



Redlands Passenger Rail Project
Response to
Comments on the
Draft EIS/EIR

SCH No. 20120410102

San Bernardino County, California

February 2015





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1.0 INTRODUCTION

The Federal Transit Administration (FTA) and San Bernardino Associated Governments (SANBAG) has prepared a Draft Environmental Impact Statement/Environmental Impact Report (EIS/EIR) to address the environmental effects of the proposed Redlands Passenger Rail Project (or Project). These agencies prepared the Draft EIS/EIR in accordance with the National Environmental Policy Act (NEPA) of 1969 and the California Environmental Quality Act (CEQA) of 1970, as well as implementing regulations and agency guidelines. The FTA is the NEPA lead agency, and SANBAG is the CEQA lead agency.

The Draft EIS/EIR evaluated three alternatives at an equal level of detail: 1) the No Build Alternative; 2) the Preferred Project Alternative; and 3) a Reduced Project Footprint Alternative. Additionally, three separate design options including the Waterman Layover Facility (Design Option 1), Use of Existing Layover Facilities (Design Option 2), and the Waterman Avenue Station Platform (Design Option 3) were evaluated. Vehicle options considered in the Draft EIS/EIR included diesel locomotives (e.g., F-59 and MP-38) and the diesel multiple unit (DMU).

The Draft EIS/EIR evaluated the potential impacts of implementing the alternatives and design options described above on transportation and circulation; land use and land use planning; parklands and recreation; Section 4(f) resources; air quality and global climate change; noise and vibration; cultural and paleontological resources; biological resources; aesthetics and visual resources; hydrology and water quality, hazards and hazardous materials; geology, soils, and seismicity; energy consumption; utilities and public services; socioeconomics; environmental justice; and regional growth. The only adverse, significant, and unmitigable impacts that would result from implementation of the Preferred Project Alternative, in the short or long term, would be operational noise effects and hazards associated with flooding. If sound barriers are constructed, additional significant and unmitigable impacts would result from the division of established communities and deterioration of the visual character along the rail corridor. These significant impacts will require that SANBAG adopt a statement of overriding considerations in conjunction with its approval of the Project. All other impacts identified for the Preferred Project Alternative would not result in significant impacts or would be less than significant, not adverse, or less than significant and not adverse with the implementation of mitigation measures.

The Draft EIS/EIR was made available to the public on August 6, 2014, with the comment period closing on September 29, 2014. During the public comment period, two public meetings were held on September 4 and 9, 2014, to receive comments on the Draft EIS/EIR. Refer to Section 6.6.5 of the Final EIS/EIR for additional details on the Draft EIS/EIR distribution and noticing.

This Response to Comments Appendix to the EIS/EIR responds to the agency and public comments received on the Draft EIS/EIR. It also describes changes made to the Draft EIS/EIR, either in response to comments received (Chapter 3.0) or as a result of consultation with agencies with jurisdiction over the project (Section 1.2). These modifications do not change the conclusions of the analysis presented in the Draft EIS/EIR, and do not introduce significant new information on the Project, Project impacts, or mitigation that is substantially different from the analysis presented and analyzed in the Draft EIS/EIR.

1.1 LOCALLY PREFERRED ALTERNATIVE

The comments received on the Draft EIS/EIR have been considered, and where appropriate, updates and clarifications have been made to the description of the Preferred Project Alternative and its anticipated impacts, as described in detail in this appendix. The Preferred Project Alternative, as described in the Final EIS/EIR with the integration of Design Options 2 (Use of Existing Layover Facilities) and 3 (Waterman Avenue Station), is SANBAG's Locally Preferred Alternative (LPA) as approved by SANBAG's Board of Directors on February 4, 2015. Based on a combination of public comment and SANBAG's consideration of environmental effects as provided in the Final EIS/EIR, SANBAG has selected the Diesel Multiple Unit (DMU) as the locally preferred vehicle option for the LPA.

1.2 PROJECT UPDATES AND MODIFICATIONS

Based on the comments received on the Draft EIS/EIR, only minor refinements and edits to the descriptions of the Build Alternatives and Design Options are proposed in the Final EIS/EIR. In limited instances, SANBAG has also made minor changes to the mitigation measures proposed in response to comments received on the Draft EIS/EIR. The minor refinements are the result of the execution of a Memorandum of Understanding (MOU) dated February 4, 2015 between SANBAG and the Cities of San Bernardino and Redlands for the implementation of quiet zones and a reduction in the Project's physical footprint just east of the Santa Ana River. These minor refinements and edits are described in more detail below. Revisions to mitigation measures proposed in the Draft EIS/EIR are reflected in Section 3 of this appendix and the Project's mitigation monitoring and reporting program (MMRP).

Since the release of the Draft EIS/EIR, SANBAG in coordination with the Cities of San Bernardino and Redlands has prepared a MOU for the Project. The MOU outlines the roles and responsibilities for each entity during the Project's final design and construction process and memorializes the commitment to the implementation of corridor-wide quiet zones within each city. Under the MOU, each of the cities is responsible for applying for quiet zones per Federal Railroad Administration (FRA) regulations. The MOU was executed by SANBAG's Board of Directors on February 4, 2015.

Based on SANBAG and FTA's ongoing consultation with the U. S. Fish Wildlife Service (USFWS) and the California Department of Fish and Wildlife (CDFW), SANBAG has modified the footprint for both the Preferred Project and Reduced Footprint Alternatives to avoid sensitive habitats that occur immediately east of the Santa Ana River and in between SANBAG's ROW and the Mission Zanja Flood Control Channel. The reduced footprint area is illustrated in Figure 2-1D (Revised) and 3.7-1 (Revised) of the Final EIS/EIR. The total acreage reduction would consist of 2.41 acres with 2.01 acres comprising habitat mapped as southern cottonwood willow riparian forest (SCWRF).

2.0 COMMENTS AND RESPONSES

This chapter includes all of the comments received on the Draft EIS/EIR, responses to each comment, and, where applicable, text changes made in the Final EIS/EIR in response to the comment.

Under the requirements of NEPA as outlined in 40 CFR 1503.4(a) and 23 CFR 771.125, the Final EIS shall include discussion of substantive comments on the draft EIS and responses thereto, summarize public involvement, and describe the mitigation measures that are to be incorporated into the proposed action. Under CEQA, Section 15088(c) of the CEQA Guidelines describes the evaluation that is required in the response to comments:

The written response shall describe the disposition of significant environmental issues raised (e.g., revisions to the proposed project to mitigate anticipated impacts or objections). In particular, the major environmental issues rose when the lead agency's position is at variance with recommendations and objections raised in the comments must be addressed in detail giving reasons why specific comments and suggestions were not accepted. There must be a good faith, reasoned analysis in response. Conclusory statements unsupported by factual information will not suffice.

In order to comply with Section 15088(c) of CEQA, reasoned, factual responses have been provided to all comments received, with a particular emphasis on significant environmental issues. Generally, the responses to comments provide explanation, clarification, or amplification of information contained in the Draft EIS/EIR. All comments and responses to comments are included in the Final EIS/EIR and will be considered by the SANBAG Board of Directors prior to certification and in any approval of the Project.

Sixty-eight (68) comment letters were submitted on the Draft EIS/EIR. Five of the comment letters were received after the end of the public review period (September 29, 2014), but have been included as part of responses. Each of the comment letters received is included in its entirety, followed by responses to the comments contained in each letter. In addition, the transcripts from the public meetings are also included in their entirety, followed by responses to the public comments received.

Table 2-1 lists the comments received on the Draft EIS/EIR. Each commenter was assigned an identification (ID) code, as shown in Table 2-1 (i.e., for United States Environmental Protection Agency, the code is USEPA). In addition, each individual comment made by the commenter was assigned a tracking number. Therefore each individual comment received has a commenter ID and comment tracking number (e.g., USEPA-1, USEPA-2, etc.). Responses are provided for each individual comment received.

In responding to comments, CEQA and NEPA do not require a Lead Agency such as SANBAG and FTA to conduct every test or perform all research, study, or experimentation recommended or requested by commenters. Rather, a Lead Agency need only respond to significant environmental issues and does not need to provide all information requested by reviewers, as long as a good faith effort at full disclosure is made in the EIS/EIR (CEQA Guidelines §15204). Further, disagreement among experts regarding conclusions in the EIR is acceptable, and exhaustive treatment of issues is not required (CEQA Guidelines §15151).



Table 2-1. Comments Received on the Draft EIS/EIR

Letter No.	Commenter	Comment Type ¹	Date Received	Response Section and Coded Responses
Federal Agency				
USEPA-1	U.S. Environmental Protection Agency	Letter	9/25/2014	2.2.1 (USEPA-1 to USEPA-4)
USDO-1	U.S. Department of the Interior	Letter	9/29/2014	2.2.2 (USDO-1)
State Agency				
CAHSR-1	California High Speed Rail Authority	Letter	9/26/2014	2.3.1 (CAHSR-1)
CDFW-1	California Department of Fish and Wildlife	Letter	9/29/2014	2.3.2 (CDFW-1 to CDFW-8)
OPR-1	Governor's Office of Planning and Research	Letter	9/30/2014	2.3.3 (OPR-1 to OPR-3)
Local Agencies				
LL-1	Jarb Thaipejr, City of Loma Linda	Letter	9/17/2014	2.4.1 (LL-1 to LL-3)
REDLANDS-1	Chris Diggs, City of Redlands	E-mail	9/8/2014	2.4.2 (REDLANDS-1)
REDLANDS-2	Don Young, City of Redlands	Letter	9/29/2014	2.4.3 (REDLANDS-2 to REDLANDS-35)
SBCPW-1	Sundaramoorthy Srirajan, San Bernardino County Department of Public Works	Letter	9/22/2014	2.4.4 (SBCPW-1 to SBCPW-8)
SB-1	Robert Eisenbeisz, City of San Bernardino	E-mail	9/25/2014	2.4.5 (SB-1)
Individuals and Organizations				
AREFFI-1	Patrick Areffi	Comment card	9/9/2014	2.5-1 (AREFFI-1 to AREFFI-5)
BATY-1	Jonathan Baty	E-mail	9/8/2014	2.5-2 (BATY-1 to BATY-9)
BELL-1	D. Bell	Comment card	9/4/2014	2.5-3 (BELL-1)
BELTZ-1	Renate Beltz	E-mail	9/28/2014	2.5-4 (BELTZ-1 to BELTZ-10)
BERRY-1	John Berry	E-mail	9/26/2014	2.5-5 (BERRY-1 to BERRY-4)
BOTTS-1	Robert Botts	E-mail	8/12/2014	2.5-6 (BOTTS-1.1 to BOTTS 1. 4)
BOTTS-2	Robert Botts	Letter	8/25/2014	2.5-7 (BOTTS-2.1 to BOTTS-2.25)
BOTTS-3	Robert Botts	E-mail	9/6/2014	2.5-8 (BOTTS-3.1 to BOTTS 3.3)
BOTTS-4	Robert Botts	E-mail	9/9/2014	2.5-9 (BOTTS-4.1 to BOTTS 4.9)



Table 2-1. Comments Received on the Draft EIS/EIR

Letter No.	Commenter	Comment Type ¹	Date Received	Response Section and Coded Responses
BRITTAIN-1	Gregory Brittain	Letter	9/30/2014	2.5-10 (BRITTAIN-1 to BRITTAIN-20)
BROWER-1	Sandra J. Brower (Higgs, Fletcher & Mack)	Letter	9/25/2014	2.5-11 (BROWER-1.1 to BROWER-23)
BROWER-2	Sandra J. Brower (Higgs, Fletcher & Mack)	E-mail	9/26/2014	2.5-12 (BROWER-2.1 to BROWER-2.2)
CAGL-1	California Gas and Liquor (Mike Polsky)	E-mail	8/5/2014	2.5-13 (CAGL-1 to CAGL-2)
CHANDLER-1	Evelyn Chandler	E-mail	9/30/2014	2.5-14 (CHANDLER-1 to CHANDLER-4)
CORONADO-1	Katherine Coronado	Comment card	9/4/2014	2.5-15 (CORONADO-1)
CROWE-1	Samuel Crowe (Attorney at Law)	Letter	9/30/2014	2.5-16 (CROWE-1)
DILL-1	Monty Dill	Letter	10/1/2014	2.5-17 (DILL-1 to DILL-6)
EGAN-1	John G. Egan	Letter	8/27/2014	2.5-18 (EGAN-1.1 to EGAN-1.10)
EGAN-2	John Egan	Oral comment	9/9/2014	2.5-19 (EGAN-2.1 to EGAN 2.5)
EGAN-3	John Egan	E-mail	9/28/2014	2.5-20 (EGAN-3.1 to EGAN 3.6)
FARQUHAR-1	William T. Farquhar	Comment card	9/4/2014	2.5-21 (FARQUHAR-1)
FRAME-1	Monica Frame	Comment card	9/4/2014	2.5-22 (FRAME-1)
FRANKE-1	Elizabeth Franke	Oral comment	9/4/2014	2.5-23 (FRANKE-1)
GLASER-1	Stacy Glaser	E-mail	9/26/2014	2.5-24 (GLASER-1 to GLASER-4)
GRAMES-1	George Grames	E-mail	9/26/2014	2.5-25 (GRAMES-1.1 to GRAMES 1.9)
GRAMES-2	George Grames	Letter	9/29/2014	2.5-26 (GRAMES-2.1 to GRAMES 2.9)
GRENDA-1	Donn Grenda	Comment card	9/4/2014	2.5-27 (GRENDA-1.1 to GRENDA 1.9)
GRENDA-2	Donn Grenda	E-mail	9/4/2014	2.5-28 (GRENDA-2.1 to GRENDA 2.12)
GRENDA-3	Donn Grenda	Letter	9/5/2014	2.5-29 (GRENDA-3.1 to GRENDA 3.4)

Table 2-1. Comments Received on the Draft EIS/EIR

Letter No.	Commenter	Comment Type ¹	Date Received	Response Section and Coded Responses
GREENDA-4	Donn Grenda	E-mail	9/30/2014	2.5-30 (GREENDA-4.1 TO GREENDA 4.7)
HAMMOND-1	James Hammond	Comment card	9/4/2014	2.5-31 (HAMMOND-1.1 to HAMMOND 1.3)
HAMMOND-2	James Hammond	E-mail	9/8/2014	2.5-32 (HAMMOND-2.1 to HAMMOND 2.4)
HARRIS-1	M. Harris	E-mail	9/9/2014	2.5-33 (HARRIS-1)
HATFIELD-1	Bill Hatfield	E-mail	9/24/2014	2.5-34 (HATFIELD-1 to HATFIELD-9)
IEBA-1	Inland Empire Biking Alliance	Letter	9/28/2014	2.5-35 (IEBA-1 to IEBA-16)
KARSTENSEN-1	Cecil Karstensen	Comment card	9/4/2014	2.5-36 (KARSTENSEN-1)
KOGEL-1	Deanna Kogel	E-mail	9/27/2014	2.5-37 (KOGEL-1.1 to KOGEL 1.3)
KOGEL-2	Frank Kogel	E-mail	9/28/2014	2.5-38 (KOGEL-2.1 to KOGEL 2.4)
LEONARD-1	Larry Leonard	E-mail	9/21/2014	2.5-39 (LEONARD-1 to LEONARD-10)
LOPEZ-1	Rosa Lopez	Oral comment	9/4/2014	2.5-40 (LOPEZ-1)
MADAI-1	Tamara Madai	E-mail	9/29/2014	2.5-41 (MADAI-1 to MADAI-7)
MCCANN-1	Aaron McCann	E-mail	9/21/2014	2.5-42 (MCCANN-1 to MCCANN-4)
MILLS-1	John Mills	Comment card	9/4/2014	2.5-43 (MILLS-1 to MILLS-3)
MOORE-1	Cheryl Moore	Oral comment	9/9/2014	2.5-44 (MOORE-1 to MOORE-3)
NASH-1	John F. Nash	E-mail	9/23/2014	2.5-45 (NASH-1 to NASH-3)
NIELSON-1	Lucy Nielson	Oral comment	9/4/2014	2.5-46 (NIELSON-1 to NIELSON-9)
PARKER-1	Victor M. Parker, Sr.	Comment card	9/4/2014	2.5-47 (PARKER-1)
PETERSON-1	Sandra Peterson	E-mail	8/26/2014	2.5-48 (PETERSON-1 to PETERSON-4)
RALEY-1	Tony Raley	E-mail	9/26/2014	2.5-49 (RALEY-1.1 to RALEY-1.7)

Table 2-1. Comments Received on the Draft EIS/EIR

Letter No.	Commenter	Comment Type ¹	Date Received	Response Section and Coded Responses
RALEY-2	Tony Raley	Letter	9/26/2014	2.5-50 (RALEY-2.1 to RALEY 2.7)
ROCK-1	James and Julie Rock	E-mail	9/27/2014	2.5-51 (ROCK-1 to ROCK-7)
SPARKS-1	Wayna Sparks	Oral comment	9/9/2014	2.5-52 (SPARKS-1 to SPARKS-6)
SUMPTER-1	Dan Sumpter	E-mail	9/29/2014	2.5-53 (SUMPTER-1 to SUMPTER-6)
VALERIE-1	Valerie	E-mail	9/26/2014	2.5-54 (VALERIE-1 to VALERIE-3)
VERSTEEG-1	Jim VerSteeg	Comment card	9/4/2014	2.5-55 (VERSTEEG-1 to VERSTEEG-2)
WALTERS-1	Andrew M. Walters	Letter	9/25/2014	2.5-56 (WALTERS-1 to WALTERS-21)
WONG-1	Sam Wong	E-mail	9/6/2014	2.5-57 (WONG-1.1 to WONG1.5)
WONG-2	Sam Wong	E-mail	9/28/2014	2.5-58 (WONG-2.1 to WONG-2.12)

¹ Comment cards and oral comments received on 9/4/14 were received during the Public Meeting held at the ESRI Café in the City of Redlands. Comment cards and oral comments received on 9/9/14 were received during the Public Meeting held at the Hilton Hotel in the City of San Bernardino.

Where changes to the text of the Draft EIS/EIR have been made, the modifications are shown in the response. Text additions are shown in double underline and text deletions are shown in strikethrough.

Text changes are referenced by the page number, paragraph on that page, and the major heading under which the text occurs. If a figure was revised, the figure number was changed to include “Revised” (i.e., Revised Figure 3.6-1), and a description of the revision is included in this appendix. Revisions and updates to the EIS/EIR also included the modification of appendices. The modifications are described in this appendix and the title of the Appendix was modified to include “Revised” (i.e., Revised Appendix B, Air Quality).

2.1 MASTER RESPONSES

Upon review of the comments received, common topics emerged and a Master Response was developed for these similar questions and comments. The purpose of a Master Response is to address broad issue areas where there was extensive public comment and to address the various comments in a comprehensive manner. Specifically, Master Responses are provided to address the following topics:

- Master Response 1: Train Noise Impact Methodology and Results
- Master Response 2: Mitigation for Train Noise

- Master Response 3: Quiet Zone Mitigation
- Master Response 4: Closures of Existing At-Grade Crossings
- Master Response 5: Projected Ridership
- Master Response 6: Project Cost
- Master Response 7: Vibration Assessment
- Master Response 8: Land Acquisition Requirements
- Master Response 9: Project Noticing
- Master Response 10: Air Quality and Health Effects
- Master Response 11: Effects to the Redlands Santa Fe Depot Historic District
- Master Response 12: Project Safety and Security
- Master Response 13: Traffic Circulation
- Master Response 14: Mill Creek Zanja Eligibility
- Master Response 15: Property Values

2.1.1 MASTER RESPONSE 1: TRAIN NOISE IMPACT METHODOLOGY AND RESULTS

General Comment. Several commenters had questions regarding the methodology applied in the Draft EIS/EIR for considering noise impacts resulting from the Project. Commenters also had questions relating to the interpretation of the noise analysis, the criteria used, and applying the results to their property of interest.

Master Response: The Draft EIS/EIR evaluates Project-related noise impacts using models that follow methodologies contained in FTA's Transit Noise and Vibration Impact Assessment Manual (FTA Manual 2006) (see pages 3.6-10 through 3.6-13 of the Draft EIS/EIR). The noise impact criteria contained in FTA's Manual (2006) are based on the potential annoyance of project noise on people, and are not based on the potential audibility of a noise source. The noise impact criteria and descriptors depend on land use, designated either Category 1, Category 2, or Category 3. Category 1 includes uses where quiet is an essential element in their intended purpose, such as indoor concert halls, outdoor concert pavilions, or National Historic Landmarks where outdoor interpretation routinely takes place. Category 2 includes residences and buildings where people sleep, while Category 3 includes institutional land uses with primarily daytime and evening use such as schools, places of worship and libraries. The criteria are then used to define the resulting noise impact using a sliding scale in which there is greater potential for impact in areas where existing noise levels are quieter (i.e., rural areas) and less potential for noise impacts where existing noise levels are higher (i.e., suburban and urban areas) (see Figure 2-1 of Appendix H1 of the Draft EIS/EIR).

Noise impacts in the Draft EIS/EIR were determined following FTA's noise criteria based on a comparison of existing noise levels to future noise levels with the addition of Project noise sources. Existing noise levels were determined throughout the corridor by taking direct field noise measurements at certain noise-sensitive receptors following FTA's methodology (see Table 3.6-2 of the Draft EIS/EIR). Noise measurements were taken at specific noise-sensitive locations near the alignment in the study area that were considered representative of conditions and were applied to several neighborhoods with similar noise sources (see Figures 3.6-3A and 3.6-3B of the Draft EIS/EIR). Specific measurement locations were then selected based on their physical relationship to existing noise sources, such as major roads.

For project noise levels, all the noise sources during a train pass-by are combined to provide the noise model with a single reference noise level for a train pass-by. FTA methods take this single reference noise level and, using the number of trains per hours during daytime and nighttime, use it to compute either the peak hour noise level or the Ldn (Day and Night Level) noise level. The peak hour noise level is used to identify noise levels at places that are used primarily for daytime activities, such as schools and parks. The Ldn is used to identify noise levels at places with sleep-related activities, such as homes, apartments, hospitals, and hotels. The Ldn adds a 10-dBA penalty to the hours between 10 p.m. and 7 a.m. to account for people being more sensitive to noise during these hours.

The steps described in the FTA Manual (2006) were used to evaluate the environmental effects of the Project. The FTA Manual (2006) identifies a screening procedure, a general noise assessment, and a detailed noise assessment. Under the noise screening procedure, the project type is identified (e.g., commuter rail mainline, commuter rail station, light rail transit station, busway). In addition, Project-to-receiver screening distances are given in the manual for each type of project. Adjustments to the generic screening distances are then tailored to the Project using the methodology in Chapter 5, the FTA spreadsheet model and, where horns and warning bells are used (as is the case with the proposed Project), the FRA's horn noise model. Receivers within the indicated screening distance of the Project are identified and, if they exist within the screening distance, then that distance defines the study area for the detailed noise assessment. Receivers of interest were selected using the guidance provided in Chapter 6 and Appendix C of the FTA manual (see Figures 3.6-3A and 3.6-3B in Appendix H1 of the Draft EIS/EIR).

The FTA detailed noise assessment method was used to quantify the Ldn noise levels at the identified receiver locations due to train operations on the rail alignment under the existing, with-Project, future-no-Project, and future-with-Project scenarios. For the with Project scenarios, the EIS/EIR considers four operational scenarios including: (1) locomotive with no quiet zones, (2) locomotive with quiet zones, (3) diesel multiple unit (DMU) without quiet zones, and (4) DMU with quiet zones. A DMU is a multiple-unit train powered by on-board engines and requires no separate locomotives as the engines are incorporated into one or more of the carriages.

The modeling accounted for the number of trains anticipated to pass along the railroad corridor during daytime and nighttime hours (22 and 3 trains, respectively), the typical train speed along the railroad corridor (20 to 35 miles per hour), the typical future train consist (i.e., one engine and two cars), and the use of locomotive horns at crossings. A reference sound exposure level (SEL) value of 92 dBA was applied for the locomotive driven trainset. For the DMU vehicle option, a reference SEL value of 85 dBA was applied in the noise calculations. Additionally, wayside signal bells at crossings were accounted for as part of the detailed noise analysis (see page 5-1 of Appendix H1 of the Draft EIS/EIR).

Figures 3.6-5A and 3.6-5B (Revised) of the Draft EIS/EIR illustrate the differences in noise impacts from the diesel locomotive and DMU for each of the modeled receivers in Appendix H1 and H2. Tables 3.6-6 and 3.6-7 of the Draft EIS/EIR summarize the pre- and post-post noise levels for receivers moderately and severely impacted by noise from the locomotive and DMU vehicle options. Table 6-1 of Appendix H1 of the Draft EIS/EIR provides the results of the rail noise modeling for all receiver locations under the locomotive vehicle option in the absence of mitigation (see Figures 6-1A through 6-1J of Appendix H1 of the Draft EIS/EIR). Table 1 in

Appendix H2 provides the results of the rail noise modeling for all receiver locations under the DMU vehicle option in the absence of mitigation. As provided, the resulting noise levels under the DMU would be comparable to those of the locomotive as illustrated in Figures 6-1A through 6-1J of Appendix H1 of the Draft EIS/EIR in the absence of mitigation. Based on the identification of both moderate and severe noise impacts from train operations, SANBAG is proposing several mitigation measures to minimize operational-related, which are discussed under Master Response 2.

2.1.2 MASTER RESPONSE 2: MITIGATION FOR TRAIN NOISE

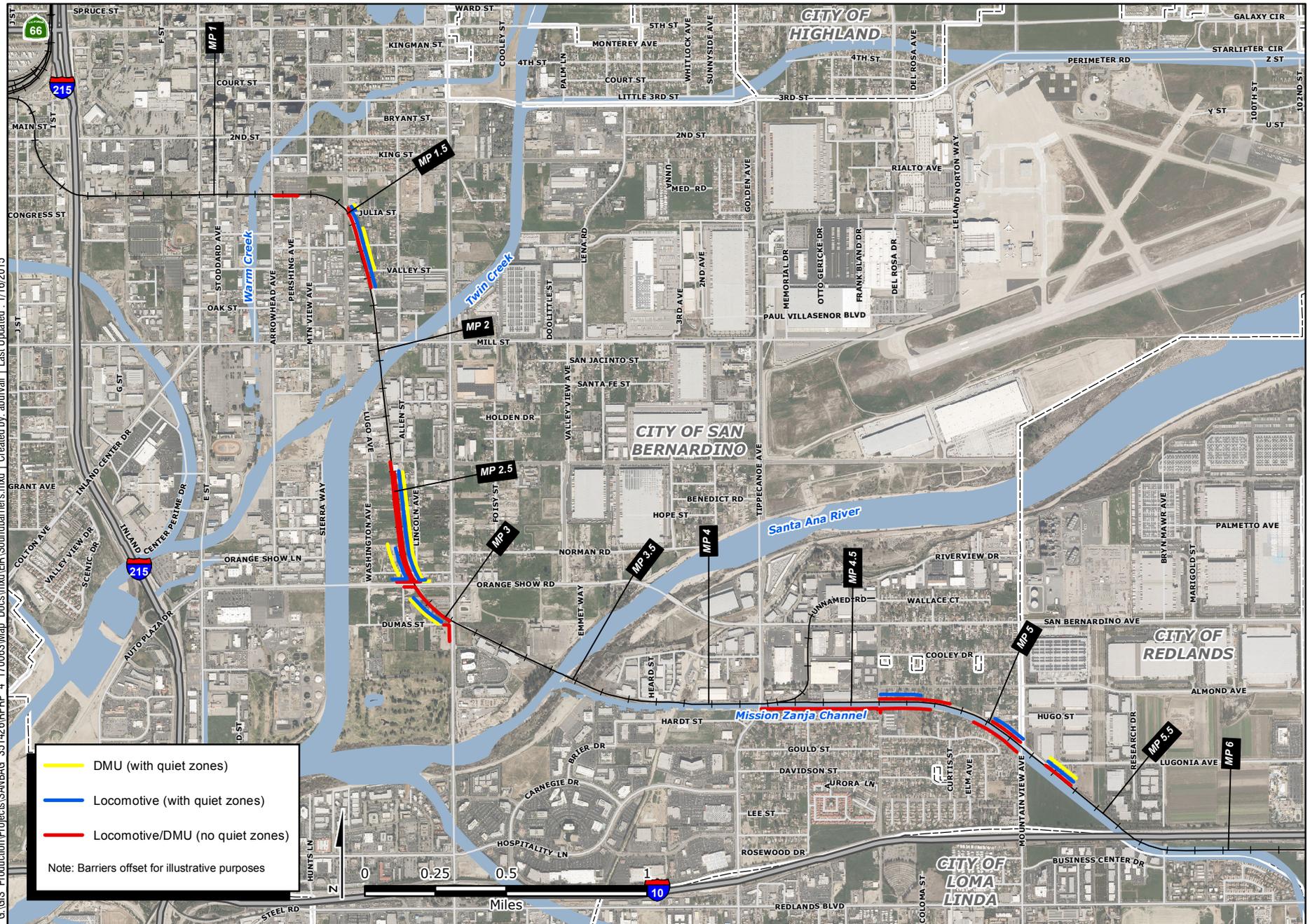
General Comment: Several commenters expressed concerns relating to the types of noise mitigation available to reduce train-related sources of noise and methods being proposed by SANBAG.

Master Response: Operational sources of noise associated with the Project-related train movements would include pass-bys, horns, warning signals, and wheel squeal at tight curves. The mitigation for train-related noise is multifaceted and the measures, in certain instances, have corresponding indirect effects that also require consideration. As provided in the Draft EIS/EIR (see pages ES-8 and 3.6-33), the Project would result in a permanent increase in ambient noise levels as a result of these noise sources associated with the proposed passenger train operations. Consistent with the FTA Manual (2006) as described in Master Response 1, mitigation measures proposed as part of the Project are focused towards mitigating moderate and severe noise impacts to Category 2 and 3 land uses that border the railroad corridor. SANBAG is proposing Mitigation Measure NV-3 (Quiet Zones) as the primary mitigation measure to mitigate the loudest source of noise (i.e., train horns) from the Project (See Master Response 3). Other noise mitigation measures proposed in the Draft EIS/EIR to address operational noise in addition to quiet zones include sound barriers (Mitigation Measure NV-4), rail lubricators at tight curves (Mitigation Measure NV-5), and building insulation (NV-7).

Sound barriers in the form of solid walls were considered for the four operational scenarios discussed in Master Response 1. For the locomotive vehicle option, the sound barriers shown in Figure 8-2 and summarized in Table 8-2 of Appendix H1 of the Draft EIS/EIR would be required to mitigate moderate or severe impacts in the absence of quiet zones. In total, up to 23,910 linear feet of sound barrier would be required. With the implementation of quiet zones, the length of sound barrier required to mitigate for moderate and severe noise impacts is 10,740 linear feet and as shown in Draft EIS/EIR Appendix H1, Figure 8-3 and summarized in Table 8-3. The sound barriers required under each scenario are illustrated in Figures 2-1A and 2-1B and listed below:

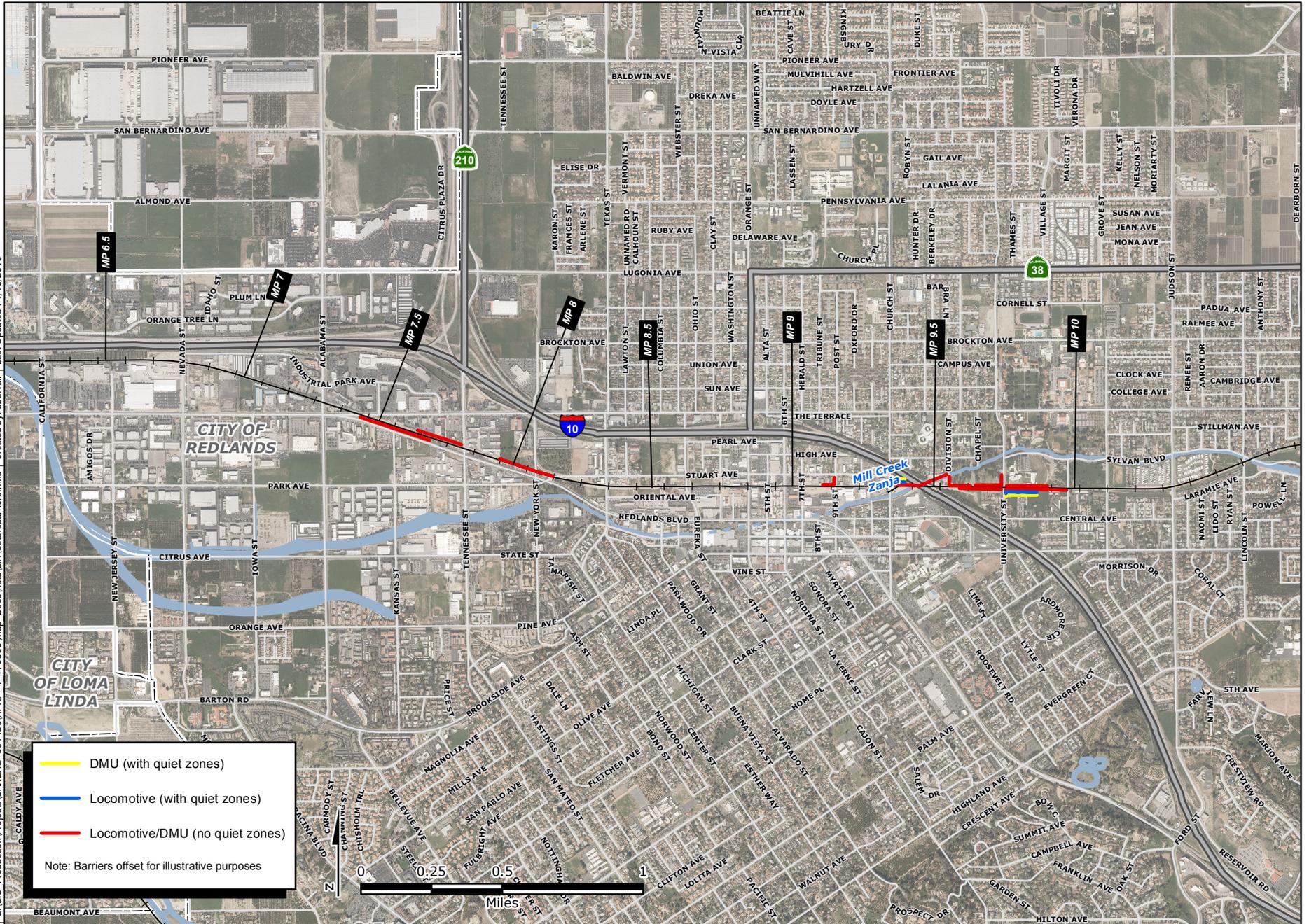
- Locomotive (no Quiet Zones): Sound barriers 1NQZ, 2NQZ, 3NQZ, 4NQZ, 5NQZ, 6NQZ, 7NQZ, 8NQZ, 9NQZ, 10NQZ, 11NQZ, 12NQZ, 13NQZ, 14NQZ, 15NQZ, 16NQZ, 17NQZ, 17A-NQZ, 17B-NQZ, 17C-NQZ, 18NQZ, 19NQZ, 20NQZ, 21NQZ, 22NQZ, and 23NQZ (see Table 8-2 and Figures 8-2A through 8-2H in Appendix H1 of the Draft EIS/EIR).
- Locomotive (with Quiet Zones): Sound barriers 1WQZ, 2WQZ, 3WQZ, 4WQZ, 5WQZ, 6WQZ, 7WQZ, 8WQZ, 9WQZ, 10WQZ (see Table 8-3 and Figures 8-3A through 8-3F in Appendix H1 of the Draft EIS/EIR in Appendix H1 of the Draft EIS/EIR).

