discontinued or do not serve the outlined project area. Please refer to the current OCTA system map for bus routes that enter the project area and serve proposed stations.				
35	R. Vandenberg	Rheia Consulting			**X**	Transportation, p. 3.2-43	Operations	Consistent with definition for significant impacts to transit, clarify that the project would have a significant impact it if would conflict with established plans and programs or otherwise decrease the performance of existing rail service.				
36	R. Vandenberg	Rheia Consulting			**X**	Transportation, p. 3.2-68	Operations	Confirm that this is complete and up to date (reference older plans).				

37	R. Vandenberg	Rheia Consulting			X	Hydrology and Water Resources, p. 3.8-46	Operations	How does the project address FEMA and USDOT policies for protection of rail facilities against 200-year flood?				
38	R. Vandenberg	Rheia Consulting			X	Safety and Security, p. 3.11-125	Operations	How does the DEIS/EIR address coordination with existing safety and security plans of rail operators and ROW owners within the shared corridor and at shared station sites?				
39	R. Vandenberg	Rheia Consulting			X	Safety and Security, p. 3.11-37	Operations	Under Operational impacts, second bullet, add "operating within the shared HSR corridor".				
40	R. Vandenberg	Rheia Consulting			X	Safety and Security, p. 3.11-66	Operations	Address also how HSR safety and security will be coordinated with SCRRA plans and Amtrak (SW Chief)`				
41	R. Vandenberg	Rheia Consulting			X	Safety and Security, p. 3.11-105	Operations	Document should recognize distinct roles of Amtrak and LOSSAN Agency for operation of long distance and intercity Amtrak service, respectively.				
42	R. Vandenberg	Rheia Consulting			X	Safety and Security, p. 3.11-106	Operations	Portions of the proposed shared corridor are unique that there are adjacent industry tracks and spurs that are not consistency with typical HSR access controls. What measures will be taken at those locations to prevent intrusion?				
43	R. Vandenberg	Rheia Consulting			X	Socioeconomics and Community, p. 3.12.20	Operations	Anaheim Municipal Code Title 18 includes specific policies and zoning requirements for the Platinum Triangle, including the ARTIC site (Platinum Triangle Mixed Use Overlay Zone).				
44	R. Vandenberg	Rheia Consulting			X	Socioeconomics and Community, p. 3.12.22	Operations	Anaheim Municipal Code Chapter 18.20 addresses specific intent and requirements for Platinum Triangle, including ARTIC station site.				
45	R. Vandenberg	Rheia Consulting			X	Cumulative Impacts, p. 3.19.31	Operations	Regarding first sentence of last paragraph: The shared track alternative would add new passenger train service to the LOSSAN Corridor and, as such, clearly affect existing railroad agreements, including the joint and inseverable easement held by OCTA and RCTC for exclusive passenger operation within the BNSF SBS between Redondo Junction and Fullerton Junction. OCTA obligations to support BNSF operations within the OCTA-owned corridor south of Fullerton Junction may also be affected. Impacts may include constraints on the number of new passenger train slots and prioritization of trains				
46	R. Vandenberg	Rheia Consulting			X	Other CEQA NEPA Considerations, p. 7-1	Operations	The document does not identify specific mitigation measures that memorialize the need for critical MOUs and amendments to standing railroad agreements to incorporate new HSR passenger trains and define/update railroad operator rights and obligations with overlay of HSR operations on existing shared use rail corridor.				
47	R. Vandenberg	Rheia Consulting			X	Preferred Alternative, p. 8-30	Operations	Proposed HSR improvements at ARTIC would also need to be coordinated with OC VIBE development, existing transit operators, "Building Bridges to Transit" project (2023 RAISE grant), and OCTA OC Mobility Hubs Strategy.				
48	R. Vandenberg	Rheia Consulting		X		GE-D6101	BoD	Fullerton Junction - viability of overall configuration needs to be confirmed with simulations that incorporate future Metrolink service plans for OC, IEOC, and Riverside Lines, allowing for normal variations in train operations				
49	R. Vandenberg	Rheia Consulting		X		GE-D6101	BoD	Do crossover configurations provide adequate operational flexibility for Metrolink trains serving relocated Commerce Station, relocated Buena Park Station, and reconfigured Fullerton Station?				
50	R. Vandenberg	Rheia Consulting		X		GE-D6101	BoD	26th St LMF yard lead configuration could affect shared passenger operation. NB access into yard required HSR trains to operate on M4 from CP Bandini; NB access out of yard would require HSR to operate on M4 to CP Olympic (north of Redondo Junction flyover).				
51	R. Vandenberg	Rheia Consulting		X		TT-B3001	BoD	Does 10.67' clearance meet Metrolink requirements for increased horizontal clearance through curves? (typ all locations)				

52	R. Vandenberg	Rheia Consulting		**X**		TT-D3003	BoD	Does access control fence at sidings extend across siding tracks? How is access control maintained without interfering with regular freight operation into adjacent industry properties?				
53	R. Vandenberg	Rheia Consulting		**X**		TT-D3011	BoD	Clarify 10' horizontal clearance. Is this to existing bridge pier? If so, confirm that there is adequate clearance for pier protection.				
54	R. Vandenberg	Rheia Consulting		**X**		TT-D3023	BoD	Would walkway more appropriately be placed on outside of catenary pole line as is shown on other side of ROW? (typ)				
55	R. Vandenberg	Rheia Consulting		**X**		TT-D1604	BoD	Verify clearance from PS to GC is at least 100 ft.				
EIR_EIS VOLUME 2												
56	R. Vandenberg	Rheia Consulting	**X**			Project Description p. 2-9	Operations	Does not acknowledge or address how the HSR PTC will integrate with existing Metrolink PTC system.				
57	R. Vandenberg	Rheia Consulting	**X**			Project Description p. 2-35, Section 2.3.3	Operations	Should acknowledge the need to also coordinate with OCTA and RCTC, who together have exclusive easement for passenger rail operations under established purchase and sale agreements and shared use agreement.				
58		OCTA			**X**	Appendix 2-A, p. 2-A-24	Stormwater Management	HYD-IAMF#1: To comply with SCRRA design standards to be reviewed and approved by SCRRA and OCTA within the Orange Sub and OCTA owned right of way.				
59		OCTA			**X**	Appendix 2-A, p. 2-A-24	Flood Protection	HYD-IAMF#2: To comply with SCRRA design standards to be reviewed and approved by SCRRA and OCTA within the Orange Sub and OCTA owned right of way.				
60		OCTA			**X**	Appendix 2-A, p. 2-A-27	Land Use	LU-IAMF#3: Authority needed TCEs need to be acquired prior to construction and the conditions including costs to be negotiated with property owners.				
61		OCTA			**X**	Appendix 2-A, p. 2-A-38	Public Notifications	PUE-IAMF#3: Notifications need to be coordinated with SCRRA, OCTA, and impacted Cities; some utility outage will required much longer coordination with each impacted agencies as critical infrastructure depends on the utility service.				
62		OCTA			**X**	Appendix 2-A, p. 2-A-29	Safety & Security	All construction safety and security must comply with SCRRA's latest right of entry permit requirements and must have property RWP safety training and appropriate railroad flagging support; additional OCTA safety and liability requirements may apply.				
63		OCTA			**X**	Appendix 2-A, p. 2-A-36	Operations	TR-IAMF#8: Liquidated damages may be assessed by SCRRA if the contractor damages or impacts the operations of the RR service. Special provisions are required to be included in the contract.				
64	R. Vandenberg	Rheia Consulting			**X**	Appendix 2-E, Section 6.1, p. 14	Operations	This high-level statewide discussion of operations does not address the specific requirements of the LA-Anaheim shared corridor.				
65	R. Vandenberg	Rheia Consulting			**X**	Appendix 3.2-D-1	Transportation	What traffic analysis / mitigation measures / traffic operational improvements have been identified and incorporated to address relocation of the Buena Park Metrolink Station?				

EIR_EIS VOLUME 3												
54	A. Shah	HDR Engineering		**X**		TT-D1598	R/W Impacts	Intersection of Highland and Walnut Ave will need to be reviewed. There is traffic signal equipment where the bridge is being proposed. Any modifications to the intersection and R/W impacts need to be included in the design.				
55	A. Shah	HDR Engineering		**X**		TT-D1599	Station	Will there be a pedestrian overpass from the parking structure to the platform?				
56	A. Shah	HDR Engineering	**X**			GE-B0101	BoD	2. Design Speeds: SCRRA maximum allowable speed for passenger trains is 90mph				
57	A. Shah	HDR Engineering	**X**			GE-B0101	BoD	3. Track Center Spacing: need RFSDC				
58	A. Shah	HDR Engineering	**X**			GE-_0110	All	State College Grade Separation is not being built by OCTA.				
59	A. Shah	HDR Engineering		**X**		RW-M1591	R/W Impacts	These R/W drawings do not show all of the improvements being proposed by CHS, therefore making it difficult to assess whether adequate R/W acquisition is shown. Further, these colored maps do not indicate what R/W is being acquired, what is needed for easement, and what is needed for TCE. This does not set the R/W footprint adequately. Critical rail assets such as signals are not shown anywhere on the plans, and will likely have additional R/W impacts that should be determined now.				
60	R. Vandenberg	Rheia Consulting		**X**		GE-D6101	Service	26th St LMF yard lead configuration could affect shared passenger operation. NB access into yard required HSR trains to operate on M4 from CP Bandini; NB access out of yard would require HSR to operate on M4 to CP Olympic (north of Redondo Junction flyover). Do crossover configurations provide adequate operational flexibility for Metrolink trains serving relocated Commerce Station, relocated Buena Park Station, and reconfigured Fullerton Station? Fullerton Junction - viability of overall configuration needs to be confirmed with simulations that incorporate future Metrolink service plans for OC, IEOC, and				
61	R. Vandenberg	Rheia Consulting		**X**		TT-D3003	Design	Does access control fence at sidings extend across siding tracks? How is access control maintained without interfering with regular freight operation into adjacent industry properties?				
62	R. Vandenberg	Rheia Consulting		**X**		TT-B3001	Design	Does 10.67' clearance meet Metrolink requirements for increased horizontal clearance through curves? (typ all locations).				
63	R. Vandenberg	Rheia Consulting		**X**		TT-D3011	Design	Clarify 10' horizontal clearance. Is this to existing bridge pier? If so, confirm that there is adequate clearance for pier protection.				
64	R. Vandenberg	Rheia Consulting		**X**		TT-D3023	R/W Impacts	Would walkway more appropriately be placed on outside of catenary pole line as is shown on other side of ROW? (typ)				
65	R. Vandenberg	Rheia Consulting		**X**		TT-D1604	Design	Verify clearance from PS to GC is at least 100 ft.				

66	R. Vandenberg	Rheia Consulting		**X**		CV-T1267	Design	How will required min. clearance of 15.5 ft be maintained during construction of RR bridge modifications?					
67	R. Vandenberg	Rheia Consulting		**X**		ST-K1266	Design	How will emergency egress be provided for Buena Park Station platform under the Beach Blvd bridge?					
68	R. Vandenberg	Rheia Consulting		**X**		ST-K3266	Design	Typical Section: Construction of widened bridge requires elimination of one existing operating track during construction. How will this impact be mitigated?					
69	R. Vandenberg	Rheia Consulting		**X**		ST-K1269	Design	Construction of bridge widening will require work within what appears to be 10' of centerline of active track (dimension not shown).					
70	R. Vandenberg	Rheia Consulting		**X**		CV-T1271	Design	How will min. 15.5 ft clearance be maintained during bridge construction?					
71	R. Vandenberg	Rheia Consulting		**X**		ST-K1271	Design	Typical Section: Construction of bridge widening requires work within what appears to be 8 ft from active tracks (dimension not shown).					
72	R. Vandenberg	Rheia Consulting		**X**		CV-T1302	Design	How will min. vertical clearance be maintained during construction? (typ both sides of bridge)?					
73	R. Vandenberg	Rheia Consulting		**X**		ST-K3301	Design	Show clearance between existing active track and proposed new construction. Differential in elevation of M3 and LA-A NB tracks appears would require ballast retainer.					
74	R. Vandenberg	Rheia Consulting		**X**		ST-K3301	Design	Show clearance between existing active track and proposed new construction. Differential in elevation of M3 and LA-A NB tracks appears would require ballast retainer.					
75	R. Vandenberg	Rheia Consulting		**X**		ST-K1311	Design	Typical Section: Construction of new proposed shared bridge will first require removal of the existing single track RR bridge. How will operating impacts be mitigated during construction?					
76	R. Vandenberg	Rheia Consulting		**X**		CV-T1351	Design	How will min. clearance be maintained during construction?					