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Sound Barrier Locations for Each Project Operational Scenario - Western Study Area

Figure 2.1 A



Sound Barrier Locations for Each Project Operational Scenario - Eastern Study Area

Figure 2.1 B

With the integration of a DMU vehicle option and in the absence of quiet zones, the same sound barriers required for the locomotive vehicle option would be required to mitigate for moderate and severe noise impacts resulting from the DMU (see Table 2 and Figures 1A through 1H in Appendix H2 of the Draft EIS/EIR). However, as shown in Figures 2-1A and 2-1B, with the application of quiet zones the DMU vehicle option would eliminate all severe noise impacts and lessen the number and length of sound barriers to 5,900 linear feet. The barriers identified below would be required to mitigate the remaining moderate noise impacts:

- DMU (with Quiet Zones): Sound barriers 1WQZ, 2WQZ (reduced), 3WQZ (reduced), 4WQZ (reduced), 5WQZ (reduced), 8WQZ, 9WQZ, 10WQZ (see Table 4 and Figures 2A through 2F in Appendix H2 of the Draft EIS/EIR).

Although sound barriers would further reduce operational noise impacts, the direct and indirect impacts of their placement may outweigh their noise reduction benefits, which depending on the operational scenario (i.e., locomotives versus DMU), may be relatively minor and unnoticeable. For example, as provided in Table 4 of Appendix H2 of the Draft EIS/EIR, under the DMU vehicle option with quiet zone scenario, the exceedance of the threshold for moderate noise impacts at multiple receiver locations (e.g., Receivers 8, 13, 18, 61, and 68) would be 2 dBA or less. Given that the human ear is generally unable to detect a change of 3 dBA or less, the minor noise reduction offered by a sound barrier may not outweigh their other indirect impacts. Such indirect impacts may include, but are not limited to, the obstruction of views, concerns related to graffiti, further division of neighborhoods, and new land requirements as discussed in Sections 3.2 (pages 3.2-23 to 3.2-24 and 3.2-26 to) and 3.4 (pages 3.4-16 to 3.4-17) of the Draft EIS/EIR. In this context, sound barriers may not be constructed at or more locations given other extenuating circumstances as provided below:

- *Sound Barriers 2WQZ, 3WQZ, 4WQZ, 9WQZ, and 10WQZ:* Each barrier is proposed to address an exceedance of the moderate noise impact threshold by 3 dBA or less. Given that this exceedance would be barely perceptible to adjacent sensitive uses, with the selection of a DMU combined with the implementation of quiet zones, these barriers would not be constructed.
- *Sound Barrier 1WQZ:* This barrier is proposed for Receiver #3, which is represented by three noise-sensitive sites. Based on the limited number of sites, building insulation is proposed for this receiver as opposed to a sound barrier (see MM NV-7).
- *Sound Barrier 5WQZ:* This barrier is proposed for Receiver #22, which is represented by one noise-sensitive site. Based on the limited number of sites, building insulation is proposed for this receiver as opposed to a sound barrier (see MM NV-7).
- *Sound Barrier 8WQZ:* This barrier is proposed for Receiver #41, which is represented by six noise-sensitive sites. Based on the limited number of sites, building insulation is proposed for this receiver as opposed to a sound barrier (see MM NV-7).

To address rail squeal at tight curves, SANBAG proposed to implement two mechanisms: (1) optimization of the rail curvature during final design and construction, and (2) the application of rail lubricators at curves along the alignment. These measures are identified in Mitigation Measure NV-5 of the Draft EIS/EIR (see page 3.6-32). The mitigation requires the

implementation of the two mechanisms above in order to achieve an acceptable level of squeal. Although there is no quantitative reduction in noise levels for curvature optimization or rail lubricators beyond their effect in reducing (or avoiding) rail squeal (see Table 6-12 of Appendix H1), rail squeal is a component of project-related train noise, which is evaluated according to noise impact criteria in the FTA Manual (2006 – see Master Response 1).

In the Draft EIS/EIR (pages ES-8, 3.6-34, and 5-16), SANBAG acknowledges that the Project would result in a permanent increase in operational noise along the Project alignment. Notwithstanding this circumstance, SANBAG is committed to operating the Project in a manner that minimizes noise disruptions to adjacent uses to the maximum extent practicable. The selection of the DMU combined with the implementation of quiet zones are expected to be effective in achieving this goal. Additionally, through the implementation of the MOU (February 4, 2015), noise mitigation would be extended to all uses along the corridor as opposed to site-specific as in the case of sound barriers. Site-specific measures will be implemented where they would function effectively pending the approval of the affected properties. Additionally, once operational, SANBAG will respond to noise complaints and work with local owners to address their site-specific concerns on a case-by-case basis.

2.1.3 MASTER RESPONSE 3: QUIET ZONE MITIGATION

General Comment: Multiple commenters requested additional information and definition on quiet zones. Several commenters requested their implementation of quiet zones at locations not proposed in Mitigation Measure NV-3 including, but not limited to D Street in San Bernardino and Texas Street, Eureka Street, and Orange Street in Redlands.

Master Response: To minimize Project-related train noise for all uses adjacent to SANBAG's right-of-way (ROW), including sensitive land uses (e.g., Category 2 and 3 uses), SANBAG proposes the implementation of quiet zones (see Draft EIS/EIR page 2-31) through the implementation of Mitigation Measure NV-3). Quiet zones are a means to reduce locomotive horn noise at at-grade crossings, which are also required under the Train Horn Rule (49 CFR Part 222), which requires locomotive engineers to sound train horns at least 15 seconds, and no more than 20 seconds, in advance of all public grade crossings. In a quiet zone, railroads have been directed to cease the routine sounding their horns when approaching public highway-rail grade crossings; although, train horns may still be used in emergency situations.

Mitigation Measure NV-3 would require SANBAG to design the applicable at-grade crossing(s) for the application of quiet zones to reduce moderate noise impacts at 14 receivers representing 49 Category 2 land uses and severe noise impacts at four receivers representing 11 Category 2 land uses for a locomotive driven trainset. Noise levels following the implementation of quiet zones for a DMU, would reduce moderate noise impacts at an additional 10 receivers representing 24 Category 2 land uses (73 total) and eliminate the remaining four severe noise impacts representing 14 Category 2 land uses (25 total) (see Figures 3.6-5A and 3.6-5B). As provided in the Draft EIS/EIR, the combined implementation of quiet zones and selection of a DMU vehicle provides the greatest practicable noise reduction compared to the other scenarios discussed in Master Response 2.



The implementation of Mitigation Measure NV-3 would ultimately require the Cities of San Bernardino and the City of Redlands to adopt quiet zones at each of the designated locations. Following construction of the supplemental safety measures (SSMs), each jurisdiction would be required to complete the Quiet Zone Creation Process in accordance with the regulations, policies and procedures established by the Federal Railroad Administrations (FRA) in their Train Horn Final Rule as amended on August 17, 2006 (49 CFR Part 222). Therefore, the full implementation of the measures is in part the responsibility of the Cities of Redlands and San Bernardino. To facilitate completion of the Quiet Zone Creation Process, SANBAG has entered into a MOU dated February 4, 2015, with the Cities of Redlands and San Bernardino.

To facilitate the implementation of a quiet zone and a corresponding absence in the routine sounding of the train horn, SANBAG is required to mitigate for the additional safety risks at the at-grade crossings. At a minimum, each public highway–rail crossing within a quiet zone must be equipped with active warning devices: flashing lights, gates, constant warning time devices (except in rare circumstances) and power out indicators. Additionally, in order for SANBAG and the Cities to create a quiet zone, one of the following conditions must be met:

1. The Quiet Zone Risk Index (QZRI) is less than or equal to the Nationwide Significant Risk Threshold (NSRT) with or without additional safety measures such as SSMs or Alternative Safety Measures (ASMs). The QZRI is the average risk for all public highway-rail crossings in the quiet zone, including the additional risk for absence of train horns and any reduction in risk due to the risk mitigation measures. The NSRT is the level of risk calculated annually by averaging the risk at all of the Nation's public highway-rail grade crossings equipped with flashing lights and gates where train horns are routinely sounded.
2. The QZRI is less than or equal to the Risk Index with Horns (RIWH) with additional safety measures such as SSMs or ASMs. The RIWH is the average risk for all public highway-rail crossings in the proposed quiet zone when locomotive horns are routinely sounded.
3. Install SSMs at every public highway-rail crossing. SSMs are pre-approved risk reduction engineering treatments installed at certain public highway-rail crossings within the quiet zone and can help maximize safety benefits and minimize risk. SSMs include: medians or channelization devices, one-way streets with gates, four quadrant gate systems, and temporary or permanent crossing closures.

As currently proposed in the MOU dated February 4, 2015, SANBAG would implement a quiet zone for the entire railroad corridor covering all at-grade crossings within each jurisdiction. In contrast, Mitigation Measure NV-3 would only require the implementation of quiet zones for at-grade crossings adjacent to Category 2 and 3 land uses (see Master Response 1). For this reason, the MOU is expected to achieve greater noise reduction benefits across the entire community as compared to the implementation of Mitigation Measure NV-3. SANBAG remains in the process of determining which of the above conditions it will pursue for implementing quiet zones for the Project consistent with the MOU. This decision will be influenced by the costs of the specific SSMs at each crossing and the number of crossings requiring SSMs, which will require additional engineering during the Project's final design. Once these details are



developed, SANBAG will perform another diagnostic meeting with FRA, CPUC, and each city to facilitate their eventual implementation.

2.1.4 MASTER RESPONSE 4: CLOSURES OF EXISTING AT-GRADE CROSSINGS

General Comment: Several commenters expressed opposition to the one or more of the proposed roadway closures at D Street in San Bernardino and 7th and 9th Streets in Redlands. Commenters indicated that the proposed closures would result in disruptions to their current business operations, such as re-routing truck deliveries and test drives.

Master Response: SANBAG's right-of-way (ROW) traverses 30 existing roadway crossings. Two of these existing roadway crossings consist of grade separations at Interstate 10 (I-10). In addition, two roadway crossings (located at Bryn Mawr Avenue and New York Street) were officially closed before the consideration of the Project. Each at-grade crossing improved (or closed) as part of the Project would also include corresponding improvements to adjoining roadway segments, where required, to maintain safety for both motorized and non-motorized forms of transportation in accordance with California Public Utility Commission (CPUC) General Orders (see page 2-24 of the Draft EIS/EIR)..

The public roadway closures proposed as part of the Project and analyzed in the Draft EIS/EIR include D Street, Stuart Avenue, 7th Street (pedestrian crossing), and 9th Street. Additionally, Hilda Street (adjacent to Arrowhead Road) is proposed for closure, Dorothy Street (east of Sierra Way) would be modified to become a one-way right turn out only roadway, and an existing licensed, private at-grade crossing that provides access to the Caliber Collisions business near New York Street would be closed. These modifications to the existing roadway network are proposed first and foremost to maintain safety for vehicles, pedestrians, and bicyclists during passenger train operations. The alternatives to full closure of these at-grade crossings along with SANBAG's basis for selecting or not selecting each is provided as follows

- **Full Grade-Separation:** Given the limited width of the City's public right-of-way at these crossings (i.e., 30 feet or less), a grade-separated crossing at these locations would be infeasible in the absence of significant property acquisition. The scale of the improvements required for a grade-separation would extend well beyond the Project's construction footprint and could potentially require full takes of adjacent private property. For these reason, no grade-separations were proposed.
- **Partial Closures:** A partial closure of the crossing is the next safest option to full closure whereby the crossing is closed to automobile traffic, but maintains pedestrian access. This type of crossing is proposed at 7th Street in Redlands to minimize the increase in pedestrian travel from north to south across SANBAG's right-of-way. .
- **Maintain At-Grade Crossing with SSMS:** In lieu of a full closure, it is possible that SANBAG could implement additional SSMS at the proposed crossings to maintain a safe crossing environment. However, this requires additional risk calculations that would be performed in conjunction with the Project's final design in coordination with the respective cities.



Based on the results of the traffic analysis provided in Appendix E of the Draft EIS/EIR and summarized in Section 3.3, the redistribution of traffic as a result of the proposed roadway closures would not change the current level of service at the adjacent roadway intersections. The modeling results are presented in Tables 3-1, 3-2, 4-2, 4-4, 5-2 and 5-4 in Appendix E of the Draft EIS/EIR. Although the closures would require changes in local business operations, including truck delivery routes, the results of the analysis indicate that the existing roadway network would continue to function similar to existing conditions (see Master Response 13).

SANBAG has been and continues to be in frequent coordination with the California Public Utilities Commission (CPUC) as part of the Project's environmental review. Early in the process, in order to address public safety as part of the Project's conceptual engineering, SANBAG held field diagnostic meetings with the CPUC and both cities in December 2012. CPUC has provided SANBAG with multiple correspondence recommending the closure of the proposed at-grade crossings with safety as the principle consideration. Based on these considerations, the Draft EIS/EIR considered the full closures at each crossing (except at 7th Street) as the worst-case scenario. These crossings and closures will be subject to refinements during final design and coordination with the affected jurisdiction.

As currently proposed, in addition to maximizing crossing safety, the closure of these at-grade crossings would also assist SANBAG and the cities in achieving the necessary risk index to facilitate quiet zones along the railroad corridor (see Master Response 3). If during the Project's final design SANBAG determines that one or more of the crossing can be maintained with SSMS (as opposed to full or partial closure) while still maintaining a satisfactory risk index, it may be possible to maintain the crossing. This would also include consideration of the safety of non-motorized transportation facilities for pedestrians and bicyclists. Prior to implementation, each closure with the exception of the private crossing between Alabama Street and New York Street would require approval from the CPUC, the Surface Transportation Board (STB), and the respective cities in which they are located. In conjunction with these final approvals for each crossing, a final decision will be made on whether to implement a full or partial closure or additional SSMS at each crossing proposed for closure.

2.1.5 MASTER RESPONSE 5: PROJECTED RIDERSHIP

General Comment: Several commenters requested information on the Project's estimated ridership.

Master Response: Ridership projections for existing conditions (2012), opening day (2018), and future conditions (2038) were calculated for the Project through the application of the San Bernardino Valley Focus Model (SBVFM). The SBVFM is a focused model derived from the Southern California Association of Governments (SCAG) regional model as documented in SCAG's 2003 Model Validation and Summary – Regional Transportation Model (January 2008). The model was used to produce travel forecasts and user benefits for future year conditions to assess future year transit ridership sensitivity along the Redlands Corridor (see Appendix C of the Draft EIS/EIR).

The analysis provided in the Draft EIS/EIR considers ridership estimates that fall on the lower end of the range of potential ridership, so as not to overstate (or estimate) the Project's

reductions in vehicle miles traveled (VMT). This has important implications for both the analysis of traffic and air quality and greenhouse gases. As indicated in Draft EIS/EIR Chapter 2 (Section 2.4.2.1 – Description of Passenger Rail Operations), ridership in the opening year is conservatively estimated at 820 daily riders and 1,330 daily riders in 2038. However, there is a strong possibility in future years that ridership demand will increase beyond these estimates, especially if any intensification in land use occurs along the railroad corridor in the future. As provided in Chapter 4, once the Project infrastructure is in place, up to 2,620 daily ridership trips could occur in future years (see page 4-16 and Table 4-2 of Appendix C in the Draft EIS/EIR), which in turn would result in further decreases in VMT from those originally considered in Sections 3.3 (Transportation) and 3.5 (Air Quality) of the Draft EIS/EIR. Additionally, if there is an increase in the number of stations or an increase in the service frequency, ridership could increase upwards of 6,100 (Table 4-2 in Appendix C of the Draft EIS/EIR), thereby incrementally adding to the Project's daily ridership and associated direct and indirect benefits as identified in Sections 3.2 (page 3.2-34) and 3.3 (page 3.3-32) of the Draft EIS/EIR.

2.1.6 MASTER RESPONSE 6: PROJECT COST

General Comment: Several comments requested information on the Project's construction and operational costs. Several comments also requested information on the anticipated sources of funding for the project as well as the cost of riding the passenger rail service.

Master Response: As stated in Section 2.6 of the Draft EIS/EIR (page 2-60), the Project's estimated cost for construction is \$202 million. The construction cost estimate is based on a pay-as-you go scenario and does not factor in potential interest payments from a scenario involving a construction loan. SANBAG developed the Project's construction cost in 2012 (see Appendix N of the Draft EIS/EIR). As a result and given the lapse in time since the development of the Project's initial cost, SANBAG expects some refinement in the cost estimate during final design and escalation of increases in the costs of some raw materials and the potential use of construction loans.

Once operational, the cost to operate the service is estimated at \$7.9 million annually (see pages 2-60 through 2-62 of the EIS/EIR). Additional details and breakdown of these costs is provided in Appendix N of the Draft EIS/EIR. The Project would be funded by a variety of federal, state, and local funds, including private funding sources for the New York Street and University of Redlands Stations. Funding from private entities remains undetermined and subject to future negotiations with the adjacent property owner(s). Federal funds being applied to the project are estimated at approximately \$72 million. These funding sources are listed below:

- Federal Transit Administration: State of Good Repair Rail;
- Federal Transit Administration: Urbanized Area Formula Grant;
- Federal Congestion Mitigation and Air Quality;
- State Transit Assistance Fund – Population;
- Measure I Senior & Disabled Transit Service: (8% of Valley subarea revenue);
- Measure I Metrolink/Rail Service – For Rail Projects (8% of Valley subarea revenue);

- Public Transportation, Modernization, Improvement, and Service Enhancement Account Program; and,
- Prop 1B Security – Transit System Safety, Security, and Disaster Response Account.

Passenger train operations over the long term would be funded through a combination of Measure I Metrolink/Rail Service and fare revenues; however, a fare structure has yet to be developed. It is important to note that if the Project is not implemented, SANBAG estimates the capital cost for the No Build Alternative at \$30 million. These funds would be required to fund needed track and bridge upgrades to facilitate continued freight service consistent with SANBAG's purchase agreement with the Burlington Northern Santa Fe (BNSF) Railway.

2.1.7 MASTER RESPONSE 7: VIBRATION ASSESSMENT

General Comment: Several commenters expressed concerns related to Project-related vibration and vibration-related damage to structures, including those in close proximity to the rail alignment. Comments also expressed questions regarding the method of vibration assessment used in the EIS/EIR.

Master Response: The FTA noise and vibration impact assessment methods identify categories of vibration-sensitive land uses (e.g., Land Use Category 1, 2 and 3) in FTA's Noise and Vibration Assessment Manual (2006). The vibration impact assessment is primarily intended to identify the potential for transit-based vibration that may interfere with: vibration-sensitive activities in buildings (Land Use Category 1), human annoyance where overnight sleep occurs (Land Use Category 2), and institutional and lands primarily used during daytime (Land Use Category 3). In assessing Project-related sources of vibration, the Noise and Vibration Technical Memorandum (TM) prepared in support of the EIS/EIR follows FTA's methods.

According to the FTA (2006), when conducting a general assessment of vibration impacts, the type of vibration source (i.e., diesel locomotive or DMU) and the vibration propagation pathway characteristics are the most important criteria to consider. In terms of propagation pathway characteristics, the geologic substrate (i.e., bedrock versus alluvium) is a key component in the evaluation. Since vibration problems occur almost exclusively inside buildings, "the vibration levels inside a building are dependent on the vibration energy that reaches the building foundation, the coupling of the building foundation to the soil, and the propagation of the vibration through the building (FTA 2006)." The structural composition of the building in question affects vibration levels at the receiver. The general guideline is that the heavier a building is, the lower the response will be to the incident vibration energy (FTA 2006).

As provided in FTA's Guidance, structural damage from vibration is rare and generally tied to unique circumstances, such as older historic structures and site geology, such as the presence of shallow bedrock or stiff clay soils (FTA 2006). As provided in Section 3.10 of the Draft EIS/EIR, the geologic conditions underlying the railroad corridor are comprised of alluvium of a relatively young in origin. Therefore, these types of shallow bedrock or stiff clay soil conditions that could propagate vibration are unlikely. Based on these geologic conditions, the vibration analysis assumes that ground-borne energy propagates normally through the soil (as opposed to efficient propagation). The Draft EIS/EIR Appendix H1 and H2 for the vibration calculations completed for the Project. Based on these existing conditions and circumstances, once



operational and as provided in Table 6-5 of Appendix H1, the predicted vibration level from rail pass-bys at the Redlands Depot (and other contributing properties within the Redlands Santa Fe Depot Historic District) would be approximately 74 VdB; substantially lower than the corresponding damage criteria of 90 VdB.

Analysis results indicate that the proposed Project has potential to cause severe vibration impacts (as defined by FTA) at multiple receiver locations during train pass-by events (see page 3.6-30 and Appendices H1 and H1 of the Draft EIS/EIR for additional detail). These are annoyance-based impacts, not structural damage impacts. To minimize these vibration annoyance impacts from train operations, SANBAG is proposing the placement of ballast mats or similar technologies per Mitigation Measure NV-5 in the Draft EIS/EIR. Further site-specific studies would be conducted during the final design process to determine the precise placement of these mitigation features along the ROW (see Mitigation Measure NV-5).

Construction vibration impacts are considered separately (see pages 3.6-30 to 3.6-31 of the Draft EIS/EIR). Construction activities can also produce varying degrees of ground vibration depending on the equipment and methods employed and the soil conditions within the area. The analysis provided in Effect 3.6-2 of the Draft EIS/EIR, applies construction vibration levels associated with a vibratory roller (0.210 PPV at 25 feet). This type of equipment would be used in conjunction with construction activities in downtown Redlands, which includes historic structures (and the subject property). Based on criteria presented in FTA's Noise and Vibration Manual (2006) fragile buildings and extremely fragile buildings are potentially subject to damage when vibration exceeds 0.20 PPV (approximately 100 VdB at 25 feet) and 0.12 PPV (approximately 95 VdB at 25 feet), respectively. Analysis results indicate that the calculated vibration levels have potential to exceed the thresholds if construction activities occur within a distance of 25 feet from several fragile structures within the Redlands Santa Fe Depot Historical District. Therefore, Mitigation Measure CUL-1 is proposed to reduce vibration impacts. However, for most typical buildings along the railroad alignment such as residences or commercial buildings (1960s or newer), vibration levels would not have the potential for damage from vibration.

2.1.8 MASTER RESPONSE 8: LAND ACQUISITION REQUIREMENTS

General Comment: Multiple commenters expressed interest in knowing whether SANBAG required acquisition of their property to facilitate construction of the Project.

Master Response: The Project primarily occurs within existing SANBAG right-of-way (ROW). In limited circumstances, the Project requires acquisition of new ROW along certain constrained sections of the existing railroad ROW, potentially at the layover site (west of California Street), and in areas near the proposed rail stations (see page 2-43 of the Draft EIS/EIR). The physical improvements associated with the Project may require up to 58 partial property acquisitions, up to 4 full property acquisitions, up to 31 roadway easements (roadway, temporary construction, sidewalk, utility, and alley vacations), and potentially two (2) business relocations. Both private and public properties could be affected by the Project. It is anticipated that the majority of properties affected would be subject to temporary construction easements (TCEs) (up to 60 properties), which may be established for appropriate lengths of time within the approximately 36-month construction period. Mitigation Measure LU-1 is proposed to mitigate



this effect through compliance with Federal and State Relocation laws and minimizing the Project's land requirements through final design refinements.

As identified in Draft EIS/EIR Section 3.2, Mitigation Measure LU-1 (page 3.2-39), SANBAG shall provide just compensation consistent with the requirements of the Uniform Relocation Assistance and Real Property Acquisition Policies Act and California Relocation Act for properties to be acquired.

Appendix D2 of the Final EIS/EIR provides a list of the property acquisitions and TCEs based on preliminary engineering for the Project. Appendix D2 was modified for the Final EIS/EIR to include the property addresses in addition to the property assessor parcel numbers as provided in the Draft EIS/EIR. The list of property acquisitions and TCEs is subject to revision pending the completion of final design refinements and implementation of Mitigation Measure LU-1 which may reduce the amount of property required for the Project.

2.1.9 MASTER RESPONSE 9: PROJECT NOTICING

General Comment: Several commenters stated that the public were not given sufficient notice of the Project by SANBAG.

Master Response: The Project has been part of SANBAG's vision to expand public transit in San Bernardino County since the approval of Measure I in 1989 (and reauthorized in 2006) followed by the purchase of the right-of-way (ROW) from AT&SF (Santa Fe) Railroad in 1993. At each stage of the Project's development, SANBAG has solicited input from the public and public agencies starting with the Measure I 2010-2040 Strategic Plan (2009) and Long Range Transit Plan, Interim Project Report (2009). As detailed below and identified in Final EIS/R Chapter 6 (Section 6.6 – Public Information Meetings and Community Outreach), a total of nine public meetings have been held for the project; six of which were conducted during the formal NEPA/CEQA process. Since 2010, SANBAG has completed the following outreach activities to solicit feedback on the Project and provided the opportunity for public comment:

Redlands Corridor Alternatives Analysis:

- Public Meeting - City of Redlands - ESRI Café: September 13, 2010

Redlands Passenger Rail:

- Public Meeting - City of Redlands - ESRI Café: May 11, 2011
- Public Meeting - City of San Bernardino – Santa Fe Depot: May 12, 2011

CEQA Notice of Preparation (NOP) Mailing/Advertisement and Scoping Meetings:

- NOP filed with County Clerk and State Clearinghouse (SCH) on April 10 (Comment Period April 10, 2012 to May 12, 2012)
- Newspaper publications on April 10, 2012: (1) San Bernardino Sun, (2) Inland Empire Community Newspapers and (3) Redlands Daily Facts
- NOP Scoping Meeting - City of Redlands - ESRI Café: April 24, 2012
- NOP Scoping Meeting - City of San Bernardino - San Bernardino Hilton: May 2, 2012



NEPA Notice of Intent (NOI) Mailing/Advertisement and Scoping Meetings:

- NOI filed in Federal Register on July 31, 2012 (NOI Comment Period: July 31, 2012 to October 11, 2012)
- Newspaper publications on July 31, 2012: (1) San Bernardino Sun, (2) Inland Empire Community Newspapers and (3) Redlands Daily Facts
- NOI Scoping Meeting - City of San Bernardino - Hilton: September 25, 2012
- NOI Scoping Meeting - City of Redlands - ESRI Café: September 27, 2012

CEQA/NEPA Draft EIS/EIR:

- Draft EIS/EIR made available to California state agencies by the State Clearinghouse beginning August 6, 2014 through September 29, 2014.
- Formal notice was published in the Federal Register on August 15, 2014 through September 29, 2014.
- The Draft EIS/EIR was noticed and posted on SANBAG's website for public review on August 6, 2014.
- Newspaper publications on August 6, 2014 and August 29, 2014: (1) San Bernardino Sun, (2) Inland Empire Community Newspapers and (3) Redlands Daily Facts
- Draft EIS/EIR Public Meeting - City of Redlands - ESRI Café: September 4, 2014
- Draft EIS/EIR Public Meeting - City of San Bernardino - Hotel: September 9, 2014

At the various public meetings identified above, SANBAG has requested feedback (verbal and written) on the range of alternatives being considered and the evaluation of potential environmental effects. To facilitate this feedback, comment cards, a court reporter, and Spanish bilingual staff have been available at all of the public meetings. In addition, SANBAG established a project-specific email address: RPRP_Public_Comments@sanbag.ca.gov to accept public input and comment on the Draft EIS/EIR. To maximize meeting attendance during the Draft EIS/EIR, email blasts and newspaper advertisements were sent out following the initial noticing. These materials are included in Appendix A5 of the Final EIS/EIR. Direct mailings were sent out to all properties adjoining SANBAG's ROW and listed in Appendix A3.

With the comments received, SANBAG has considered the range of topics raised and prepared a Final EIS/EIR that includes responses to comments on the Draft EIS/EIR and mitigation monitoring and reporting program (MMRP) that will be used by SANBAG to verify compliance with mitigation measures adopted.

2.1.10 MASTER RESPONSE 10: AIR QUALITY AND HEALTH EFFECTS

General Comment: Several Commenters raised concern about air quality and health impacts (for example, respiratory diseases) due to fugitive dust emissions caused by moving and idling passenger trains.



Master Response: Since diesel-related exhaust, specifically diesel particulate matter (DPM), is considered a toxic air contaminant (TAC) by the Air Resources Board (ARB), a health risk assessment (HRA) was conducted to assess the risk associated with the Build Alternatives and Design Options. An HRA consists of three parts: (1) a TAC emissions inventory, which is described in Section 4.2 of the Draft EIS/EIR, (2) air dispersion modeling to evaluate off-site concentrations of TAC emissions, and (3) assessment of risks associated with predicted concentrations. The HRA was conducted using the guidelines provided by the California Office of Environmental Health Hazard Assessment (OEHHA) for the Air Toxics Hot Spots Program and the HRA guidelines developed by the California Air Pollution Control Officers Association (CAPCOA) and South Coast Air Quality Management District (SCAQMD).

The Project involves both a new local transit service along a dedicated right-of-way and extension of diesel regional passenger rail service. The Project is considered to be a “regionally significant project” under 40 CFR 93.101; however, it would not result in an adverse number of diesel vehicles that would congregate at a single location. In addition, dispersion modeling conducted for the vehicle technologies (diesel locomotive or DMU) under consideration for the Project indicates that rail emissions associated with the Build Alternatives and Design Options would not exceed the thresholds for PM_{2.5} or PM₁₀. This finding is largely based on the Project’s incorporation of Tier IV engine technology and the minimal duration that trains would be idling at any one location. Consequently, the Project is not considered a project of air quality concern (POAQC) for PM₁₀/PM_{2.5} and the CAA and 40 CFR 93.116 requirements are met without a hot-spot analysis.

SCAG’s Transportation Conformity Working Group’s (TCWG) interagency consultation (IAC) provided concurrence with this determination on October 2, 2014 following the TCWG Committee Meeting on August 26, 2014 (see Draft EIS/EIR Appendices G1 and G2). Therefore, the health risks associated with long-term operations of the Project would not result in an increased cancer risk to the nearby sensitive receptors (see Table 3.5-12 of the Draft EIS/EIR). Additionally, as evaluated under Effect 3.5-1 above, the Project is not expected to result in violations of the state or federal 1- or 8-hour CO standards. Based on these results, no adverse effect would result under NEPA and the impact would be less than significant under CEQA.

Tables 3.5-9 and 3.9-10 of the Draft EIS/EIR summarize the incremental daily operational emissions for the opening year 2018 and future conditions (2038) compared to No Project conditions. As shown, the Project would result in an increase in emissions over the No Project scenario in 2018, except PM₁₀, which would show minor decreases under the “Without Express Service” scenarios. The DMU vehicle option would result in lower daily operational emissions when compared to the MP36 and F59 locomotives. Based on the result of the air quality analysis contained in Appendix G1 and G2 of the Draft EIS/EIR, Project-related increases in emissions of criteria air pollutants for all the vehicle technologies under consideration would be below SCAQMD’s thresholds of significance.

2.1.11 MASTER RESPONSE 11: EFFECTS TO THE REDLANDS SANTA FE DEPOT HISTORIC DISTRICT

General Comment: Several comments expressed concerns related to the Project's construction and operational affects to the Redlands Santa Fe Depot Historic District.

Master Response: Implementation of the Project would require construction through the NRHP-listed Redlands Santa Fe Depot Historic District. Once operational, passenger train service would involve trains passing through the district on a daily basis. This historic district was originally evaluated and listed in the National Register of Historic Places (NRHP) in 1991 (1S status code; Draft EIS/EIR Appendix M). It currently consists of 23 contributing properties of which eight are located within the Project's area of potential effect (APE) and listed below. Dating from 1888 through 1946, the buildings visually document the district's economic and social history (see Appendix M, pages 4-01 through 4-2).

The analysis provided in the Section 3.12 Draft EIS/EIR for the historic district summarizes the assessment of effects as provided on pages 5-3 through 5-14 of Appendix M. This includes consideration of potential affects to the Downtown Redlands Station (351 Orange Street), which is a NRHP-listed contributor to the district. As stated in the methodology in Section 5 of Appendix M, an adverse effect is found when an "project" may alter, directly or indirectly, any of the characteristics of a historic property that qualify the property for inclusion in the NRHP in a manner that would diminish the integrity of the property's location, design, setting, materials, workmanship, feeling, or association.

The Build Alternatives and Design Options would result in no direct physical destruction or damage to the historic district or to any of its contributors. Construction in the historic district would be limited to sidewalk improvements to the north and east of the Redlands Depot and track improvements within SANBAG's right-of-way. These improvements would be consistent with the district's existing character and the Depot would continue to exhibit its essential Classical Revival architectural features thereby maintaining its status as a contributor to the district. Indirect effects related to construction-related vibration impacts at historic structures adjacent to SANBAG's ROW would be minimized through the implementation of Mitigation Measure CUL-1. SHPO concurred with this finding on August 16, 2014. Please also refer to Master Response 7 for additional discussion of construction-related vibration impacts at historic structures.

2.1.12 MASTER RESPONSE 12: PROJECT SAFETY AND SECURITY

General Comment: Multiple commenter's expressed concerns related to Project safety and security. Several commenters had concerns with pedestrian and automobile safety at the at-grade roadway crossings, including those commonly used by students. Security at the proposed stations was also raised as a concern.

Master Response: One of SANBAG's stated objective for the Project is to implement safety improvements that will benefit both existing freight and proposed passenger operations per Federal Railroad Administration (FRA) safety guidelines and SANBAG's purchase agreement with the Burlington Northern Santa Fe (BNSF) Railway (see Draft EIS/EIR Chapter 1, page 1-6).



As part of the Project, existing at-grade crossings would be designed to include raised medians, widened sidewalks, traffic striping, flashing lights, pedestrian gate arms, and swing gates where appropriate, or where requested by the California Public Utilities Commission (CPUC) (see Mitigation Measure TR-3, Approval from CPUC for Grade Crossings and Safety Measures). New warning devices would include passive railroad crossing signs, a simple bell, flashing light signals, and flashing light signals with gates. Where appropriate, SANBAG would reuse the existing modern signal equipment and warning devices to the greatest extent feasible. These collective improvements would maximize safety for at-grade crossings for both vehicles and non-motorized forms of transportation. During construction, compliance with Mitigation Measure TR-1 (Prepare Traffic Management Plan) would minimize Project-related safety hazards.

Pedestrians and bicycle movements would be permitted to cross the tracks only when trains are not present and at designated crossings. Similar to existing conditions, unauthorized crossings at undesignated locations would be prohibited and considered trespassing. To minimize unauthorized crossings and in compliance with CPUC requirements to minimize risks to pedestrians and cyclists, fencing and signage would be erected to notify pedestrians and bicyclists of potential train hazards and to discourage trespassing. SANBAG will conduct additional outreach with San Bernardino Unified and Redlands Unified School Districts to verify that sufficient safety measures are included at crossings heavily used by students.

At each proposed station, the facility layout would be designed to provide a safe and secure transit system with limited amenities (i.e., bike racks). Safety control features proposed as part of the Project include security lighting, in-station pedestrian crossings at select stations with railroad/pedestrian crossing equipment, and small shade canopy areas. In addition, SANBAG would include security-related design features such as emergency telephones, public address systems, and video surveillance systems. The specific improvements for each station location would be further defined during the Project's final design and in compliance with Mitigation Measure SS-1 (Develop Safety and Security Management Plan).

2.1.13 MASTER RESPONSE 13: TRAFFIC CIRCULATION

General Comment: Several commenters expressed concerns related to the Project's affect on existing roadway congestion.

Master Response: SANBAG performed a comprehensive traffic impact analysis in support of the EIS/EIR (see Appendix E) to assess the Project's impact to the local roadway network and current levels of service (LOS). The traffic analysis models peak hour turning movements in the morning and evening for 39 intersections under existing (No Project) and with Project conditions for 2012 (base year), 2018 (opening day), and 2038 (future conditions). In analyzing the Project's affects to the local roadway network, it is important to understand that the Project is would not be a high trip-generating use. According to the Ridership Study (Appendix C of the Draft EIS/EIR), only three (3) percent of the commuters would utilize vehicles to access the stations, with the highest percentage people commuting by vehicles going to the Downtown Redlands Station. In this context, the Project would not result in a substantial increase in the amount of trips generated due to the low percentage of vehicle use by projected riders, but rather a re-distribution of existing vehicle trips that a travel a shorter distance (i.e., fewer vehicle

miles traveled - VMT). Table 4-1 in Appendix G1 of the Draft EIS/EIR provides the VMT with and without the Project in 2018 and 2038.

The conclusions of the traffic analysis generally support this general overview. As provided in Appendix E and summarized in Section 3.3 of the Draft EIS/EIR, the results of the traffic analysis with the implementation of the Project are as follows:

- *Year 2012 (Existing with Project) Intersection LOS and Vehicle to Capacity Ratio (V/C).* Of the 39 intersections modeled, one intersection, California Street and I-10 East Ramps would operate at a LOS of F in the AM and PM peak hours with the Project. In addition, California Street and Redlands Boulevard would operate at below the V/C standard. The remaining modeled intersections would either not be impacted or would experience an overall improvement from the 2011 (No Project) existing conditions.
- *Year 2018 (With Project) Intersection LOS and V/C.* Once operational, of the 39 intersections analyzed, two intersections (Orange Street and Pearl Avenue and 6th Street and Pearl Avenue), would not operate at satisfactory LOS in the PM peak hour (LOS D or E). Additionally, the V/C for two intersections (California Street and I-10 West Ramps and California Street and I-10 East Ramps) would exceed V/C thresholds (1.08 V/C and 1.10 V/C, respectively). The remaining modeled intersections would either not be impacted or would experience an overall improvement from the 2011 (No Project) existing conditions.
- *Forecast Year 2038 (With Project) Intersection LOS and V/C.* In 2038, train operations are assumed to be similar to those proposed in 2018. Table 3.3-12 presents the Year 2038 scenario for traffic intersection impacts resulting under 2038 conditions with the Project, a total of four intersections in the AM peak hour and 14 intersections in the PM peak hour intersections would operate at an unsatisfactory LOS. A total of 11 intersections would have an unsatisfactory V/C in the PM peak hour and two intersections in the AM peak hour under 2038 conditions with the Project; however, in most instances, the Project-related changes are marginal (i.e., difference of 0.01 change).

Overall the Project would have minimal disruptions to existing traffic patterns and intersection operating conditions. However, there are a few intersections that would be impacted. These impacts were identified as significant under CEQA and adverse under NEPA in the Draft EIS/EIR and Mitigation Measure TR-2 (Existing LOS and V/C Year 2018 and 2038 Impact Roadway Improvements) is proposed to minimize Project-related deterioration in LOS. Additionally, Mitigation Measure TR-3 (Approval from CPUC for Grade Crossings and Safety Measures) and Mitigation Measure TR-4 (Recommended Pre-Signals for Queuing) are proposed to minimize traffic hazards at existing at-grade crossings. With the application of the proposed mitigation, the Project would result in no adverse effect to existing travel patterns under NEPA and impacts under CEQA would be less than significant.

2.1.14 MASTER RESPONSE 14: MILL CREEK ZANJA ELIGIBILITY

General Comment: Commenters expressed concerns and disagreement regarding the eligibility determination made for the segment of the Mill Creek Zanja identified within the

Project's Area of Potential Effect (APE). Multiple commenters requested clarification on the methodologies and considerations used to determine the ineligible determination for the segment of the Mill Creek Zanja located within the Project area.

Master Response: As identified in Draft EIS/EIR Appendix M, the Mill Creek "Zanja," east of Division Street, is listed on the National Register of Historic Places (NRHP). Portions of Mill Creek to the west of Division Street were determined to lack integrity and, thus, was determined ineligible for the NRHP. Specifically, the portion of the Mill Creek Zanja within the Project's APE was interpreted as not part of the Mill Creek Zanja segment nominated in the NRHP 1976 Nomination Form for the resource. Granted, this form offers contradictory descriptions of the extent of the Zanja segment nominated for NRHP listing as identified as follows (see pages 3-3 to 3-16 of Appendix M of the Draft EIS/EIR).

Item 2 - Location, the form describes the west boundary as "just west of Division Street at Sylvan Blvd." In consideration of other information in the form the quoted statement was interpreted to mean that the nominated segment ends in the vicinity of Division Street.

Item 10 – Geographical Data, states that "six miles downstream from [west of] the intake, just west of Sylvan Park in Redlands, it [the water-conveyance course] goes into the business area of Redlands, and this is the end of the proposed district." While this statement could be read as indicating that the nominated Zanja segment ends at the business area, where the feature is undergrounded, in light of other information in the form, the quoted statement was interpreted to mean that the nominated segment ends in the vicinity of Division Street.

Item 10 – Geographical Data, the form also states that the "End" of the nominated segment is in the "SW quarter of Sec. 26 T3W R1S, San Bernardino Base and Meridian," which could be interpreted as in the vicinity of Division Street or as far west as Church Street, but not west of Church Street, where the course extends another 1,000 feet west before it is undergrounded beneath the business area.

Item 10 – Geographical Data (page 4), the nomination describes the west end of the nominated segment as "University Ave. to Division St. University of Redlands." Here the form states that the nominated segment is 5.5 miles long rather than 6 miles long.

Nomination Form, includes a photo looking west from Division Street toward I-10 that states: "this portion to I-10 could be included, but is not beautiful."

A map included in the nomination form package and labeled "6 miles of Mill Creek Zanja shown in Red" offers a visual representation of the nominated segment. This map locates the western boundary of segment at Division Street. Although the identified Zanja segment continues to convey water, it now functions as a flood-control channel west of Division Street. The water-conveyance course west of Division Street was evaluated based on current conditions, and setting. Setting and feeling are important aspects of integrity for linear resources—historically significant trails, for example, have been divided into eligible and ineligible segments as a result of altered setting and feeling. Since the segment between Division Street and I-10 was



photographed for the 1976 Nomination Form, that segment was widened and its upper banks appear to have been graded. The resource retains integrity of location, but its widening, grading, modern pipe outfalls, rip-rap, and other features diminish its integrity of design, workmanship, setting, and feeling. The setting and feeling of the Mill Creek Zanja, west of Division Street, have been diminished for this segment to when it was photographed for the 1976 Nomination.

De-listing of the resource or any portion of it is not the intent of the Zanja evaluation completed as part of the cultural resources study for the Project. Rather, the portion of the resource within the Project APE was evaluated in light of its contradictorily defined western boundary in the 1976 Nomination Form. With the contradictory boundary information provided by the 1976 Nomination Form in mind, the portion of the Zanja west of Division Street was evaluated in good faith as part of the cultural resources study (Appendix M of the Draft EIS/EIR), and found not eligible for NRHP or CRHR listing. The State Historic Preservation Officer (SHPO) concurred with this eligibility determination in its letter provided on August 14, 2014 (see Section 3.12.1, Final EIS/EIR and Appendix M).

2.1.15 MASTER RESPONSE 15: PROPERTY VALUES

General Comment: Commenters expressed concerns about property values in the area with implementation of the Project. Multiple commenters requested clarification on if property values in their area would be affected by the Project.

Master Response: No studies were found that definitively answered the specific question of rail impacts on real estate property values. However, several studies did evaluate the broader impacts of rail projects on growth and development trends and regional economies. The evidence from different studies on the effect of rail transit is mixed and the conclusion is that the introduction of rail transit alone is not sufficient for social-economic impacts to take place. Such impacts depend on other prevailing conditions, especially a buoyant local economy that can take advantage of new opportunities offered by improved accessibility, supported by local planning policies. Station accessibility, commute-time savings, and commute costs may all contribute to the complex of factors that can influence (or not influence) real estate values in the vicinity of rail transit projects. In summary, there is no agreement on the extent to which the rail transit infrastructure leads to wider socioeconomic impacts. The evidence is mixed and there seems to be disagreement on whether overall impacts, if they exist, are positive or negative.

The independent studies^{1, 2} show that the potential exists for the values of residential and commercial properties to appreciate as a result of rail transit projects. Property value increases can result from both the new access to a train transportation system and the associated intensification of development that can occur around station locations. However, given the potential for nuisance impacts (such as noise and visual impacts) resulting from trains passing

¹ Diaz, Roderick B. 1999. "Impacts of Rail Transit on Property Values." In Proceedings of the 1999 Commuter Rail/Rapid Transit Conference. American Public Transportation Association. May 22-27, 1999.

² Reconnecting America, Center for Transit-Oriented Development. 2008. Capturing the Value of Transit. Prepared for the United States Department of Transportation, Federal Transit Administration. 2008.



in close proximity, it is possible that some properties could experience a decrease in value. This potential for a decrease in property value may be particularly true for residences and businesses in locations considerably removed from train stations but exposed to some nuisance impacts of the project. This balance between the amount of project benefit enjoyed compared to the nuisance factor endured would be unique for each property and would be only one of the many factors influencing the ultimate market value of any particular property.

SANBAG is not aware of any evidence that suggests the Project would result in an adverse effect to local property values. CEQA Guidelines Section 15145 states that “if, after thorough investigation, a Lead Agency finds that a particular impact is too speculative for evaluation; the agency should note its conclusion and terminate discussion of the impact.” However, as provided on page 4-37 of the Draft EIS/EIR, once constructed, the Project in conjunction with other reasonably foreseeable projects is likely to entail desirable economic benefits, which may include, but is not limited to, increases in property values.



2.2 FEDERAL AGENCY COMMENTS AND RESPONSES



U.S. Environmental Protection Agency



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

SEP 25 2014

Raymond Sukys
Director, Office of Planning and Program Development
Federal Transit Administration, Region 9
201 Mission Street, Suite 1650
San Francisco, CA 94105-1839

Subject: Draft Environmental Impact Statement (DEIS) for the Redlands Passenger Rail Project, San Bernardino County, California (CEQ# 20140228)

Dear Mr. Sukys:

The U.S. Environmental Protection Agency has reviewed the Draft Environmental Impact Statement (DEIS) for the proposed Redlands Passenger Rail Project. Our review and comments are provided pursuant to the National Environmental Policy Act (NEPA), the Council on Environmental Quality Regulations (40 CFR Parts 1500-1508), and our NEPA review authority under Section 309 of the Clean Air Act.

USEPA-1

The Federal Transit Administration (FTA), as NEPA lead agency, working with the San Bernardino Associated Governments (SANBAG) acting in its role as the San Bernardino County Transportation Commission, propose extending passenger rail operations east, from the City of San Bernardino to the City of Redlands in an approximate 9 mile corridor. The DEIS evaluates three Alternatives, including a Preferred Project, a Reduced Project Footprint, and a No Build. The DEIS includes three Design Options for the build Alternatives.

EPA provided Scoping comments on May 17th, 2012. We appreciate the additional information incorporated into the Draft EIS in response to those comments, including committing to diesel-powered locomotives that would meet Tier 4 engine emissions requirements, and completing a traffic study that identified queuing impacts and mitigation at the numerous at-grade crossings of the proposed rehabilitated track. Following our review of the DEIS, EPA has rated the proposed project as Lack of Objections (LO) (see enclosed *Summary of EPA Rating Definitions*). While the DEIS identifies that project implementation, combined with proper mitigation, should not result in significant environmental impacts, we offer the following recommendations for your consideration going forward.

USEPA-2

Waters of the United States

The DEIS identifies less than 1 acre of impacts to the Waters of the United States (WUS) resulting from the project, and FTA is still in the process of completing a jurisdictional delineation to be approved by the Army Corps of Engineers (ACOE). EPA encourages FTA to continue to work closely with the ACOE to identify and commit to minimization and mitigation of any WUS impacts. In particular, EPA recommends that FTA document how the reduced length of bank improvements along the Mission Zanja Channel (associated with Alternative 3) and proposed Design Options may minimize impacts to the Waters of the US.

USEPA-3



We appreciate the opportunity to review the DEIS. When the FEIS is available for review, please send one copy to the address above (mail code: ENF 4-2). If you have any questions, please contact Zac Appleton, the lead reviewer for this project. Zac can be reached at 415-972-3321 or appleton.zac@epa.gov.

USEPA-4

Sincerely,

APR 23 2015

Connell Dunning, Transportation Team Supervisor
Environmental Review Section

Enclosures: Summary of EPA Rating Definitions

cc: Mitchell Alderman, SANBAG
Dominique Paukowits, FTA



SUMMARY OF EPA RATING DEFINITIONS*

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

ENVIRONMENTAL IMPACT OF THE ACTION

"LO" (Lack of Objections)

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

"EC" (Environmental Concerns)

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

"EO" (Environmental Objections)

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

"EU" (Environmentally Unsatisfactory)

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

ADEQUACY OF THE IMPACT STATEMENT

Category "1" (Adequate)

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

Category "2" (Insufficient Information)

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

Category "3" (Inadequate)

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

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



2.2.1 U.S. ENVIRONMENTAL PROTECTION AGENCY (USEPA)

2.2.1.1 Response to USEPA-1

The comment indicates that the USEPA has reviewed and commented on the Draft EIS/EIR for the Project pursuant to EPA's review authority. The comment also provides a summary of the Project. This comment is introductory to other comments and is not a comment on the adequacy or findings of the Draft EIS/EIR. This comment will be included as part of the record and made available to the decision makers prior to a final decision on the project.

2.2.1.2 Response to USEPA-2

The comment states that additional information was incorporated in the Draft EIS/EIR as requested by EPA as part of scoping comments submitted on May 17, 2012. The comment indicates that EPA has assigned the Project a USEPA rating of "Lack of Objection." This comment is introductory to other comments and does not propose a comment on the adequacy or findings of the environmental analysis for the Project. This comment will be included as part of the Draft EIS/EIR record and made available to the decision makers prior to a final decision on the project.

2.2.1.3 Response to USEPA-3

The comment recommends that FTA continue to work closely with the Army Corps of Engineers (USACE/COE) to identify and minimize impacts to waters of the U.S. The comment also recommends that the environmental document show how the reduced length of bank improvements along the Mission Zanja Channel (associated with Alternative 3) and proposed Design Options minimize impacts to waters of the U.S.

SANBAG appreciates USEPA's input and recommendation to minimize Project-related impacts to waters of the U. S., including the Mission Zanja Flood Control Channel (MZC). SANBAG is proposing the implementation of the Preferred Project Alternative mainly because of the cost savings offered by the design for Bridge 3.4 and the segment of track that borders the I-10/California Citrus Grove. Notwithstanding SANBAG's selection of the Preferred Project Alternative, as described in Section 1.2 (Project Modifications) of this appendix, SANBAG is modifying the Project's physical footprint at the western extent of the MZC; just east of Bridge 3.4 (see Figure 2-1D (Revised)). As provided in Section 1.2 of this appendix, this modification would reduce the Project's impacts to 2.01 acres of Southern cottonwood willow riparian forest (SCWRF) habitats located to the south of SANBAG's ROW. These revisions to the Project's physical footprint would also further limit the extent of impacts to waters of the U. S. as described in Effect 3.7-3 of the Draft EIS/EIR (page 3.7-15 to 3.7-18) and would support the Project's regulatory permitting process as required under the Clean Water Act. These minor refinements and revisions are reflected in Section 3 of Appendix P, Sections 3 and 5 of Appendix I1, Chapters 2 (page 2-45) and Sections 2.4,3 (pages 3.7.1-7, 3.7-16, 3.7-17, 3.7-20, and 3.7.3-21 and Tables 3.7-5 and 3.7-6) of the Final EIS/EIR.



2.2.1.4 Response to USEPA-4

The comment concludes the comment letter. The comment requests that a copy of the Final EIS be provided to EPA once it is released. In conjunction with the release of the Final EIS/EIR, SANBAG forwarded a copy of the Final EIS/EIR to USEPA.



U.S. Dept. of the Interior



United States Department of the Interior

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

IN REPLY REFER TO:
(ER. 14/0523)

Filed Electronically

29 September 2014

Mitchell A. Alderman
P.E., Director of Transit & Rail Programs
SANBAG
1170 West 3rd Street, 2nd Floor
San Bernardino, CA 94210

Subject: Draft Environmental Impact Statement (DEIS), Department of Transportation (DOT),
Federal Transit Administration (FTA), Redlands Passenger Rail Project

Dear Mr. Alderman:

The Department of the Interior has received and reviewed the subject document and has no
comments to offer.

Thank you for the opportunity to review this project.

}
USDOI-1

Sincerely,

Patricia Sanderson Port
Regional Environmental Officer

cc: REO/San Francisco
OEPC-Staff Contact: Lisa Chetnik Treichel, (202) 208-7116; Lisa_Treichel@ios.doi.gov



2.2.2 U.S. DEPARTMENT OF INTERIOR (USDO I)

2.2.2.1 *Response to USDO I-1*

FTA and SANBAG appreciate the U. S. Department of Interior (USDO I) review of the draft EIS/EIR and notes USDO I has no comment on the Draft EIS/EIR.



2.3 STATE AGENCY COMMENTS AND RESPONSES



California High Speed Rail Authority

September 26, 2014

BOARD MEMBERS

Dan Richard

Thomas Richards

Jim Hartnett

Richard Frank

Patrick W. Henning, Sr.

Katherine Perez-Estolano

Michael Rossi

Lynn Schenk

Thea Selby

Jeff Morales

Mitchell A. Alderman
Director of Transit & Rail Programs
San Bernardino Associated Governments
1170 W. 3rd Street, 2nd Floor
San Bernardino, CA 92410-1715

Dear Mr. Alderman:

SUBJECT: Redlands Passenger Rail Project

The California High-Speed Rail Authority (Authority) is working to connect major regions of the State through fast, reliable high-speed train service. Over the years, the Authority has worked with regional partners, including the San Bernardino Associated Governments (SANBAG) and its member cities, to find ways to collectively lay the groundwork for a statewide rail modernization program that enables local and regional rail lines to meet their expected operational needs while at the same time planning for future connections to California's high-speed rail system.

Among the most important components of the statewide rail system is improving transportation links to the Inland Empire and San Diego – large population centers currently lacking multiple options for connectivity to outside regions. The Authority supports regional efforts to develop localized rail, transit, and transportation programs that strengthen the state system by increasing connectivity. SANBAG's Redlands Passenger Rail Project creates a nine-mile extension of passenger rail service in order to provide an additional transportation alternative along the east-west travel corridors between San Bernardino and Redlands. The project's benefits include significant track improvements, strengthening or replacement of five bridges, increased safety through implementation of Positive Train Control and increased system accessibility through five proposed stations, supporting passenger needs while respecting surrounding communities.

Further, the Redlands Passenger Rail Project will greatly progress SANBAG's efforts to reduce traffic congestion and improve air quality for the region. The project can also integrate with the statewide high-speed rail system in the future, providing easy cross-state connections via transportation hubs in the Inland Empire and Los Angeles, optimizing its positive environmental potential.

We look forward to our continued collaboration with SANBAG as we work to address the state's mobility needs, keeping California at the forefront of smart infrastructure development.

Sincerely,

MICHELLE BOEHM
Southern California Regional Director
California High-Speed Rail Authority

700 North Alameda Street, Los Angeles, CA 90012 • www.hsr.ca.gov

CAHSR-1



2.3.1 CALIFORNIA HIGH SPEED RAIL AUTHORITY (CAHRS)

2.3.1.1 *Response to CAHSR-1*

The comment is introductory in nature and provides information regarding the California High-Speed Rail Authority's goals for a statewide rail modernization program. The comment states how the Project will strengthen the state system by increasing connectivity in the region with the potential for future integration with the statewide high-speed rail system. The comment does not contain any substantive statements or questions about the Draft EIS/EIR or the analysis therein. This comment will be included as part of the record and made available to the decision makers prior to a final decision on the project.



State of California - Natural Resources Agency
DEPARTMENT OF FISH AND WILDLIFE
Inland Deserts Region
3602 Inland Empire Blvd., Suite C-220
Ontario, CA 91764
(909) 484-0459
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EDMUND G. BROWN, Jr., Governor
CHARLTON H. BONHAM, Director



California Dept. of Fish and Wildlife

September 29, 2014

Mr. Mitchell A. Alderman
Director of Transit & Rail Programs
San Bernardino Associated Governments
1170W. 3rd Street, 2nd Floor
San Bernardino, CA 92410

Subject: Draft Environmental Impact Report
Redlands Passenger Rail Project
State Clearinghouse No. 2012041012

Dear Mr. Alderman:

The Department of Fish and Wildlife (Department) appreciates the opportunity to comment on the Draft Environmental Impact Report (DEIR) for the Redlands Passenger Rail Project (project) [State Clearinghouse No. 2012041012]. The Department is responding to the DEIR as a Trustee Agency for fish and wildlife resources (California Fish and Game Code Sections 711.7 and 1802, and the California Environmental Quality Act [CEQA] Guidelines Section 15386), and as a Responsible Agency regarding any discretionary actions (CEQA Guidelines Section 15381), such as the issuance of a Lake or Streambed Alteration Agreement (California Fish and Game Code Sections 1600 *et seq.*) and/or a California Endangered Species Act (CESA) Permit for Incidental Take of Endangered, Threatened, and/or Candidate species (California Fish and Game Code Sections 2080 and 2080.1).

CDFW-1

Project Description

The proposed project encompasses passenger rail operations along an approximate nine-mile corridor extending east from the City of San Bernardino to the City of Redlands, within the County of San Bernardino, State of California. The project includes local and express train service via five station stops located at E Street, Tippecanoe Avenue (or Waterman Avenue), New York Street, Orange Street (Downtown Redlands), and University Street (University of Redlands) and will involve: the replacement of the existing railroad tracks and ties; reconstruction or rehabilitation of existing bridge structures; construction of station platforms and a train layover facility; and auxiliary improvements such as parking, at-grade roadway crossings, and pedestrian access.

CDFW-2

Conserving California's Wildlife Since 1870



Draft Environmental Impact Report
Redlands Passenger Rail Project
SCH No. 2012041012
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Biological Resources and Impacts

Following review of the Biological Resources section of the DEIR, the Department offers the comments and recommendations listed below to assist the Lead Agency (i.e., San Bernardino Associated Governments; SANBAG) in adequately identifying and/or mitigating the project's significant, or potentially significant, impacts on biological resources. The Department has jurisdiction over the conservation, protection, and management of fish, wildlife, native plants, and the habitat necessary for biologically sustainable populations of those species (i.e., biological resources). The Department is a Trustee Agency with responsibility under CEQA for commenting on projects that could affect biological resources. As a Trustee Agency, the Department is responsible for providing, as available, biological expertise to review and comment upon environmental documents and impacts arising from project activities (CEQA Guidelines, § 15386; Fish and Game Code, § 1802). The comments and recommendations listed below are based on the requirement for the environmental document to include the following information:

- A description of feasible mitigation measures to avoid potentially significant impacts, and/or mitigate significant impacts, of the proposed project on the environment (CEQA Guidelines, §§ 15021, 15063, 15071, 15126.2, 15126.4 & 15370).

CDFW-3

State Threatened, Endangered, and Candidate Species

The Department has discretionary authority over activities that could result in the "take" of any species listed as candidate, threatened, or endangered, pursuant to the California Endangered Species Act (CESA; Fish and Game Code, § 2050 *et seq.*). The Department considers adverse impacts to CESA-listed species, for the purposes of CEQA, to be significant without mitigation. Take of any CESA-listed species is prohibited except as authorized by state law (Fish and Game Code, §§ 2080 & 2085). Consequently, if a project, including project construction or any project-related activity during the life of the project, results in take of CESA-listed species, the Department recommends that the project proponent seek appropriate authorization prior to project implementation. This may include an incidental take permit (ITP) or a consistency determination in certain circumstances (Fish and Game Code, §§ 2080.1 & 2081).

Please note that the Department must comply with CEQA prior to issuance of an ITP for a project. As such, the Department may consider the lead agency's CEQA documentation for the project. To minimize additional requirements by the Department and/or under CEQA, the CEQA avoidance, minimization, mitigation, monitoring and reporting measures for issuance of the ITP.

The DEIR identifies the potential for project-related impacts to least Bell's vireo and Santa Ana River Woollystar. The Department recommends that the Applicant apply for a CESA ITP for incidental take of least Bell's vireo and Santa Ana River Woollystar prior to commencing project activities. An ITP will provide for greater flexibility during project construction, and minimize project delays.

CDFW-4



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The Department does not concur that Mitigation Measure BIO-1 is sufficient to reduce impacts to Santa Ana River Woollystar to a level less than significant. BIO-1 lists only avoidance and minimization measures and defers the development of mitigation, monitoring and reporting measures to a later date: BIO-1 states: "If one or more species are detected, then SANBAG shall consult with the USFWS (or CDFW if appropriate) to develop additional minimization measures prior to project construction (if necessary). These additional measures may include construction timing restrictions and/or construction monitoring."

Due to lack of information regarding a mitigation plan to offset impacts to the potential loss of individuals of Santa Ana River Woollystar and associated suitable habitat, the Department is unable to determine whether the impacts would be mitigated, and cannot, without further information from SANBAG concur that impacts to Santa Ana River Woollystar would be mitigated to less than significant levels through the implementation of Mitigation Measure BIO-1.

Please note that CEQA Guidelines §15126.4, subdivision (a)(1)(8) states formulation of feasible mitigation measures should not be deferred until some future date. The Court of Appeal in *San Joaquin Raptor Rescue Center v. County of Merced* (2007) 149 Cal.App.4th 645 struck down mitigation measures which required formulating management plans developed in consultation with State and Federal wildlife agencies after Project approval. Courts have also repeatedly not supported conclusions that impacts are mitigable when essential studies, and therefore impact assessments, are incomplete (*Sundstrom v. County of Mendocino* (1988) 202 Cal. App. 3d. 296; *Gentry v. City of Murrietta* (1995) 36 Cal. App. 4th 1359; *Endangered Habitat League, Inc. v. County of Orange* (2005) 131 Cal. App. 4th 777).

CDFW-4

Nesting Birds

It is the Project proponent's responsibility to comply with all applicable laws related to nesting birds and birds of prey. Migratory non-game native bird species are protected by international treaty under the federal Migratory Bird Treaty Act (MBTA) of 1918, as amended (16 U.S.C. 703 *et seq.*). In addition, sections 3503, 3503.5, and 3513 of the Fish and Game Code (FGC) prohibit the take of all birds and their nests. Section 3503 states that it is unlawful to take, possess, or needlessly destroy the nest or eggs of any bird, except as otherwise provided by FGC or any regulation made pursuant thereto; Section 3503.5 states that it is unlawful to take, possess, or destroy any birds in the orders FALCONIFORMES or STRIGIFORMES (birds-of-prey) or to take, possess, or destroy the nest or eggs of any such bird except as otherwise provided by FGC or any regulation adopted pursuant thereto; and Section 3513 states that it is unlawful to take or possess any migratory nongame bird as designated in the MBTA or any part of such migratory nongame bird except as provided by rules and regulations adopted by the Secretary of the Interior under provisions of the MBTA.

CDFW-5



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Mitigation Measure BIO-3 states that for the purposes of the DEIR, the breeding bird season includes "...February 15 through August 31". Please note that some species of raptors (e.g., owls) may commence nesting activities in January, and passerines may nest later than August 31. The Department encourages the Lead Agency to complete nesting bird surveys regardless of time of year to ensure compliance with all applicable laws related to nesting birds and birds of prey.

Mitigation Measure BIO-3 also states that a pre-construction nesting bird survey will occur prior to vegetation removal. Please note that the Department recommends that pre-construction surveys be required no more than three (3) days prior to vegetation clearing or ground disturbance activities, as instances of nesting could be missed if surveys are conducted sooner. The Department also recommends that surveys occur over the entirety of the project site, and not be limited to those areas with shrubs and trees: not all bird species nest in vegetation; some species nest directly on the ground. As mentioned previously, it is the Lead Agency's responsibility to ensure that the project complies with all applicable laws related to nesting birds and birds of prey, and that violations of these laws do not occur.

CDFW-5
Cont.

Lake and Streambed Alteration Agreement

Regarding the following statement (page 2-7 of Appendix I): "Pursuant to the Code, a stream is defined as a body of water that flows at least periodically or intermittently through a bed or channel having banks and supports fish or other aquatic life." Please note that this information is incorrect. California Code of Regulations Title 14, section 1.72 does not pertain to the Department's jurisdiction as embodied in FGC section 1600 *et seq.*, and is not the definition of a stream used by the Department. The section 1.72 definition was developed to address a specific sport fish issue that came before the Fish and Game Commission, and although the definition does speak to periodic and intermittent flow, section 1.72 is limited to fish-bearing or aquatic life-bearing streams.

Rather than limiting Department jurisdiction to fish-bearing streams alone, FGC Chapter 6, Fish and Wildlife Protection and Conservation, Section 1600 *et seq.* was enacted to provide for the conservation of fish and wildlife resources associated with stream ecosystems. The FGC further defines fish and wildlife to include: all wild animals, birds, plants, fish, amphibians, invertebrates, reptiles, and related ecological communities, including the habitat upon which they depend for continued viability (FGC Division 5, Chapter 1, section 45, and Division 2, Chapter 1, section 711.2(a), respectively). Fish means wild fish, mollusks, crustaceans, invertebrates, or amphibians, including any part, spawn or ova thereof (FGC, Division 5, Chapter 1, section 45).

CDFW-6

For the purposes of implementing sections 1601 and 1603 of the FGC, California Code of Regulations Title 14, section 720 requires submission to the Department of general plans sufficient to indicate the nature of a project for construction by or on behalf of any person, government agency, state or local, and any public utility, of any project which will divert, obstruct or change the natural flow or bed of any river, stream or lake



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designated by the Department, or will use material from the streambeds designated by the Department, all rivers, streams, lakes, and streambeds in the State of California, including all rivers, streams and streambeds which may have intermittent flows of water, are hereby designated for such purpose.

For any activity that will divert or obstruct the natural flow, or change the bed, channel, or bank (which may include associated riparian resources) of a river or stream or use material from a streambed, the project applicant (or "entity") must provide written notification to the Department pursuant to Section 1602 of the Fish and Game Code. Based on this notification and other information, the Department then determines whether a Lake and Streambed Alteration (LSA) Agreement is required. The Department's issuance of an LSA Agreement is a "project" subject to CEQA (see Pub. Resources Code 21065). To facilitate issuance of an LSA Agreement, if necessary, the environmental document should fully identify the potential impacts to the lake, stream or riparian resources and provide adequate avoidance, mitigation, and monitoring and reporting commitments. Early consultation with the Department is recommended, since modification of the proposed project may be required to avoid or reduce impacts to fish and wildlife resources. To obtain a Lake or Streambed Alteration notification package, please go to <http://www.dfg.ca.gov/habcon/1600/forms.html>.

CDFW-6

The Department's website has information regarding dryland streams in "A review of Stream Processes and Forms in Dryland Watersheds," available at this location: <http://www.dfg.ca.gov/habcon/1600/1600resources.html>.

Additional information can also be found in "Methods to Describe and Delineate Episodic Stream Processes on Arid Landscapes for Permitting Utility-Scale Solar Power Plants, With the MESA Field Guide - Final Project Report" available here: <http://www.energy.ca.gov/2014publications/CEC-500-2014-013/index.html>

The DEIR states that impacts to areas subject to jurisdiction under Section 1600 *et seq.* of the FGC will occur with implementation of the proposed project. At this point in time the Department does not concur with the delineation of areas subject to jurisdiction under FGC Section 1600 *et seq.* reported in the DEIR. Please note that the Department must comply with CEQA prior to its issuance of a Lake or Streambed Alteration Agreement (LSA) for a project. As such, the Department may consider the Lead Agency's CEQA documentation for the project. To minimize additional requirements by the Department and/or under CEQA, the DEIR should fully disclose potential project impacts to any stream, and provide adequate avoidance, minimization, mitigation, monitoring and reporting measures for issuance of the LSA agreement.

Riversidean Alluvial Fan Sage Scrub (RAFSS)

The DEIR fails to identify impacts to RAFSS. Appendix I acknowledges that RAFSS occurs within the project site, but the assessment included in the DEIR states (page 3-3) that because "these areas are considerably less than 15 percent vegetated..." they

CDFW-7



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were excluded from the larger vegetation assessment. Please note that RAFSS is a state-designated S-1.1 "very threatened" community, and impacts to this community should be discussed in the DEIR. If impacts are anticipated a mitigation strategy should also be included in the DEIR. The Department recommends that the Final EIR (FEIR) include an assessment of project-related impacts to RAFSS and that mitigation measures be included for this threatened community.

CDFW-7
Cont.