77	R. Vandenberg	Rheia Consulting		**X**		ST-K1361	Design	Typical Section: Unique Metrolink platform structure would straddle two bridges.				
78	R. Vandenberg	Rheia Consulting		**X**		AR-B0900	Access	Very long path of travel from parking structure to center Amtrak/Metrolink platform. Metrolink standards call for platform access close to center of platform, while proposed solution provides access only from one end of platform. How will emergency egress be provided from the end of center platform.				
79	R. Vandenberg	Rheia Consulting		**X**		AR-B0901	All	Note 1: Note should include coordination with OCTA and other transit providers.				
Technical Reports												
80	J. Lee	OCTA			**X**	2-A-24	Stormwater Management	To comply with SCRRA design standards to be reviewed and approved by SCRRA and OCTA within the Orange Sub and OCTA owned right of way.				
81	J. Lee	OCTA			**X**	2-A-24	Flood Protection	Same comment as above.				
82	J. Lee	OCTA			**X**	2-A-27	Land Use	Authority needed TCEs need to be acquired prior to construction and the conditions including costs to be negotiated with property owners.				
83	J. Lee	OCTA			**X**	2-A-28	Public Notifications	Notifications need to be coordinated with SCRRA, OCTA, and impacted Cities; some utility outage will required much longer coordination with each impacted agencies as critical infrastructure depends on the utility service.				
84	J. Lee	OCTA			**X**	2-A-29	Safety & Security	All construction safety and security must comply with SCRRA latest right of entry permit requirements and must have property RWP safety training and appropriate railroad flagging support; additional OCTA safety and liability requirements may apply.				
85	J. Lee	OCTA			**X**	2-A-36	Transportation	Liquidated damages may be assessed by SCRRA if the contractor damages or impacts the operations of the RR service. Special provisions are required in be included in the contract.				
86	R. Vandenberg	Rheia Consulting			**X**	2-4	Aesthetics &Visual Quality	Fullerton row, 4th bullet: Confirm that this is consistent with existing purchase & sale and shared use agreements, or what modification to those agreements would be required as a result of the project.				
87	R. Vandenberg	Rheia Consulting			**X**	2-12	Aesthetics &Visual Quality	Section 2.2.1.5: There seems to be a typo here - are the two mainline tracks shared by passenger rail and freight operators to be electrified or non-electrified?				
88	R. Vandenberg	Rheia Consulting			**X**	2-13	Aesthetics &Visual Quality	Figure 2-10: Confirm that HSR Yard lead tracks are long enough to avoid impacts of slowing HSR trains on other passenger train operations.				
89	R. Vandenberg	Rheia Consulting			**X**	2-18	Aesthetics &Visual Quality	An 800-foot center platform does not match Amtrak standard platform length of 1,000 feet.				
90	R. Vandenberg	Rheia Consulting			**X**	2-19	Aesthetics &Visual Quality	Figure 2-14: Clarify access between platforms - grade-separated ped access?				

91	R. Vandenberg	Rheia Consulting			X	2-20	Aesthetics &Visual Quality	Figure 2-15: See comments on other sections re long path of travel, platform length, and emergency egress.					
92	R. Vandenberg	Rheia Consulting			X	2-21	Aesthetics &Visual Quality	What traffic analysis was conducted to identify traffic operational impacts, improvements, and mitigations related to Buena Park Station relocation?					
93	R. Vandenberg	Rheia Consulting			X	2-34	Aesthetics &Visual Quality	Section 2.3.1: The 2012 HSR MOU with So Cal Agencies included as early action projects additional OC grade separations at Ball Rd and Orangethorpe Ave; these should be added to this list					
94	R. Vandenberg	Rheia Consulting			X	2-38	Transportation	Figure 2-24: See comments elsewhere re: long path of travel, platform length, and emergency egress					
95	R. Vandenberg	Rheia Consulting			X	2-40	Transportation	Table 2-7: This schedule doesn't prioritize early works grade separation.					
96	R. Vandenberg	Rheia Consulting			X	2-38	Transportation	Figure 2-24: See comments elsewhere re: long path of travel, platform length, and emergency egress.					
97	R. Vandenberg	Rheia Consulting			X	2-41	Transportation	Section 2-7: This report should also address whether HSR plans would preclude or impact planned passenger train service and frequency improvements planned for Metrolink and LOSSAN services. Similar to as stated for freight, the HSR solution should commit to maintain current and projected passenger train volume. Existing railroad agreements (re purchase & sale, shared use, capital improvements) that establish railroad operator rights and obligations should be acknowledged and described. The overlay of HSR service within the LOSSAN corridor would require modification or renegotiation of these agreements and concurrence among all parties to those standing agreements that would be affected by HSR operation in the LOSSAN corridor (Metro, OCTA, RCTC, SBCTA, NCTD, LOSSAN Agency, SCRRA, and BNSF). A stand-alone MOU between BNSF and HSR would not supplant or take precedence over these standings.					
98	R. Vandenberg	Rheia Consulting			X	3-21	Transportation	Section 3.3.4.2: This narrative is not up to date. The "forthcoming" Transit Master Plan was released as the 2024 OC Transit Vision in May 2025. This master plan document places heavy emphasis on "transit opportunity corridors" that will connect to Metrolink stations and complement planned increases to Metrolink service frequencies. The plan also identified the Metrolink Buena Park and Fullerton Stations for pilot projects to improve first-and last-mile connections to Metrolink. The potential impacts of station modifications to these plans and pilot projects should be addressed.					
99	R. Vandenberg	Rheia Consulting			X	3-22	Transportation	Section 3.3.4.2: This discussion does not accurately reflect the conclusions and recommendations of the 2017 State of OC Transit document, nor the resulting strategies that are presented in the 2024 Transit Vision, which presents service expansion plans for Metrolink and transit improvements along and connecting to high-demand corridors including the LOSSAN Corridor					
100	R. Vandenberg	Rheia Consulting			X	4-3	Transportation	Traffic impacts due to relocation of Buena Park Metrolink station do not appear to be addressed.					
101	R. Vandenberg	Rheia Consulting			X	5-28	Transportation	Should acknowledge clearly-defined objective for 30 min. all-day frequency OC Line ridership is out of date (5,116 in most recent Metrolink fact sheet)					
102	R. Vandenberg	Rheia Consulting			X	5-94	Transportation	Figure 5-20: Should show OC River Walk.					
103	R. Vandenberg	Rheia Consulting			X	5-95	Transportation	Figure 5-21: Map is not reflective of all existing and planned bike facilities. See City of Anaheim GIS mapping: https://www.arcgis.com/apps/View/index.html?appid=f8b43cf542324de2baac76aad0558bd3&utm					

104	R. Vandenberg	Rheia Consulting			X	6-5	Transportation	Table 6-1: Check Metro is the lead agency for Project #s: ORA020113 and ORA120531. Remove duplicated projects.				
105	R. Vandenberg	Rheia Consulting			X	6-6	Transportation	Table 6-1: List does not appear to be up to date.				
106	R. Vandenberg	Rheia Consulting			X	6-25	Transportation	ARTIC Station Area: Does analysis reflect OC VIBE build-out?				
107	R. Vandenberg	Rheia Consulting			X	6-48	Transportation	Section 6.3.1.4: Does ARTIC trip data reflect OC VIBE build-out?				
108	R. Vandenberg	Rheia Consulting			X	6-226	Operations	This section does not address the localized effects of the rearrangement of freight rail yards, which could impact the availability of passenger train slots that were identified and modeled based on specific capital improvements as input to existing shared use agreements. Results of railroad modeling performed by CHSRA along the LOSSAN Corridor and through the Fullerton Interlocker are not provided.				#NAME?

OCTA

COMMENT-RESPONSE LOG

Project: A4205 CHSRA LA to Anaheim
Submittal: Preliminary Engineering for Project Definition
Contract Reference: A4205-F18

Response Codes: **A**=Agreed and will comply/take action. **B**=Will investigate. **C**=Disagree for reasons noted in Response/Status Column. **D**=Will address in next phase.

REVIEWER RESPONSIBILITY									RESPONDER RESPONSIBILITY			
NO.	Reviewer	Agency	SPEC	DWG	REPORT	REF. PAGE	DISCIPLINE	COMMENT	RESPONDER	RESPONSE CODE	RESPONSE	RESOLUTION-ACTION ITEM
1	R. Vandenberg	Rheia Consulting				Transmittal Letter	NA	Preferred alternative does not include HSR Station at Fullerton. How will HSR Fullerton Station and Modified Metrolink Fullerton Station be addressed in the				
PEDP VOLUME 3.1												
2	A. Shah	HDR Engineering		X		GE-D0101	General	Suggest having sheet after symbols because it is unclear what the blue linework is				
3	A. Shah	HDR Engineering		X		GE-B0101	General	Metrolink design criteria requires 15' minimum track spacing. Need to review and file RFSDCs for where Metrolink commuter tracks are shown with reduced track spacing.			Close	
4	A. Shah	HDR Engineering		X		GE-B0101	General	Max design speed for this corridor is 110mph				
5	R. Vandenberg	Rheia Consulting		X		GE-D6101	General	Fullerton Junction - viability of overall configuration needs to be confirmed with simulations that incorporate future Metrolink service plans for OC, IEOC, and Riverside Lines, allowing for normal variations in train operations			Close	
6	R. Vandenberg	Rheia Consulting		X		GE-D6101	General	Certain XO configurations appear to limit operational flexibility for Metrolink trains, including: • No XO are provided on the north side of the Relocated Metrolink Commerce Station • XO configuration south of Relocated Buena Park Station • At CP Santa Fe Springs (MP 155.0), SB operation on M3 (if required) does not have access to the west Norwalk/Santa Fe Springs Metrolink Station platform • 2 LH XO rather than universal configuration north of Fullerton Station • CP Orangethorpe (MP 166.2) includes 2 LH crossovers rather than universal configuration				
7	R. Vandenberg	Rheia Consulting		X		GE-D6101	General	26th St LMF yard lead configuration could affect shared passenger track operations as: • NB access into 26th St LMF would require NB HSR trains to operate on M4 from CP Bandini (MP 148.9) to the LMF lead (approx MP 146) • NB access out of the 26th St LMF would require NB HSR trains to operate on M4				
8	R. Vandenberg	Rheia Consulting		X		TT-D3001	Track Alignment	In Section C-C, please demonstrate that proposed 10' horizontal clearance between M1 track and OCS poles will meet Metrolink's minimum clearance standards, in consideration of increased clearance required at curves.				
9	R. Vandenberg	Rheia Consulting		X		TT-D3003	Track Alignment	How will ROW access be controlled at industry sidings?				
10	R. Vandenberg	Rheia Consulting		X		TT-B3001, TT-D3005, TT-D3006, TT-D3015, TT-D3016, TT-D3029. TT-D3030, TT-D3031	Track Alignment	On aerial structure, please demonstrate that proposed min. 10.67' horizontal clearance to OCS poles will meet Metrolink's minimum clearance standards, in consideration of increased clearance required at curves.				
11	R. Vandenberg	Rheia Consulting		X		TT-D3008	Track Alignment	Section L-L: identify which station this is (Commerce Station)				
12	R. Vandenberg	Rheia Consulting		X		TT-D3011	Track Alignment	Section R-R at 605 Fwy: please clarify what 10' horizontal clearance is to… if to bridge pier, demonstrate that there is adequate clearance for pier protection that will be required for Caltrans structure				
13	R. Vandenberg	Rheia Consulting		X		TT-D3023	Track Alignment	At retained fill sections through Buena Park, can east (left) walkway be moved outside OCS poles (like at west/right)?				
14	A. Shah	HDR Engineering		X		TT-D3027	Track Alignment	Need a dimension to the intertrack fence from the CL of track				
15	R. Vandenberg	Rheia Consulting		X		TT-D3028	Track Alignment	Section NN-NN at Fullerton Jct: please explain clearance between BNSF M3 and SCRRA MT1 which is shown as 0' to 108'. Where 0', is this a shared track?				
16	R. Vandenberg	Rheia Consulting		X		TT-D1503, TT-D1603	Track Alignment	It would be useful to show in Plan and Profile sheets which tracks are intended solely for passenger train operations, which tracks are dedicated for freight use, and which tracks would support shared passenger / freight operations.				
17	G. Jennings	Mott MacDonald		X		TT-D1581	Track Alignment	NW end of new station platforms have horizontal/vertical curvature for New Metrolink Buena Park Station. Depending on train stopping positions, the risk to platform train interface (PTI) could be minimal but is there opportunity to remove curvature for a new station and de-risk construction and PTI? Note the platform location is not shown on the profile which would aid understanding (platforms are identified in other drawings)				