Alternatives

The Department encourages the adoption of an alternative that will avoid and/or minimize impacts to biological resources. Of the alternatives proposed, the Department prefers Alternative 3, Reduced Project Footprint. The DEIR states that Alternative 3 will have reduced impacts at the Santa Ana River.

CDFW-8

The Department appreciates the opportunity to comment on the DEIR for the Redlands Passenger Rail Project (SCH No.2012041012) and requests that the Department's comments be addressed in FEIR. If you should have any questions pertaining to this letter, please contact Joanna Gibson at Joanna.Gibson@wildlife.ca.gov and 909-987-7449.

Sincerely,

for

Kimberly Nicol
Regional Manager

cc: State Clearinghouse, Sacramento

2.3.2 CALIFORNIA DEPARTMENT OF FISH AND WILDLIFE (CDFW)

2.3.2.1 Response to CDFW-1

The comment states that the California Department of Fish and Wildlife (CDFW) has reviewed the Draft EIR for the Project and is providing comments as a trustee and responsible agency under CEQA and authorities under the California Fish and Game Code and Endangered Species Act. The comment does not contain any substantive statements or questions about the Draft EIS/EIR or the analysis therein.

2.3.2.2 Response to CDFW-2

The comment briefly describes the Project and proposed improvements. The comment does not contain any substantive comments or questions about the Draft EIS/EIR or the analysis therein.

2.3.2.3 Response to CDFW-3

The comment indicates that as a trustee agency, the CDFW is responsible for providing, as available, biological expertise to review and provide recommendations on projects that may impact biological resources. The comment recommends that a description of feasible mitigation measures to avoid or mitigate impacts on biological resources resulting from the project be provided. Mitigation measures proposed as part of the Project to avoid, minimize, or reduce impacts to biological resources are provided in Section 3.7.4 (Mitigation Measures) of the Draft EIS/EIR (see pages 3.7-23 to 3.7-27).

2.3.2.4 Response to CDFW-4

The comment provides a summary of CDFW's discretionary authority associated with take of special status species under CEQA and the process for the issuance of an incidental take permit. The comment also provides a recommendation for the applicant to apply for an incidental take permit for least Bell's vireo and Santa Ana River Woolly star prior to commencing project activities. These topics were discussed in further detail during a meeting between SANBAG and CDFW on December 18, 2014.

SANBAG is proposing a combination of mitigation measures that together would effectively minimize Project-related impacts to LBV and Woolly star under CEQA (and F&GC) to a less than significant level. Through the collective implementation of Mitigation Measures BIO-1, BIO-2, and BIO-4 as provided in on pages 3.7-22 through 3.7-27 for Effect 3.7-1, Project-related impacts to both LBV and Woolly star are minimized and considered less than significant under CEQA. Mitigation Measure BIO-2 requires compensation for both temporary and permanently impacts to occupied LBV habitat. SANBAG has prepared a revised draft of the mitigation monitoring plan (MMP) to address adverse effects to LBV in accordance with Mitigation Measure BIO-2, which is now provided as Appendix I5 to the Final EIS/EIR. The compensatory measures proposed in the MMP are consistent with the conservation measures proposed by U. S. Fish and Wildlife Service (USFWS) in the final Biological Opinion (BO) (FWS-SB-13B0313-14F0146) issued in February 2015.



As provided on page 3.7-15 under Effect 3.7-2, the occurrence of Woolly star consists of a single individual that is not part of a larger population in the Study Area, and is located approximately 0.7 miles downstream from the nearest, locally established population. The plant is located within the proposed temporary impact footprint and although construction crews would make every attempt to avoid the individual, construction activities associated with the installation of the cofferdam (or CISS piles) may directly affect the woolly star individual. The direct effect to the individual Woolly star would not be considered an adverse effect under NEPA to the species' population as a whole. However, this impact was determined significant under CEQA and Mitigation Measures BIO-1 and BIO-4 are proposed to minimize Project-related effects. Additionally, SANBAG has added Mitigation Measure BIO-7 to the Final EIS/EIR, which is modification to Conservation Measure 21 in the BO0 contained in Appendix I46 (see below). This measure was developed in coordination with USFWS and CDFW (Kim Freeburn and Joanna Gibson) as part of their review and coordination on the draft BO.

Based on these considerations, SANBAG looks forward to working with CDFW to determine the most efficient approach for processing the Project impacts under the California Endangered Species Act (CESA) for the woolly star and LBV. Based on the overlapping federal and state listed status for these species, CDFW has the option of conducting a consistency determination (utilizing the USFWS BO – February 2015) for LBV and Woolly star in coordination with Section 2081(b) of the F&GC.

BIO-7 Reseeding for Woolly Star. Seeds from the closest known occurrences of woolly-star plants found both upstream and downstream of Bridge 3.4 shall be collected in the fall prior to construction of the SAR crossing. If construction activities require the loss of the single woolly-star at the SAR crossing, the collected seeds will be broadcast in the temporary impact areas, near the impacted woolly-star plant, after construction activities are complete and soils have been restored to pre-Project contours.

- a. Seed collection and broadcast methodologies will be proposed by a qualified seed collector approved by the Service prior to seed collection in a Santa Ana Woolly-Star Management Plan.
- b. Seed harvest shall be from a minimum of three plants per collection location, limited to no more than 50 percent of the available seeds from any one woolly-star plant.
- c. Seeds shall be held at the appropriate temperature and humidity for the shortest length of time necessary prior to planting.
- d. Planting of seeds shall be coordinated to occur prior to the first rains of the season, typically during early fall.
- e. If the woolly-star plant known in the Project area is avoided, collected seeds will be hand broadcast near the parental plants where they were collected.

If SANBAG confirms that removal of the one individual is required during final design, SANBAG will purchase ILF or mitigation credits from a qualified

mitigation program to address the Project's temporal affect on woolly-star during the up to three-year construction period. Credits will be purchased to cover affects to the on-site individual and off-site parental plants.

The addition of Mitigation Measure BIO-7 is intended to incorporate mitigation proposed in the draft BO and does not change the analysis or conclusions made in the Draft EIS/EIR.

2.3.2.5 Response to CDFW-5

The comment provides a summary of the Migratory Bird Treaty Act (MBTA) and applicable Fish and Game Code pertaining to nesting birds and birds of prey. The comment also provides recommendations for Draft EIS/EIR Mitigation Measure BIO-3 associated with pre-construction nesting bird surveys. SANBAG has modified Mitigation Measure BIO-3 in response to comments by CDFW (see below). Revisions made to Mitigation Measure BIO-3 will ensure that the Project complies with all applicable laws relating to nesting birds and birds of prey and that Project-related effects to nesting birds protected under the MBTA and CEQA (and F&GC) remain at a less than significant level.

BIO-3 MBTA Covered Species. Prior to habitat removal during the avian breeding season (February 15-August 31), a qualified biologist shall conduct a pre-construction nest survey (in suitable areas) no more than 3 days prior to ground disturbing activities for migratory birds prior to construction. Pre-construction surveys will performed year-around between Mile Post (MP) 3.3 and 3.5. Should an active nest of any MBTA covered species occur within or adjacent to the project impact area, a 100-foot buffer (300 feet for raptors) shall be established around the nest and no construction shall occur within this area until a qualified biologist determines the nest is no longer active or the young have fledged.

These refinements to Mitigation Measure BIO-3 are intended to clarify information included in the Draft EIS/EIR and do not change the analysis or conclusions made in the Draft EIS/EIR.

2.3.2.6 Response to CDFW-6

As provided in Table 2-10 of the Draft EIS/EIR, SANBAG expects to file an application with CDFW for a 1602 streambed alteration agreement (SSA). SANBAG notes CDFW's comments regarding the statement on page 2-7 of Appendix I1 (Biological Technical Report) and has modified the text based on CDFW's comment in reference to citing F&GC 1.72 (see edits below). This change does not affect the delineation of CDFW's jurisdiction as presented in Table 3.7-6 and discussed in Effect 3.7.3 (see pages 3.7-16 to 3.7-18) of the Draft EIS/EIR or Appendix I2 (Wetland Delineation). As provided in Effect 3.7.3 of the Draft EIS/EIR, the Preferred Project could affect up to 16.39 acres of CDFW jurisdiction with 15.47 acres of this total considered temporary and the remaining 0.92 acres permanent. SANBAG has prepared a mitigation plan (see Appendix I5) to mitigate these impacts consistent with the requirements of Mitigation Measure BIO-6 of the Draft EIS/EIR. SANBAG filed a draft application f with CDFW on November 3, 2014 and looks forward to additional consultation and coordination with CDFW in support of the issuance of SSA for the Project.

Sections 1600 to 1603 of the State Fish and Game Code

All diversions, obstructions, or changes to the natural flow or bed, channel, or bank of any river, stream, or lake in California are subject to the regulatory authority of the CDFW pursuant to Sections 1600 through 1603 of the State Fish and Game Code (Code) and require preparation of a Streambed Alteration Agreement. Pursuant to the Code, a stream is defined as a body of water that flows at least periodically, or intermittently, through a bed or channel having banks and supporting fish or other aquatic wildlife, including all wild animals, birds, plants, fish, amphibians, invertebrates, reptiles, and related ecological communities, including the habitat upon which they depend for future viability. Based on this definition, a watercourse with surface or subsurface flows that support or have supported riparian vegetation is a stream and is subject to CDFW jurisdiction (CDFG 2004).

2.3.2.7 Response to CDFW-7

The comment states that the Draft EIS/EIR fails to identify impacts to Riversidean Alluvial Fan Sage Scrub (RAFSS). As noted by CDFW's comment, effects to RAFSS from the Project were considered as part of the Draft EIS/EIR (see page 3-3 of Appendix I1). As part of the vegetation mapping in support of the Draft EIS/EIR and verified in the field on October 29, 2014, the Project footprint generally supports unvegetated wash. At the time of the original vegetation mapping, RAFSS occurred in small patches (totaling less than 15-percent of the total cover) in the understory of the southern willow scrub (SWS) and southern cottonwood willow riparian forest (SCWRF) on the less active flood terrace in the northeast quadrant of the survey area at the Santa Ana River Bridge and within the Project Study Area.

During the subsequent field visit in October 2014, RAFSS-associated species were observed in these same areas and in some additional areas previously mapped as SCWRF or disturbed. These non-vegetated channel areas are now re-mapped as RAFSS in Figure 3.7-1 of the Final EIS/EIR and in Table 2 of Appendix I1 (also see Figure 4G). A description of RAFSS is also added to page 3-2 of Appendix I1. Based on this mapping revision, the permanent impact areas do not include RAFSS and the temporary impact areas include only a small proportion RAFSS (not to exceed 0.05 acre). Temporary impact areas are proposed for restoration per Mitigation Measure BIO-4 and BIO-6. Given the dynamic nature of RAFSS, the temporary impact areas are anticipated to recover rapidly following construction, including within the widened channel area created by the construction of the proposed bridge 3.4. Therefore, temporary impacts to RAFSS were addressed as part of the Draft EIS/EIR and impacts after implementation of Mitigation Measure BIO-7 are considered less than significant and not adverse.

2.3.2.8 Response to CDFW-8

The comment states that CDFW prefers the adoption of Alternative 3, Reduced Project Footprint due to reduced impacts at the Santa Ana River. The comment also states that CDFW appreciates the opportunity to comment on the Draft EIR and to contact them if there are any questions pertaining to the comment letter provided. Please refer to Section 1.2 of this appendix and Response to Comment USEPA-3 for additional discussion regarding changes to the Project footprint in the vicinity of the Santa Ana River.



Governor's Office of Planning and Research



EDMUND G. BROWN JR.
GOVERNOR

STATE OF CALIFORNIA
GOVERNOR'S OFFICE of PLANNING AND RESEARCH
STATE CLEARINGHOUSE AND PLANNING UNIT



KEN ALEX
DIRECTOR

September 30, 2014

Mitchell Alderman
San Bernardino Associated Governments
1170 W. 3rd Street, 2nd Floor
San Bernardino, CA 92410

Subject: Redlands Passenger Rail Project
SCH#: 2012041012

Dear Mitchell Alderman:

The State Clearinghouse submitted the above named Draft EIR to selected state agencies for review. On the enclosed Document Details Report please note that the Clearinghouse has listed the state agencies that reviewed your document. The review period closed on September 29, 2014, and the comments from the responding agency (ies) is (are) enclosed. If this comment package is not in order, please notify the State Clearinghouse immediately. Please refer to the project's ten-digit State Clearinghouse number in future correspondence so that we may respond promptly.

OPR-1

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

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

OPR-2

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

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

OPR-3

Sincerely,

Scott Morgan
Director, State Clearinghouse

Enclosures
cc: Resources Agency

1400 10th Street P.O. Box 3044 Sacramento, California 95812-3044
(916) 445-0613 FAX (916) 323-3018 www.opr.ca.gov



Document Details Report
State Clearinghouse Data Base

SCH# 2012041012
Project Title Redlands Passenger Rail Project
Lead Agency San Bernardino Associated Governments

Type EIR Draft EIR
Description The project would include the development of new railroad infrastructure along an approximate nine-mile section of rail corridor owned by SANBAG and commonly referred to as the Redlands Subdivision. The project would include the development of four new stations consisting of boarding platforms with supporting amenities and parking and a new train layover/storage facility. Track upgrades would include signal improvements, culverts and utility replacements and relocations, replacement or retrofit of six existing bridge structures, and improvements to 30 grade crossings. Local transit service would occur from five stations located at E Street and Tippercanoe Avenue (or Waterman Avenue) in the City of San Bernardino and New York Street, Orange Street (Downtown Redlands), and University Street (University of Redlands) in the City of Redlands.

Lead Agency Contact

Name Mitchell Alderman
Agency San Bernardino Associated Governments
Phone 714-884-8276 **Fax**
email
Address 1170 W. 3rd Street, 2nd Floor
City San Bernardino **State** CA **Zip** 92410

Project Location

County San Bernardino
City San Bernardino, Redlands
Region
Lat / Long 34° 7' 37.3" N / 117° 26' W
Cross Streets Various
Parcel No. Various
Township

	Range	Section	Base
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Proximity to:

Highways I-215, 10
Airports San Bernardino International
Railways BNSF/Metrolink
Waterways Various including Santa Ana River
Schools Various
Land Use Various

Project Issues Agricultural Land; Air Quality; Archaeologic-Historic; Biological Resources; Drainage/Absorption; Economics/Jobs; Fiscal Impacts; Flood Plain/Flooding; Forest Land/Fire Hazard; Geologic/Seismic; Minerals; Noise; Population/Housing Balance; Public Services; Recreation/Parks; Schools/Universities; Septic System; Sewer Capacity; Soil Erosion/Compaction/Grading; Solid Waste; Toxic/Hazardous; Traffic/Circulation; Vegetation; Water Quality; Water Supply; Wetland/Riparian; Growth Inducing; Landuse; Cumulative Effects; Other Issues; Aesthetic/Visual

Reviewing Agencies Caltrans, Division of Aeronautics; Department of Conservation; Department of Fish and Wildlife, Region 6; Office of Historic Preservation; Department of Parks and Recreation; Office of Emergency Services, California; California Highway Patrol; Caltrans, District 9; Air Resources Board; Air Resources Board, Transportation Projects; Regional Water Quality Control Board, Region 8; Department of Toxic Substances Control; Native American Heritage Commission; Public Utilities Commission; Resources Agency



Document Details Report
State Clearinghouse Data Base

Date Received 08/06/2014 *Start of Review* 08/06/2014 *End of Review* 09/29/2014



2.3.3 GOVERNOR'S OFFICE OF PLANNING AND RESEARCH (OPR)

2.3.3.1 Response to OPR-1

The comment indicates the State Clearinghouse's submittal of the Draft EIS/EIR to the state agencies listed in the supporting attachment. The comment also states the comment period on the Draft EIS/EIR closed on September 29, 2014. The comment does not contain any substantive statements or questions about the Draft EIS/EIR or the analysis therein. This comment will be included as part of the record and made available to the decision makers prior to a final decision on the project.

2.3.3.2 Response to OPR-2

The comment provides a summary of Section 21104(c) of the California Public Resources Code pertaining to a responsible or public agency comments on a project. The comment also states that comments received by the State Clearinghouse have been forwarded for use in preparing the final environmental document. One comment letter from the California Department of Fish and Wildlife (CDFW) was received as a result of OPR's distribution. Responses to the comment letter received from CDFW have been provided in Responses CDFW-1 through CDFW-8.

2.3.3.3 Response to OPR-3

The comment states that the Project has complied with the State Clearinghouse review requirements for the draft environmental document pursuant to CEQA, the California Environmental Quality Act. The comment does not contain any substantive statements or questions about the Draft EIS/EIR or the analysis therein. This comment will be included as part of the record and made available to the decision makers prior to a final decision on the project.



2.4 LOCAL AGENCY COMMENTS AND RESPONSES



City of Loma Linda



City of Loma Linda

25541 Barton Road, Loma Linda, California 92354-3160 • (909) 799-2800 • FAX (909) 799-2890

Sister Cities: Manipal, Karnataka, India - Libertadore, San Martin, Argentina • www.lomalinda-ca.gov

September 17, 2014

Mitchell A. Alderman, P.E., Director of Transit & Rail Programs
SANBAG
1170 W. 3rd St, 2nd Floor
San Bernardino, CA 92410

Subject: Redlands Passenger Rail Project

Dear Mr. Alderman,

My staff and I have reviewed the draft Environmental Impact Report (EIR) for the subject project. In the original scoping meetings the station placement was presents as one (1) station in downtown Redlands and the next station at the eastbound I-10 freeway off ramp and California Street. Considering the location of the second station being very near to and convenient for Loma Linda residents we were very supportive of the project. I am very disappointed to see this second station changed to a layover stop with a possible upgrade to a station in phase 2.

LL-1

The overall design within the EIR calls for stations every half mile. This is the spacing for the three (3) phase 1 stations in the City of Redlands. However, there is a vacant 2 mile stretch between Redlands and the next station at Tippecanoe Avenue in the City of San Bernardino. California Street is midway in this 2 mile stretch and would service the new 350,000 square foot Veterans Affairs medical office building and outpatient clinic.

LL-2

I am strongly requesting that you move the I-10/California Street station from phase 2 to this phase 1. I look forward to hearing from you to discuss this further.

LL-3

If you have any questions, please call me at (909) 799-2811.

Sincerely,

T. Jarb Thaipejr
City Manager/City Engineer

Cc: Rhodes Rigsby, Mayor

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Recycled Paper

2.4.1 CITY OF LOMA LINDA (LL)

2.4.1.1 *Response to LL-1*

SANBAG notes the City of Loma Linda's comment as it relates to a station stop at California Street. Although a potential station stop at the eastbound Interstate-10 freeway off ramp and California Street was considered during the initial alternatives analysis for the Project (2010), a station stop at this location was not carried forward for consideration in the Draft EIS/EIR due to insufficient population densities based on existing and planned land uses within a half mile of the station stop. In addition, the City of Loma Linda's interest in participating in the Project was not conveyed to SANBAG until recently. The station stops proposed as part of the Project, with the exception of Waterman Avenue (Design Option 3), were identified in the CEQA Notice of Preparation (NOP) and NEPA Notice of Intent (NOI) that were filed in 2012 and the subject of four scoping meetings.

The Draft EIS/EIR analyzed the construction and operation of layover facility west of California Street as part of the Preferred Project. However, SANBAG is proposing the implementation of Design Option 2, which would utilize existing layover facilities (see Final EIS/EIR Section 2.4.5 and Figure 2-8). Therefore, at this time, the property at California Street described in the comment is not proposed for development of a layover facility. Notwithstanding this circumstance, SANBAG is interested in working with the City of Loma Linda to develop a future station stop in the vicinity of California Street, subject additional environmental review. The comment does not contain any substantive statements or questions about the Draft EIS/EIR or the analysis therein.

2.4.1.2 *Response to LL-2*

The comment states that the overall design with the Draft EIR calls for stations every half mile. The comment also states that the addition of a station at California Street would service the new Veterans Affairs medical office building and outpatient clinic. The comment references inaccurate information as to the Project's overall design concept; a station every half mile would equate to 18 total station stops. As provided in Chapter 2 of the Draft EIS/EIR, a total of five station stops are proposed as part of the Project. Four of the proposed stations would be new facilities – Tippecanoe (or Waterman), New York Street, downtown Redlands, and University – with the fifth being the E Street Station, which is currently under construction.

In response to the City of Loma Linda's comment, SANBAG met with the City on November 25, 2014 to discuss its request for a station stop in the vicinity of California Street. The City indicated that a regional medical center approved and under construction by the Veterans Administration (VA) assumed the availability of transit service as part of the City's selection. SANBAG noted the VA's transit need and indicated that staff were not aware of the VA project's approval or need for transit. SANBAG expects that the Project would benefit all users, including veterans, by developing transit backbone that could interlink with other forms of alternative transportation (i.e., bikes, buses, etc.). Additionally, once the backbone infrastructure is installed as part of the Project, other station stops could be added to the route, including California Street, subject to future environmental review. The comment does not address the adequacy or findings of the Draft EIS/EIR.



2.4.1.3 Response to LL-3

SANBAG appreciate the City of Loma Linda's interest in developing a station stop at California Street. Once the proposed railroad infrastructure is in place, SANBAG expects to add additional station stops in the future as demands and funding allow. This expectation is noted in the cumulative analysis for the Draft EIS/EIR (see Table 4-1), which notes future station stops as reasonable foreseeable projects (project #22). Additionally, further environmental review would be required to assess the effects of locating a station platform at the desired location per the City's request. The comment does not address the adequacy or findings of the Draft EIS/EIR.



City of Redlands-1

From: Diggs, Chris [mailto:cdiggs@cityofredlands.org]
Sent: Monday, September 08, 2014 11:06 AM
To: Mitch Alderman
Cc: Justin Fomelli; Mousavipour, Fred
Subject: RPRP presentation

Mitch, several other city staff and I, attended your/SANBAG's public outreach meeting on September 4, 2014, at the Esri campus. At that meeting you requested public comments via written comments only. Although you were likely meeting the letter of the law requirements, this was a bit of a surprise to us as our thoughts are that to fully meet the public's needs, questions and answers need to be addressed at a public meeting to dispel any potential feeling that SANBAG, and possibly the City, is keeping information from the public.

To perform this type of Q and A meeting I am offering the City's Council chambers as a meeting place if need for an additional meeting. If additional time is needed to conduct this meeting please postpone your review period to accommodate this meeting.

Topic we believe needing to be addressed are:

- Overall route of the project
- Project funding
- Details of the project route
- Maps showing station locations
- Pictures of the type of trains
- Ridership information including schedules and ticket costs
- Rail crossing details
- Quiet Zone
- Impact to neighborhoods – noise, vibration, visual
- Traffic flow
- Impact to historic facilities
- Impact to public parks

REDLANDS-1.1



- Proposed street closures
- Overview of major proposed mitigation measures

REDLANDS-1.1
Continued

Please contact me to schedule a public meeting and to discuss your needs to address our concerns.

Thank you.

Chris Diggs



2.4.2 CITY OF REDLANDS (REDLANDS-1)

2.4.2.1 *Response to REDLANDS-1.1*

The comment requests that an additional public information meeting be held to cover various topics associated with the Project. FTA and SANBAG appreciate the City of Redlands' interest in learning more about the Project. Public outreach efforts for the Project are summarized in Final EIS/EIR Chapter 6. As requested, an additional informational meeting was held at the City of Redlands' Council chambers on September 16, 2014 (during the Draft EIS/EIR public review period). SANBAG summarized information obtained from the Draft EIS/EIR related to the Project's route, funding, station locations, ridership information and at-grade rail crossings proposed for closure as provided in Chapter 2 of the Draft EIS/EIR. SANBAG also provided information related to the Project's significant environmental impacts (i.e., noise, vibration, etc.) as described in Chapter 3 of the Draft EIS/EIR, including impacts to historic facilities (Draft EIS/EIR Section 3.12) and public parks (Draft EIS/EIR Sections 3.13 and 3.16). Information related to the implementation of quiet zones was also presented based on the information presented in Chapter 2 and Section 3.3 and 3.15 of the EIS/EIR (see Master Response 2 and 3 for additional discussion). These topics were then discussed in more detail on November 25, 2014 when the City of Redlands and SANBAG met to go over the City's comment letter submitted on September 29, 2014 (see Responses to Comment Letter Redlands-2). During this meeting, SANBAG presented its draft responses to the City's comments, which were subsequently modified, based on the City's input and provided in their entirety in Responses to Comment Letter Redlands-2.



City of
REDLANDS

Incorporated 1888
Municipal Utilities & Engineering Department
35 Cajon Street, Suite 15A
Redlands, CA 92373
909-798-7698

City of Redlands-2

CHRIS DIGGS
Interim Director

MICHAEL POOL
Interim City Engineer

September 29, 2014

Mitch Alderman
SANBAG
1170 W. 3rd Street
San Bernardino, CA 92410

Subject: RPRP EIS/EIR comments from City of Redlands

The City of Redlands provides the following comments to the draft EIS/EIR.

Mitigation Measure SS1 described on page 3.15-12 should include installation of cameras at each of the stations for use by the Redlands Police Department. Project would provide the power supply, mounting location and the cameras. City of Redlands would do installation and setup.

Redlands-2.1

Heavy truck usage is restricted during the hours of 7:00 am-8:00 am and 5:00 pm-6:00 pm. This should be adjusted to 6:30 am-8:30 am and 4:30 pm-6:30 pm in the area of high traffic intersections (>10K ADT).

Redlands-2.2

Mitigation Measure TR-2 calls for payment of fair share for improvements at California/110 ramps but does not emphasize the need to actually get this location fixed. As part of the project, does this interchange need to be changed so that it is safe even if that means altering the timetable of the interchange modifications?

Redlands-2.3

Mitigation Measure TR-4 discusses queuing at some intersections and then waiting until 2038 to reevaluate. There should be an intermediate review every 5 years.

Redlands-2.4

Construction screening is required to be to the extent feasible. What does this mean? Would it be better to state to the extent required by local agency. In addition, Construction yards for contractor usage are by separate permit as required by the local agency.

Redlands-2.5

Mitigation VQA-3 – What permissions are necessary to remove trees not in ROW? There should be a tree replacement ratio. In addition, why use 12” at 5’ as the site cutoff? Given that many species do not achieve this size, it would be better to use a smaller size or a comparison to species vs height at maturity.

Redlands-2.6

Mitigation NV-3 – Every intersection in Redlands needs to be made Quiet Zone ready.

Redlands-2.7

<p>Mitigation NV-4 – Is there a map showing where soundwalls will be constructed. The text with the noise section states the installation would be cost prohibitive if installed everywhere. How is “cost prohibitive defined”? Should there be a mitigation fund established for installation of additional sound walls at a later date if Quiet Zone and the proposed sound walls prove to still be necessary?</p>	<p>Redlands-2.8</p>
<p>Mitigation NV-5 – How is “acceptable” level of squeal defined? Would it be better to require customized profiling for all curves less than XXX’ radius? Obviously, the rail line cannot be reprofiled at a later date.</p>	<p>Redlands-2.9</p>
<p>Chapter 2, page 2-2 describes the existing rail line. The report should directly state that the easterly end of the line is out of service and has been for an extended period of time in order to accurately describe the existing condition. A clarifying statement can be included to explain that the line can be brought back into service for freight operations within ### days if the need for customer service arose.</p>	<p>Redlands-2.10</p>
<p>Chapter, page 2-? Bridge at Bryn Mawr is in the City of Redlands. The boundary between Loma Linda and Redlands is the southerly boundary of the flood control channel.</p>	<p>Redlands-2.11</p>
<p>Bridge at Bryn Mawr and the flood channel will be reconstructed as part of the project to provide access to the staging area?</p>	<p>Redlands-2.12</p>
<p>Chapter 2, page 2-9 The maps should include the California/I-10 westbound ramps in the study area.</p>	<p>Redlands-2.13</p>
<p>Chapter 2, page 2-14 makes reference to residential on north side of tracks MP 5.2-8.3.</p>	<p>Redlands-2.14</p>
<p>Chapter 2, page 2-15 Uses east of I-10 Freeway should mention Sylvan Park</p>	<p>Redlands-2.15</p>
<p>Chapter 2, Page 2-18 How does a nominal increase of 10% change the values from 820 to 1330. Is there a typo in the values?</p>	<p>Redlands-2.16</p>
<p>Chapter 2, Page 2-24 Bryn Mawr and New York are already officially closed. Project proposed closure of Stuart, 7th and 9th. What happens to access into the auto repair facility? How will this impact Quiet Zone. Should there be reference to the agreement that calls for construction of necessary improvements?</p>	<p>Redlands-2.17</p>
<p>Chapter 2, page 2-25 How will the physical layout of Park Avenue be impacted?</p>	<p>Redlands-2.18</p>
<p>Chapter 2, Table 2-4 Nevada, sidewalk on north and south side of RWW is needed to connect pedestrian access.</p>	<p>Redlands-2.19</p>
<p>Stuart – why maintain pedestrian access? Would it be better for pedestrian access to be at the station?</p>	<p>Redlands-2.20</p>
<p>Eureka – are project design features, as shown, adequate for quiet zone?</p>	<p>Redlands-2.21</p>
<p>Orange – are project design features, as shown, adequate for quiet zone?</p>	<p>Redlands-2.22</p>

<p>Chapter 2, Page 2-33 Please verify size of Park Once structure, if it is built, and make reference to the City requirement to provide 200 spaces within ¼ mile of the Downtown Station. <u>The University Station is also to have 100 parking spaces ¼ mile of the station.</u> The EIR specifically states that the parking will be at the east end of the station. Is that accurate? Will east end parking be required even if a different location can be obtained that still meets the requirement for 100 stalls within ¼ mile of the station?</p>	<p>Redlands-2.23 Redlands-2.24</p>
<p>Chapter 2, Section 2.4.2.15 Construction. The trucks operating on local streets to construct this project will cause wear and tear on said streets. Large construction projects in Redlands typically are required to “make the City whole” through two mitigation measures – repair of any construction related damage and payment of a road repair fee preliminarily estimated to be \$0.67/truck-mile to mitigate for the long term wear and tear of the road substructure. The City deposits this money directly into it’s road maintenance account.</p>	<p>Redlands-2.25</p>
<p>Chapter 2, Section 2-6 Funding. Does BNSF have a responsibility for providing funding for some of the railbed rehabilitation if they were supposed to be maintaining the railbed during their maintenance period? Or would everything need to be completely redone anyway?</p>	<p>Redlands-2.26</p>
<p>Chapter 2, Section 2-6 Funding. Should City of Redlands, Esri, or University of Redlands be listed as other sources of funding given their participation is various aspects of the project?</p>	<p>Redlands-2.27</p>
<p>Chapter 3, Page 3.2-33 states that there will be street closures of up to several months. Why? There should be a mitigation measure to emphasize minimization of street closures during construction. The impact on local businesses could be significant. There should also be a mitigation measure to assist businesses with customer retention during the construction period <u>(additional signage, advertising, marketing assistance).</u> <u>A mitigation measure should require one lane to be open on all streets with 4 or more lanes except in very limited circumstances.</u></p>	<p>Redlands-2.28 Redlands-2.29</p>
<p>Chapter 3, Page 3.3-18 states that there will be 210 daily boardings at the downtown station in 2018 but there will be 0 vehicles, i.e., everyone will use alternative modes of transportation to get to the station. Is this a typo? If it is accurate, then why is there a need for the City of Redlands to provide 200 parking spaces within ¼ mile of the station?</p>	<p>Redlands-2.30</p>
<p>Chapter 3, page 3.3-19 mentions that Pearl/Orange and Pearl/6th are both deficient but no mitigation is proposed. Is Page 3.3-20 to be interpreted that <u>these intersections are a problem anyway so the project does not need to help fix them?</u> Given that Pearl/Orange is a State Highway (SR-38) and Pearl is under Caltrans jurisdiction, should these areas be fixed? Or at least a mitigation measure to pressure Caltrans to modify the capacity of these intersections as they are of regional significance?</p>	<p>Redlands-2.31 Redlands-2.32</p>
<p>Pedestrian traffic – both 7th Street and 9th Street are proposed to be closed with cul-de-sacs constructed on the southerly side of the tracks. 7th is proposed to also have pedestrian traffic. Given the separation between 6th Street and Church Street, it would be better if pedestrian traffic were permitted at the 9th Street crossing in lieu of the 7th Street crossing unless there is a strong engineering/safety reason that would preclude a 9th Street pedestrian crossing.</p>	<p>Redlands-2.33</p>
<p>Mitigation Measure HWQ-1 does not adequately address the issue of “deep erosional features within the ROW” described on page 3.8-11 in Section 3.8.2.3. There is very limited discussion on what connections to existing municipal drainage facilities will be made to drain the ROW. Obviously, erosion has occurred and simply blocking inlets at the street that then drain over to</p>	<p>Redlands-2.34</p>



the ROW is not an acceptable solution. The railbed effectively functions as a drainage control device so appropriate collection and piping must be included in the design. There should be additional discussion on coordination with local agencies.

Redlands-2.34
Continued

Hydrology, as discussed in Appendix J, references 1976 hydrology studies prepared by County Flood Control. In 2013 the County updated the hydrology based upon the updated hydrology manual of 1986. In addition, the City of Redlands spent \$300K to evaluate hydrology within the City. The final design for the Project storm drain improvements should fully reflect this newer information.

Redlands-2.35

If you have any question, please contact our office at 909-798-5875 x6.

Sincerely,

Donald Young
Engineering Manager

cc: Chris Diggs, Interim Director

2.4.3 CITY OF REDLANDS (REDLANDS-2)

2.4.3.1 *Response to REDLANDS-2.1*

The comment recommends revisions to Mitigation Measure SS1 to include installation of cameras at each of the stations. SANBAG met with City of Redlands staff representatives on November 24, 2014 to discuss the City's comments and provide SANBAG's preliminary responses. Section 3.15 of the Draft EIS/EIR (pages 3.15-12 through 3.15-13) provides discussion of the Project's security considerations. Mitigation Measure SS-1 is proposed to address site-specific security issues what were raised in the comment and is revised as provided below to include specific consideration for security surveillance per the City's request. Engineering details cited in the comment would be addressed through the final design process if the SANBAG Board of Directors approves the Project.

- SS-1** **Develop Safety and Security Management Plan.** Prior to construction, SANBAG shall coordinate and consult with local safety and crime prevention authorities to develop a Safety and Security Management Plan (SSMP) for the track alignment, bridges, parking facilities, and station areas. If a non-FRA compliant DMU vehicle type is selected for the Project, the SSMP shall include a plan element that includes appropriate levels of safety as may be necessary to facilitate a shared-use operation.

These refinements to Mitigation Measure SS-1 are intended to clarify information included in the Draft EIS/EIR and do not change the analysis or conclusions made in the Draft EIS/EIR.