OCTA

COMMENT-RESPONSE LOG

Project: A4205 CHSRA LA to Anaheim
Submittal: Preliminary Engineering for Project Definition
Contract Reference: A4205-F18

Response Codes: **A**=Agreed and will comply/take action. **B**=Will investigate. **C**=Disagree for reasons noted in Response/Status Column. **D**=Will address in next phase.

REVIEWER RESPONSIBILITY									RESPONDER RESPONSIBILITY			
NO.	Reviewer	Agency	SPEC	DWG	REPORT	REF. PAGE	DISCIPLINE	COMMENT	RESPONDER	RESPONSE CODE	RESPONSE	RESOLUTION-ACTION ITEM
18	G. Jennings	Mott MacDonald		X		TT-D1584, TT-D1592, TT-D1621, TT-D1622	Track Alignment	There are a number of turnout/crossover units in a complex arrangement which are located on (or are in close proximity) to the underpasses. This imparts a risk in terms of differential track stiffness (due to the stiff bridge structure) for operationally critical assets with impacts on maintenance and the risk/consequence of derailment. How has the risk been considered/assessed/mitigated, as additonal landtake may be required to relocate the complex turnout/crossover units? Also relates to grade separation drawings ST-K1271, ST-K3301, ST-K1571 in volume 3.3 and drawing B-1 in volume 3.3A				
19	G. Jennings	Mott MacDonald		X		TT-D1599	Track Alignment	No.11 and No. 20 Turnout are located in close proximity to the Fullerton station platform ends. Noted that train control systems are not part of this contract but this distance may be a challenge for signal standback and overlaps, has this be				
20	A. Shah	HDR Engineering		X		TT-D1599	Track Alignment	Will the existing ped bridge be protected in place or removed?				
21	R. Vandenberg	Rheia Consulting		X		TT-D1619	Track Alignment	Operational implications of shared use of proposed HST overnight storage lead with UPRR local freight movement needs to be better understood (connection to UP Tustin Branch)				
22	R. Vandenberg	Rheia Consulting		X		TT-D1604	Track Alignment	100-ft min. is required between #20 TO PS and Orangethorpe Ave GC				
23	R. Vandenberg	Rheia Consulting		X		TT-D1604	Track Alignment	Show PS to existing Metrolink storage track south of Orangethorpe Ave				
24	J. Lee	OCTA		X		General	Track Alignment	OCS poles shown throughout the plans will reduce the overall usable ROW for OCTA and the ability for expansion in the future				
25	J. Lee	OCTA		X		General	ROW	The dedicated HSR storage tracks proposed will occupy most of OCTA's ROW and prevent the owner from future service expansion and other uses				
26	J. Lee	OCTA		X		General	ROW	Use of OCTA's ROW for HSR as shared use including new improvements should be discussed and agreed upon				
27	J. Lee	OCTA		X		General	ROW	ROW discussions and negotiations between HSR and BNSF only apply to the corridor north of Fullerton Junction; need to add a note to discuss and negotiate with OCTA on the corridor south of Fullerton Junction to ARTIC Station				
28	I. Watkins	Mott MacDonald		X		RW-M1598-1560	ROW	Note that agreements will be required for rail and public ROW area adjustments around modified Metrolink Fullerton Station with OCTA. Who will be the lead agency for such agreements?				
29	I. Watkins	Mott MacDonald		X		RW-M1598-1623	ROW	Note that agreements will be required for rail ROW area adjustments around proposed HSR Anaheim Station with OCTA. Who will be the lead agency or such agreements?				
PEDP VOLUME 3.3												
30	A. Evans	Mott MacDonald		X		CV-T0266	Grade Sep	The new alignment near Buena Park Station will move HSR lines closer to residential properties to the south. What mitigation is anticipated in terms of acoustic treatment and/or potential purchase of some of the properties to provide credible offset between residents and the rail corridor?				
31	R. Vandenberg	Rheia Consulting		X		CV-T1267, CV-T1271, CV-T1302	Grade Sep	Beach Blvd / Dale St / Commonwealth Ave grade separation - min. vertical clearance for roadway below RR bridge matches existing (15.5 ft) but would be reduced by falsework during construction. What would vertical clearance be during construction?				
32	R. Vandenberg	Rheia Consulting		X		ST-K1266	Grade Sep	Buena Park Station Platform extends onto Beach Blvd grade separation structure - how will emergency egress be achieved?				
33	R. Vandenberg	Rheia Consulting		X		ST-K3266	Grade Sep	Proposed construction at Beach Blvd grade separation requires demolition of existing bridge parapet wall adjacent to track M1. This would need to be accomplished while maintaining existing M1 track in place until new M1 alignment is constructed to minimize impacts to train operations. What provisions are being taken for temporary parapet or other measures to retain CPUC walkway during construction?				

OCTA

COMMENT-RESPONSE LOG

Project: A4205 CHSRA LA to Anaheim
Submittal: Preliminary Engineering for Project Definition
Contract Reference: A4205-F18

Response Codes: **A**=Agreed and will comply/take action. **B**=Will investigate. **C**=Disagree for reasons noted in Response/Status Column. **D**=Will address in next phase.

REVIEWER RESPONSIBILITY								RESPONDER RESPONSIBILITY			
NO.	Reviewer	Agency	SPEC	DWG	REPORT	REF. PAGE	DISCIPLINE	COMMENT	RESPONDER	RESPONSE CODE	RESPONSE	RESOLUTION-ACTION ITEM
34	R. Vandenberg	Rheia Consulting		X		ST-K1269	Grade Sep	Proposed construction at Break Creek requires demolition of existing bridge parapet wall and raised walkway adjacent to track M3. This would need to be accomplished while maintaining existing M3 track in service to minimize impacts to train operations. What provisions are being taken for temporary parapet or other measures to retain CPUC walkway during construction?				
35	R. Vandenberg	Rheia Consulting		X		ST-K1271	Grade Sep	Proposed construction at Dale St grade separation requires demolition of existing bridge parapet and walkway adjacent to M1 (LA-A SB). This would need to be accomplished while maintaining existing LA-A SB track in place to minimize impacts to train operations. What provisions are being taken for temporary parapet or other measures to retain CPUC walkway during construction?				
36	R. Vandenberg	Rheia Consulting		X		CV-T3281	Grade Sep	What intrusion protection or other measures are being taken to avoid people/objects getting into trench section adjacent to Artesia Ave?				
37	R. Vandenberg	Rheia Consulting		X		ST-K1291	Grade Sep	Proposed construction at Gilbert St grade separation requires demolition of existing bridge parapet and walkway adjacent to M4. This would need to be accomplished while maintaining existing track in place to minimize impacts to train operations. What provisions are being taken for temporary parapet or other measures to retain CPUC walkway during construction?				
38	R. Vandenberg	Rheia Consulting		X		ST-K1291, ST-K1541	Grade Sep	Is 2' clearance sufficient for seismic interactions between two RR bridges? Provide relevant codes.				
39	R. Vandenberg	Rheia Consulting		X		ST-K3301	Grade Sep	Commonwealth Ave Section B and Section E - verify no ballast retainer is needed between M3 and LA-A NB due to difference in profile elevation				
40	R. Vandenberg	Rheia Consulting		X		ST-K1311	Grade Sep	Proposed construction at Euclid St requires demolition of existing single-track RR bridge to allow for construction of new 2 track shared bridge. While 5 tracks still available during construction, some of these are used by BNSF for storage. Storage of trains should be precluded during construction to minimize impacts to passenger train operations				
41	R. Vandenberg	Rheia Consulting		X		CV-T1322	Grade Sep	Walnut Ave grade separation proposes 15.67 ft min clearance. Point of measurement in cross section is at roadway crown, clearance at corner of RR bridge soffit should be verified/shown on drawing				
42	R. Vandenberg	Rheia Consulting		X		CV-T1351	Grade Sep	Highland Ave grade separation - min. 15.67 ft clearance matches existing but will be reduced by falsework during construction				
43	R. Vandenberg	Rheia Consulting		X		ST-K1361	Grade Sep	Proposed construction at Harbor Blvd grade separation requires removal of existing bridge fence/barrier next to existing m3 track and walkway next to existing m1 track. Provisions for temporary parapet or other measures to retain CPUC walkway during construction?				
44	R. Vandenberg	Rheia Consulting		X		ST-K1361	Grade Sep	Harbor Blvd grade separation typical section -- is HSR platform cantilevered over existing structure? What is interaction between two bridges?				
45	R. Vandenberg	Rheia Consulting		X		ST-K1571, ST-K1572	Grade Sep	Proposed construction Katella Ave requires construction of half of new RR bridge, demolition of existing RR bridge, then construction of second half of new RR bridge. Verify constructability and clearances between first half of new RR bridge and existing RR bridge. First half of new RR bridge would need to be able to support operation of two tracks but current construction staging concept only provides 6'10" horizontal clearance between M2 and temporary parapet wall.				
46	R. Vandenberg	Rheia Consulting		X		CV-T1583	Grade Sep	Douglass Service Rd proposes 13' minimum clearance under new RR bridge. Does that agree with Metrolink standards?				
47	R. Vandenberg	Rheia Consulting		X		ST-K1582	Grade Sep	Please check vertical clearance labels and notes				
48	J. Lee	OCTA		X		General	Grade Sep	Construction phasing should be considered for grade separations to maintain full passenger operations during construction and minimize service disruptions				

OCTA

COMMENT-RESPONSE LOG

Project: A4205 CHSRA LA to Anaheim
Submittal: Preliminary Engineering for Project Definition
Contract Reference: A4205-F18

Response Codes: **A**=Agreed and will comply/take action. **B**=Will investigate. **C**=Disagree for reasons noted in Response/Status Column. **D**=Will address in next phase.

REVIEWER RESPONSIBILITY									RESPONDER RESPONSIBILITY			
NO.	Reviewer	Agency	SPEC	DWG	REPORT	REF. PAGE	DISCIPLINE	COMMENT	RESPONDER	RESPONSE CODE	RESPONSE	RESOLUTION-ACTION ITEM
PEDP VOLUME 3.4												
49	G. Jennings			X		UT-C1585, UT-C1597, UT-C1604, UT-C1621	Utilities	Utilities in close proximity to turnouts/crossovers. Potential for differential track stiffness leading to dynamic forces, voiding and subsequent component failures; and therefore to increased maintenance activity. Risk may be mitigated by utility depth (not indicated on plan) but how has the risk been considered/assessed/mitigated, as additional landtake may be required to relocate the turnout/crossover units?				
50	A. Shah	HDR Engineering		X		UT-C1599	Utilities	Need to detail with retaining wall				
51	J. Lee	OCTA		X		General	Utilities	Utilities under license proposed to be relocated should include relocation costs and potential ROW needed if relocation cannot stay within OCTA's ROW				
52	J. Lee	OCTA		X		General	Utilities	Confirm utility impacts from grade separations are also defined within the utility plans				
53	A. Evans	Mott MacDonald		X		UT-C1599	Utilities	Note largest utility for coordination is City of Fullerton 36" Storm Drain which will need asset protection during the works but not necessarily diversion. Provide guidance on how this line will be protected?				
PEDP VOLUME 3.5												
54	R. Vandenberg	Rheia Consulting		X		AR-B0201	Stations	Commerce Station - proposed orientation of Metrolink platform and station plaza/parking creates a long path of travel for Metrolink riders, with platform accessible only from one end. This does not seem to meet the standard. Metrolink criteria calls for access to be provided at the center of the platform or as close as possible to mini-high platform. Explain how HSR will meet the standard and what the provisions are for emergency egress from the far end of the platform.				
55	I. Watkins	Mott MacDonald		X		AR-B0601	Stations	Proposed relocation of Buena Park Station will include a 680' platform with accessible entrance to the transit plaza (via. pedestrian tunnel) and Beach Bvd (via. stair and lift). What ammenities will be provided at this relocated station similar to those provided at the existing Buena Park Station (including number of parking stalls, transit plaza,				
56	I. Watkins	Mott MacDonald		X		AR-B0601	Stations	What phase of construction will the entrance to Beach Blvd. be completed as part of the station relocation? This entrance would be complex to retrofit once the station is operational.				
57	I. Watkins	Mott MacDonald		X		AR-B0601	Stations	Provide details for potential pedestrian connection to Tulare Street. What phase of construction will the underpass be completed as a part of the station relocation? This element would be complex to retrofit once the station is operational.				
58	I. Watkins	Mott MacDonald		X		AR-B0601	Stations	Provide details how staging of works between relocated station and existing station will be arranged to minimize disruption to the public across all transit modes. Details of staging for Metrolink operations, OCTA Buses and transit plaza amenities etc. to be agreed.				
59	J. Lee	OCTA		X		AR-B0601	Stations	With a planned year of construction, the parking capacity needs to be increased to accommodate the service improvements with the station relocation				
60	R. Vandenberg	Rheia Consulting		X		AR-B0601	Stations	What are provisions for emergency egress from south end of Buena Park station platform at Beach Blvd grade separation?				
61	R. Vandenberg	Rheia Consulting		X		AR-B0701	Stations	Offset of two Metrolink platforms creates a very long path of travel for SB Metrolink/Amtrak riders. More direct access should be provided between parking structure and SB platform.				
62	A. Shah	HDR Engineering		X		AR-B0701	Stations	Will there be any connection from the parking structure to the Amtrak/Metrolink center platform? What is the ped routing from the parking structure?				
63	A. Shah	HDR Engineering		X		AR-B0701	Stations	Will passenger trains be on the BNSF Main Tracks to be able to utilize the existing platform?				
64	A. Shah	HDR Engineering		X		AR-B0701	Stations	Will any of the existing station parking lot on the south side of the station be salvaged?				
65	J. Lee	OCTA		X		AR-B0701	Stations	How will the enhanced sidewalk be accessed from Walnut? It appears there is a retaining wall along Walnut to support the track structure				

OCTA

COMMENT-RESPONSE LOG

Project: A4205 CHSRA LA to Anaheim
Submittal: Preliminary Engineering for Project Definition
Contract Reference: A4205-F18

Response Codes: **A**=Agreed and will comply/take action. **B**=Will investigate. **C**=Disagree for reasons noted in Response/Status Column. **D**=Will address in next phase.

REVIEWER RESPONSIBILITY									RESPONDER RESPONSIBILITY			
NO.	Reviewer	Agency	SPEC	DWG	REPORT	REF. PAGE	DISCIPLINE	COMMENT	RESPONDER	RESPONSE CODE	RESPONSE	RESOLUTION-ACTION ITEM
66	J. Lee	OCTA		X		AR-B0701	Stations	Loss of station and street parking with direct access from Walnut should be mitigated				
67	J. Lee	OCTA		X		AR-B0701	Stations	Should evaluate the passenger path of travel from the amenities on the north side to the new platform for added time and degradation of convenience. Mitigate as needed.				
	J. Lee	OCTA		X		AR-B0701	Stations	The new platform length should accommodate both future Amtrak and Metrolink services				
68	A. Shah	HDR Engineering		X		AR-B0701	Stations	What are the exit points off of the center platform? Need to consider NFPA 130				
69	A. Evans	Mott MacDonald		X		AR-B0701	Stations	Realignment to Fullerton Station configuration and termination of existing lines get connected through the new proposed 800' station length will require reconfiguration of Walnut Ave also required. Provide details of how this will be addressed.				
70	A. Evans	Mott MacDonald		X		AR-B0701	Stations	Enhancing the interface with the TOD neighborhood area, is there any consideration for additional infrastructure (e.g. parking) for increased ridership as a consequence of High Speed? What improvements and parking encroaches partially in OTCA land will require purchase from other land owners?				
71	A. Evans	Mott MacDonald		X		AR-B0701	Stations	Changes to overpass bridge for passengers to an underpass will require works during track realignment phase. How will HSR ensure existing service will be protected during construction works?				
72	A. Evans	Mott MacDonald		X		AR-B0701	Stations	Note large new bridging structures required over Harbor Rd. to support track and new platform.				
73	A. Evans	Mott MacDonald		X		AR-B0701	Stations	Anticipate that loss of parking for current revenue service will be required to support construction site in the temporary case. How will HSR mitigate this issue?				
74	A. Evans	Mott MacDonald		X		AR-Y9901	Stations	Note, all minimum public areas are met through proposed design for HSR requirements. However, it is unclear whether this includes interchange and/or increased ridership from Metrolink passengers as a consequence of the scheme, i.e. Will HSR improve current platform space/ticketing/amenties for the Metrolink				
75	A. Evans	Mott MacDonald		X		AR-Y9903	Stations	Parking set at 608 spaces. Is this current or forecasted to what year? Also, is there any consideration for increased ridership as a consequence of the interchange?				
76	A. Evans	Mott MacDonald		X		AR-B0901	Stations	Clarity required on pedestrian modelling for pedestrian link between existing Artic Station, new HSR/Metrolink/Amtrak parking structure and HSR Station facility. How will HSR ensure sufficient space to allow anticipated cross movements between assets?				
77	A. Evans	Mott MacDonald		X		AR-B0901	Stations	Proposed HSR alignment will require additional land purchase from adjacent stakeholders most noteably Angel Stadium. While consideration has been made to HSR drop off zone and assocaited road works, the environmental footprint terminates at North West corner of the site. What other road improvements are expected in order to complete the connection to E Katella Ave? Will HSR cover the cost for land acquisition?				
78	A. Evans	Mott MacDonald		X		AR-B0901	Stations	New HSR platform will require extensive works over Douglass Road and beneath the Orange Fwy 57. Provide explanation for how removal of ~15No support columns can be achieved whilst also maintaining the operation of the Fwy. Any additional bracing structure would likely reduce headrooms beneath the Fwy to both the HSR platforms and potentially existing Metrolink/Amtrak platform.				
79	A. Evans	Mott MacDonald		X		AR-B0901	Stations	Creation of new platform (including new bridge over Douglass Rd) will likely have impact on existing Metrolink / Amtrak infrastructure. Can HSR provide asset protection to ensure stability of line? If so, how? If not, any loss of revenue until reinstatement of existing infrastructure must be compensated.				
80	A. Evans	Mott MacDonald		X		AR-B0901	Stations	Scheme appears to show curtailment of existing Metrolink/Amtrak platform. Provide possible mitigation efforts for potential impact on services based on this proposal.				

OCTA

COMMENT-RESPONSE LOG

Project: A4205 CHSRA LA to Anaheim
Submittal: Preliminary Engineering for Project Definition
Contract Reference: A4205-F18

Response Codes: **A**=Agreed and will comply/take action. **B**=Will investigate. **C**=Disagree for reasons noted in Response/Status Column. **D**=Will address in next phase.

REVIEWER RESPONSIBILITY								RESPONDER RESPONSIBILITY			
NO.	Reviewer	Agency	SPEC	DWG	REPORT	REF. PAGE	DISCIPLINE	COMMENT	RESPONDER	RESPONSE CODE	RESPONSE	RESOLUTION-ACTION ITEM
81	A. Evans	Mott MacDonald		X		AR-B0901	Stations	Extended pedestrain undercrossings to serve HSR platform. The proposal offers new elevator access which is seen as a benefit, but also requires new access ramps to be integrated within existing platform width. How will this impact the remaining width of the platforms to ensure safe operational width? Note that during construction this will likely also limit the available length of platform for passengers.				
82	A. Evans	Mott MacDonald		X		AR-B0901	Stations	New Station location will sever existing at grade access to Metrolink/Amtrak platforms (via stairs/ramps) from the south. How will HSR mitigate length of passenger travel routes to reach the new HSR platforms?				
83	A. Evans	Mott MacDonald		X		AR-B0901, AR-C1901	Stations	How will existing underpass between Artic bus terminal site for new station south of tracks be maintained to avoid excessive passenger travel routes for interchange?				
84	R. Vandenberg	Rheia Consulting		X		AR-B0901, AR-C1901, AR-J8901, AR-J8903	Stations	Coordinate ARTIC site plan as needed with ongoing final design efforts by City of Anaheim for "Building Bridges to Transit" project that includes new active transportation connections, ped bridges, and riverbank trail realignment. These ongoing improvements are not reflected in these drawings.				
PEDP VOLUME 3.6												
85	I. Watkins	Mott MacDonald		X		TT-D1598A	Track Alignment	What options other than the track alignment and ROW Impact have been considered? Provide details of those options and scoring criteria if implemented for review.				
86	I. Watkins	Mott MacDonald		X		TT-D1598A	Track Alignment	It is assumed that a new station entrance will be provided on to Highland Avenue if the Fullerton Station option is implemented. Provide details of secondary means of escape to the west (if required for fire egress). Also provide details of interchange between Metrolink and the proposed HSR station option.				
87	R. Vandenberg	Rheia Consulting		X		AR-B0701A	Stations	Site plan for "unpreferred" alternative at Fullerton Station includes new ped bridge from existing parking structure that improves access to SB Metrolink/Amtrak station as compared to the preferred site plan.				

COMMENT-RESPONSE LOG

Project: A4205 CHSRA LA to Anaheim
Submittal: 15% Preliminary Engineering for Project Definition
Contract Reference: A4205-F18

Response Codes: **A**=Agreed and will comply/take action. **B**=Will investigate. **C**=Disagree for reasons noted in Response/Status Column. **D**=Will address in next phase.