2.4.3.2 *Response to REDLANDS-2.2*

The comment provides information on heavy truck usage restrictions in the City of Redlands. Mitigation Measure TR-1 was revised to include the additional timing restrictions on haul truck traffic for high traffic intersections operating a greater than 10,000 average daily trips (ADT) per the City's request. Revisions to Mitigation Measure TR-1 also include refinements on roadway pavement damage resulting from construction activities as identified in Response REDLANDS-2.25.

- TR-1** **Prepare a Traffic Management Plan.** SANBAG shall prepare a Traffic Management Plan prior to the start of construction, and the provisions of the Traffic Management Plan shall be implemented prior to, and during construction, as appropriate, to address traffic considerations of pedestrian and bicycle access and safety, and vehicular flow. The objective of the Traffic Management Plan will be to reduce construction related effects to traffic, non-motorized forms of transportation (i.e., bicycle and pedestrians), and existing public transit (i.e., buses) and will include the following:
- Construction detour plans and designated construction truck access routes for each phase of construction;

- Maintain maximum travel lane capacity to the greatest extent possible during construction periods and provide advanced notice to drivers or roadway changes or closures;
- Signage indicating the construction limits, access routes, and entrances to individual business sites and community facilities that may be affected by construction activities. In addition, the construction contractor would supply “open for business” signs to encourage normal business activity during construction;
- Pre-planning, outreach, and signage indicating pedestrian and bicycle routes detours;
- Coordination with public transit service providers, as necessary;
- Heavy trucks and other construction transport vehicles shall avoid the busiest commute hours to the greatest extent possible (weekdays 7 a.m. to 8 a.m. and 5 p.m. to 6 p.m. – High traffic intersections (greater than 10,000 ADT) – 6:30 a.m. to 8:30 a.m. and 4:30 p.m. to 6:30 p.m.);
- Early notification to emergency service providers and area drivers of any road closures or detours and the timeframes of the closures or detours. This information will be posted in a local newspaper, via SANBAG’s web site and will be updated on a monthly basis;
- Coordination with the Cities of San Bernardino, Loma Linda, and Redlands for community events in the area to accommodate crowds and road closures;
- SANBAG shall require the selected construction contractor to perform pre- and post-construction condition assessments for roadways impacted by Project construction-related haul truck traffic. Pavement damage resulting from Project construction will be repaired prior to the completion of construction; and
- SANBAG shall maximize opportunities for coordinated construction and installation of improvements that occurs outside the SANBAG ROW with the Cities of San Bernardino, Loma Linda, and Redlands to the greatest extent practicable.

These refinements to Mitigation Measure TR-1 are intended to clarify information included in the Draft EIS/EIR and do not change the analysis or conclusions made in the Draft EIS/EIR.

2.4.3.3 Response to REDLANDS-2.3

The comment provides a summary of Mitigation Measure TR-2 and requests information about when improvements to the Interstate 10 (I-10)/California Street ramps would be initiated. The traffic impact analysis provided in Appendix E of the draft EIS/EIR and summarized in Section 3.3 analyzes the operations of the I-10 eastbound (EB) and westbound (WB) on- and off-ramps with and without the project under existing conditions (2012), opening day (2018), and future conditions (2038). As shown in Tables 4-6 and 5-6 of Appendix E, the available queue storage from the northern edge of the California Street (#12) at-grade crossing to the southern edge of

the EB-10 Ramps at the California Street interchange is 80 feet. Under existing conditions, the queue is 129 feet in the morning and 156 feet in the evening whereas there is currently spill back south across the grade crossing in the AM and PM peak hour and the queue length exceeds the available storage capacity.

In the opening day (2018) scenario, the queue spill back from the I-10 EB intersection on California Street increases to 195 feet, which is attributed to an increase in background traffic volumes on the local roadways in addition to the Project-related train movements through the crossing. As such, Mitigation Measures (MM) TR-4 proposes the installation of either queue cutters or pre-signals at the crossing prior to opening day. This queue is unrelated to queuing on the actual ramps, which are several thousand feet in length. The Project would contribute a minor, incremental increase to the vehicle storage on the EB ramps and, as such, would contribute its fair share of funding through MM TR-2 for their eventual improvements. Based on correspondence with the California Department of Transportation (email correspondence from Chad Costello, December 4, 2014), environmental review is scheduled to be completed in 2017 with construction starting in 2019 and ending in 2024.

Improvements to the on- and off-ramps are within the jurisdiction of the California Department of Transportation (Caltrans). For this reason, beyond the contribution of fair share funding, SANBAG does not retain authority to change the current timetable for construction. The required safety improvements proposed in MM TR-4 would be installed in coordination with the City prior to opening day in order to facilitate the safe operation of the at-grade crossing at California Street.

2.4.3.4 Response to REDLANDS-2.4

The comment provides a summary of Mitigation Measure TR-4 and requests that an intermediate review on intersection queuing be conducted every five years. Mitigation Measure TR-4 was revised to include the additional performance standard for reevaluation restrictions per the City of Redlands' request.

TR-4 Recommended Pre-Signals for Queuing. Prior to the start of operations, pre-signals shall be implemented at the following grade crossing locations and shall be operational prior to the start of 2018:

- Eastbound I-10 Ramps and California Street crossing;
- Industrial Park Avenue and Alabama Street crossing; and
- Redlands Boulevard and Tennessee Street crossing.

Prior to 2038 and if warranted based on future intersection operations (as determined through reevaluation in 5-year increments by SANBAG following procedures in the Los Angeles Metropolitan Transportation Authority (MTA) Grade Crossing Policy for Light Rail Transit), pre-signals will be implemented at the following grade crossing locations:

- Waterman Avenue and Orange Show Road Crossing (Northbound Approach);
- Orange Show Road and Waterman Avenue Crossing (Eastbound Approach);

- Redlands Boulevard and California Street Crossing; and
- Redlands Boulevard and Alabama Street Crossing.

These refinements to Mitigation Measure TR-4 are intended to clarify information included in the Draft EIS/EIR and do not change the analysis or conclusions made in the Draft EIS/EIR.

2.4.3.5 Response to REDLANDS-2.5

The comment recommends providing additional clarification regarding construction screening and permitting for construction yards. Mitigation Measure VQA-1 was revised to include coordination with the local jurisdiction per the City of Redlands' request. The types of screening may include but is not limited to the use of fence slats, netting, or mesh or tarps, subject to the City's approval.

VQA-1 Screening of Construction Staging Areas. For construction staging areas within 500 feet of a residence, park, or educational facility, the contractor will be required to shield the staging area to the extent feasible and coordinate with the local jurisdiction regarding the type and method of screening, which may include but is not limited to, the use of fence slats, netting, or mesh or tarps. SANBAG shall limit construction to daylight hours to the extent possible. If nighttime lighting or construction is necessary, the SANBAG shall ensure that unshielded lights, reflectors, or spotlights are not located and directed to shine toward or be directly visible from adjacent properties or streets. To the extent possible, SANBAG shall minimize the use of nighttime construction lighting within 500 feet of existing residences. This measure shall be identified on grading plans and in construction contracts.

These refinements to Mitigation Measure VQA-1 are intended to clarify information included in the Draft EIS/EIR and do not change the analysis or conclusions made in the Draft EIS/EIR.

2.4.3.6 Response to REDLANDS-2.6

The comment requests a tree replacement ratio be included for Mitigation Measure VQA-3. The comment also requests information about what permissions are necessary to remove trees not in the right of way. SANBAG will adhere to the requirements of San Bernardino's Tree Ordinance (Code Section 19.28.090) and Redland's Tree Ordinance (Ordinance Section 12.52.140) for any tree removal that occurs outside SANBAG's right-of-way. Mitigation Measure VQA-3 was revised to include the additional performance standard per the City of Redlands' request.

VQA-3 Tree Replacement. Prior to construction, SANBAG shall have a registered arborist conduct a tree survey to identify native and ornamental trees requiring removal outside SANBAG's ROW. The arborist will identify measures to avoid and minimize indirect impacts on trees, where feasible, and develop a plan for the replacement of trees that cannot be avoided. The plan will include planting and irrigation design details and a weaning schedule for the establishment period. Trees with a diameter at breast height of 426 inches or greater will be replaced at a minimum ratios of 1:1 and consistent with City of Redlands and San Bernardino standards.

These refinements to Mitigation Measure VQA-3 are intended to clarify information included in the Draft EIS/EIR and do not change the analysis or conclusions made in the Draft EIS/EIR.

2.4.3.7 Response to REDLANDS-2.7

The comment requests that Mitigation Measure NV-3 be revised to implement quiet zones for all at-grade crossing within Redlands. Mitigation Measure NV-3 identifies those intersections that would require the implementation of quiet zones to minimize adverse noise effects to Category 2 and 3 land uses along the railroad corridor. Per the Memorandum of Understanding (MOU) between the City and SANBAG (dated February 4, 2015), the current measure does not restrict implementation of quiet zones at additional at-grade crossings. Please refer to Master Response 3 for additional information on implementation of quiet zones.

2.4.3.8 Response to REDLANDS-2.8

The comment requests a map showing where soundwalls will be constructed and to provide a definition of “cost prohibitive” in relation to soundwall installation. The comment also inquires if a mitigation fund would be established for future soundwall installation. The locations of potential sound barriers for the locomotive and DMU vehicle options in the absence of quiet zones are provided in Figures 8-2A through 8-2F of Appendix H1 of the Draft EIS/EIR. Figures 8-3A through 8-3F in Appendix H1 of the Draft EIS/EIR provide the locations of potential sound barriers for the locomotive vehicle option with the implementation of quiet zones. Figures 2A through 2F in Appendix H2 of the Draft EIS/EIR illustrate the sound barriers required for the DMU vehicle option with the implementation of quiet zones. Please refer to Master Responses 2 for additional discussion.

SANBAG is not proposing the establishment of a fund for future soundwall installation. As provided in Master Response 2 and based on SANBAG’s selection of the DMU as part of the LPA, the noise reduction offered by the addition of sound barriers may not outweigh their indirect impacts. Although issues related to cost are important, cost would not be a primary reason for not constructing one or more of the sound barriers.

2.4.3.9 Response to REDLANDS-2.9

The comment requests additional information on how an acceptable level of squeal is defined. An “acceptable” level of squeal reduction would be achieved through reductions in squeal noise via two mechanisms: (1) optimization of the rail curvature during final design and construction, and (2) the application of rail lubricators at curves along the alignment as presented in Mitigation Measure NV-5 of the Draft EIS/EIR. As provided in Master Response 2, FTA Manual (2006) provides no quantitative reduction in noise levels for curvature optimization or rail lubricators beyond their effect in reducing (or avoiding) rail squeal (see Table 6-12 of Appendix H1 of the Draft EIS/EIR). Please refer to Master Response 2 for additional discussion.

2.4.3.10 Response to REDLANDS-2.10

The comment states that the environmental report should describe the existing condition of the rail line. The comment requests that a statement be included indicating that the easterly end of

the line is out of service for an extended period of time but could be brought back into service for freight operations if needed. The detail requested by the commenter is contained within Section 3.3 of the Draft EIS/EIR in the first paragraph on page 3.3-6. As stated in the Draft EIS/EIR (pages 2-15 to 2-16), freight service beyond the current extent of service, Mile Post (MP) 4.4, could be requested by BNSF at any time and SANBAG is obligated to facilitate that service per its license agreement with BNSF with or without the Project.

2.4.3.11 Response to REDLANDS-2.11

The comment states that the bridge at Bryn Mawr Avenue is within the City of Redlands and that the boundary between the City of Loma Linda and the City of Redlands is the southerly boundary of the flood control channel. The commenter is referred to page 2-40 of the Draft EIS/EIR for a description of the layover facility proposed as part of the Preferred Project (as described in the Draft EIS/EIR). As provided, access to the layover facility would occur via Bryn Mawr Avenue, if constructed. SANBAG notes the layover facility's location is within the City's jurisdictional limits. As provided in Section 1, SANBAG identified Design Option 2 (Use of Existing Layover Facilities) as part of the locally preferred alternative, which does not include the development of a layover facility at the property west of California Street.

2.4.3.12 Response to REDLANDS-2.12

The comment asks for clarification on if the bridge at Bryn Mawr Avenue and the flood channel would be reconstructed as part of the project to provide staging area access. If SANBAG selects the proposed layover facility at California Street, as provided in Table 2-3 of the Draft EIS/EIR, the reconstruction of the existing Bryn Mawr Avenue Bridge would be required. The effects of bridge reconstruction are considered in Sections 3.7 (pages 3.7-15 to 3.7-19) and 3.8 (3.8-24 to 3.8-30) of the Draft EIS/EIR.

2.4.3.13 Response to REDLANDS-2.13

The commenter requests that the I-10/California westbound ramps be included in the Study Area for the Project. The existing I-10 ramps are contained within the cumulative study area for the Project as illustrated in Figure 4-1 of the Draft EIS/EIR. As provided in Response REDLANDS-2.3, the I-10 on- and off-ramps are within the jurisdiction of Caltrans. SANBAG would contribute to the fair share of funding for the ramp improvements through MM TR-2. The current Project footprint includes the areas for the contemplated improvements on California Street, south of the ramps, as proposed in TR-4 and for this reason, the current Project footprint does not include the ramps.

2.4.3.14 Response to REDLANDS-2.14

The comment states that Draft EIS/EIR Chapter 2 identifies existing residential uses to the north of SANBAG's right-of-way from Mile Post (MP) 5.2 to 8.3. This statement was removed from the Final EIS/EIR. Please refer to Section 3 of this appendix for the deleted text.

2.4.3.15 Response to REDLANDS-2.15

The comment requests that uses east of the I-10 should mention Sylvan Park. The Draft EIS/EIR identified Sylvan Park on page 2-15 as “East of I-10, the Study Area parallels Park Avenue with Sylvan Park located adjacent and to the north.

2.4.3.16 Response to REDLANDS-2.16

The comment requests clarification regarding a nominal increase of 10% (from 820 to 1330 riders) on Draft EIS/EIR page 2-18. The cited text was deleted. The increase between opening day and the future year condition is calculated at 62 percent.

2.4.3.17 Response to REDLANDS-2.17

The comment summarizes that the closure of Bryn Mawr Avenue and New York Street have already occurred and that the Project proposes the street closures of Stuart Avenue, 7th Street, and 9th Street. The comment requests additional information regarding access into the existing auto repair facility and how the closures will impact Quiet Zones. The private access to the auto repair facility (Caliber Collision) is an authorized at-grade crossing via a license agreement between the property owner and SANBAG. As provided in Table 2-4 of the Draft EIS/EIR, this private crossing is proposed for closure as part of the Project. SANBAG considered access options for this subject property at part of the Draft EIS/EIR, including closure and retention of the crossing. If the private crossing is closed, SANBAG would work with the landowner and City of Redlands to secure the necessary easements from adjacent landowners to facilitate alternative access. If the private crossing remains open, it would require compliance with Mitigation Measure TR-3 along with additional coordination with the CPUC. Please refer to Master Response 3 for additional discussion on quiet zones and the process for their implementation.

2.4.3.18 Response to REDLANDS-2.18

The comment requests additional information on how the physical layout of Park Avenue would be impacted by the Project. The location of Park Avenue, south of Sylvan Park, would largely remain the same under the Project when compared to existing conditions. The notable difference would occur at the southwest and southeast corners of the Sylvan Park, where based on advanced conceptual engineering, the current alignment would need to shift slightly north. Please refer to Section 3.16 (pages 3.16-21 through 3.16-25) and Figure 3.16-5 for additional description of the contemplated improvements.

2.4.3.19 Response to REDLANDS-2.19

The comment recommends that pedestrian improvements be included at Nevada Street to maintain pedestrian safety. These improvements will be integrated as part of the Project’s final design subject to the SANBAG Board’s approval of the Project. Please refer to the revised Table 2-4 in the Final EIS/EIR, which reflects these improvements at the Nevada Street crossing.

2.4.3.20 Response to REDLANDS-2.20

The comment requests clarification as to why pedestrian access is maintained at Stuart Avenue. Pedestrian access in the vicinity of the (West) Stuart Avenue at-grade crossing is proposed due to the need to safely move passengers to the north and south of the tracks, just east of the proposed New York Street Station. The station platform at New York Street would be placed to the south of the tracks, so the pedestrian crossing would facilitate direct access to areas northeast of the station.

2.4.3.21 Response to REDLANDS-2.21

The comment inquires if Project design features noted for Eureka Street would be adequate for a quiet zone. Please refer to Master Response 3. As described in the MOU dated February 4, 2015, SANBAG in cooperation with the two cities will implement corridor-wide quiet zones. The ultimately SSMs selected for each crossing remains subject to final engineering design in order for SANBAG to achieve the necessary risk index for the implementation of quiet zones.

2.4.3.22 Response to REDLANDS-2.22

Please refer to Response REDLANDS-2.21.

2.4.3.23 Response to REDLANDS-2.23

The comment requests a reference to the City requirement to provide 200 spaces within ¼ mile of the Downtown Redlands Station and to provide 100 spaces within ¼ mile of the University of Redlands Station. The comment also requests verification of the size of the Park Once structure. The number of parking spaces cited in the Draft EIS/EIR (page 2-33) for the University of Redlands and downtown Redlands Stations is based on the agreement (SANBAG Contract 97-026) between SANBAG and the City of Redlands. SANBAG understands that the final number of parking spaces is subject to change pending the City's development plans. As provided in Section 3.3 of the Draft EIS/EIR, 90 percent of commuters that use the Metrolink Express Service would be expected to drive a vehicle or get a ride to access the Downtown Redlands Station.

2.4.3.24 Response to REDLANDS-2.24

The comment requests confirmation regarding parking at the University of Redlands Station. The final location of parking at the University of Redlands Station is subject to change based on a variety of factors including the University of Redlands' ongoing master planning process. To meet the intent of CEQA and NEPA, SANBAG considered a surface parking lot at the east of the station platform. However, if another parking option is developed that meets the station's parking needs, SANBAG would be amenable to such options instead of using the area east of the platform. In the event that the location and extent of the parking changes, additional environmental review may be required. SANBAG would coordinate with the City of Redlands and the University of Redlands for the final design of parking at the University Station.

2.4.3.25 Response to REDLANDS-2.25

The comment states that large construction projects within the City of Redlands are typically required to repair any construction related damage to City streets or to pay a road repair fee to mitigate for long term wear and tear of the roadway. The comment states that trucks operating on local street to construct this project will cause wear and tear on associated streets. In general, SANBAG will require the selected contractor to perform pre- and post-construction condition assessments for roadways impacted by construction related haul truck traffic. Mitigation Measure TR-1 was revised to address the City's concerns related to roadway wear and tear. Refer to Response Redlands 2.2 for the revisions to Mitigation Measure TR-1. These refinements to Mitigation Measure TR-1 are intended to clarify information included in the Draft EIS/EIR and do not change the analysis or conclusions made in the Draft EIS/EIR.

2.4.3.26 Response to REDLANDS-2.26

The comment requests clarification regarding Burlington Northern Santa Fe (BNSF) funding responsibilities for rail bed rehabilitation. BNSF's existing maintenance responsibilities are outlined in the shared use agreement between SANBAG and BNSF. The existing tracking, ballast and subgrade are all proposed for improvement and are reflected in the Project's construction cost estimate. Funding contributions from the BNSF Railway, if any, would be determined during final design of the Project. This comment does not address the adequacy, content, or findings of the Draft EIS/EIR.

2.4.3.27 Response to REDLANDS-2.27

The comment requests clarification on the extent of funding that may come from City of Redlands, ESRI, or University of Redlands for the Project. Local funding sources for the Project are acknowledged in Section 2.6 (Cost and Financing Information) of the Draft EIS/EIR. While the Draft EIS/EIR does not currently identify the City of Redlands, ESRI, or the University of Redlands as funding partners for the Project, SANBAG will engage in discussions with these entities as future potential funding partners. This comment does not address the adequacy or findings of the Draft EIS/EIR.

2.4.3.28 Response to REDLANDS-2.28

The comment states that the Draft EIS/EIR indicates street closures of up to several months. The comment also recommends that a mitigation measure should be included that minimizes street closures during construction and that additional assistance be provided to local businesses during the construction period. This text was revised in Section 3.2 of the final EIS/EIR to state that temporary closures could be on the order of "weeks" not months described in the text, so the discussion is consistent with Section 3.3 (Effect 3.3-1). The intent of the comment's recommendation is already captured in Mitigation Measure TR-1 which includes a measure to provide construction signage to individual business sites and community facilities that may be affected by construction activities. In addition, SANBAG will work with its contractor to minimize any temporary roadway closures to the shortest duration possible. As part of developing the traffic management plan, SANBAG will consult with each of the local

jurisdictions, including the City of Redlands, to address concerns related to temporary closures, maintaining multiple lanes of travel, etc. during construction of the Project.

2.4.3.29 Response to REDLANDS-2.29

The comment recommends that a mitigation measure be included that requires one lane to be open on all streets with 4 or more lanes except in very limited circumstances. As provided in Mitigation Measure TR-1, the City of Redlands will be provided an opportunity to review a draft of the traffic control plan in order to request any changes or revisions. Please refer to Response Redlands-2.28.

2.4.3.30 Response to REDLANDS-2.30

The comment states that the Draft EIS/EIR indicates 210 daily boardings at the Downtown Redlands Station but 0 vehicles. The comment requests clarification as to why the City of Redlands needs to provide 200 parking spaces within ¼ mile of the Downtown Redlands Station. The results of the ridership modeling indicate a modal split with very few automobile trips at the Downtown Redlands Station in 2018. However, as provided in Master Response 5, the ridership estimates applied for the environmental analysis assume a low ridership to enable for consideration of environmental impacts. Therefore, parking facilities are included at this station location; especially, since they are contemplated in future years. Additionally, the traffic analysis as summarized in Section 3.3 and provided in Appendix E, assumes the re-distribution of existing vehicle trips to the downtown station (see Master Response 13). SANBAG has always planned for some level of parking accommodation at the Downtown Redlands Station per its agreement with the City.

2.4.3.31 Response to REDLANDS-2.31

The comment states that the Pearl Street/Orange Street and Pearl Street/6th Street intersections are deficient and no mitigation for these intersections is proposed as part of the Project. As provided in Draft EIS/EIR Tables 3.3-6 and 3.3-7 and intersections of Pearl and Orange Streets and Pearl and 6th Streets operate at poor levels of service (LOS) in the open year (2018) and future years (2038) without the Project. As provided in Tables 3.3-11 and 3.3-12, the Project's operation would not result in change in the current LOS or a significant change in V/C. For these reasons, the Project-related impact is considered less than significant and no mitigation is required.

2.4.3.32 Response to REDLANDS-2.32

The comment states that Pearl Street/Orange Street is State Route 38 (SR-38) and is under the jurisdiction of the California Department of Transportation (Caltrans). The comment recommends providing a mitigation measure to pressure Caltrans into modify capacity of this transportation facility. The cited intersections are under the jurisdiction of Caltrans and, therefore, any improvements to these roadways (outside of SANBAG's ROW) and intersections are subject to the discretionary approval of Caltrans. Please refer to Response REDLANDS-2.3.



2.4.3.33 Response to REDLANDS-2.33

The comment recommends moving the proposed pedestrian crossing at 7th Street to 9th Street. Based on the pedestrian counts conducted in November 2012, 7th Street exhibited a considerably higher level of pedestrian usage than 9th Street (greater than 30 pedestrians) and was selected during the field diagnostic meeting with the CPUC in December 2012. CPUC reaffirmed its recommendation for the proposed closures in an email dated January 11, 2015. Notwithstanding this direction, as provided in Master Response 3, SANBAG will consider the City of Redlands' recommendation during the Project's final design and as part of the update to the quiet zone risk calculations.

2.4.3.34 Response to REDLANDS-2.34

The commenter states that Mitigation Measure HWQ-1 does not adequately address the issue of deep erosional features within the right of way. The comment recommends that additional discussion on coordination with local agencies be conducted to ensure effective drainage control is provided in the Project design. SANBAG has proposed a combination of mitigation measures to address potential short- and long-term water quality impacts from the Project (see Draft EIS/EIR Mitigation Measures HWQ-1, HWQ-2, and HWQ-6 on pages 3.8-38 through 3.8-39). The existing conditions documented in the comment are summarized in Section 3.8 of the Draft EIS/EIR and described greater detail in Draft EIS/EIR Appendix J1. Subject to the Project's approval by the SANBAG Board, staff looks forward to working with the City to address their drainage and erosion concerns in conjunction with the implementation of Mitigation Measures HWQ-1, HWQ-2, and HWQ-6.

2.4.3.35 Response to REDLANDS-2.35

The comment states that the final design for the Project storm drain improvements reflect the County Flood Control Hydrology Manual (2013 Updates) and the City of Redlands hydrology study recently conducted. The City's Master Drainage Plan is identified as a cumulative project in Table 4-1 of the Draft EIS/EIR (Project #21). Subject to the Project's approval by the SANBAG Board, staff will incorporate the City's updated hydrology information as part of the Project's final design.



DEPARTMENT OF PUBLIC WORKS

FLOOD CONTROL • ENVIRONMENTAL & CONSTRUCTION • OPERATIONS
SOLID WASTE MANAGEMENT • SURVEYOR • TRANSPORTATION

**San Bernardino County
Dept. of Public Works**



COUNTY OF SAN BERNARDINO

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GERRY NEWCOMBE
Director of Public Works

September 22, 2014

File: 10(ENV)-4.01

Mitchell A. Alderman
RPRP_Public_Comments@sanbag.ca.gov

RE: CEQA – NOTICE OF AVAILABILITY OF A DRAFT ENVIRONMENTAL IMPACT REPORT FOR THE REDLANDS PASSENGER RAIL PROJECT FOR SAN BERNARDINO ASSOCIATED GOVERNMENTS

Dear Mr. Alderman:

Thank you for giving the San Bernardino County Department of Public Works the opportunity to comment on the above-referenced project. **We received this request on August 7, 2014** and pursuant to our review, the following comments are provided:

Environmental Management Division (Nancy Sansonetti, Senior Planner, 909-387-1866):

- 1. The San Bernardino County Flood Control District agrees that Alternative 3, Reduced Project Footprint is the environmentally superior alternative under CEQA. } SBCPW-1
- 2. Mitigation Measure PCS-1: "Coordinate Trail Planning with Local Jurisdictions"; please revise this measure to include coordination of final design and construction of Bridge 3.4 with the Department of Public Works, Transportation Design Division, as well as the San Bernardino County Parks and Recreation Department for consistency with the Santa Ana River Trail Project. } SBCPW-2
- 3. Impacts to Santa Ana River biological species including the San Bernardino kangaroo rat, least Bell's vireo and Santa Ana Sucker have potential to occur with the project. Biological mitigation should consider, and be consistent with, mitigation efforts/methods currently being developed within the Santa Ana River Habitat Conservation Plan. } SBCPW-3

Flood Control Planning Division (David Lovell, PWE III, 909-387-7964):

- 1. The proposed rail line crosses and runs adjacent to multiple Flood Control facilities for its length, specifically Warm Creek, Santa Ana River and Mission Channel. Any encroachment into or onto flood control property, through right of way or easements, during construction will require permit applications to District Flood Control Permits Operations Support Division. } SBCPW-4
- 2. Also any District easement with a differing underlying fee owner will require proof of permit/acceptance for any work or improvements performed on the fee owned property from the owner, in addition to the permit on District easement. } SBCPW-5

GREGORY C. DEVEREAUX
Chief Executive Officer

Board of Supervisors

ROBERT A. LOVINGOOD First District	JAMES RAMOS Third District
JANICE RUTHERFORD Second District	GARY C. OVITT Fourth District
JOSIE GONZALES Fifth District	



M. Alderman, San Bernardino Associated Governments
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Water Resources Division (Mary Lou Mermilliod, PWE III, 909-387-8213):

1. Prior to any activity on San Bernardino County Flood Control District (District) right-of-way, a permit shall be obtained from the District's Permits/Operations Support Division, Permit Section. Other on-site or off-site improvements may be required which cannot be determined at this time.
2. It is assumed that the project will incorporate adequate provisions for intercepting and conducting the accumulated drainage around or through the site in a manner that will not adversely affect adjacent or downstream properties.
3. We recommend that the most current FEMA regulations, for construction within established floodplains and the Regulatory Floodway, be enforced by the local jurisdiction. In particular, we emphasize the regulation that states that the proposed encroachment "... will not result in any increase in flood levels within the community during the occurrence of the base flood discharge (44CFR 60.3(d)(3))."

} SBCPW-6

} SBCPW-7

} SBCPW-8

If you have any questions, please contact the individuals who provided the specific comment, as listed above.

Sincerely,

SUNDARAMOORTHY SRIRAJAN, P.E.
Public Works Engineer III
Environmental Management



2.4.4 SAN BERNARDINO COUNTY DEPARTMENT OF PUBLIC WORKS (SBCPW)

2.4.4.1 *Response to SBCPW-1*

The comment states that the San Bernardino County Flood Control District (SBCFCD) concurs with SANBAG's determination that Alternative 3, Reduced Project Footprint, is environmentally superior under CEQA. Please refer to Response to Comment Section 1.2 of this appendix and USEPA-3 for a discussion of a proposed change to the physical footprint to both the Preferred Project and Reduced Project Footprint Alternatives.

2.4.4.2 *Response to SBCPW-2*

The comment requests the revision of Draft EIS/EIR Mitigation Measure PCS-1 (Coordinate Trail Planning with Local Jurisdictions) to include coordination of final design and construction of Bridge 3.4 to ensure consistency with the Santa Ana River Trail Project. Mitigation Measure PCS-1 was revised as part of the Final EIS/EIR as provided below.

PCS-1 Coordinate Trail Planning with Local Jurisdictions. SANBAG will implement the following activities to minimize Project-related conflicts with proposed trails:

- Santa Ana River Trail - SANBAG shall coordinate final design and construction of Bridge 3.4 with the San Bernardino County's Department of Public Works, Transportation Design Division, and Parks and Recreation Department to integrate the trail as contemplated in the SANBAG's Non-Motorized Transportation Plan (2011) (NMTP), so as to maintain its planned future continuity along the Santa Ana River. If the trail is constructed and operational in advance of the bridge structure, SANBAG will maintain trail access during the course of construction, to the extent feasible. In instances, where trail closures are required the construction contractor will be required to minimize the duration of the closure and support the County with any noticing, outreach, or implementation of temporary detours.

These refinements to Mitigation Measure PCS-1 are intended to clarify information included in the Draft EIS/EIR and do not change the analysis or conclusions made in the Draft EIS/EIR.

2.4.4.3 *Response to SBCPW-3*

The comment indicates that impacts to certain Santa Ana River species such as the San Bernardino kangaroo rat, least Bell's vireo and Santa Ana Sucker may occur with the Project. The comment also requests that mitigation measures should consider and be consistent with mitigation currently developed with the Santa Ana River Habitat Conservation Plan (HCP). Mitigation measures proposed in Section 3.7 of the Final EIS/EIR are consistent with typical conditions identified by the U. S. Fish and Wildlife Service (USWFS) and the California Department of Fish and Wildlife (CDFW) for similar projects. At the time of the preparation of the Draft EIS/EIR, no draft conservation measures have been made available for the Upper Santa Ana River HCP, which remains in the preliminary development stages (i.e., data gathering). As proposed, the Project would generally be consistent with the goal and intent of

the proposed HCP by minimizing, avoiding, and lessening adverse effects to listed species through the implementation of Mitigation Measures BIO-1 through BIO-7. Additional discussion is provided in Section 3.7 of the Final EIS/EIR to acknowledge the development of the HCP. This comment does not address the adequacy or findings of the Draft EIS/EIR.

2.4.4.4 Response to SBCPW-4

The comment states that the proposed rail line crosses and runs adjacent to multiple flood control facilities and that any encroachment into or onto flood control property will require permit applications to District Flood Control Permits/Operations Support Division. Please refer to Table 2-10 of the Draft EIS/EIR where the permit requirements for encroachments into flood control-owned properties are acknowledged.

2.4.4.5 Response to SBCPW-5

The comment notes that work performed within any District easement with a different/underlying fee owner will require proof of permit/acceptance for any work or improvements performed on the fee owned property. As noted in Draft EIS/EIR Table 2-10 (page 2-66), the Project is expected to require a Flood Control Permit for corresponding drainage improvements that would occur within or adjacent to lands within the SBCFCD's jurisdiction. This comment does not address the adequacy or findings of the Draft EIS/EIR.

2.4.4.6 Response to SBCPW-6

The comment states that any activity occurring on flood control property will require a permit from the District Flood Control Permits/Operations Support Division. Please refer to Response SBCPW-4.

2.4.4.7 Response to SBCPW-7

The comment requests that the Project incorporate adequate design to ensure that adjacent or downstream properties are not impacted by the Project's drainage. SANBAG will incorporate appropriate provisions into the Project for the safe conveyance of drainage runoff from its right-of-way. Mitigation Measures HWQ-1, HWQ-2, and HWQ-6 are proposed in Section 3.8.4 of the Draft EIS/EIR to address drainage discharges to off-site locations. Implementation of these mitigation measures would ensure impacts remain less than significant.

2.4.4.8 Response to SBCPW-8

The comment requests that current FEMA regulations for floodway encroachments and changes to the base flood discharge are enforced for the Project. As provided on page 3.8-25 through 3.8-29 of the Draft EIS/EIR, the proposed bridge improvements would satisfy FEMA's criteria with no increase in the current base flood elevation at each of the proposed bridge replacements. Draft EIS/EIR Appendices J2, J3, J4, and J5 provide the supporting analysis and modeling results to support these determinations. The comment does not contain any substantive statements or questions about the Draft EIS/EIR or the analysis therein.



City of San Bernardino

Justin:

Please consider this a formal comment to the environmental document that is currently being circulated for review and comment. The City is concerned about pedestrian access with regard to the proposed closure of the "D" Street crossing. We understand that the crossing will be closed and that there will not be any accommodation for pedestrians crossing the rail line at this location. During the field review for the PUC application, we noted that the alternate path of travel for pedestrians south of the rail line is a significant distance, which impacts pedestrian access to and from this area of "D Street. The City would like to know what will be done to mitigate the impact to non-motorized access to and from this location.



SB-1

Robert G. Eisenbeisz, P.E.
City Engineer

City of San Bernardino
Public Works Department
300 North "D" Street, 3rd Floor
San Bernardino, CA 92418
Ph. (909) 384-5203 Fax (909) 384-5190
eisenbeisz_ro@sbcity.org
www.sbcity.org

2.4.5 CITY OF SAN BERNARDINO, ROBERT EISENBEISZ (SB)

2.4.5.1 *Response to SB-1*

The comment states that the City of San Bernardino is concerned with pedestrian (and other non-motorized) access associated with the proposed closure of the D Street crossing. The Draft EIS/EIR evaluates the traffic and circulation effects of closing the at-grade crossing at D Street, including non-motorized forms of transportation (refer to Draft EIS/EIR pages 3.3-30 to 3.3-32 and 3.15-7 to 3.15-8). In addition, the primary reason for closing D Street is for safety per the California Public Utilities Commission (CPUC)'s recommendation.