REVIEWER RESPONSIBILITY									RESPONDER RESPONSIBILITY			
NO.	Reviewer	Agency	SPEC	DWG	REPORT	REF. PAGE	DISCIPLINE	COMMENT	RESPONDER	RESPONSE CODE	RESPONSE (Provided to OCTA 12/20/19)	RESOLUTION-ACTION ITEM
1	J. Gallardo	OCTA				General	R/W Impacts	From a right-of-way (ROW) perspective, OCTA owns the Orange subdivision south of Fullerton junction. The HSR requires a lot of new property in the segment from Anaheim to Fullerton for the rail infrastructure. Is this ROW acquired by HSR intended to be consolidated into the Orange Subdivision operating ROW owned by OCTA?		D	Yes, HSR intends to operate as a tenant railroad in the So Cal Shared Corridors. ~~Any~~ ROW acquired would likely be consolidated into the Orange subdivision. Agreement to be negotiated as project advances.	
2	N. Barrett	OCTA		X		General	Highway Impacts	At the Katella Avenue NB Off-Ramp, Alts 2 and 2B widen the existing bridge and because of the alignment of the existing bridge columns and the need to keep the same alignment, there is a conflict with the bent #2 column and the rail bridge for HSR. In addition, whereas the new-off-ramp structure in Alt. 2A spans the proposed service road, for Alts. 2 and 2B, there's a slight conflict with the proposed alignment of the service road and the width of the HSR bridge over Douglass Road. The service road could be realigned to avoid both abutment #1 and bent #2, possibly requiring that the bridge over Douglass Road be a little longer.		D	During PEPD design phase, SR-57 alternatives were not available. Lengthening the bridge over Douglass road would require the deck to be expanded, either increasing re-profiling on Douglass or pushing the tracks into conflict with existing SR-57 and the proposed underpass. Coordination will be required in future phase to resolve potential conflicts.	
3	N. Patel	OCTA		X		General	Plan & Profile	There will be Metrolink, Amtrak, California High Speed Rail (CHSR), OCTA 30-minutes trains between Fullerton Station and Anaheim ARTIC Station. The train traffic will be increased for the future based on projections. How is it possible to run all these trains on the proposed tracks? There are only two tracks at certain locations. A modeling shall be carried out to determine the facilities that are needed for the future train services. The modeling is very necessary and will be done prior to any decision by OCTA to approve CHSR project. Any additional improvements necessary to accommodate all train services and required by modeling will be included as a part of the CHSR project.		A	CHSRA have been working jointly with all operators – passenger and freight – that may be impacted by the plans to introduce high-speed services into Southern California. The joint schedule planning and modelling work to date been used to inform development of the Authority's plans as shown in the PEPD and EIR/EIS documents. The investments proposed by the Authority in track layouts and signal system upgrades are sufficient to accommodate the introduction of the proposed levels of high-speed service, whilst still allowing for growth of service levels for Metrolink and Amtrak services consistent with the levels outlined in the State Rail Plan. CHSRA would be happy to provide a briefing to OCTA on the plans developed to date if that is required. Note from Avi Shah (HDR) on 1/19/2026: Comment is still open - no modeling provided	This answer appears to be generic. The answer do not make it clear if the modeling included OCTA 30-minutes train service or any other commuter or freight services or emergency situations. Modeling data used for this project shall be submitted for review by OCTA. OCTA will also like to have an independent review, conducted by another consultant (either hired by CHSR or OCTSA), of the data and modeling summary to ascertain that the facilities to be constructed by CHSRA will not require additional right-of-ways to be purchased by OCTA for their future service expansion. OCTA also wants to make sure the proposed two tracks at certain locations will be sufficient for existing and future rail services of all carriers. Does the modeling take into account any disruption to one track as a result of any emergency and still be able to continue with the expected rail services?
4	N. Patel	OCTA		X		General	Plan & Profile	OCTA and other SCRRA member agencies are responsible for providing funding for the maintenance and operation of the Metrolink train services on Metrolink system, especially on the Orange Subdivision. Since it is proposed by CHSR to share the tracks for Metrolink, Amtrak, and CHSR trains, who will maintain and operate the train services? Who will be responsible to pay for the cost of maintenance and operation? Who will maintain the catenary? An agreement or agreements will be necessary to clearly delineate responsibility of each organization.		A	CHSRA plans to run as a tenant railroad on this corridor under agreement with the existing operators and will be responsible for their share of the cost for maintenance and operations. Most likely they will negotiate an agreement with the existing operators to provide the maintenance including for the catenary system. Note from Avi Shah (HDR) on 1/19/2026: Comment is still open - no agreements developed yet	Is there a timetable for completing the agreements? Did CHSRA had any preliminary discussions with SCRRA and OCTA for sharing the costs and the mechanism to come to an agreement?
5	N. Patel	OCTA		X		General	Plan & Profile	Since both BNSF and UP has rights to use the track for their freight services on OCTA right-of-way, written approval from both of the freight railroad will be necessary for the revised freight operations. Any modifications to existing Purchase and Sales agreements or any other agreements necessary for the project must be obtained by CHSR prior to OCTA approval of the project.		A	CHSRA is coordinating with both UP and BNSF for future plans to run in So Cal Urban Corridor with all other operators and plans modifications to the infrastructure for increased service and future HSR service. Note from Avi Shah (HDR) on 1/19/2026: Comment is still open - modified agrewements have not been shared. It seems BNSF is proceeding with projects that support CHRS such as Fullerton 3rd MT and Station Redevelopment.	Can CHSRA provide a summary of what has been discussed and what has been finalized with freight railroads? What steps has been taken to continue with the HSR services if the freight railroads are not in agreement with any of the assumptions made by CHSRA?
6	N. Patel	OCTA		X		General	Plan & Profile	As per SCRRA Grade Separation Guidelines, Section 6.0, it is necessary to preserve the utility of the operating system, and have ability for future expansion of at least one additional track. The proposed grade separation structures shall be designed to provide one additional track.		C	In order to minimize ROW takes and impacts, HSR policy is to only environmentally clearing what is necessary to provide the safe and efficient operation of HSR trains and other operators. This does not preclude future expansion. Note from Avi Shah (HDR) on 1/19/2026: Comment is still open - we need to see that SCRRA agrees to this design deviation.	The response does not make it clear if CHSRA is going to follow SCRRA criteria. The preliminary plans and environmental clearance can not be completed unless a decision is obtained in writing from OCTA and SCRRA on their willingness to agree with CHSRA decision not to follow the SCRRA requirement.

7	N. Patel	OCTA		**X**		General	Plan & Profile	A plan showing the feasibility to locate one additional track in the OCTA right-of-way will be prepared and submitted for acceptance. Any right-of-way necessary for the expansion will be obtained as a part of your project.		D	Current HSR policy is to minimize ROW impacts for a shared corridor from LA to Anaheim. If additional ROW is needed HSR will acquire any ROW required for the project.Note from Avi Shah (HDR) on 1/19/2026: Comment is still open - it does not appear the R/W acquisition accounts for any expansion.	OCTA wants to make sure that their ability to expand the services in the future will not be affected by the introduction of CHSRA services. OCTA can not be held liable for the cost for obtaining right-of-way for future expansion if the existing ROW is used up by CHSRA for their own services. OCTA wants to know at this time what are their liabilities and the plan showing the feasibility for the future expansion will help in understanding this liability.
8	N. Patel	OCTA		**X**		General	Plan & Profile	Has blended services been accepted in writing by Metrolink, BNSF, UP, Amtrak, and LA Metro? An agreement accepting this type of blended service will be provided to OCTA for review and approval.		A	CHSR has included blended service for So Cal Urban corridor since 2014. It has held coordination meetings with BNSF, UP, Metro and SCRRA. Has previously reached out to OCTA to schedule meetings. ~~CHSR would like to have coordination meetings with OCTA.~~ Agreement to be negotiated as project advances. Note from Avi Shah (HDR) on 1/19/2026: Comment is still open - agreement is needed	OCTA can not agree to any plans prepared by CHSRA that are not approved by all affected agencies. It is CHSRA responsibility to obtain approval from all affected agencies prior to making their decision on blended services. OCTA is willing to work with CHSRA if they negotiate with all affected agencies who has inherent rights to operate the rail services based on existing agreements.
9	N. Patel	OCTA		**X**		General	Plan & Profile	The Technical Working Group (TWG) established by the U.S. Department of Transportation and led by representatives from the Federal Highway (FRA), Federal Transit Administration, and National Highway Traffic Safety Administration recommend grade separations for trains exceeding 100 mph speed. What measures has been taken to meet these recommendations?		A	LA-A corridor will be design up to 110 mph where applicable. CHSR plans to run their high-speed trains at reduced speeds, in the urban corridor, at similar speeds as other passenger trains.	
10	N. Patel	OCTA		**X**		General	Plan & Profile	Fiber optic line(s) dedicated for Metrolink services for tracks, stations, signals, communications, and PTC services will be designed and constructed as a part of the CHSR project. The design will be coordinated with SCRRA and OCTA.		D	This type of coordination and design is beyond scope of 15% PEPD design and will be done in future designs after environmental clearance. Note from Avi Shah (HDR) on 1/19/2026: Comment is still open - design details are still needed	Fiber optic lines are located in OCTA right-of-way under existing agreements with BNSF and fiber optic companies. There are certain requirements that must be met to relocate or replace the fiber optic lines, including ten feet easement area. It is necessary to provide ten feet easement for these lines. The 15% PEPD must determine of there is sufficient room the fiber optic lines in the ROW. If not, provisions has to be made at this time for any other solution.
11	N. Patel	OCTA		**X**		General	Plan & Profile	The construction of all the improvements between Fullerton Station and Anaheim will adversely affect the operations of the Metrolink, BNSF, and Amtrak trains. In order to minimize the disruption to the existing train service, it may be necessary to run more trans on the Olive Subdivisions. CHSR will prepare a report on the operation of the trains during construction and any necessary modifications to the Olive Subdivision infrastructure. If it is necessary to make changes to existing rail infrastructures on the Olive Subdivision, the changes will be carried out as a part of the CHSR project.		A	Currently, CHSR doesn't intend to run trains on the Olive subdivision, but does intend to improve the infrastructure of the OC Line. Staff would like to discuss this issue with OCTA and SCRRA. Note from Avi Shah (HDR) on 1/19/2026: Comment is still open - meetings are still needed to discuss	The 15% PEPD must include the operation plans that affect the existing services. A solution that is acceptable to all affected railroads will be negotiated as a part of the 15% design. It is the CHSR responsibility to come to a solution. OCTA is willing to review and attend any coordination done by CHSR.
12	N. Patel	OCTA		**X**		GE-A0101	Location Map	What is Tongva Subdivision? Is this separate from SCRRA Subdivision names? What will be the name of the subdivision in Orange County?		D	This is old CAHSR's designation for the LA - Anaheim line segment in their operating documents which is no longer applicable. Will revise as needed. Note from Avi Shah (HDR) on 1/19/2026: Comment is still open - cover sheet still says Tongva Subdivision	
13	N. Patel	OCTA		**X**		GE-B0101	Basis of Design	As per SCRRA's DCM, Section 5.3, the maximum speed in the segment from Fullerton to Anaheim is 90 mph. SCRRA approval is necessary for 110 mph speed in this segment. An exception approved by SCRRA will be provided to OCTA.		A	Design criteria is up to 110 mph (where applicable) but HSR trains will be restricted to speeds of other passenger trains.	comment closed
14	N. Patel	OCTA		**X**		GE-B0101	Basis of Design	As per SCRRA's DCM, Section 5.4.3, the minimum distance between the main line tracks is 15 feet. The 14'-0" shown in this plan should be revised as per this criteria on OCTA Orange Subdivision.		C	This is driven by constraints and legacy track spacing on the BNSF and does not apply to the OCTA Orange Subdivision. However, we agree track center spacing could be included in future design phase. Note from Avi Shah	
15	N. Patel	OCTA		**X**		GE-B0101	Basis of Design	Remove Note No. 14 from Basis of Design Summary for OCTA property.		C	Note 14 has been approved by Metrolink and BNSF for use at three other locations where grade-separation of diamond crossings is infeasible. OWL (One way Low Speed) diamonds are also a existing condition. Note from Avi Shah (HDR) on 1/19/2026: Comment is still open	A copy of the agreement from Metrolink and BNSF will be provided to OCTA. OCTA is not in agreement with diamond crossings. All other feasible alternatives will be explored to eliminate diamond crossings.
16	N. Patel	OCTA		**X**		GE-D6101	Track Schematic	The two tracks between Lewis Street and ARTIC Station and located geographic north are not the New HSR Tracks. They are Metrolink operated tracks. The schematic color is wrong for this segment. Revise the schematic as necessary.		C	The two new tracks are HSR, to be used for over-night storage.	I am not sure if this comment is understood. The main two tracks are Metrolink tracks and it should be shown in light blue color as per legend. The main tracks are Metrolink tracks from Orangethorpe Avenue.
17	N. Patel	OCTA		**X**		TT-D3025 & ST-G0021	Cross Sections	Section in Drawing TT-D3026 indicates that the distance between the track and the electrical pole is typically 12 feet. Section in Drawing ST-G0021 indicate a distance of only 10'-8". This is confusing and misleading. 12 feet clearance should be used for all cross-sections.		C	10'-8" is required in constrained areas. 12' would incur additional ROW encroachments and HSR policy is to minimize ROW impacts. Note from Avi Shah (HDR) on 1/19/2026: Comment is still open - approval of RFSDC required	CAHSR policy is in conflict with minimum requirements. Approval is required if the policy and requirements are in conflict. Any exception to the requirements will be conveyed as a part of the design submittal.

18	N. Patel	OCTA		**X**		TT-B3001	Typical X-Section	The overhead wire clearance is 25.5 feet. The existing vertical clearances for many of the bridges in the Orange Subdivision are less than this. For example, the vertical clearance for CA-91 bridge 22.45 feet. How do you plan to meet your, CPUC, and SCRRA requirement?		C	As note #4 indicates on sheet TT-B3001, wire height to clear double stack (plate H) clearances on the BNSF is 23'-6", all other areas (which includes the OCTA section) the wire height will be set at HSR standard of 18'-9". Use of a Rigid overhead contact system (ROCS) is also proposed where physical constraints deem it necessary. Note from Avi Shah (HDR) on 1/19/2026: Comment is still open	Orange Subdivision is also used by BNSF. If exception is granted by BNSF in this area, OCTA will be provided with proof of approval from BNSF. Also if an approval from Metrolink to use 18'-9" is obtained, a copy will be provided to OCTA.
19	N. Patel	OCTA		**X**		TT-D1581 & AR-B0601	Plan & Profile	Only 313 parking spaces are provided at Buena Park Station. Minimum number of 500 parking spaces as required by SCRRA's Design Criteria Manual (DCM) - Section 7.5 (Page 31), will be provided.		D	HSR is only environmental clearing a station design that matches the existing Buena Park station but there sufficient space for more parking which can be coordinated in future design phase. Note from Avi Shah (HDR) on 1/19/2026: Comment is still open	Any exception to Metrolink criteria will be cleared from Metrolink and the approval of exception will be provided to OCTA. The 15% design can not be considered complete if there is not agreement on the design criteria exception.
20	N. Patel	OCTA		**X**		TT-D1581 & AR-B0601	Plan & Profile	Any required property for the access Road and the parking spaces will be obtained as a part of the California High Speed Train Project. Any and all property agreements necessary for the proposed station facilities will be prepared by CHSR to the satisfaction of the affected cities and OCTA.		A	Property acquisitions needed due to the HSR project will be obtained by HSR. In future phases HSR will draft and negotiate agreements necessary for station facilities. Note from Avi Shah (HDR) on 1/19/2026: Comment is still open	
21	N. Patel	OCTA		**X**		TT-D1581 & AR-B0601	Plan & Profile	There is a drainage channel on north side of the proposed Buena Park Station. How deep will be the passenger tunnel to avoid the channel? The passenger tunnel will be designed to provide clear view from the existing ground surface.		D	The drainage channel begins west of the pedestrian underpass and therefore at a 15% design level doesn't appear to conflict with the proposed pedestrian tunnel. Future final design will be coordinated with stakeholders.	
22	N. Patel	OCTA		**X**		TT-D1584	Plan & Profile	All costs related to removal of existing Buena Park Station facilities will be included as a part of the CHSR project.		A	Agree that costs related to removal of existing Buena Park Station facilities will be part of the CHSR project. Agreement to be negotiated as project advances. Note from Avi Shah (HDR) on 1/19/2026: Comment partially addressed - need to see agreement.	
23	N. Patel	OCTA		**X**		TT-D1584	Plan & Profile	The disposition of the existing parking lot and its future use will be discussed, finalized, and approved by the City of Buena Park and OCTA.	A	D	The PEPD plans include station areas for platforms and parking. Design will be done in future phases in coordination with Buena Park and OCTA. Note from Avi Shah (HDR) on 1/19/2026: Comment open until	
24	N. Patel	OCTA		**X**		TT-D1587	Plan & Profile	There are series of double slip turnouts around Station SNB 1141+79 and SBN 1142.89. SCRRA does not allow these types of turnouts. Does BNSF accepted these types of turnouts? Please elaborate.		C	This is a grade separation, not a double-slip switch. Please refer to profile, the two passenger tracks will go under the BNSF mainline tracks.	comment closed
25	N. Patel	OCTA		**X**		TT-D1599	Plan & Profile	Any modifications and constructions to the existing Fullerton Station platform, pedestrian bridge, Harbor Blvd. bridge, and other facilities will be a part of the CHSR project.		A	Agree modifications are part of CHSR Project as shown in the PEPD plans. Note from Avi Shah (HDR) on 1/19/2026: Comment open until coordination is completed.	
26	N. Patel	OCTA		**X**		TT-D1599	Plan & Profile	An inter-track fences between the Metrolink platforms shall be provided to prevent trespassing.		A	Space has been provided to allow for inter-track fences which will be shown in future design phase. Note from Avi Shah (HDR) on 1/19/2026: Comment open - inter-track fence not shown on track plans	
27	N. Patel	OCTA		**X**		TT-D1599	Plan & Profile	OCTA spent about 90 million on construction of stations, main line tracks, sidings, signals, communication, and bridges in 1990 to have 30-minute service between Fullerton Station and Irvine Station. OCTA and SCRRA also have a new project to expand Irvine Station for this additional service. There is an existing platform at Fullerton Station dedicated to 30-minute OCTA train service. No provisions has been made to replace this platform and tracks. This will severely affect the future plans of OCTA. A report will be prepared to study the effect of CHSR project on the existing and future services of Metrolink, Amtrak and OCTA's 30-minute train service. Any improvements studied as a part of the study and necessary to meet this requirement will be a included in the CHSR project. OCTA can not approve the proposed design at the Fullerton Station until a very comprehensive report is prepared by CHSR.		A	During development of PEPD record set, HSR operations indicated that all OC intercounty trains will be interlining with CAHSR to Los Angeles. In future phases an operational report will be prepared, shared and coordinated with OCTA and Metrolink and other operators. Note from Avi Shah (HDR) on 1/19/2026: Comment still open	Do not agree with the response. All the modifications necessary at the Fullerton Station to accommodate HSR will severely affect OCTA services. No attempt has been made to address OCTA existing and future services at Fullerton Station. The 15% report must address any and all existing OCTA facilities and any mitigation necessary to continue the services that will be affected by HSR.
28	N. Patel	OCTA		**X**		TT-D1599 thro TT-1602	Plan & Profile	It appears from the track alignments in these drawings that the Orange County trains will not be able to use the northern most platform at Fullerton Station. Also the 91 line trains may not be able to use the southern platform. Is this the case? Do you have a plan of how to use the platforms at Fullerton Station for Orange County Trains and 91 Trains? What can be used in emergency?		C	At the time of the development of the PEPD, the operational intent of the HSR design between LA-A is to eliminate all existing cross-plant passenger movements that currently cause considerable delays today and in future (The N/B OC cross plant movement at Fullerton being a prime example of this). The PEPD design proposes that OC N/B trains will use the new center platform on the LA-A NB track (or can use the LA-A SB track and southerly platform in case of emergency). 91 trains will have three options to use existing platform on north side as well as both platform faces on new center platform. Due to physical constraints, there is no viable way to provide all the movements described in comment with turnouts that meet track speeds required at this location; however, the proposed layout meets the stated HSR operational intent and provides far greater operational flexibility than exists today. Note from Avi Shah (HDR) on 1/19/2026: Comment still open	Has this plan approved by Metrolink, BNSF, and Amtrak? Provide copy of written approval of this plan from these three agencies to OCTA.