However, in response to the City's comment, SANBAG compiled pedestrian and vehicle counts at the D Street at-grade crossing during a 24-hour period starting at 10:00 AM on Monday, October 27, 2014. Results from these counts indicate a total of 96 pedestrians and 1,190 vehicles were observed over the 24-hour period. Of the 96 pedestrian crossings, particular attention was paid to those pedestrian movements towards the Tri-City County Community Day School; approximately 1,000 ft. south of the D Street at-grade crossing. SANBAG reviewed the video collected during the morning of October 28, 2014 to determine how many of the students utilize the D Street crossing to walk to school. The results of the video shows that only three (3) student-pedestrians use the D Street crossing to school during the 7:00 to 8:00 AM time period. A majority of the remaining pedestrian movements consisted of transient movements during the nighttime hours. Several of these movements resulted in trespassing into SANBAG's ROW in the direction of Warm Creek.

As proposed, pedestrian access across the tracks would be maintained at E Street and Arrowhead Avenue. With the closure of the at-grade crossing at D Street, direct pedestrian access from Rialto Avenue to portions of D Street, south of SANBAG's ROW, would be restricted. The closure of the at-grade crossing at D Street would in turn increase the distance a pedestrian would have to travel from the intersection of E Street and Rialto Avenue to the intersection of D Street and Stoddard Avenue from 630 feet to 1,200 feet. Therefore, the closure of D Street would require pedestrians to walk an additional 570 feet to access this segment of D Street. In relation to the school further south, the three students would still have alternative access from either E Street or Arrowhead Avenue via West Athol Street. The path of travel from these two roadways would be similar to the existing path of travel down D Street.

Based on a review of the City of San Bernardino's General Plan (Figure PRT-2, D Street) and SANBAG's Non-Motorized Transportation Plan (NMTP), D Street is not designated as a bicycle route or multi-purpose trail. Therefore, the additional path of travel created by the closure of the at-grade crossing at D Street would not decrease the performance of a locally designated non-motorized transportation facility and no adverse or significant impact would result. Additionally, SANBAG will continue to work with the City during the Project's final design to further refine the pedestrian linkages between Rialto Street and areas south of SANBAG's right-of-way (between E Street and Arrowhead Avenue).



2.5 INDIVIDUAL AND ORGANIZATION COMMENTS AND RESPONSES



Patrick Arefffi



Thank you for your interest in the Redlands Passenger Rail Project.

San Bernardino Associated Governments (SANBAG) would like to accurately and personally address your questions and concerns. Please complete the contact information below and indicate the best way to reach you.

CONTACT INFORMATION

Name: PATRICK AREFFFI
Street Address: 1206 West Fern Ave
City: REDLANDS State: CA Zip Code: 92373-4883
Phone: () Cell: (909) 556-2848
Email: branco@eee.org FAX: ()
Are you a local business owner? Yes: No:
If so, please name the business: _____

Preferred Contact Method: (Please check one)

By Phone: Email: FAX: In Writing:

Questions:
OUR COMMENTS/QUESTIONS (1) Will there be a single track line or with sidings or will there be parallel tracks between San Bernardino & Redlands? (2) How will the stations be secured for safety? (3) What kind of station parking will be provided? Will there be unial audits? Ridership may start out slowly; what is the break-even point & when do you project you will reach it.

- AREFFI-1
- AREFFI-2
- AREFFI-3
- AREFFI-4
- AREFFI-5

Thank you for your input on the Redlands Passenger Rail Project.

To provide comments or questions, send an email to

2.5.1 PATRICK AREFFI (AREFFI)

2.5.1.1 Response to AREFFI-1

The comment requests clarification on if there will be a single track line with sidings or a parallel track between San Bernardino and Redlands. The Project would consist of a single track as described on page 2-19 of the Draft EIS/EIR with an approximately 10,000-foot siding (or double track) between extending between Richardson Street and California Street. This comment does not raise any issue related to the adequacy or findings of the Draft EIS/EIR.

2.5.1.2 Response to AREFFI-2

The comment requests clarification on how stations will be secured for public safety. Details relating to the security features proposed for each of the stations remained to be determined as part of the Project's final design, which remains subject to the SANBAG Board's approval of the Project. The Draft EIS/EIR (page 3.15-12) notes that necessary design elements per FTA guidelines (i.e., surveillance, sufficient line of sight, etc.) would be integrated to deter criminal acts and protect passengers, employees and the community. In addition, to address security concerns for the entire Project, SANBAG is proposing Mitigation Measure SS-1, which requires SANBAG to prepare a Safety and Security Management Plan (SSMP) for the track alignment, bridges, parking areas, and station platforms. Please refer to Response WONG-1.2 and Master Response 12 for additional discussion on public safety at the stations.

2.5.1.3 Response to AREFFI-3

The comment requests clarification on the provision of parking at the proposed stations. Surface parking facilities are proposed at each of the station stops. Draft EIS/EIR Table 2-5 (page 2-36) provides additional details on the maximum number of parking spaces that may be constructed at each of the stations. This comment does not raise any issue related to the adequacy or findings of the Draft EIS/EIR.

2.5.1.4 Response to AREFFI-4

The text comprising this comment is illegible and, therefore, SANBAG is unable to respond.

2.5.1.5 Response to AREFFI-5

The comment requests clarification on when the Project would reach the "break-even" point (i.e., when Project revenues pay for Project costs). A fare structure for the Project has not been developed that would allow for a calculation of the Project's "break-even" point based on ridership. This comment does not address the adequacy or findings of the Draft EIS/EIR.



Jonathan Baty

Mitchell A. Alderman, P.E.
Director of Transit and Rail Programs
SANBAG
1170 West 3rd St. 2nd Floor
San Bernardino, CA 92410

Because of the adverse environmental impacts of increased traffic flows and vehicle storage problems associated with the historic Sante Fe station in Redlands and the lack of infrastructure at the University of Redlands, I would highly recommend starting with the West Redlands station near esri first and adding the other two stations when the service becomes light rail focused. Until ridership supports light rail and three stations, having a single station near the esri campus would benefit the community in several ways.

1. Redlands/esri station is a public/private funded partnership so it limits tax payer exposure.
2. Redlands/esri station is well served location with exits from both I-10 and 210 freeways to support the influx of commuter traffic that wants to drive to a station closer than San Bernardino
3. Redlands/esri station has adequate land around it to handle parking for both motor vehicles and bicyclists.
4. Redlands/esri station reduces the congestion in downtown Redlands by directing regional commuting motorists toward a location that would not burden historic downtown Redlands with long term commuter vehicle storage and allow it to focus on commerce.
5. It would allow the Redlands - Orange Blossom Trail to be extended from its present location at the University of Redlands through downtown Redlands to the New York St. station and allow easy biking and walking from the esri station to points East until such time that ridership supports light rail frequencies.
6. Starting with one station in Redlands would speed the ability of commuters to get on their way. Having 3 stops in town would take 20 minutes to complete before going 3 miles!
7. Building a good BikeStation style bicycle storage facility similar to the one in Claremont at the Redlands/esri station would allow regional bike commuters to extend the radius of service well beyond what three stations would do for Redlands. An easy bicycle commute extends the radius of service from ¼ mile for pedestrian service to 3-5 miles.
8. Plans are shovel ready for the Redlands/esri station and it eliminates bridge rework near the historic mission zanja.



Please let me know your thoughts on the matter.

Thanks!



Jonathan Baty
Vice President, Technology
EnerPath / ESI
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Redlands, CA 92374

909 335-1699 Office
909 335-5715 Fax
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2.5.2 JONATHAN BATY (BATY)

2.5.2.1 *Response to BATY-1*

The comment recommends limiting the number of stations in Redlands to just the proposed New York Street Station and adding the Downtown Redlands and University Stations at a later date once the light rail operations commence. The commenter states that having a single station near the ESRI campus would benefit the community in several ways. To clarify and as provided on page 2-57 of the Draft EIS/EIR, the light rail mode was removed from further consideration in the Draft EIS/EIR based on a number of factors including increased cost and the requirement for a larger footprint.

2.5.2.2 *Response to BATY-2*

The comment states that the New York Street Station that would service the ESRI campus is a public/private funded partnerships which reduces taxpayer exposure. This comment does not address the adequacy or findings of the Draft EIS/EIR.

2.5.2.3 *Response to BATY-3*

The comment states the roadway network serving the New York Street Station location would support commuter traffic. This comment does not address the adequacy or findings of the Draft EIS/EIR.

2.5.2.4 *Response to BATY-4*

The comment states that the New York Street Station has adequate availability of land to accommodate parking for both motor vehicles and bicyclists. This comment is informational and does not raise any issue related to the adequacy or findings of the Draft EIS/EIR.

2.5.2.5 *Response to BATY-5*

The comment states that the New York Street Station would reduce congestion in downtown Redlands by directing regional commuting motorists toward a location that would not impact downtown Redlands with long-term commuter vehicle storage. SANBAG appreciates the comment's interest in reducing congestion in downtown Redlands by limiting the station stops to just the New York Street Station. However, as provided in Table 3.3-7 of the Draft EIS/EIR, roadway congestion in downtown Redlands is projected to occur without the Project. As provided in Table 3.3-12, the Project's contribution to these poor portioning conditions is negligible and not significant.

2.5.2.6 *Response to BATY-6*

The comment suggests extending the planned Orange Blossom Trail west from its current terminus through downtown Redlands to the proposed New York Street Station instead of extending Project operations to the University of Redlands. The placement of a trail within SANBAG's right-of-way (ROW) in advance of the Project infrastructure would likely prohibit



development of the proposed rail infrastructure due to the size of SANBAG's ROW through downtown Redlands. As provided on page 2-19 of the Draft EIS/EIR, SANBAG's ROW is constrained to 38-feet through portions of downtown Redlands, thereby requiring a modified track profile in order to accommodate drainage facilities. As shown in Draft EIS/EIR Figure 2-2C, insufficient space exists within SANBAG's ROW to accommodate a multi-use trail. For this reason, SANBAG is proposing Mitigation Measure PCS-1, which requires SANBAG to develop an alternate route for the Orange Blossom Trail as part of SANBAG's next update of its Non-Motorized Transportation Plan.

2.5.2.7 Response to BATY-7

The comment states that by having one station instead of three stations in Redlands would decrease the amount of time needed to go three miles. The travel times provided in the comment are inaccurate and inconsistent with the travel times provided in Table 2-2 of the Draft EIS/EIR (see page 2-18), which indicate that the travel time between the University and New York Street Stations would average less than 5 minutes. This comment does not raise any issue related to the adequacy or findings of the Draft EIS/EIR.

2.5.2.8 Response to BATY-8

SANBAG acknowledges the comment's support for a bicycle storage facility at the New York Street Station. This comment does not address the adequacy, content, or findings of the Draft EIS/EIR.

2.5.2.9 Response to BATY-9

The comment states that plans for the Redlands/ESRI Station are shovel ready and would eliminate bridge work near the Mill Creek Zanja. SANBAG is not aware of any final design plans for the New York Street Station. Final design for the Project will not commence until the SANBAG Board of directors approves the project and certifies the EIR per the requirements of CEQA. This comment does not raise any issue related to the adequacy or findings of the Draft EIS/EIR.



D. Bell



Thank you for your interest in the Redlands Passenger Rail Project.

San Bernardino Associated Governments (SANBAG) would like to accurately and personally address your questions and concerns. Please complete the contact information below and indicate the best way to reach you.

CONTACT INFORMATION

Name: D BELL

Street Address: _____

City: _____ State: _____ Zip Code: _____

Phone: (_____) _____ Cell: (_____) _____

Email: DNBELL@YAHOO.COM FAX: _____

Are you a local business owner? Yes: No:

If so, please name the business: _____

Preferred Contact Method: (Please check one)

By Phone: Email: FAX: In Writing:

YOUR COMMENTS/QUESTIONS ANOTHER TAXPAYER BONDGOGGLE LIKE THE STATE BULLET TRAIN?

Thank you for your input on the Redlands Passenger Rail Project.

To provide comments or questions, send an email to RPRP_Public_Comments@sanbag.ca.gov or call the project helpline at (855) SBR-RAIL / 727-7245.

} BELL-1



2.5.3 D. BELL (BELL)

2.5.3.1 *Response to BELL-1*

The comment provides a statement regarding the expenditure of public tax dollars. This comment expresses an opinion and does not raise any issues related to the adequacy, content, and findings of the Draft EIS/EIR.



Renate and James Beltz

September 28, 2014

Mitch Alderman
Director of Transit and Rail
SanBag
1170 W. 3rd St., 2nd Floor
San Bernardino, CA 92410

Dear Mr. Alderman:

In reviewing the Rail to Redlands Environmental Impact Report and pertinent SanBag documentation, as longstanding residents of Redlands, we would like to pose the following questions and personal observations:

1. How is this project expected to benefit Redlands?

] BELTZ-1

It seems to us, that beyond the completion of a proposed rail net inert-connecting local cities, there would be very little benefit. Aside from those locally positioned to profit from this project, ridership projections point to continuing operational deficits, at public expense.

] BELTZ-2

2. What is the economic incentive to Redlands in having this system built?

] BELTZ-3

Practically speaking, there is none. What does San Bernardino possess that Redlands might need? Commerce? All the money is already here. Crime, and urban blight? No thanks! Moreover, who wants to travel to San Bernardino?

] BELTZ-4

3. What about the potential damage to Redlands' historic infrastructure?

] BELTZ-5

As we understand it, there are plans to operate up to 24 trains to Redlands each day, heavy trains, not light-rail, powered by diesel locomotives. The environmental impact of air and noise pollution stand out, not to mention the impact to historic structures adjoining the right-of-way. Historically, Redlands industry was serviced by two railroads, with small daily locals consisting of no more than a few freight cars each. Contrast this with the intense service planned by Rail to Redlands!

] BELTZ-6

4. And what of the health and public safety issues?

] BELTZ-7

Given the many grade crossings involved in this proposed system, a great increase in the number of emergency incidents can be expected to occur. What provisions are planned to safeguard the public from this increase in exposure? Will the casualties to this project simply be the price of progress?

] BELTZ-8

As we consider what Rail to Redlands will mean for our city, we can see nothing that would improve the quality of life for this community. In fact, the entire concept of a rail link to a relatively small city like Redlands seems like a project in search of a purpose, particularly in view of the alternate public transportation currently available.

] BELTZ-9

In closing, we do not share the vision of a futuristic utopia that Rail to Redlands purports to provide. We do question, however, who stands to profit from this venture.

] BELTZ-10

Thank you for your consideration.

Sincerely,

James E. Beltz, D.D.S.
Renate E. Beltz
1523 Franklin Ave.
Redlands, CA 92373

2.5.4 RENATE AND JAMES BELTZ (BELTZ)

2.5.4.1 Response to BELTZ-1

The commenter requests clarification on how the Project would benefit the City of Redlands. The benefits of the Project are identified in Chapter 1 of the Draft EIS/EIR. Specifically, the Draft EIS/EIR identified the purpose and need for the Project in Draft EIS/EIR Section 1.4 (see pages 1-3 through 1-6). Anticipated Project benefits would include providing a mobility alternative that would be capable of achieving shorter travel times compared to travel on congested roadways and improving connections to the regional multimodal transportation system to residents. These benefits would be applicable to the residents of Redlands. Economic benefits associated with the Project are identified in Draft EIS/EIR Section 3.14.

2.5.4.2 Response to BELTZ-2

The commenter asserts that the Project would have little benefit to the area and that ridership projections point to continuing operational deficits. This comment expresses an opinion about the Project's benefits. Please refer to Master Response 5 regarding projected ridership for the Project.

2.5.4.3 Response to BELTZ-3

The comment requests clarification on what economic incentive does the City of Redlands have to build the Project. The economic impacts, and benefits, of the Project are described in Section 3.14 of the Draft EIS/EIR. This comment does not address the adequacy or findings of the Draft EIS/EIR.

2.5.4.4 Response to BELTZ-4

The commenter states that there is no economic incentive for the Project to be built because all of the monetary resources are located in the City of Redlands and no one wants to travel to San Bernardino. This comment expresses an opinion and does not raise any issues related to the adequacy or findings contained in the Draft EIS/EIR.

2.5.4.5 Response to BELTZ-5

The commenter requests clarification on the Project's impacts to the City of Redlands' historic infrastructure. The Project's effects to the Redlands Santa Fe Depot Historical District are considered in Section 3.12 of the Draft EIS/EIR. Please refer to Master Response 11.

2.5.4.6 Response to BELTZ-6

The commenter has concerns about air and noise impacts associated with the Project. The commenter also has concerns about impacts to historic structures that are located adjacent to the rail right of way. Issues and concerns raised by the commenter are addressed and analyzed in Sections 3.5 (Air Quality and Climate Change), 3.6 (Noise and Vibration), and 3.12 (Cultural

and Historical Resources) in the Draft EIS/EIR. This comment does not raise any issues related to the adequacy or findings contained in these sections of the Draft EIS/EIR.

2.5.4.7 Response to BELTZ-7

The commenter has concerns about health and public safety impacts associated with the Project. Issues and concerns raised by the commenter are addressed and analyzed in Sections 3.5 (Air Quality and Climate Change) and 3.15 (Safety and Security) in the Draft EIS/EIR. Please also refer to Master Response 10 and 12 for discussion on air quality health effects and Project safety and security. This comment does not raise any issues related to the adequacy or findings contained in these sections of the Draft EIS/EIR.

2.5.4.8 Response to BELTZ-8

The commenter has concerns about a potential increase in the number of emergency incidents that may occur at the proposed crossings. Section 3.15 of the Draft EIS/EIR (pages 3.15-3 through 3.15-5) provides information on rail hazards, which includes incidents involving pedestrian or vehicular collisions with trains. The infrequency of past pedestrian or motorist collisions, and the unique circumstances under which they occur, do not allow for a valid quantitative projection of future collisions along the railroad corridor. There are some distinct trends present in the background data. For example, collisions with pedestrians are more likely to occur near stations where large numbers of pedestrians cross the tracks. Inattention to pedestrian warning devices, whether due to distractions, inattention, or other causes, is a factor in many of these collisions. Nevertheless, the low number of pedestrian collisions with passenger trains can be attributed to a safe design, operator training, and public education programs that teach people about potential hazards around the trains. Draft EIS/EIR Table 3.15-3 (page 3.15-4) summarizes all train accidents/incidents within the past ten years in San Bernardino County. As shown in Table 3.15-3, there have been a total of 435 accidents/incidents within San Bernardino County since 2003; 386 of which have been classified as “other accidents/incidents,” meaning these accidents/incidents were events other than train accidents or crossing incidents that cause physical harm to persons. In addition, SANBAG will design and construct all safety improvements per the recommendations of the California Public Utilities Commission (CPUC). Draft EIS/EIR Mitigation Measure SS-1 (see page 3.15-12) requires SANBAG to prepare a Safety and Security Management Plan (SSMP) as part of the Project to address safety and security at the stations, bridges, and track infrastructure. Please refer to Master Response 12 for additional detail.

2.5.4.9 Response to BELTZ-9

The commenter states that the Project will do nothing to improve the quality of life in the City of Redlands. This comment expresses an opinion and does not raise any issues related to the adequacy or findings contained in the Draft EIS/EIR.



2.5.4.10 Response to BELTZ-10

The commenter does not agree with the purpose or the population that would be serviced by the Project. This comment expresses an opinion and does not raise any issues related to the adequacy or findings contained in the Draft EIS/EIR.



John Berry

Mitch Alderman:

I want to go on record as opposing the Redlands "crazy train."

] BERRY-1

Redlands had a street "trolley" for several years and nobody ever rode it. The Metrolink out of San Bernardino claims to not have enough riders, so if the link into LA doesn't have enough riders, what makes people think that a link to Redlands will suddenly change the Metrolink's ridership?

] BERRY-2
] BERRY-3

My tax dollars would be better spent on building better roads.

] BERRY-4

John Berry
317 Van Ness Lane
Redlands, CA 92374



2.5.5 JOHN BERRY (BERRY)

2.5.5.1 Response to BERRY-1

The commenter is opposed to the Project. This comment expresses an opinion and does not raise any issues related to the adequacy or findings of the Draft EIS/EIR.

2.5.5.2 Response to BERRY-2

The comment provides information related to prior trolley service in Redlands. This comment does not address the adequacy or findings of the Draft EIS/EIR.

2.5.5.3 Response to BERRY-3

The comment requests clarification on Metrolink ridership. Ridership estimates for the Project are provided on page 2-18 of the Draft EIS/EIR. These estimates are based on the Ridership Report, which is provided as Appendix C to the Draft EIS/EIR. Please refer to Master Response 5 for additional discussion on projected ridership.

2.5.5.4 Response to BERRY-4

The commenter states a preference for building roads with taxpayer funds. This comment expresses an opinion and does not raise any issues related to the adequacy or findings of the Draft EIS/EIR.



Bob Botts-1

Mr. Mitch Alderman
Director of Transit and Rail Programs
SANBAG
San Bernardino, California

Good Morning Mr. Alderman:

As owners of property and a building located right next to the proposed passenger rail line from San Bernardino to Redlands we received a letter indicating that the EIR had been completed and that two public meetings had been scheduled. To my knowledge this was the first notification we have received in regard to this project.

} BOTTs-1.1

Our family owned property is located at 123 S. "D" Street, San Bernardino and is within the "Severe Impact" area according to Figure 8-1A in the EIR Document. The northern wall of our building appears to be about 20' or less from the existing track. I will be measuring the distance to be more accurate.

} BOTTs-1.2

Obviously we have some concerns about this project as it relates to our family owned property and building and our current and future tenants. Our concerns revolve primarily around sound, noise and vibration issues, as well as potential air pollution and of course the number of trains that will be traversing the tracks both now and in the future.

} BOTTs-1.3

It is one thing for a property and building to be within a negative impact range, for a project of this magnitude, but for our property to abut the rail right away and in fact our building being just feet away from the track is a little disconcerting. **While the project may be very good for the general public, I'm sure you will understand our concerns in regard to our family investment and the future value of the property and our improvements to it.**

} BOTTs-1.4

I will be attending your informational meeting in Redlands and probably the one in San Bernardino however I would really like to sit down with someone who can deal with



specifics relating to our property and the potential impacts to it from this project. **Can you direct me to the right person in your Agency and I would be happy to schedule some time to come to San Bernardino and learn more about the project, its impact on our property and any mitigation measures that might allay some of our concerns?**

BOTTS-1.4
Continued

Thanks and I look forward to hearing from you.

Bob

Robert E. Botts
5410 Pinehurst Dr.
Banning, CA 92220

951.295.3950
rbotts@dc.rrcom

Former Mayor and Council Member
City of Banning

2.5.6 BOB BOTTTS (BOTTTS-1)

2.5.6.1 Response to BOTTTS-1.1

The comment is introductory in nature and indicates that the commenter had received a letter regarding the completion of the Project EIR and information related to two public meetings for the Project. The comment also notes that the letter was the first notification received by the property owner about the Project. The referenced notification on August 6, 2014 was SANBAG's first formal noticing for the Project since the release of the Notice of Preparation (NOP) and Notice of Intent (NOI) in April and July of 2012, respectively. As provided in Draft EIS/EIR Appendix A3, the subject property was included on the distribution list for the NOP and NOI in 2012. Both the NOI and NOP indicated that SANBAG was in the process of preparing an environmental document for the Project. Please refer to Master Response 9 for additional information on noticing for the Project. This comment does not raise any issue related to the adequacy or findings of the Draft EIS/EIR.

2.5.6.2 Response to BOTTTS-1.2

The comment provides the location of the commenter's property at 123 S. D Street in the City of San Bernardino. The comment also states that the property is within the "Severe Impact" area based on Draft EIS/EIR Figure 8-1A. The comment misinterprets the information depicted in Figure 8-1A of Appendix H of the Draft EIS/EIR. The subject property contains commercial land uses and does not meet the criteria for a Category 2 or 3 land use (see Master Response 1). For this reason, the subject property was not identified as a receiver of interest for the detailed noise analysis based on the guidance provided in Chapter 6 and Appendix C of FTA's Noise and Vibration Manual (2006). Although the subject property was not specifically modeled as part of the detailed noise analysis, as shown in Figure 8-1A, the subject property is contained within the "screening level noise impact area." Please refer to Master Response 1 for additional discussion. This comment does not raise any issue related to the adequacy or findings of the Draft EIS/EIR.

2.5.6.3 Response to BOTTTS-1.3

The commenter is concerned about sound, noise, and vibration issues as well as air quality and the number of trains that will be utilizing the rail line. Issues related to the comment's concerns regarding rail noise are addressed in Master Response 1, 2, and 3. Air quality and associated air quality impacts have been analyzed for the Project in Appendix G1 and G2 and summarized in Section 3.5 (pages 3.5-1 through 3.5-28) of the Draft EIS/EIR. As provided in Draft EIS/EIR Section 3.5.3, the Project's short- and long-term impacts to air quality are less than significant. Please refer to Master Response 10 regarding air quality and health effects. Information relating to the number of trains that would operate on a typical weekday and weekend are provided in Draft EIS/EIR Chapter 2, Table 2-1 (see page 2-17). As provided in Chapter 2, the Project would result in 25 daily round trips. This comment does not raise any issue related to the adequacy or findings of the Draft EIS/EIR.



2.5.6.4 Response to BOTTTS-1.4

The comment states that there are concerns relating to the property owner's investment in the subject property and intention to attend to the public meetings scheduled for September 4 and 9, 2014. Please refer to Master Response 15 for a discussion of potential changes to property values. The commenter also indicates that he would like to meet with an agency staff member to discuss the Project and impacts on the reference property. SANBAG had multiple discussions with the commenter in early August 2014. Tim Watkins (SANBAG's Public Information Officer) followed up with Mr. Botts on August 13, 2014. As described in Master Response 9, SANBAG has conducted multiple public outreach meetings for the Project and will hold a public hearing prior to approval of the Project and certification of the Final EIR. This comment does not raise any issue related to the adequacy or findings of the Draft EIS/EIR.



Bob Botts-2

8/24/2014

Subject Property - 123 South D Street, San Bernardino, Ca - WorkFlowy

Subject Property - 123 South D Street, San Bernardino, Ca

- Co-Owners - Robert and Beverly Ann Botts and Truitt and Penny Westbrook
- Contact Bob Botts, 5410 Pinehurst Dr., Banning, Ca, 92220, Tele: 951.295.3950, bbotts@dc.rr.com
- Subject property is adjacent to the right of way and rail track at 123 S. D St in San Bernardino.
- The building on the proprty is located approximately thirty (30') from the actual rail track.
- Subject property was a land fill project, next to the Warm Creek River/Stream, created by the San Bernardino Redevelopment Agency approximately 39 years ago. Prior to the City creating the built up land fill lot, water flowed from D Street, to the East, into Warm Creek . This area was compacted with fill dirt to create the Pad for the RDA, next to the rail line, with very limited train travel over the tracks for the past 30 years.
- AREAS OF CONCERN:
 - Noise from:
 - Train traversing the track
 - Train Wheel noise
 - Locomotive noise
 - Wheel squeel
 - Blowing of horn when approaching grade and street intersections
 - Vibration impact on building and people just 30 feet away
 - Potential vibration impact on dirt pad and lot created by fill dirt near a river/stream
 - Impact to dirt property fill/hill grade from construction of the rail line and construction of a new bridge over Warm Creek River/Stream which is immediately adjacent to subject property.
- QUESTIONS AND ISSUES
 - 1. What is a sensitive receiver and is the subject property list as a sesentive receiver? Can you provided a list of receivers as numbered and referred to in 6.0 Impact Assessment 6.1 Operational noise u.1.1 MP 1 to MP 2 (E Street to southeast of Sierra Way)?
 - 2. Please confirm that subject property is classified as being in a "Severe Impact Zone". If so what does this mean or imply. Are there proposed mitigation measures that would lesson the severe impact to subject property?
 - 3. What is the projected short and long term impact to the property and

BOTTS-2.1

BOTTS-2.2

BOTTS-2.3

BOTTS-2.4

BOTTS-2.5

BOTTS-2.6

BOTTS-2.7



8/24/2014

Subject Property - 123 South D Street, San Bernardino, Ca - WorkFlow

building due to EIR vibration studies?

- 4. Was there any analysis done to potential damage to improvements or products within the subject building due to being 30' from the actual track?
- 5. Was any engineering analysis done regarding the impact of vibration on the soil of subject property due to having been created by tons of fill dirt from D Street to the Warm Creek river bed?
- 6. What are the study calculation for vibration impact to subject property and what are the State and Federal Standards, both for the dirt lot and the building itself?
- 7. What are the proposed emissions created by the locomotive engines be used both for electric and diesel and what are the State and Federal standards requirement?
- 8. The EIR talks about Category Numbers and Description. What category/number is the subject property?
- 9. What is the noise impact to the subject property from trains, wheels, wheel squeal blowing of horns...what are the projections (dBA) and what are the federal and state standards.
- 10. What is proposed at the "D" Street Crossing? Will "D" Street remain open?
- 11. Will the D Street area be included in a Quiet Zone? The EIR calls out a Quiet Zone for Arrowhead Ave. Why not D Street? While there seems to more emphasis on Quiet Zones for residential areas understandably, particularly at night, why should owners of businesses and their employees not also be protected and have noise mitigation measures provided when the business is located in a severely impacted area and the building just 30' from the tracks?
- 12. Do different uses have different noise mitigations, subject to the land use i.e., commercial property, where people work, versus residential areas?
- 13. Under Ground Borne Noise and Vibration Analysis, Summary Table 6-4 it does not appear to list subject property, even though it is occupied by employees and is about 30' from the tracks?
- 14. What are the projected number of trains during the day and night, in the first year of operation and then what are the growth projections over the next 3-5-10-20 years?
- 15. At what speeds will the trains be traveling both from an eastward direction, leaving the Street Station when passing subject property, and then when the train is traveling westward from Redlands preparing to stop at the E Street Station? Since when traveling eastward the locomotive will be working harder to begin to move the train, and get up to speed, are there calculations showing increased noise and emissions from the engines and train?
- The proposed bridge replacement appears to be over Warm Creek River/Stream which is immediately adjacent to subject property. Is this correct? Similar concerns, as have been previously indicated here regarding the Pad, created with fill dirt and the potential that vibration on an on-going basis and

BOTTS-2.7
Cont.

BOTTS-2.8

BOTTS-2.9

BOTTS-2.10

BOTTS-2.11

BOTTS-2.12

BOTTS-2.13

BOTTS-2.14

BOTTS-2.15

BOTTS-2.16

BOTTS-2.17

BOTTS-2.18

BOTTS-2.19

BOTTS-2.20



8/24/2014

Subject Property- 123 South D Street, San Bernardino, Ca - WorkFlowy

potentially with construction of a new bridge, could create subsidence of the soil near the railroad and bridge construction site and stream?

- Is it correct that whether referring to residential or commercial property and buildings, that according to Federal Standards "Severe Impact", as subject property is designated, is defined as "A significant percentage of people would be highly annoyed by the noise, perhaps resulting in vigorous, adverse community reaction"?
- 15. What is the proposed socio/economic impact, and mitigation measures, to subject property and to its economic value, since the building is occupied by people and the building and work environment is just 30' feet from the track and is designated as a severe impact property? Note: When given a choice, why would a business or entity want to buy or lease this subject property and building, at a normal market rate when they could lease or buy some other property and building that isn't situated in a severe impact zone which would subject their employees to significant noise, vibration and air pollution?
- 16. Why are commercial buildings and businesses and occupied by human employees and are in a designated severe impact zone not considered as "Sensitive" and not listed under Noise-Vibration-Sensitive Land Uses"? It appears that subject property is well within any screening distance (30') from building to track, but isn't given any consideration because it isn't a residence, transient residency or park or church? While there is less impact at night on subject property, at 30' from the trains and track there is major impact to the employees in the building.
- 17. What were the dBa noise levels both current and projected at subject property? Table 4.1 only lists residences.
- 18. What are the four proposed at grade road closures?

BOTTS-2.20
Continued

BOTTS-2.21

BOTTS-2.22

BOTTS-2.23

BOTTS-2.24

BOTTS-2.25

2.5.7 BOB BOTTS (BOTTS-2)

2.5.7.1 *Response to BOTTS-2.1*

The comment provides information on the property located at 123 South D Street in San Bernardino and the placement of fill on the subject property by the San Bernardino Redevelopment Agency approximately 40 years ago. SANBAG appreciates this additional information and will take it into consideration during final design if the Project is carried forward by SANBAG's Board of Directors. This comment does not raise any issue related to the adequacy or findings of the Draft EIS/EIR.

2.5.7.2 *Response to BOTTS-2.2*

The comment states that there are concerns about train noise, train wheel noise, wheel squeal, and train horn blowing at grade and street intersections. Please refer to Master Response 1 for information related to train noise, train wheel noise, and wheel squeal. As provided in Master Response 2, SANBAG's preferred form of noise mitigation is the implementation of Quiet Zones per Mitigation Measure NV-3 in the Draft EIS/EIR, given that the noise reduction benefits provided are distributed more equitably along the railroad corridor (i.e., not just Category 2 and 3 land uses). This comment does not raise any issue related to the adequacy or findings of the Draft EIS/EIR.

2.5.7.3 *Response to BOTTS-2.3*

The comment states that there are concerns about vibration impacts on buildings and people as a result of the Project. The commenter also has concerns about potential vibration impacts on fill dirt to properties near a river/stream. Please refer to Master Response 7 for information associated with vibration impacts. If the Project is ultimately approved by the SANBAG Board, during the final design process SANBAG will be required to comply with Mitigation Measure GEO-1. This measure requires the completion of a final geotechnical evaluation during the Project's final design to address sub-surface issues including, but not limited to, sources of Project fill and localized settlement. The inclusion of Draft EIS/EIR Mitigation Measure GEO-1 would ensure that potential impacts associated with geology, soils, and seismicity for the Project are addressed and mitigated to a less than significant level through the Final Geotechnical Report which verifies the conditions identified in the Preliminary Geotechnical Evaluation. To provide further clarification, Mitigation Measure GEO-1 was revised.

GEO-1 Prepare Final Geotechnical Report for the Project and Implement Recommended Measures. A Final Geotechnical Report shall be prepared to verify conditions identified in the Preliminary Geotechnical Evaluation prepared for the Project and to support the refinement of the Project's final design. Facility design for all Project components along the alignment shall comply with the site-specific design recommendations as provided by a licensed geotechnical or civil engineer to be retained by SANBAG. The final geotechnical and/or civil engineering report shall address and make recommendations on the following:

- Site preparation;
- Soil bearing capacity;

- Appropriate sources and types of fill;
- Liquefaction;
- Lateral spreading;
- Settlement;
- Landslides (with emphasis on improvements that border the Mission Zanja Flood Control Channel);
- Hydroconsolidation;
- Compressible/Collapsible soils;
- Corrosive soils;
- Structural foundations; and
- Grading practices.

In addition to the recommendations for the conditions listed above, the geotechnical report shall include subsurface testing of soil and groundwater conditions, and shall determine appropriate foundation designs that are consistent with the latest version of the CBC, as applicable at the time building and grading permits are pursued. All recommendations contained in the final geotechnical engineering report shall be implemented by SANBAG.

These refinements to Mitigation Measure GEO-1 are intended to clarify information included in the Draft EIS/EIR and do not change the analysis or conclusions made in the Draft EIS/EIR.

2.5.7.4 Response to BOTTTS-2.4

The commenter is concerned with impacts to adjacent properties associated with fill associated with the hill grade and construction of a new bridge over Warm Creek. SANBAG appreciates the comment's provision of its site history and location relative to SANBAG's ROW. SANBAG will take this information into consideration when implementing revised Mitigation Measure GEO-1 (see Response BOTTTS-2.3) as part of the Project's final design process if the Project is ultimately adopted and carried forward by SANBAG's Board. This comment does not address the adequacy or findings of the Draft EIS/EIR.

2.5.7.5 Response to BOTTTS-2.5

The comment requests clarification of what a sensitive receiver is and if his property is listed as a sensitive receiver. The comment also requests a list of receivers as numbered and references to in the Draft EIS/EIR. Please refer to Master Response 1. As provided in Table 3.6-1 on page 3.6-4 of the Draft EIS/EIR, the USDOT has published impact assessment procedures and criteria (FTA 2003) pertaining to noise from transportation sources. Noise impact criteria have been adopted by FTA to assess the contribution of noise from conventional rail sources to the existing environment. These guidelines establish methods for analyzing and assessing noise and vibration impacts.

Based on the subject properties existing commercial use, the subject property would not qualify for one of the three land use categories identified in Section 3.6.2 and, therefore, is not considered “noise sensitive.” Therefore, the subject property’s location along the railroad corridor was not selected for detailed noise modeling per FTA’s Manual (see Master Response 1). Notwithstanding this consideration, a representative receiver location for the subject property based on its relative proximity to the track centerline (i.e., less than 50 feet) would be Receiver 3 as depicted in Figures 3.6-3A, 3.6-4A, and 3.6-5A of the Draft EIS/EIR. However, SANBAG would note that the subject property is located along a straight segment of track with the train traveling at lower speeds in contrast to Receiver #3. Receiver #3 (a Category 2 land use) is located at 50 feet from the track centerline and would be subject to severe noise impacts from the Project as depicted in Figures 3.6-4A and 3.6-5A and Tables 3.6-6 and Table 3.6-7. As provided, Receiver #3 has an existing noise level of experience a noise level of 55 dBA Ldn (see Table 3.6-6). With the Project, noise levels with a locomotive would be 68 dBA Ldn in the absence of quiet zones and 62 dBA Ldn with quiet zones. If a DMU is selected, noise levels with quiet zones would be further reduced to 60 dBA Ldn (Table 3.6-7).

It is important to note that although the noise levels provided for Receiver 3 could be generally applied to the subject property, the corresponding impact determination would not apply to the subject property given that it does not meet the criteria for a Category 2 land use. Additionally, the existing noise levels at the subject property are likely less than those recorded for Receiver #3 due to differing roadway classifications.

2.5.7.6 Response to BOTTs-2.6

The comment requests clarification to what a Severe Impact Zone is and if his property is classified as being within this impact zone. The comment also requests additional information on any proposed mitigation measures that would reduce impacts to this property.

As illustrated in Figure 3.6-4A and 3.6-5A, the subject property is located within FTA’s Screening Level Noise Impact Area. Although not modeled as a specific noise receiver as discussed in Response BOTTs-2.5, the subject property would be subject to increased noise levels based on the application of the noise levels for Receiver #3 (see Tables 3.6-6 and 3.6-7). A severe noise impact is defined in Table 2-1 of Appendix H1 and is determined based on a receivers existing noise level. Please refer to Master Responses 1 and 2 for additional discussion.

2.5.7.7 Response to BOTTs-2.7

The comment requests clarification on project short term and long term vibration impacts to the property and building owned by the commenter. Please refer to Master Response 7. The Draft EIS/EIR provides a general assessment of construction and operational vibration affects for the entire railroad corridor following FTA’s Manual (2006). The commenter is referred to Impact 3.6-2, which provides discussion of potential vibration effects from construction (short-term) and operation (long-term) of the Project along the entire railroad corridor (see pages 3.6-29 through 3.6-31 of the Draft EIS/EIR). As provided in Response BOTTs-2.5, the subject property is not a Category 2 or 3-type land use based on FTA’s Guidance (2006). Therefore, the subject property

was not specifically modeled in the Noise and Vibration Technical Memorandum (see Appendices H1 and H2).

2.5.7.8 Response to BOTTs-2.8

The comment request clarification on if vibration analysis was done for buildings within 30 feet from the rail track. Please refer to Master Response 7. The Draft EIS/EIR provides a general assessment of vibration-related damage to adjacent structures from both construction and operation of the project. Although no site-specific vibration estimates were produced for the subject property, a representative receiver location for the subject property is Receiver #3 (see MP 1 to MP 2 – see page 3.6-29). As provided, Receiver #3 could experience “vibration annoyance” impacts based on the vibration analysis for the Draft EIS/EIR (see Table 6-4 of Appendix H1 and H2). As provided in FTA’s Guidance, damage from vibration is rare and generally tied to unique circumstances, such as older historic structures and site geology, such as the presence of shallow bedrock or stiff clay soils (FTA 2006). In general and based on geologic borings for the study corridor, these geologic conditions do not exist along the railroad corridor based on the local alluvial geology. To minimize vibration annoyance from train operations, SANBAG is proposing the placement of ballast mats or similar technologies per Mitigation Measure NV-6 in the Draft EIS/EIR.

2.5.7.9 Response to BOTTs-2.9

The comment requests clarification on if any engineering analysis was conducted for vibration impacts on the referenced property. No site-specific vibration analysis was completed for the subject property. As provided in Response 2.7, Receiver #3 provides the most representative receiver location based on the subject property’s proximity to the railroad corridor. It is important to note that CEQA and NEPA do not require a Lead Agency to conduct every test or perform all research, study, or experimentation recommended or requested by commenters. Rather, a Lead Agency need only respond to significant environmental issues and does not need to provide all information requested by reviewers, as long as a good faith effort at full disclosure is made in the EIS/EIR.

SANBAG appreciates the comment’s insights regarding the placement of fill along the northeastern portion of the subject property, in the vicinity of Warm Creek. This information will be taken into consideration by SANBAG during final design if the Project is approved by the SANBAG Board of Directors.

2.5.7.10 Response to BOTTs-2.10

The comment requests clarification on the vibrational analysis calculations and what State and Federal standards or criteria were used in the analysis. The input/output calculations for the vibrational analysis are provided in Appendix H1 and H2 (see Appendix H). Federal ground-borne vibration criteria are provided in Table 2-1 of Appendix H1 of the Draft EIS/EIR.

2.5.7.11 Response to BOTTTS-2.11

The comment requests clarification on the train emissions calculations (for both electric and diesel) and what State and Federal standards or criteria were used in the analysis. Please refer to Master Response 10. The commenter is referred to Section 3.5 of the Draft EIS/EIR, Air Quality and Greenhouse Gases, for an analysis of the project emissions for the Project. Tables 3.5-8, 3.5-9, and 3.5-10 provide the projected emissions of criteria air pollutants for each vehicle option under consideration for existing conditions (2012), opening day (2018), and future conditions (2038). As provided, the Project emissions are not expected to exceed thresholds established by the South Coast Air Quality Management District (SCAQMD) and would be less than significant for all vehicle options considered.

2.5.7.12 Response to BOTTTS-2.12

The comment requests clarification on what a Category Number is and what Category Number is assigned to the commenter's property. The subject property is not considered a sensitive land use based on its commercial land use and, therefore, was not selected for detailed noise modeling. As provided in Response BOTTTS-2.7, the noise levels modeled for Receiver #3, although not specific to, are representative for the subject property.

2.5.7.13 Response to BOTTTS-2.13

The comment requests clarification on the train noise impact to his property and what State and Federal standards were used for the noise analysis. The subject property was not included as a modeled receiver in the detailed noise analysis. Tables 3.6-6 and 3.6-7 of the Draft EIS/EIR provide the noise levels for Receiver #3 along with the applied federal standards.

2.5.7.14 Response to BOTTTS-2.14

The comment requests clarification on what is proposed at the D Street Crossing and if D Street will remain open. As provided in Table 2-4 of the Draft EIS/EIR, the existing D Street at-grade crossing is proposed for closure as part of the Project. The proposed closure of D Street is in response to recommendations from the California Public Utilities Commission (CPUC) based on field diagnostic meeting held in December 2012.

2.5.7.15 Response to BOTTTS-2.15

The comment requests clarification if the D Street area will be included as part of a Quiet Zone. The comment also requests noise mitigation measures for businesses impacted by the Project. SANBAG is proposing to implement quiet zones at both E Street and Arrowhead Avenue based on an MOU with San Bernardino (see Master Response 3). Supplemental safety improvements required to implement a quiet zone extend beyond the actual at-grade crossing and, for this reason, SANBAG is proposing the closure of D Street to meet this standard. If implemented at E Street and Arrowhead Avenue, D Street would be required to be included in order to maintain a satisfactory risk index (see Master Response 3).

2.5.7.16 Response to BOTTTS-2.16

The comment requests clarification on if different land uses have different noise regulations. Per FTA's guidance and as elaborated in Responses BOTTTS-2.5, the prioritization of sound mitigation is largely focused on sensitive land uses. However, as provided in Responses BOTTTS-2.5 and 2.6, SANBAG is proposing the implementation of quiet zones and the integration of a DMU, which would provide the most equitable distribution of noise reduction mitigation for all uses throughout the railroad corridor.

2.5.7.17 Response to BOTTTS-2.17

The comment states that the underground borne noise and vibration analysis does not list the subject property. Please refer to Responses BOTTTS-2.7 and 2.8.

2.5.7.18 Response to BOTTTS-2.18

The comment requests information about the number of trains projected during the day and night when the Project is operational and future operating years. As provided on page 2-17 of the Draft EIS/EIR, daily weekday train operations would average 25 daily round trips. See Table 2-1 of the Draft EIS/EIR for additional detail.

2.5.7.19 Response to BOTTTS-2.19

The comment requests information about train speeds when trains are traveling eastward and westward. The comment also requests information about calculations which show train emissions in both eastward and westward directions. Average train speeds between E Street and Tippecanoe Avenue are provided in Table 2-2 of the Draft EIS/EIR. Although Table 2-2 indicates that train speeds would have 32.43 miles per hour (mph) along this segment of track, in reality, given the subject property's proximity to the E Street Station (800 feet), actual train speeds (both east and westbound) would likely be much less than that provided in Table 2-2 and modeled for Receiver #3 (see Response BOTTTS-2.5).

2.5.7.20 Response to BOTTTS-2.20

The comment requests clarification on the proposed bridge replacement over Warm Creek and if there could be subsidence impacts associated with placement of fill along the northeastern portion of the subject property. As identified in Draft EIS/EIR Table 2-3, the Project proposes the full replacement of Bridge 1.1 at Warm Creek. Please refer to Response BOTTTS-2.3.

2.5.7.21 Response to BOTTTS-2.21

The comment's reference to "severe impact," as defined by FTA is correct. However, the impact definition is applied to one of the three noise categories as provided in Response BOTTTS-2.5. As defined, these categories do include commercial land uses. Therefore, the application of the "severe impact" finding to the subject property would not be appropriate according to FTA's Guidance.



2.5.7.22 Response to BOTTTS-2.22

SANBAG completed an economic impact analysis for the Project, which is provided in Appendix N and summarized in Section 3.14 of the Draft EIS/EIR. As provided in Response BOTTTS-2.22, the commenter is using the “severe impact” conclusion, which is to be applied to Category 1, 2, and 3 land uses, out of its appropriate context. The Project would not adversely affect the current use of the subject property and, therefore, is unlikely to result in an economic loss to the subject property. The potential for the Project to result in changes to currently property values is considered to speculative for evaluation. However, based on the property’s proximity to a transit station (e.g., E Street), its value has the potential to increase in the future.

2.5.7.23 Response to BOTTTS-2.23

Please refer to Response BOTTTS-2.21.

2.5.7.24 Response to BOTTTS-2.24

Please refer to Responses BOTTTS-2.5 and 2.6.

2.5.7.25 Response to BOTTTS-2.25

Please refer to Master Response 4. As provided on page 2-24 of the Draft EIS/EIR, SANBAG is proposing the closure of the at-grade crossing at D Street in San Bernardino and the at-grade crossings at Stuart Avenue, 7th Street, and 9th Street in Redlands. This comment does not address the adequacy or findings of the Draft EIS/EIR.



Bob Botts-3

Clint:

It was good to meet you at the meeting last week in Redlands....it was certainly well attended and I assume most everyone was supportive of the project!!??

As I indicated to you and staff, I am a believer in Passenger Light Rail and basically support the propose project however as you can understand my family and I have a significant economic interest (from our perspective) in our property and building located immediately adjacent to the right of way and track.

While I will probably make some general comments regarding the project, in relation to requested responses to the EIR, and send them on to Tim, **as an owner of property and a building adjacent to the project and apparently identified as in the Severe Impact Zone, I would appreciate a written response to my specific questions that I have included here.**

] BOTTs-3.1

] BOTTs-3.2

If you have any question please don't hesitate to contact me by email or phone.

Thanks.

Bob

Robert E. Botts
5410 Pinehurst Dr.,
Banning, CA 92220

bbotts@dc.rr.com
951.295.3950



8/24/2014

Subject Property - 123 South D Street, San Bernardino, Ca - WorkFlow

Subject Property - 123 South D Street, San Bernardino, Ca

- Co-Owners - Robert and Bevery Ann Botts and Truitt and Penny Westbrook
- Contact Bob Botts, 5410 Pinehurst Dr., Banning, Ca, 92220, Tele: 951.295.3950, bbotts@dc.rr.com
- Subject property is adjacent to the right of way and rail track at 123 S. D St in San Bernardino.
- The building on the proprty is located approximately thirty (30') from the actual rail track.
- Subject property was a land fill project, next to the Warm Creek River/Stream, created by the San Bernardino Redevelopment Agency approximately 39 years ago. Prior to the City creating the built up land fill lot, water flowed from D Street, to the East, into Warm Creek . This area was compacted with fill dirt to create the Pad for the RDA, next to the rail line, with very limited train travel over the tracks for the past 30 years.
- AREAS OF CONCERN:
 - Noise from:
 - Train traversing the track
 - Train Wheel noise
 - Locomotive noise
 - Wheel squeel
 - Blowing of horn when approaching grade and street intersections
 - Vibration impact on building and people just 30 feet away
 - Potential vibration impact on dirt pad and lot created by fill dirt near a river/stream
 - Impact to dirt property fill/hill grade from construction of the rail line and construction of a new bridge over Warm Creek River/Stream which is immediately adjacent to subject property.
- QUESTIONS AND ISSUES
 - 1. What is a sensitive receiver and is the subject property list as a sesentive receiver? Can you provided a list of receivers as numbered and referred to in 6.0 Impact Assessment 6.1 Operational noise u.1.1 MP 1 to MP 2 (E Street to southeast of Sierra Way)?
 - 2. Please confirm that subject property is classified as being in a "Severe Impact Zone". If so what does this mean or imply. Are there proposed mitigation measures that would lesson the severe impact to subject property?
 - 3. What is the projected short and long term impact to the property and

BOTTs-3.3

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8/24/2014

Subject Property - 123 South D Street, San Bernardino, Ca - WorkFlowy

building due to EIR vibration studies?

- 4. Was there any analysis done to potential damage to improvements or products within the subject building due to being 30' from the actual track?
- 5. Was any engineering analysis done regarding the impact of vibration on the soil of subject property due to having been created by tons of fill dirt from D Street to the Warm Creek river bed?
- 6. What are the study calculation for vibration impact to subject property and what are the State and Federal Standards, both for the dirt lot and the building itself?
- 7. What are the proposed emissions created by the locomotive engines be used both for electric and diesel and what are the State and Federal standards requirement?
- 8. The EIR talks about Category Numbers and Description. What category/number is the subject property?
- 9. What is the noise impact to the subject property from trains, wheels, wheel squeel blowing of horns...what are the projections (dBA) and what are the federal and state standards.
- 10. What is proposed at the "D" Street Crossing? Will "D" Street remain open?
- 11. Will the D Street area be included in a Quiet Zone? The EIR calls out a Quiet Zone for Arrowhead Ave. Why not D Street? While there seems to be more emphasis on Quiet Zones for residential areas understandably, particularly at night, why should owners of businesses and their employees not also be protected and have noise mitigation measures provided when the business is located in a severely impacted area and the building just 30' from the tracks?
- 12. Do different uses have different noise mitigations, subject to the land use i.e., commercial property, where people work, versus residential areas?
- 13. Under Ground Borne Noise and Vibration Analysis, Summary Table 6-4 it does not appear to list subject property, even though it is occupied by employees and is about 30' from the tracks?
- 14. What are the projected number of trains during the day and night, in the first year of operation and then what are the growth projections over the next 3-5-10-20 years?
- 15. At what speeds will the trains be traveling both from an eastward direction, leaving the Street Station when passing subject property, and then when the train is traveling westward from Redlands preparing to stop at the E Street Station? Since when traveling eastward the locomotive will be working harder to begin to move the train, and get up to speed, are there calculations showing increased noise and emissions from the engines and train?
- The proposed bridge replacement appears to be over Warm Creek River/Stream which is immediately adjacent to subject property. Is this correct? Similar concerns, as have been previously indicated here regarding the Pad, created with fill dirt and the potential that vibration on an on-going basis and

BOTTS-3.3
Continued

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8/24/2014

Subject Property - 123 South D Street, San Bernardino, Ca - WorkFlowy

potentially with construction of a new bridge, could create subsidence of the soil near the railroad and bridge construction site and stream?

- Is it correct that whether referring to residential or commercial property and buildings, that according to Federal Standards "Severe Impact", as subject property is designated, is defined as "A significant percentage of people would be highly annoyed by the noise, perhaps resulting in vigorous, adverse community reaction"?
- 15. What is the proposed socio/economic impact, and mitigation measures, to subject property and to its economic value, since the building is occupied by people and the building and work environment is just 30' feet from the track and is designated as a severe impact property? Note: When given a choice, why would a business or entity want to buy or lease this subject property and building, at a normal market rate when they could lease or buy some other property and building that isn't situated in a severe impact zone which would subject their employees to significant noise, vibration and air pollution?
- 16. Why are commercial buildings and businesses and occupied by human employees and are in a designated severe impact zone not considered as "Sensitive" and not listed under Noise-Vibration-Sensitive Land Uses"? It appears that subject property is well within any screening distance (30') from building to track, but isn't given any consideration because it isn't a residence, transient residency or park or church? While there is less impact at night on subject property, at 30' from the trains and track there is major impact to the employees in the building.
- 17. What were the dBA noise levels both current and projected at subject property? Table 4.1 only lists residences.
- 18. What are the four proposed at grade road closures?

BOTTS-3.3
Continued



2.5.8 ROBERT BOTTS (BOTTS-3)

2.5.8.1 *Response to BOTTS-3.1*

The comment states the commenter's basic support for the Project with an understanding that the commenter has a significant economic interest in the property located at 123 S D Street. This comment is introductory and does not address the adequacy or findings of the Draft EIS/EIR.

2.5.8.2 *Response to BOTTS-3.2*

The commenter requests that a written response to his letter be provided. Responses to written comments provided by the commenter are provided in the Final EIS/EIR. Specifically, responses to all comments provided in Comment Letter BOTTS-1, BOTTS-2, BOTTS-3, and BOTTS-4 are included in Section 2 of Appendix P of the Final EIS/EIR. See Master Response 9.

2.5.8.3 *Response to BOTTS-3.3*

The comments contained in BOTTS 3.3 are duplicative of the comments submitted as Comment Letter BOTTS-2. Please refer to Responses BOTTS-2.1 through BOTTS-2.25 for additional details.



Bob Botts-4

Mr. Tim Watkins
SANBAG

Subject Property – 123 S. “D” Street, San Bernardino, California

Good Morning Tim:

As you are aware my family and I are property owners in a “Severe Impact Zone” along the right of way for the proposed passenger rail service to Redlands. Because of that we have sent some questions to SANBAG and will appreciate a written response to those questions. I talked with Clint, SANBAG’s Consultant, at the recent meeting in Redlands, and followed up with an email to him providing the eighteen questions.

} BOTTs-4.1

As a separate issue from the foregoing specific questions, we am submitting the following comments to be included in the EIR.

“As individuals we basically support the light rail project providing passenger service to the City of Redlands and return to San Bernardino, however as a property owner, who’s property and building abuts the right-of-way and is 30’ feet from the track, and according to the EIR lists our property in a Severe Impact Zone, **we offer the following comments, objections and thoughts.**

} BOTTs-4.2

1. We object to the closing of “D” Street in San Bernardino. Closing “D” Street will have a major impact on the ingress/egress of people, employees, owners and employees going to and from the businesses located on “D” Street South of Rialto Ave. While there is limited ingress/egress traveling south on “D” Street, the only access to major thoroughfares is by side streets crossing “D”, which dead ends at _____. Closing “D” Street to the North severely limits the access to the businesses on “D” Street, south of Rialto, as well as totally

} BOTTs-4.3



eliminates traffic from businesses, customers and employees going northward to the major east/west corridor of Rialto Ave., for access to Interstate 10, as well as not having direct northerly access to the heart of the City and northward, without taking a circuitous route south and then east or west and then turning northerly on "E" or Arrowhead Streets.

BOTTS-4.3
Continued

The closing of "D" Street would have a material negative economic impact on our specific property and building as well as the other businesses located on "D" Street South of Rialto Ave.

BOTTS-4.4

- 2. We ask that the "D" Street Crossing be included in a quiet zone for the benefit of the businesses and employees who work in close proximity to the proposed route. As discussed in more detail below, owners and employees working within these buildings should be protected and noise mitigation provided just as it is for persons living in residences in Severe Impact Zones.

BOTTS-4.5

The unmitigated noise and vibration to our property and building, which has owners and employees who work there, would be a negative economic impact to its value as well as other businesses and property owners in the area.

BOTTS-4.6

- 3. As a more Global comment, it appears that the project and EIR focus' on protecting individuals living in residences along the route, in Severe Impact Zones, from vibration and noise and provides mitigation measures particularly regarding sound, i.e., track and wheel noise, wheel squeal and the required sounding of the train horn when approaching a crossing, and less emphasis to individuals that work within the buildings along the route.

BOTTS-4.7

While it is understandable that negatively impacted residences (individuals) need sound mitigation, due to being subjected to the vibration and noise on a twenty-four hour basis, individuals that work within the buildings along the right of way should have the same rights and protection and mitigation for noise.

BOTTS-4.8

Without mitigation for the noise created by the new rail engines and cars there will be a negative economic impact to the return on investment and our long term (30+ years) investment in the community of San Bernardino.

BOTTS-4.9

Thank you".

Robert E. Botts of behalf of property owners Robert E. and Beverly Ann Botts and Harold Truitt and Penny Westbrook III.

2.5.9 ROBERT BOTTS (BOTTS-4)

2.5.9.1 Response to BOTTS-4.1

SANBAG is in receipt of the letter submitted by the commenter on August 25, 2014. Responses to those comments are provided in Responses BOTT-2.1 through BOTTS-2.25.

2.5.9.2 Response to BOTTS-4.2

SANBAG notes the comment's support for the Project and concerns relating to property owned adjacent to the railroad corridor. This comment does not address the adequacy or findings of the Draft EIS/EIR.

2.5.9.3 Response to BOTTS-4.3

The comment objects to the closure of D Street in San Bernardino as part of the Project and notes that its closure would limit access to the businesses south of Rialto Street. SANBAG's proposal to close D Street is in response to ongoing coordination with the California Public Utilities Commission (CPUC). CPUC retains approval authority over at-grade railroad crossings and has recommended to SANBAG that D Street be closed. This recommendation is provided in a letter from CPUC on December 14, 2012. SANBAG understands that access from the south along D Street would be maintained thereby providing the businesses to the south of the railroad access to E Street and Arrowhead Street via West Athol or West Valley Streets. This comment does not raise any issue related to the adequacy or findings of the Draft EIS/EIR.

2.5.9.4 Response to BOTTS-4.4

The comment states that the closure of D Street would have a material negative effect on commenter's subject property. SANBAG would appreciate any information or data that the commenter could provide to regarding this concern. Please refer to Master Response 15. This comment does not address the adequacy or findings of the Draft EIS/EIR.

2.5.9.5 Response to BOTTS-4.5

The comment requests the implementation of a quiet zone at D Street to minimize train noise from Project operations. Please refer to Master Response 3. As provided on page 2-31 of the Draft EIS/EIR, SANBAG is proposing the implementation of quiet zones as the primary form of noise mitigation for Project. The closure of D Street would support the implementation of a quiet zone that extends from E Street east to Sierra Way thereby distributing the noise reduction benefits of a quiet zone to all land uses in downtown San Bernardino.

2.5.9.6 Response to BOTTS-4.6

Please refer to Master Response 1. As provided in the Section 3.6 of the Draft EIS/EIR (see pages 3.6-33), ambient noise levels will increase along the railroad corridor as a result of the Project's operation. These increases will result even following the application of all reasonable noise minimization measures. SANBAG has identified this increase as a significant adverse



effect of the Project in the Draft EIS/EIR (see pages ES-8) and will be required to adopt a statement of overriding considerations in order to approve the Project. This comment does not address the adequacy or findings of the Draft EIS/EIR.

2.5.9.7 Response to BOTTTS-4.7

Please refer to Master Response 1. The noise analysis as contained in the Draft EIS/EIR follows the methodology outlined in FTA's Transit Noise and Vibration Manual (2006). SANBAG is proposing quiet zones as part of the Project, which will provide for the most equitable distribution of noise reduction benefits where quiet zones are adopted by the local jurisdiction.

2.5.9.8 Response to BOTTTS-4.8

Section 3.6.4 of the Draft EIS/EIR identifies the mitigation measures proposed by SANBAG to minimize or lessen Project-related increases in noise along the railroad corridor. Six mitigation measures (NV-1 through NV-6) are proposed to address a combination of construction noise, train operational noise, and vibration. This comment does not address the adequacy or findings of the Draft EIS/EIR.

2.5.9.9 Response to BOTTTS-4.9

The comment states that without mitigation for noise impacts, local property values will be affected negatively. Please refer to Master Responses 2, 3, and 15.



Gregory W. Brittain



Redlands, California: www.redlandsteaparty.net
Email: info@redlandsteaparty.net
Cabinet Members: *John Berry, Greg Brittain, Carolyn Hays,
Joann Marshall, Richard Marshall, Ross Sevy*

RECEIVED
SEP 30 2014
SAN BERNARDINO
ASSOCIATED GOVTS

September 29, 2014

Mitchell A. Alderman
Director of Transit & Rail Programs
San Bernardino Associated Governments
1170 West Third Street
San Bernardino, CA 92410

Via E-Mail and Regular Mail
Rpr_public_comments@sanbag.ca.gov

Re: EIR for the Rail to Redlands aka Redlands "Crazy Train"

Dear Mr. Alderman and SanBag:

I am a resident of Redlands.

I write as citizen and cabinet member of the Redlands Tea Party Patriots. The Redlands Tea Party Patriots has ~1700 members on our e-mail list, ~800 members on our Facebook page and ~1090 followers on Twitter. Our meetings average ~150 people. In 2012, our canvassing program knocked on more than 8000 doors.

BRITTAIN-1

The Redlands Tea Party Patriots and I oppose the Rail to Redlands aka the Redlands "Crazy Train" and specifically the draft EIR for the following reasons:

1. The ridership does not warrant the cost of ~\$245 Million, and government construction projects typically cost more than estimated. Metrolink ridership has declined since 2009 while operating costs continue to increase.
2. The economic analysis does not calculate the cost of any associated construction loans.
3. The ~\$200 Million SBx is proving to be a dismal failure in ridership. We should observe and study the SBx project before committing to this project.

BRITTAIN-2

BRITTAIN-3

BRITTAIN-4



San Bernardino Associated Governments

Re: EIR for the Rail to Redlands aka Redlands “Crazy Train”

September 29, 2014

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- | | | | |
|-----|---|---|------------|
| 4. | The project is economically unsustainable with perpetual taxpayer subsidized operating losses of \$3 million per year. | } | BRITAIN-5 |
| 5. | The project will cause traffic congestion in Redlands with 14 street crossings and 24 trains per day. This will cause inconvenience, delay for people who live and work in Redlands, loss of time, more air pollution as vehicles idle at the crossings and in the congested traffic, and delays for emergency services. | } | BRITAIN-6 |
| 6. | The resulting traffic congestion in downtown Redlands will likely cause many consumers to go elsewhere for their shopping harming downtown businesses, and quite possibly putting many them out of business. | } | BRITAIN-7 |
| 7. | The project will cause excessive noise, again with 24 trains per day, with three horn blasts per crossing, unless the crossings are quieted. | } | BRITAIN-8 |
| 8. | Of the project will cause division of the community’s common cohesion, one side of the tracks to the other. | } | BRITAIN-9 |
| 9. | The project will reduce property values near the tracks. The EIR does not address this problem. | } | BRITAIN-10 |
| 10. | The project will disrupt mobility from one side of the city to the other. | } | BRITAIN-11 |
| 11. | The project will incur increased policing costs along the right-of-way and at the stations. | } | BRITAIN-12 |
| 12. | The EIR does not sufficiently address ground traffic and pedestrian safety. The spill back at grade crossing will cause serious congestion and safety hazards. | } | BRITAIN-13 |
| 13. | The rail option for public transportation between San Bernardino in Redlands was undertaken before the “bus rapid transit” alternative environmental and economic analyses were completed. Bus lines are less expensive and more flexible. Expanded bus service should be fully considered environmentally and economically before committing ~\$240 million of taxpayer money to the rail project. | } | BRITAIN-14 |
| 14. | Redlands Chinatown (CA-SBR-5314H) appears to have been missed in the analysis and thus the fieldwork may have been inadequate to find it. | } | BRITAIN-15 |



San Bernardino Associated Governments

Re: EIR for the Rail to Redlands aka Redlands “Crazy Train”

September 29, 2014

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- 15. Mill Creek Zanja (CA-SBR-8092H) is a National Register listed site and the EIR/EIS suggests that a small portion of it is not eligible to be listed because it lacks integrity. The ditch still conveys water in its original location and splitting the ditch into eligible and ineligible sections may lead to other portions being found not eligible in the future. } BRITTAIN-16
- 16. If the project is built, the train crossings at Eureka, Orange, and Sixth Streets should be quiet zones and ballast mats and other vibration minimizing technologies should be installed throughout the historic district. Also, no sound walls should be constructed within the historic district. Fencing designed to enhance the district (i.e., architecturally-appropriate) should be used. } BRITTAIN-17
- 17. Intersection improvements and traffic concerns at the Orange/Stuart Street intersection need to be addressed. A large parking garage adjacent to the historic district and the Cope Commercial Company Warehouse is one alternative for the Downtown Redlands station yet mitigation is not offered because a surface lot is also an alternative. } BRITTAIN-18
- 18. The draft EIR does not adequately address the cumulative effects on the Santa Fe Depot Historic District. This project along with the Redlands Park Once Project, Interstate 10 widening, previous development of Krikorian Theater, the Redlands Downtown Specific Plan, and the Redlands Promenade together will clearly have a cumulative effect on the National Register District. } BRITTAIN-19
- 19. The planned high density, high-rise “stack and pack” housing around the train stations will change the unique character and look of Redlands, especially in the downtown area and near the University of Redlands. The EIR does not adequately address this. } BRITTAIN-20

Thank you for your consideration.

Very truly yours,

GREGORY W. BRITTAIN

2.5.10 GREGORY W. BRITAIN (BRITAIN)

2.5.10.1 Response to BRITAIN-1

The comment provides information about the Redlands Tea Party Patriots. The commenter states that he is a resident of Redlands and part of the Redlands Tea Party Patriot. The commenter and the Redlands Tea Party Patriots are opposed to the Project. The comment is informational and does not comment on the adequacy or findings of the Draft EIS/EIR.

2.5.10.2 Response to BRITAIN-2

The comment states that the current ridership does not warrant the cost of constructing the Project. The comment also states that Metrolink ridership has declined since 2009 while operating costs have increased. Please refer to Master Response 5 and Master Response 6.

2.5.10.3 Response to BRITAIN-3

The comment states that the Project's economic analysis does not calculate the cost of construction loans. The construction cost estimate assumes a pay-as-you-go funding scenario (see page 2-60 of the Draft EIS/EIR).

2.5.10.4 Response to BRITAIN-4

The comment states that the SBx Project has low ridership and that SANBAG should observe and study the SBx Project before committing to the Project. A summary of the Project's planning efforts (which included an Alternatives Analysis) is provided in Draft EIS/EIR Section 2.1 (page 2-1). The comment expresses an opinion and does not comment on the adequacy or findings of the Draft EIS/EIR.

2.5.10.5 Response to BRITAIN-5

The commenter asserts that the Project is economically unsustainable with operating losses of \$3 million per year. Please refer to Master Response 6.

2.5.10.6 Response to BRITAIN-6

The comment states that the Project will cause traffic congestion in the City of Redlands, due to traffic congestion at 14 street crossings, increases in air pollution due to idling cars, and delays in emergency services. A traffic impact analysis was completed for the Project, which analyzed traffic conditions with and without the Project under existing conditions (2011), opening year (2018), and future conditions (2038). The results of this analysis are presented in Section 3.3 of the Draft EIS/EIR. Please refer to Master Response 13. An Air Quality, Greenhouse Gas, and Health Risk Assessment Technical Report was also prepared for the Project (see Draft EIS/EIR Appendix G) and summarized in Section 3.5 of the Draft EIS/EIR. Please also refer to Master Response 10. Delays in emergency services were analyzed in Draft EIS/EIR Section 3.13. As identified in the Draft EIS/EIR (see page 3.13-13), construction of the Project would have the potential to result in temporary delays in response times for fire, police, and emergency vehicles

due to construction activities. However, implementation of Mitigation Measure TR-1 would minimize these effects. The Draft EIS/EIR also concludes that no adverse long-term operational effects associated with services ratios and responses times are anticipated with implementation of the Project (see page 3.13-14).