29	N. Patel	OCTA		**X**		TT-D1600	Plan & Profile	The drawings do not show the locations of railroad wayside signal locations. It appears that there may not be sufficient right-of-way to locate the foundations for the railroad signals. It is suggested that the railroad signal locations be shown in this and other drawings.		D	This type of coordination and design is beyond scope of 15% PEPD design and will be done in future designs after environmental clearance Note from Avi Shah (HDR) on 1/19/2026: Comment still open - not addressed	If there is a need for additional ROW to locate the railroad signals, to meet existing railroad criteria, it should be indicated. How is it possible to obtain environmental clearance when the design could be affected to meet design criteria? Once the environmental clearance is obtained for a project, the design is set. If additional Right-of-ways are required for the project, it may not possible to modify the environmental report. CHSRA will argue, during the design and construction, that the additional ROW is not a part of the past environmental clearance so it is not possible to acquire additional right-of-ways. This will result in inadequate project which will not meet railroad agency design and operation requirements. All such issues shall be resolved at this stage to avoid future problems and prior to this environmental clearance phase and this 15% design.
30	N. Patel	OCTA		**X**		TT-D1600	Plan & Profile	Where do you plan to locate the railroad signal for the No. 20 turnout located at Station 1308+94.45?		D	This type of coordination and design is beyond scope of 15% PEPD design and will be done in future designs after environmental clearance Note from Avi Shah (HDR) on 1/19/2026: Comment still open - not addressed	If there is a need for additional ROW to locate the railroad signals, to meet existing railroad criteria, it should be indicated. How is it possible to obtain environmental clearance when the design could be affected to meet design criteria? If additional Right-of-ways are required for the project, it may not possible to modify the environmental report. CHSRA will argue, during the design and construction, that the additional ROW is not a part of the past environmental clearance so it is not possible to acquire additional right-of-ways.
31	N. Patel	OCTA		**X**		TT-D1601	Plan & Profile	The LA-A SB track location appears to be too close to the property line near Station 1325+00. There is not sufficient room for the CPUC clearance requirements from the property line. How will you resolve this condition?		A	ROW acquisitions will be a part of the DRAFT Environmental document submittal Note from Avi Shah (HDR) on 1/19/2026: Comment still open - not addressed	Understood, however, the plans must show the boundaries of the proposed right-of-way. Revise the plans to show the additional ROW.
32	N. Patel	OCTA		**X**		TT-D1603	Plan & Profile	The label indicating Ex BNSF Industry Spur tracks appears to be in error. These two are Metrolink tracks at this time.		C	The existing tracks will become the BNSF industrial tracks. Metrolink and HSR will share new tracks as shown on plan.	If this is the case, why these tracks are labeled as existing BNSF tracks? Comment closed
33	N. Patel	OCTA		**X**		TT-D1603	Plan & Profile	SCRRA does not allow #9 turnouts on the system. The smallest turnout on Metrolink for spur track is #10.		A	Noted. CAHSR is clearing a #9; however, this can be modified in the final the next set of PEPD plans to a #10, but note this is on a spur track.	Comment closed
34	N. Patel	OCTA		**X**		TT-D1604	Plan & Profile	#11 turnout are not allowed on Metrolink territory. They should be #14 turnouts.		A	Will be changed to #14, but note that this is on a spur track.	Comment closed
35	N. Patel	OCTA		**X**		TT-D1604 & TT-1605	Plan & Profile	The area on the west side of the tracks between Orangethorpe Avenue and CA-91 was reserved for Anaheim Layover Facility as per Metrolink Service Expansion project. Refer to this project plan and revise these drawings to include the layover facility as designed previously.		D	All OC intercounty trains will be interlining with CAHSR to Los Angeles. HSR does replace the existing storage siding south of the existing location.	Comment closed
36	N. Patel	OCTA		**X**		TT-D1606 & TT-D1608 & ST-K1421	Plan & Profile	As per SCRRA PTC requirements, a power derail is necessary to connect industry/freight track to the main line track. The connection of the BNSF track at Station 1384+50 and 1413+43.09 shall be revised as per this requirement.		D	This type of coordination and design is beyond scope of 15% PEPD design and will be done in future designs after environmental clearance Note from Avi Shah (HDR) on 1/19/2026: Comment still open - not addressed	
37	N. Patel	OCTA		**X**		TT-D1619 & GE-B0101	Plan & Profile	No diamonds will be allowed for the UP Tustin Branch. The UP Track should be grade separated or other arrangement will be made that makes it possible to remove the diamonds.		C	Noted - HSR is using the existing OWLS diamond crossing and adding a new track to the west. The OWLS diamonds are in existence today. A grade separation is not viable here. This was presented to UP and HSR also provided copy of the PEPD plans for review. Note from Avi Shah (HDR) on 1/19/2026: Comment still open	A copy of the agreement from Metrolink and BNSF will be provided to OCTA. OCTA is not in agreement with diamond crossings. All other feasible alternatives will be explored to eliminate diamond crossings.
38	N. Patel	OCTA		**X**		TT-D1621 & TT-D1622	Plan & Profile	The drawings do not show the locations of railroad wayside signal locations. It appears that there may not be sufficient right-of-way to locate the foundations for the railroad signals. It is suggested that the railroad signal locations be shown in this and other drawings.		C	This type of coordination and design is beyond scope of 15% PEPD design and will be done in future designs after environmental clearance Note from Avi Shah (HDR) on 1/19/2026: Comment still open	If there is a need for additional ROW to locate the railroad signals, to meet existing railroad criteria, it should be indicated. How is it possible to obtain environmental clearance when the design could be affected to meet design criteria? If additional Right-of-ways are required for the project, it may not possible to modify the environmental report. CHSRA will argue, during the design and construction, that the additional ROW is not a part of the past environmental clearance so it is not possible to acquire additional right-of-ways.
39	N. Patel	OCTA		**X**		TT-D1621 & TT-D1622	Plan & Profile	#11 turnout are not allowed on Metrolink territory. They should be #14 turnouts.		D	Will be changed to #14, but note that this is on a spur track. Note from Avi Shah (HDR) on 1/19/2026: Comment still open - plans still show #11 turnouts	
40	N. Patel	OCTA		**X**		TT-D1623 & TT-D1624	Plan & Profile	An inter-track fence shall be provided between the Metrolink platform and the CHSR track to prevent trespassing.		D	Fence will be provided at back of platform, but is not shown at this level of design. Note from Avi Shah (HDR) on 1/19/2026: Comment still open	
41	N. Patel	OCTA		**X**		TT-D1623 & AR-B0901	Plan & Profile	Existing Anaheim Station Platform not used by Metrolink and Amtrak will be removed as part of the CHSR project.		D	Agree. This type of coordination and design is beyond scope of 15% PEPD design and will be done in future designs after environmental clearance	

42	N. Patel	OCTA		X		AR-B0601	Plan & Profile	A switchback ramps used for Buena Park Station center platform shall be avoided to provide more space for platform circulation.		D	This type of coordination and design is beyond scope of 15% PEPD design and will be done in future designs after environmental clearance	
43	N. Patel	OCTA		X		TT-D1581 & AR-B0601	Plan & Profile	Have you prepared, submitted, and obtained approval of a level-entry boarding report for FTA and FRA for the new Buena Park Station? The draft report shall be approved by SCRRA and OCTA prior to submittal to FTA and FRA.		D	Metrolink stations that will be relocated by HSR will be designed further in future design phases when level boarding requirements will be followed.	
44	N. Patel	OCTA		X		TT-D1599 & AR-B0701	Plan & Profile	Have you prepared, submitted, and obtained approval of a level-entry boarding report for FTA and FRA for the Fullerton Station? The draft report shall be approved by SCRRA and OCTA prior to submittal to FTA and FRA.		A	HSR Trains will be level boarding not requiring a report at this time. Metrolink stations that will be relocated by HSR will be designed further in future design phases when level boarding requirements will be followed.	
45	N. Patel	OCTA		X		ST-K1411	Plan & Profile	The bridges span for Orangethorpe Avenue are 56' and 63'. The section on this drawings indicates PC/PS box girders for superstructures. As per SCRRA Grade Separation Guidelines, Table 8.1, steel beam superstructure is necessary. The bridge design will be changed to use steel beams.		D	This type of coordination and design is beyond scope of 15% PEPD design and will be done in future designs after environmental clearance.	The drawings will be revised to show steel girders, not concrete girders.
46	N. Patel	OCTA		X		ST-K1411	Plan & Profile	Refer to PSR prepared by OCTA for this street grade separation and revise this concept plan unless this concept is better.		D	At such time that HSR is working on a supplemental EIR/EIS for LA-A, if the grade separation has been CEQA cleared in time to be incorporated, then HSR will NEPA clear it in the supplemental EIR/EIS.	
47	N. Patel	OCTA		X		Grade Separation General Plans	Plan & Profile	Traffic forecast for train volume on this drawing does not account for 30-minutes train service between Fullerton and Irvine. The forecast will be changed. All tracks, stations, and other facilities design will be revised if they are based on the criteria shown here which needs revisions.		D	During development of design, HSR operations indicated that all OC intercounty trains will be interlining with CAHSR to Los Angeles.	Provide modeling information to show if this will work.
48	N. Patel	OCTA		X		Grade Separation General Plans	Plan & Profile	What is the basis for 118 future freight trains forecast?		D	At time of design, this was just used as a general forecast to provide basis of structural design. Will update data obtained from operators and as shown in the environmental documents.	
49	N. Patel	OCTA		X		ST-K1451	Plan & Profile	The bridges span for La Palma Avenue are 56'-8" and 70'. The section on this drawings indicates PC/PS box girders for superstructures. As per SCRRA Grade Separation Guidelines, Table 8.1, steel beam superstructure is necessary. The bridge design will be changed to use steel beams.		D	This type of coordination and design is beyond scope of 15% PEPD design and will be done in future designs with coordination with key stakeholders after environmental clearance	The drawings will be revised to show steel girders, not concrete girders.
50	N. Patel	OCTA		X		CV-T1521	Plan & Profile	Refer to PSR prepared by OCTA for this street grade separation and revise this concept plan unless this concept is better.		D	At such time that HSR is working on a supplemental EIR/EIS for LA-A, if the grade separation has been CEQA cleared in time to be incorporated, then HSR will NEPA clear it in the supplemental EIR/EIS.	
51	N. Patel	OCTA		X		CV-T1581	Plan & Profile	The Douglas Road underpass will be lowered by about 9 feet under the existing bridge foundation. The structural capability of the existing bridge foundation to withstand the proposed depth will be analyzed and any necessary modifications necessary will be included as a part of the CHSR project.		D	Agree. This type of coordination and design is beyond scope of 15% PEPD design and will be done in future designs after environmental clearance	Once the environmental clearance is obtained for a project, the design is set. If additional Right-of-ways are required for the project, it may not possible to modify the environmental report. CHSRA will argue, during the design and construction, that the additional ROW is not a part of the past environmental clearance so it is not possible to acquire additional right-of-ways. This will result in inadequate project which will not meet railroad agency design and operation requirements. All such issues shall be resolved at this stage to avoid future problems and prior to this environmental clearance phase and this 15% design.
52	N. Patel	OCTA		X		UT-D1609	Plan & Profile	Is there any study done as a part of this project that justify the decision to keep at-grade crossings or provide a pedestrian overhead?		D	A letter was received from the City of Anaheim to the HSR Authority, dated Nov. 3, 2014, defined what action to be taken at each road/rail crossing	Please provide a copy of the letter to OCTA.
53	N. Patel	OCTA		X		TN-C3587	Section	Is railing or fencing necessary at the top of the trench structure walls?		D	Railing and fencing can be accommodated in future designs	
54	M.Shaver	OCTA		X		RW-M1581 & RW-M1582	R/W Impacts	3ft acquisition shown on Section DD-DD (LT side) on TT-D3021 may not be adequate for footing dimensions of Type 1 wall for station range shown in Section DD-DD. See Ret Wall plans ST-G1089 & ST-G1090. Avoid existing parking spaces. Consider Type 3 wall.		D	This type of coordination and design is beyond scope of 15% PEPD design and will be done in future designs after environmental clearance	
55	M.Shaver	OCTA		X		General	R/W Impacts	Not all TCE's are shown. Recommend revisit R/W Requirements at PE (30%) and later at 60% to define TCE's. Also Contractor access, material delivery access, staging/laydown and vehicle maint areas to be shown in later milestones.		D	Agree. This will be done in a future design phase.	
56	M.Shaver	OCTA		X		General	Utilities	Significant lead times required for planning, coordination, negotiation, and design of relocation plans for stakeholder utilities. Include impacts in project schedule		D	This will be handled in future project phase.	
57	M.Shaver	OCTA		X		RW-M1592	R/W Impacts	R/W impact due to prop ret wall SBN 1201+50 RT. Not shown		D	Based on a 15% design level, the prop ret wall falls within BNSF and public ROW. Future project phases will finalize design and ultimate ROW requirements.	
58	M.Shaver	OCTA		X		RW-M1598	R/W Impacts	R/W Requirements for prop 10" sewer + MH at 1287+00 RT. APN 032-251-42 (ignore if Public R/W)		D	Based on a 15% assumption design level, the proposed ROW requirements are sufficient. Future project phases will be coordinated with stakeholders to finalize design and ultimate ROW requirements.	

59	M.Shaver	OCTA		**X**		RW-M1604	R/W Impacts	Insufficient R/W Requirements for prop 12" sewer SBN 1361+70 RT. APN 073-100-39 (Mas' Chinese Islamic Restaurant)		D	Based on a 15% assumption design level, the proposed ROW requirements are sufficient. Future project phases will be coordinated with stakeholders to finalize design and ultimate ROW requirements.	
60	M.Shaver	OCTA		**X**		RW-M1616	R/W Impacts	Wall shown on either side of Ball Rd (UT-D1616), R/W Requirements here?		D	Based on a 15% assumption design level, the proposed ROW requirements are sufficient. Future project phases will be coordinated with stakeholders to finalize design and ultimate ROW requirements.	
61	M.Shaver	OCTA		**X**		RW-M1616	R/W Impacts	SD from catch basin in parking lot on Ball Rd - SOC 1517+25, 110ft LT. See UT-D1616; R/W Requirements here? This is temp environmental impact.		D	Based on a 15% assumption design level, the proposed ROW requirements are sufficient. Future project phases will be coordinated with stakeholders to finalize design and ultimate ROW requirements.	
62	M.Shaver	OCTA		**X**		CV-T1276	Grade Sep	Potential impact to existing pump station from prop Ret Wall at back of sidewalk at 39+00 RT Dale St. See also Section D CV-T3271.		D	Based on a 15% assumption design level, the proposed ROW requirements are sufficient. Future project phases will be coordinated with stakeholders to finalize design and ultimate ROW requirements.	
63	M.Shaver	OCTA		**X**		CV-T1282	Grade Sep	Potential impact to existing building from prop Ret Wall at 73+25 RT Artesia St. (SBN 1161+75 RT). Eliminates ground floor access to existing industrial building from Artesia side of building. Will City Planning Dept. allow face of building 2 ft off City R/W? See also Section D CV-T3281. Check wall proximity to building footing to confirm there is enough room to locate wall so close to existing building.		D	Based on a 15% assumption design level, the proposed ROW requirements are sufficient. Future project phases will be coordinated with stakeholders to finalize design and ultimate ROW requirements.	
64	M.Shaver	OCTA		**X**		CV-T1282	Grade Sep	Potential impact to existing building from prop Ret Wall at 74+50 RT Artesia St. (SBN 1163+00 RT). Impacts Arteisa side of existing industrial building. See comment No 21 above. See also Section D CV-T3281.		D	Based on a 15% assumption design level, the proposed ROW requirements are sufficient. Future project phases will be coordinated with stakeholders to finalize design and ultimate ROW requirements.	
65	M.Shaver	OCTA		**X**		CV-T3411	Grade Sep - Cross Sections	Prop ret walls are shown abutting exist/prop City R/W. Consider dimensions of wall footings when acquiring R/W. Typical all locations where walls are planned to be located close to R/W.		D	Based on a 15% assumption design level, the proposed ROW requirements are sufficient. Future project phases will be coordinated with stakeholders to finalize design and ultimate ROW requirements.	
66	M.Shaver	OCTA		**X**		UT-Y1416	Grade Sep - Utilities	R/W requirements (util easement or other) needed for prop realignment of 12 in sewer through restaurant property (and other properties?) at NW quadrant Orangethorpe and RR R/W? SOC 1360+50 RT.		D	Based on a 15% assumption design level, the proposed ROW requirements are sufficient. Future project phases will be coordinated with stakeholders to finalize design and ultimate ROW requirements.	
67	M.Shaver	OCTA		**X**		UT-Y1456	Grade Sep - Utilities	R/W requirements (util easement or other) needed for prop realignment of 10 in sewer through private property NW quadrant La Palma St and RR R/W? SOC 1406+00 RT. Missing RW Impact sheet covering properties along La Palma St; e.g. between Pauline St and N. Sabina St.		D	Based on a 15% assumption design level, the proposed ROW requirements are sufficient. Future project phases will be coordinated with stakeholders to finalize design and ultimate ROW requirements.	
68	M.Shaver	OCTA		**X**		CV-T1511 & RW-M1762	R/W Impacts	R/W requirements shown on RW-M1762 don't match the property take areas shown on CV-T1511. NW quadrant Vermont Ave and S. Dakota St. See also CV-T1513 along S Dakota St		D	Based on a 15% assumption design level, the proposed ROW requirements are sufficient. Future project phases will be coordinated with stakeholders to finalize design and ultimate ROW requirements.	
69	M.Shaver	OCTA		**X**		RW-M1762 & UT-Y1516	R/W Impacts	R/W requirements shown on RW-M1762 don't match the sewer alignment on UT-Y1516. At cul-de-asac north of Olive Elementary School.		D	Based on a 15% assumption design level, the proposed ROW requirements are sufficient. Future project phases will be coordinated with stakeholders to finalize design and ultimate ROW requirements.	
70	M.Shaver	OCTA		**X**		RW-M1761 & CV-T1517	R/W Impacts	R/W requirements shown on RW-M1761 don't seem to cover the ret wall at 21+00 RT Vermont Ave. See CV-T1517.		D	Based on a 15% assumption design level, the proposed ROW requirements are sufficient. Future project phases will be coordinated with stakeholders to finalize design and ultimate ROW requirements.	
71	J. Lee	OCTA		**X**		General		Upon entry into Orange Sub where tracks are shared between various services, how will PTC and other safety considerations be addressed?		A	The current hand-off of dispatching will continue but with modernized system to handle new train volumes.	
72	J. Lee	OCTA		**X**		General		Has HSR studied risks associated with high speed derailments in the shared corridor with adjacent rail operations and shared tracks?		A	CHSR trains will be traveling at the similar speed as other operators and will not be traveling at high speeds in this corridor.	
73	J. Lee	OCTA		**X**		TT-D1599	Plan & Profile	How will the ped bridge across Harbor be modified to accommodate both passenger boarding/alighting and serves as ped bridge to connect to parking structure		D	This will be determined in future design phases; however, the 15% PEPD is proposing that the existing ped bridge be reconstructed such that the new platform also serves as ped bridge to the parking structure.	
74	J. Lee	OCTA		**X**		TT-D1599	Plan & Profile	The pick up / drop off area along Walnut Ave will be removed, and it appears there will be new retaining walls along Walnut, this will impact passenger access from Walnut Street.		C	A new pedestrian underpass is proposed that will provide access from Walnut	
75	J. Lee	OCTA		**X**		TT-D1600	Plan & Profile	The existing turnback track is on OCTA ROW is being displaced by new HSR tracks in it's place, where will the turnback track be relocated to serve Orange County Line?		D	During development of design, HSR operations indicated that all OC intercounty trains will be interlining with CAHSR to Los Angeles. Will coordinate as project advances.	
76	J. Lee	OCTA		**X**		TT-D1604	Plan & Profile	The identified Ex BNSF Industry Tracks are actually SCRRA ML #1 and #2		D	Correct, SCRRA will operate shared with HSR on the new tracks adjacent to the existing.	
77	J. Lee	OCTA		**X**		TT-D1605	Plan & Profile	Please note the proposed BNSF Industry Track extension are in both OCTA and private ROW		D	Noted	

78	J. Lee	OCTA		**X**		TT-D1608	Plan & Profile	Why is BNSF Industry Track extended within OCTA ROW?		D	At time of PEPD preparation, this to provide additional storage capacity for industry and to allow ability of BNSF to switch industry off of mainline tracks thus eliminating existing operational conflicts. Necessity of this arrangement will be further evaluated in future design phases.	
79	J. Lee	OCTA		**X**		TT-D1609	Plan & Profile	The proposed HSR track configuration limits OCTA/SCRRA future growth and expansion		D	The HSR plan to share the tracks in the corridor minimizes impacts to the community in an already constrained corridor where potential for growth is limited. However, modernization of the signal system will provide shorter headways for all service providers. Will coordinate as project advances.	
80	J. Lee	OCTA		**X**		TT-D1613	Plan & Profile	Is the City of Anaheim agreeable to the closure of South Street at-grade crossing?			A letter from City of Anaheim, dated Nov. 3, 2014 requested closure of South St. and Sycamore. Need for Ped. grade separation only.	
81	J. Lee	OCTA		**X**		TT-D1617	Plan & Profile	Will SCRRA be allowed to utilize the HST storage yard in OCTA ROW? If exclusive to HSR use, this proposed track configuration does not allow for any OCTA/SCRRA future growth and expansion		D	A configuration can be considered in future design phase that improves sharing facilities. Will coordinate as project advances.	
82	J. Lee	OCTA		**X**		TT-D1621	Plan & Profile	The proposed HSR track configuration is different from the 30% grade separation design approved by the City, OCTA/SCRRA, and HSR where two tracks are for SCRRA services with space for a third track and one for HSR.		D	HSR plans to share tracks in the corridor. A configuration can be considered in future design phase that improves sharing the facilities. Will coordinate as project advances.	
83	J. Lee	OCTA		**X**		AR-C1701	Plan & Profile	How will the fare gates function with passengers coming in from Harbor Blvd stairs as both Amtrak and Metrolink service not verifying fares until after boarding?		D	Station design details will be developed in future design phase.	
84	J. Lee	OCTA		**X**		AR-B0601	Plan & Profile	The parking demand projection is 1,000 spaces by 2030, the proposed 313 stalls is not sufficient for the future service		D	As indicated on sheet, HSR is only clearing a design that matches existing current station. But the amount of space that is being cleared allows for additional expansion. Coordination of future number of parking spaces will be done in a future design phase.	
85	J. Lee	OCTA		**X**		AR-B0701	Plan & Profile	Reminder to transition platform height from HSR to Metrolink/Amtrak (15" ATR) if different for level boarding.		D	Transitions between platform height will be developed in future designs. HSR platform is 51" high	
86	J. Lee	OCTA		**X**		AR-J1901	Plan & Profile	Will HSR allow the service road to be used as a kiss and ride area for all passengers?		D	This will be coordinated and handled in future project phase.	
87	J. Lee	OCTA		**X**		RW-M1599 to RW-M1624	R/W Impacts	Please verify ROW information presented from Fullerton Station to Anaheim Station. Most of the ROW information within the Orange Sub is not accurately shown.		D	Based on a 15% design level, the proposed ROW requirements are sufficient. Future project design phases will finalize the ultimate ROW requirements.	
88	J. Lee	OCTA		**X**		CV-T1527	Plan & Profile	Previous grade separation study prepared for Ball Rd shows two track alignment to the west of OCTA ROW to accommodate a future bridge and track with expansion of service. The proposed track and bridge alignment limits OCTA's future service expansion		D	In order to minimize ROW takes and impacts, HSR policy is to environmentally clear what is necessary to provide the safe and efficient operation of HSR trains and other operators with minimal impacts to communities. This does not preclude future expansion or revised designs that will be coordinated in future design phase.	
89	J. Lee	OCTA		**X**		CV-T1416	Grade Sep	Previous grade separation study prepared for Orangethorpe Ave shows two mainline tracks being realigned to the east edge of OCTA ROW and other modifications including the Kimberly-Clark lead, Anaheim layover track, and freight siding track.		D	In order to minimize ROW takes and impacts, HSR policy is to environmentally clear what is necessary to provide the safe and efficient operation of HSR trains and other operators with minimal impacts to communities. This does not preclude future expansion or revised designs that will be coordinated in future design phase.	
90	J. Lee	OCTA		**X**		General		For all grade separations, please show the proposed shoofly tracks and associated property impacts. Please also identify how these grade separations will be constructed and how it will be phased. Will each crossing be closed during construction with detours or a bypass road be constructed?		D	Shoofly designs are not part of HSR PEPD 15% design scope; however, ROW takes shown allots space for them. It is proposed that each crossing will be closed on the roadway side, but phased such that adjacent grade separations are not closed at the same time.	
91	J. Lee	OCTA		**X**		General		Please provide HSR vehicle dynamic envelope for SCRRA review to ensure compatibility with existing operating conditions		D	HSR will operate within the current railroad operating conditions at speeds restricted to other passenger services and not at high speeds.	
92	J. Lee	OCTA		**X**		General		Please coordinate with OCTA/SCRRA on the proposed commuter track alignment in Orange County, specifically how existing and future improvements will be accommodated		A	Coordination is occurring and will continue until HSR operates in the corridor.	
93	J. Lee	OCTA		**X**		General		Can HSR share the rail modeling performed with OCTA/SCRRA to understand how the proposed improvements and any future improvements could be accommodated within the Orange Subdivision		A	Yes, HSR will meet with OCTA and share the modeling when available.	
94	J. Lee	OCTA		**X**		General		State College Grade Separation is not shown in PEPD Vol 3. Is HSR assuming the project will be completed by the others before the LA to Anaheim segment begins construction?		D	Stage College based on the existing 35% PSE will now be included in the final HSR PEPD plans. HSR initially assumed that it will be completed by others but after further discussion with the City, HSR will now include it in the final PEPD Submittal.	