2.5.10.7 Response to BRITAIN-7

The comment states that the Project will cause traffic congestion that will impact downtown Redlands businesses. Draft EIS/EIR Section 3.3 discusses both the potential traffic and circulation impacts of the Project. Appendix E of the Draft EIS/EIR contains the traffic impact study.

2.5.10.8 Response to BRITAIN-8

The commenter states that the Project will cause excessive train noise. Please refer to Section 3.6 of the Draft EIS/EIR, which provides an analysis of Project-related noise and vibration. Quiet zones (Mitigation Measure NV-3) are one of several noise minimization measures being proposed by SANBAG to reduce train noise generated by the Project. Please refer to Master Responses 1, 2, and 3 for additional discussion on train noise and implementation of quiet zones.

2.5.10.9 Response to BRITAIN-9

The comment states that the Project will create a division in community cohesion. Issues related to the division of established communities are discussed in Section 3.2 of the Draft EIS/EIR and evaluated in Effect 3.2-1 on page 3.2-22 through 3.2-25. As provided, the Project's direct construction and operational impacts were determined to be less than significant given the pre-existence of the railroad ROW. However, if sound barriers are constructed as mitigation, these features could result further division of existing communities and neighborhoods.

2.5.10.10 Response to BRITAIN-10

The comment states that the Project will result in a reduction in property values near the tracks. Please refer to Master Response 15.

2.5.10.11 Response to BRITAIN-11

The comment states that the Project will disrupt mobility within the City of Redlands. Please see Master Response 13 regarding further mobility and circulation discussion. .

2.5.10.12 Response to BRITAIN-12

The commenter states that the Project will result in an increase in law enforcement costs for law enforcement at the stations and along the corridor. As provided on page 2-60 of the Draft EIS/EIR, SANBAG estimates that operating costs will average \$7.9 million annually. The cost for providing security for the Project facilities is considered in this estimate. The cost of

constructing the necessary infrastructure (e.g., CCTV) to support safety and security is factored into the Project's construction cost, which is estimated at \$202 million.

2.5.10.13 Response to BRITTAIN-13

The comment states that the Draft EIS/EIR did not adequately address traffic and pedestrian safety. Issues related to traffic and pedestrian safety is addressed in Section 3.3 and 3.15 of the EIS/EIR. More specifically, Effect 3.3-3 (on pages 3.3-26 through 3.3-28) provides an evaluation of Project-related hazards to the local transportation network. Mitigation Measures TR-3 and TR-4 are proposed to address the comment's concerns. Additional discussion is provided in Master Response 12.

2.5.10.14 Response to BRITTAIN-14

The commenter states that the Project alternatives were undertaken before the "bus rapid transit" alternative environmental and economic analyses were completed. The commenter also states that bus lines are less expensive and more flexible and should be considered before approving the Project. Please refer to Response EGAN-1.6.

2.5.10.15 Response to BRITTAIN-15

The commenter states that the Redlands Chinatown site (CA-SBR-5314H) was not analyzed in the Draft EIS/EIR and the fieldwork inadequate to find it. The EIS/EIR Section 3.12, pages 3.12-39 to 3.12-40, provides an analysis for the Project's potential impacts to Redlands Chinatown based on the Cultural Resources Technical Memorandum (TM) evaluation, included as Appendix M to the EIS/EIR. Following the release of the draft EIS/EIR, the SHPO provided its concurrence with the eligibility determinations and findings of effect for portions of the Redlands Chinatown located with the Project's area of potential effect (APE).

2.5.10.16 Response to BRITTAIN-16

The commenter does not concur with the Draft EIS/EIR eligibility determination on the Mill Creek Zanja. The commenter also state that the eligibility determination could lead to the ineligible determination of the remaining sections of the Mill Creek Zanja in the future. Please refer to Master Response14.

2.5.10.17 Response to BRITTAIN-17

The commenter notes a preference for the implementation of quiet zones within the Redlands Santa Fe Depot Historic District (specifically the proposed crossings at Eureka, Orange, and 6th Streets). The commenter also states that no sound walls should be constructed in the historic district, fencing installed should be designed to enhance the historic district, and installation of vibration minimizing technologies (i.e., ballast mats) be considered. The comment is noted. Please refer to Master Responses 7 and 11.



2.5.10.18 Response to BRITAIN-18

The comment states that intersection improvements and traffic concerns at the Orange/Stuart Street intersection need to be addressed. The comment also states that the parking garage should be analyzed as an alternative for the Downtown Redlands Station. Please refer to Response GREYDA-2.11 for discussion on the Orange/Stuart Street intersection and refer to Response GREYDA-2.12 for discussion on alternative location for Downtown Redlands Station.

2.5.10.19 Response to BRITAIN-19

The commenter states the Draft EIS/EIR did not adequately address cumulative impacts to the Santa Fe Depot Historic District. An assessment of the Project's cumulative effect is provided on pages 4-34 to 4-36 of the EIS/EIR (see Master Response11-Effects to the Redlands Santa Fe Depot Historic District). As provided, the cumulative analysis acknowledges the combined effects of the Project could result in cumulative adverse effects. However, with the proposed mitigation, Project-related effects would not be cumulatively considerable, and SHPO has concurred with this determination.

2.5.10.20 Response to BRITAIN-20

The comment states that future high density development around the Project will change the existing character of downtown Redlands and the University of Redlands. SANBAG is not proposing any new forms of transit oriented development (TOD) along the railroad corridor. However, SANBAG acknowledges that the Project would provide a new transit backbone that could encourage such forms of development in the future. This possibility is acknowledged in Section 6.1, Growth Inducing Impacts.



Sandra Brower-1



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September 25, 2014

(Via U.S. Mail and Email: *RPRP_public_comments@sanbag.ca.gov*)

Mitchell A. Alderman
Director of Transit and Rail Programs
San Bernardino Association of Governments
1170 W. Third Street, 2nd Floor
San Bernardino, CA 92410-1724

**Re: Redlands Passenger Rail Project
Draft Environmental Impact Statement/
Environmental Impact Report
SCH No. 2012041012**

Dear Mr. Alderman:

This firm represents Catalina Gardens Redlands LLC, owner of the Catalina Garden Apartments, which are located adjacent to the proposed Redlands Passenger Rail Project ("Rail Project") at 333 North University Street, Redlands, California. Below are our comments to the subject EIS/EIR.

BROWER-1.1

The Proposed Project and the Impacts on Catalina Garden Apartments

Catalina Garden Apartments are uniquely situated across the street from the University of Redlands, recognized as one of the best universities in the nation, and adjacent to Sylvan Park, 23.3 acres of beautifully landscaped areas, with recreational and picnic facilities, through which the historic Mill Creek Zanga River flows. The Catalina Garden Apartments are charming, single-story, bungalow-type apartments set in a park-like setting with tropical plants, palm trees and a swimming pool, all of which provide a relaxing and quiet environment. Residents generally include the University of Redlands faculty and graduate students, and medical personnel from the nearby Loma Linda University Medical Center.

BROWER-1.2

In stark contrast to these peaceful surroundings, the proposed Rail Project will be located between Catalina Garden Apartments and Sylvan Park, running diesel-powered trains every 30 minutes during peak hours and every hour in the off-peak period. Nowhere in the 1,000+ pages in the EIS/EIR, or the even larger attached appendices, were the impact of this Rail Project studied on these residential apartments, nor was consideration given to any mitigation

BROWER-1.3

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measures to lessen the significant impacts of its noise, vibrations, traffic, air quality, visual character and quality.

BROWER-1.3
Continued

Although alternative forms of travel are encouraged, it is crucial to ensure that projects such as this Rail Project are designed very carefully so that existing land uses, and particularly residential uses adjacent to such a project, are not significantly and adversely impacted, and that various forms of mitigation of those impacts are implemented.

BROWER-1.4

Noise and Vibration Generated by the Rail Project Will Have a Significant Environmental Impact on the Catalina Garden Apartments

Diesel powered locomotives are noisy and vibrate the ground. The EIS/EIR itself concludes that the Rail Project will create a permanent increase in ambient noise from passing trains which will have a significant adverse impact on adjacent properties. The EIS/EIR also concludes that the Rail Project's operation will generate groundborne vibration and noise that will have a significant adverse effect on residences.

BROWER-1.5

To mitigate the significant noise impact, the EIS/EIR proposes a sound barrier wall along Sylvan Park and the Redlands Lawn Bowling Club, both of which are directly across the rails from the Catalina Garden Apartments, and yet no sound barrier is proposed on its side, where people will be sleeping and living alongside the passing trains 24 hours a day. This one-sided sound barrier wall will actually increase the noise to Catalina Garden Apartments, so that this one-sided mitigation measure will make the noise impacts much louder than without it. Although a quiet zone is proposed at the adjacent intersection with North University Street, that only quiets the train's horns, and does nothing to mitigate the noise of the passing diesel-powered locomotives themselves.

BROWER-1.6

There is no proposed mitigation for the significant adverse impact of the groundborne vibrations created by the Rail Project. These vibrations will rattle the adjacent Catalina Garden Apartments every 30 minutes as trains pass. Further analysis is needed to adjust the diesel-powered locomotives to reduce this significant impact.

BROWER-1.7

No study of the significant adverse impact of the noise and vibration on the Catalina Garden Apartments was performed, and no mitigation measures were considered. These unmitigated significant environmental impacts of noise and vibration on the Catalina Garden Apartments needs to be addressed.

BROWER-1.8

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Traffic Circulation and Access Will be Impaired by the Rail Project Creating Significant Adverse Environmental Impacts on the Catalina Garden Apartments

Of utmost importance to the Catalina Garden Apartments is the traffic impacts which will be caused by this Rail Project at the North University Street crossing. North University Street is already a very busy main thoroughfare with an on-and-off ramp to I-10 within one quarter of a mile from this proposed train crossing. The Rail Project would significantly increase the existing heavy traffic and congestion. Catalina Garden Apartment residents, freeway commuters, surrounding neighbors, University of Redlands students and Redlands High School students would all be adversely impacted by further congestion caused by the Rail Project and crossing on North University Street.

BROWER-1.9

The EIS/EIR concluded that traffic impacts will be significant. Most significant and adverse to the Catalina Garden Apartments is that its sole ingress and egress is off North University Street at the proposed at-grade crossing. No study has been performed as to the adverse impacts of Catalina Garden Apartment's only access caused by the Rail Project. Furthermore, no construction plans have been made available to Catalina Garden Apartment's owner so that discussion and evaluation can be made as to how to maintain its only in-and-out access. The current proposal will unreasonably restrict access and make it inherently dangerous.

BROWER-1.10

BROWER-1.11

The EIS/EIR also concluded that there will be adverse significant impacts on pedestrians and bicyclists, and attendant safety risks, at this crossing. Because many of the residents at Catalina Garden Apartments are University of Redlands faculty and graduate students, walking and biking is their main form of transportation. Construction plans for this intersection need to be designed to address both the restricted access to and from the apartments and the safety of the apartment pedestrians and bicyclists.

BROWER-1.12

Air Quality Will Have a Significant Environmental Impact on the Catalina Garden Apartments

Diesel-powered locomotives create diesel fumes. The farther from the train, the less the impact, until it becomes less than significant. The EIS/EIR concluded that diesel fumes and air quality will have a less-than-significant impact. No consideration was made to the Catalina Garden Apartments which are adjacent to the diesel-powered locomotives. Adjacent residents will be adversely and significantly impacted by the diesel fumes. As with noise and vibrations, no buffer zone exists between the apartment residents and the passing trains. No study was performed and no mitigation is proposed for these next door residents.

BROWER-1.13

BROWER-1.14

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The Degradation of Visual Character and Quality Will Have a Significant Adverse Environmental Impact on the Catalina Garden Apartments

The EIS/EIR concludes that the visual character and quality surrounding the Rail Project will be significantly and adversely impacted in that it will substantially degrade the existing quality of its surroundings. This will be felt most strongly by the residents of the Catalina Garden Apartments located adjacent to the Rail Project. Again, no mitigation measures have been studied or proposed to lessen this adverse impact to these residents.

BROWER-1.15

Mitigation Measures Must be Analyzed and Proposed to Lessen the Significant Adverse Environmental Impacts of this Project on the Catalina Garden Apartments

Residents of Catalina Garden Apartments will suffer significant impacts as to noise, vibrations, traffic, access, air quality and visual character. No studies have been performed to analyze mitigation measures for this residential community adjacent to the Rail Project. Little actual scientific field work was performed and no mitigation is proposed other than a quiet zone, which only addresses the sound of the trains' horns, and nothing else.

BROWER-1.16

BROWER-1.17

A barrier wall is necessary between the Catalina Garden Apartments and the passing trains. Traffic and the train crossing designed at North University Street must accommodate the sole ingress and egress to Catalina Garden Apartments both ways along North University Street. Additional mitigation measures, such as double pane windows and other means of acoustical mitigation need to be proposed for the residential structures themselves at Catalina Garden Apartments.

BROWER-1.18

BROWER-1.19

BROWER-1.20

The broad brush approach taken in the EIS/EIR, although voluminous, is not detailed as to actual field and scientific measuring of the existing conditions, and reliance on substitute modeling for measurements and assumptions made without scientific validation do not result in realistic evaluation of the impact of the Rail Project. No actual vibration analysis appears to have been made on the diesel-powered locomotives themselves, which if properly done may result in mitigation measures to the design of the trains themselves to lessen the ground-based vibrations.

BROWER-1.21

BROWER-1.22

Conclusion

Without the above substantial and adverse environmental impacts to the Catalina Garden Apartments addressed and studied in the EIS/EIR, an informed decision on this Rail Project cannot be made. Mitigation is necessary and required to this overlooked residential area adjacent to the proposed Rail Project.

BROWER-1.23

110769-00001
1213585.1



HIGGS
FLETCHER
& MACK^{LLP}®

Mr. Mitch Alderman
September 25, 2014
Page 5

Thank you for your attention to this most important matter.

Very truly yours,

SANDRA J. BROWER
of
HIGGS FLETCHER & MACK LLP

SJB/lm

110769-00001
1213585.1

2.5.11 SANDRA BROWER (BROWER-1)

2.5.11.1 Response to BROWER-1.1

The comment states that the owner of the Catalina Garden Apartments (located at 333 University Street in the City of Redlands), has retained Higgs, Fletcher, and Mack LLP to represent their interests and comment on the Draft EIS/EIR. The comment is introductory and does not address the content, adequacy, or findings of the Draft EIS/EIR.

2.5.11.2 Response to BROWER-1.2

The comment provides a description of the apartment complex and residential composition. This comment is informational and does not address the adequacy or findings of the Draft EIS/EIR.

2.5.11.3 Response to BROWER-1.3

The comment states that the Draft EIS/EIR did not identify impacts and associated mitigation to offset impacts associated with noise, vibration, traffic, air quality, and aesthetics to the subject property. The subject property was considered in the noise and vibration analysis prepared in support of the Draft EIS/EIR (Draft EIS/EIR Appendix H1 and H2). As provided in Appendix H1 and H2, the subject property was included in the noise modeling via three separate receiver locations (65, 66, and 67) on the subject property. These receivers captured existing noise levels from multiple locations within the apartment complex. Mitigation measures proposed by SANBAG to minimize noise impacts are identified in Section 3.6.4 of the Draft EIS/EIR. As provided, although these measures would achieve reductions in projected noise levels for Project operations, SANBAG is unable to fully mitigate for the increase in noise at all receiver locations and, therefore, this impact is considered significant and unmitigable as provided in the Executive Summary and Section 3.6 of the Draft EIS/EIR. In addition, the Draft EIS/EIR included an analysis on air quality which identified sensitive receptors including the subject property (see Figure 3.5-1B, page 3.5-9). This analysis is summarized in Draft EIS/EIR Section 3.5 (see pages 3.5-1 through 3.5-28) and included in full as part of Draft EIS/EIR Appendix G. The Draft EIS/EIR also provided an analysis on visual impacts to the area which included the subject property. This analysis is provided in Draft EIS/EIR Section 3.4 (see pages 3.4-1 through 3.4-23).

2.5.11.4 Response to BROWER-1.4

The comment states that consideration is given to adjacent land uses (specifically residential uses) as part of the Project's design in order to minimize and mitigate adverse effects. Residential and other sensitive land uses are identified in Figures 3.5-1A and 3.5-1B of the Draft EIS/EIR. This comment does not raise any issue in relation to the adequacy or findings contained in the Draft EIS/EIR.

2.5.11.5 Response to BROWER-1.5

The comment correctly states that the Draft EIS/EIR identifies a significant and adverse effect related to a permanent increase in ambient noise levels to adjacent properties as a result of the

Project's operation (see Draft EIS/EIR pages ES-8 and 3.6-33 through 3.6-36). This comment provides a summary of statements made in the Draft EIS/EIR and does comment on the adequacy or findings contained in the Draft EIS/EIR.

2.5.11.6 Response to BROWER-1.6

The comment states that the Draft EIS/EIR proposes a sound barrier wall along Sylvan Park and the Redlands Lawn Bowling Club but does not propose a sound barrier wall along Catalina Garden Apartments. The comment states that installation of the sound barrier wall along only one side of the tracks would result in greater noise to Catalina Garden Apartments. The comment also states that the implementation of a quiet zone would not mitigate the noise of passing diesel-powered trains. Please see the noise analysis provided in Section 3.6 of the Draft EIS/EIR (see Impact 3.6-1 and Tables 3.6-6 and 3.6-7). As provided in Table 3.6-6, noise levels with the operation of a diesel locomotive are projected at 62 dBA Ldn for Receiver #66. Based on FTA's criteria (see Master Response 1), this change in noise levels from existing conditions results in a "moderate impact." As provided in Table 3.6-7, with the operation of a DMU, noise levels would be slightly lower at 61 dBA Ldn, but would still result in a moderate impact.

As provided in Figure 8-2H in Appendix H1 of the Draft EIS/EIR, a sound barrier is depicted to the north of the subject property. However, it is important to note that SANBAG's preferred form of noise mitigation is the implementation of quiet zones as described on page 2-17 of the Draft EIS/EIR (see Master Response 2 and 3) given that they would provide more effective noise reduction as opposed to sound barriers. With the implementation of quiet zones, as provided in Draft EIS/EIR Tables 3.6-6 and 3.6-7, no impact would result to the subject property. Likewise, with the implementation of quiet zones, the sound barrier north of the tracks at Sylvan Park would not be required.

As provided in Section 3.6.4 of the Draft EIS/EIR, other mitigation measures under consideration by SANBAG to address train noise include sound barriers (NV-4) and rail lubricators (NV-6).

2.5.11.7 Response to BROWER-1.7

The comment states that there is no mitigation identified for groundborne vibrations associated with the Project. The comment states that the vibrations will rattle the adjacent Catalina Garden Apartments when a train passes by and that further analysis is needed. Please refer Master Response 7 and to Appendix H1 and H2 of the Draft EIS/EIR for additional information regarding the effects related to groundborne vibration.

2.5.11.8 Response to BROWER-1.8

The comment states that the Draft EIS/EIR did not analyze noise and vibration impacts on the Catalina Garden Apartments and no mitigation measures provided for these impacts. Please refer to Response BROWER-1.3.

2.5.11.9 Response to BROWER-1.9

The comment states that the Project would significantly increase existing traffic and congestion on North University Street. Traffic conditions along University Street were modeled for existing conditions (2011), opening day (2018), and future conditions (2038) as part of the traffic report prepared for the Draft EIS/EIR (see Draft EIS/EIR Appendix E). As provided in Section 3.3 of the Draft EIS/EIR (see Tables 3.3-7 and 3.3-12), University Street at the I-10 East Ramps would operate at a level of service (LOS) F in 2038 during the PM peak hour. However, these poor operating conditions would result with or without the Project. As provided in Draft EIS/EIR Table 3.3-12, the resulting delay at this intersection would decrease with the Project when compared to the No Build. Based on these results, the Project's impact to University Street would not be adverse (or significant). Therefore, no mitigation is proposed for this roadway.

2.5.11.10 Response to BROWER-1.10

The comment states that the Catalina Garden Apartments only ingress and egress is off North University Street at the proposed at-grade crossing. The commenter asserts that no study was performed to address this access issue into the apartment complex. Please refer to Response BROWER-1.9 and BROWER-1.11.

2.5.11.11 Response to BROWER-1.11

The comment asserts that no construction plans were made available to the property owner in order to provide discussion and evaluation of access in and out of the apartment complex. The commenter asserts that the current Project would restrict access and create an unsafe situation at the apartment complex. Preliminary engineering plans in the vicinity of the proposed University Station are reflected in Figure 2-4F of the Draft EIS/EIR. The placement of the at-grade crossing improvements at this location remain subject to further discussions with the City, University of Redlands, and Union Pacific (UP), which owns property immediately south of SANBAG's right-of-way (ROW) and north of the subject property. Parking improvements north of the subject property, including the existing driveway, are located within UP's right-of-way and subject to a license agreement with UP. SANBAG understands that access to and from the subject property will need to be considered during the final design of the Project and required to satisfy applicable CPUC safety standards. With the implementation of Mitigation Measure TR-3, this impact is less than significant.

2.5.11.12 Response to BROWER-1.12

The comment states that the Draft EIS/EIR concluded that there will be adverse significant impacts on pedestrian and bicyclists at the proposed train crossing. The comment also states that construction plans for the intersection need to be designed to address access to and from the apartment complex and the safety of pedestrians and bicyclists coming from the apartment complex. SANBAG is aware of the need to maintain pedestrian and bicycle safety for all of the at-grade crossings traversed by the Project. For this reason and as discussed in more detail in Master Response 12, Mitigation Measure SS-1 is proposed to address pedestrian and bicycle safety through the preparation of a Safety and Security Management Plan (SSMP) that covers

the entire Project. Preparation and implementation of the SSMP would minimize safety-related impacts to a level of less than significant.

2.5.11.13 Response to BROWER-1.13

The comment states that the Draft EIS/EIR did not analyze diesel fumes and air quality impacts on the Catalina Garden Apartments. The Draft EIS/EIR considers adjacent residential areas in the context of potential health risks associated with the Project's operation. As provided in Section 3.5 of the Draft EIS/EIR (see Table 3.5-12), based on the results of a health risk assessment (HRA) performed in support of the Draft EIS/EIR, the Project vehicle options (i.e., locomotive or DMU) would not exceed thresholds established by the South Coast Air Quality Management District (SCAQMD).

2.5.11.14 Response to BROWER-1.14

The comment states that adjacent residents will be impacted by the diesel fumes and that the Draft EIS/EIR did not analyze these impacts or propose any mitigation for adjacent residents. Please refer to Response BROWER-1.13.

2.5.11.15 Response to BROWER-1.15

The comment states that the Draft EIS/EIR concludes that the visual character and quality surrounding the Project will be significantly and adversely impacted. The comment also states that the Draft EIS/EIR did not provide mitigation measures to address significant visual impacts on the Catalina Garden Apartments. The subject property is located with Landscape Unit 5 as defined in Section 3.4 of the Draft EIS/EIR. Both construction and operational effects are described and evaluated on pages 3.4-14 through 3.4-17 of the Draft EIS/EIR. As provided, both construction and operational effects to visual resources would require the implementation of Mitigation Measures VQA-1, VQA-2, and VQA-3 (see Draft EIS/EIR Section 3.4.4). These measures would minimize adverse effects and impacts would be considered less than significant.

However, if sound barriers were ultimately constructed, Mitigation Measure VQA-4 would also be required. As provided on page 3.4-23 of the Draft EIS/EIR, even with the implementation of VQA-4, the visual disruptions resulting from the construction of sound barriers would remain. The residual effect under CEQA would remain significant. Under NEPA, the effect would be adverse.

2.5.11.16 Response to BROWER-1.16

The comment states that the residents of Catalina Garden Apartments will experience significant impacts associated with noise, vibration, traffic, traffic access, air quality, and visual character. Please refer to Responses BROWER-1.3, BROWER-1.5, BROWER-1.6, BROWER-1.7, BROWER-1.9, BROWER-1.11, BROWER-1.13 and BROWER-1.15.

2.5.11.17 Response to BROWER-1.17

The comment asserts that no studies were performed to analyze Project impacts to the apartment complex and no mitigation proposed to address impacts on the apartment complex. Please refer to Responses BROWER-1.3 through BROWER-1.5.

2.5.11.18 Response to BROWER-1.18

The comment states that a barrier wall is necessary between the subject property and the railroad. Please refer to Master Responses 2 and 3.

2.5.11.19 Response to BROWER-1.19

The comment states that the traffic and train crossing designed at North University Street must accommodate the access to the subject property. Please refer to Response BROWER-1.11.

2.5.11.20 Response to BROWER-1.20

The comment requests additional mitigation measures to address train noise, including the installation of double pane windows at the Catalina Gardens Apartments. As provided in Response BROWER-6, with the implementation of quiet zones, no noise impact would result at the subject property based on FTA's guidance. Therefore, no additional mitigation is required beyond the implementation of quiet zones for the subject property.

2.5.11.21 Response to BROWER-1.21

The comment asserts that the Draft EIS/EIR did not use actual field and scientific measuring of existing conditions and relied on substitute modeling measurements. Please refer to Response BROWER-3.

2.5.11.22 Response to BROWER-1.22

The comment asserts that no actual vibration analysis was done on the diesel-powered train which may result in changes in train design to lessen ground-based vibrations. Please refer to Response BROWER-1.3.

2.5.11.23 Response to BROWER-1.23

The comment asserts that environmental impacts to the Catalina Garden Apartments was not addressed in the Draft EIS/EIR and that mitigation measures are required to address these impacts. Please refer to Responses BROWER 1.1 through BROWER-1.21.



Sandra Brower-2

Dear Mr. Alderman,

This firm represents Catalina Gardens Redlands, LLC, and attached is a copy of the comment letter submitted to SANBAG yesterday on behalf of our client, owner of the Catalina Gardens Apartments, which are located adjacent to the proposed Redlands Passenger Rail Project at 333 North University Street in Redlands. My client and I would like very much to arrange a meeting with you to discuss the impacts of this project on my client's apartments in the hope that we can work together to arrive at solutions to my client's concerns that will eliminate further opposition by my client to this proposed project. We hope that you would like to do the same. Please let me know what times you might have in your schedule that we could come meet with you and discuss this matter. We appreciate your anticipated cooperation. Thank you.

BROWER-2.1

BROWER-2.2

Sandra J. Brower | Partner

Phone (619) 236.1551
Fax (619) 696.1410
Email Browers@higgslaw.com

401 West A Street, Suite 2600, San Diego, CA 92101

www.higgslaw.com

Please read the [legal disclaimers](#) that govern this e-mail and any attachments.

TAX ADVICE: Any federal tax advice contained in this communication (including attachments) is not intended or written to be used, and cannot be used, for the purpose of avoiding penalties under the Internal Revenue Code or promoting, marketing, or recommending any transaction or matter discussed herein.



2.5.12 SANDRA BROWER (BROWER-2)

2.5.12.1 Response to BROWER-2.1

The comment states that the owner of the Catalina Garden Apartments, located at 333 University Street in Redlands, has retained Higgs, Fletcher, and Mack LLP to represent their interests and comment on the Draft EIS/EIR. The comment also states that a comment letter was submitted to SANBAG on September 25, 2014. The comment letter referenced in the comment was included as Comment Letter BROWER-1. Responses from Comment Letter BROWER-1 are provided in Responses BROWER-1.1 through BROWER-1.23.

2.5.12.2 Response to BROWER-2.2

The comment states that the owner of the Catalina Garden Apartments and Higgs, Fletcher, and Mack LLP would like to meet with representatives from SANBAG to further discuss the Project and their concerns as described in the letter received September 25, 2014. SANBAG looks forward to working with the property owner and their legal representatives to better understand their concerns and develop potential solutions that are mutually acceptable to both parties if the SANBAG Board approves the Project. This comment does not raise any issues with the adequacy or findings of the Draft EIS/EIR.



Date: Tuesday, August 05, 2014 4:37:42 PM

We have been advised that environmental impact report is now open for public input from August to September of 2014. Please see below

We currently have many strong concerns that have been brought up, with no avail, consideration and/or response.

Your projected railway goes across the California Street intersection next to the Cal-trans California off-ramp. The local businesses on many occasions have presented that there is a SERIOUS issue to vehicles that back up on the proposed tracks and even presented a traffic study that presented an safer alternative that not only cures the dangerous situation, but also resolves the access issues the west-side properties. This alternative was not only cheap it was a simple and easy cure

CAGL-1



for all parties involved. Given this project is moving forward we ask as an "interested party" why NOTHING has been done about this matter nor why it has not been mentioned in the Draft environmental report.

CAGL-1
Cont.

Further we would like the California stop to placed back on the proposed project. California street is a access point to Loma Linda and also we feel has a demand for a stop. Additionally the property owners on California Street has been willing to corporate by allowing a platform, which would be again little cost to the project.

CAGL-2

Mike Polsky

2.5.13 CALIFORNIA GAS AND LIQUOR (CAGL)

2.5.13.1 Response to CAGL-1

The comment states that local business are concerned with the potential of vehicles queuing up on the proposed rail tracks at the California Street intersection. The comment also mentions that a separate traffic study was presented that provided an alternative to address potential vehicle queuing on the proposed rail tracks and resolves the access to west side properties affected by the Project. No independent traffic study was submitted along with the comment.

SANBAG prepared a traffic report (see Appendix E) as part of the Draft EIS/EIR to analyze the effects of the Project's operation on the existing (and future) roadway network. As detailed in the Traffic Report and summarized in the Section 3.3 of the Draft EIS/EIR (see Tables 3.3-11 and 12), implementation of the Project would result in a deterioration in the current LOS and V/C for California Street (I-10 on- and off-ramps) in both 2018 and 2038. Mitigation Measure TR-2 is proposed to minimize delay along the affected portions of California Street. Additionally, based on the queuing analysis provided in the Traffic Report, Mitigation Measures TR-3 and TR-4 are proposed to address safety hazards associated potential blockage of at-grade crossings and intersections as a result of vehicle spill back. With the implementation of these measures, the corresponding impact would be less than significant.

2.5.13.2 Response to CAGL-2

The comment requests that the California Street Station be added back into the Project for consideration and also notes that property owners on California Street would be interested in locating a station platform at California Street. SANBAG initially considered a station location at California Street during its preliminary alternatives analysis and related outreach effort in 2010. As provided in Chapter 2 of the Draft EIS/EIR (see pages 2-31 through 2-37) and based on ridership projections for opening day (see Appendix C), station stops are proposed at E Street, Tippecanoe Avenue, New York Street, Orange Street, and University Street. An optional station location is also considered at Waterman Avenue (see Design Option 3, pages 2-53 through 2-55). Although a station location at California Street was considered early in the process, based on the results of SANBAG's AA, this location was not carried forward for consideration in the Draft EIS/EIR.

In the future and subject to the availability of funding, SANBAG may provide additional station stops along the corridor as ridership demands increase. For any future station platform not considered in the Draft EIS/EIR, SANBAG will be required to complete additional environmental review once details become better known.



Evelyn Chandler

Date: Tuesday, September 30, 2014 7:08:19 PM

I would like to formally submit these comments on the DESI/EIR for the Redlands Passenger Rail Project. I also mentioned these issues verbally to one of the presenters at the public meeting held The Hotel on September 9th.

CHANDLER-1

Overall, this is a well-written document and the technical studies performed appear adequate.

My primary concern is that impacts to Orangewood High School, which is clearly shown on Figure 2-1H as being within 200 feet of the proposed rail line, have not been fully analyzed. In Table 2-4, the Texas Street grade crossing pedestrian gates are mentioned as 'potential.' Given the proximity of the school and the fact that students walk to/from the school along Texas Street, I strongly urge SANBAG to include establishment of sidewalks/pedestrian crossings and/or pedestrian gates at Texas Street as required elements of the project in Chapter 2. I also strongly urge SANBAG to include sidewalks/pedestrian crossings and/or pedestrian gates at Texas Street as required elements in the Safety and Security Management Plan specified in Mitigation Measure SS-1 within Section 3.15 to mitigate potentially significant safety impacts.

CHANDLER-2

CHANDLER-3

Section 3.6 does not identify Orangewood High School as a sensitive noise receptor. This high school is located within 200 feet of the proposed rail line at the Texas Street crossing. I strongly urge SANBAG to include this school in its noise analysis. Given the proximity of this school to the crossing, I further urge SANBAG to include the Texas Street crossing as a location for establishment of a required Quiet Zone.

CHANDLER-4

Thank you for your consideration of these comments.

Evelyn Chandler
Redlands, CA

2.5.14 EVELYN CHANDLER (CHANDLER)

2.5.14.1 Response to CHANDLER-1

The comment is introductory and states the comments are formally submitted on the Draft EIS/EIR and appendices on behalf of the commenter. SANBAG notes the commenter's review of the EIS/EIR and associated appendices. This comment does not address the adequacy or findings of the Draft EIS/EIR.

2.5.14.2 Response to CHANDLER-2

The comment states that the Draft EIS/EIR did not fully analyze Project impacts on Orangewood High School. Potential impacts to the Orangewood High School were considered as part of the analysis provided in the Draft EIS/EIR. Additionally, SANBAG and FTA have been in consultation with the Redlands Unified School District (RUSD) regarding the project as provided in Section 3.16 of the Draft EIS/EIR. As shown in Draft EIS/EIR Figure 3.5-1B (page 3.5-9), the school property is identified as a sensitive receptor for the purposes of air quality, noise, and vibration analysis.

2.5.14.3 Response to CHANDLER-3

The commenter requests that sidewalks/pedestrian crossings and/or pedestrian gates be included as required Project elements at the Texas Street at-grade crossing. SANBAG will consider the installation of additional safety measures at the Texas Street at-grade crossing as part of its implementation of Mitigation Measures NV-1 and SS-1 during the Project's final design. Please also refer to Master Response 12 for additional information on Project safety and security.

2.5.14.4 Response to CHANDLER-4

The commenter states that Draft EIS/EIR Section 3.6 does not identify Orangewood High School as a sensitive noise receptor. The commenter also requests that the Texas Street crossing to be included as part of a required Quiet Zone for the Project. Orangewood High School was modeled as Receiver #49 as part of the Project's noise and vibration analysis (see Draft EIS/EIR Appendix H1 and H2). As depicted in Figures 3.6-4B and 3.6-5B, the results of the noise modeling indicate that no impact to the high school would result with and without the implementation of quiet zones. Please refer to Master Responses 1, 2, and 3 for additional description of the methodology applied for the noise analysis, mitigation measures considered, and the process for implementing quiet zones.



Katherine Coronado



Thank you for your interest in the Redlands Passenger Rail Project.

San Bernardino Associated Governments (SANBAG) would like to accurately and personally address your questions and concerns. Please complete the contact information below and indicate the best way to reach you.

CONTACT INFORMATION

Name: Katherine Coronado

Street Address: 1758 E. VICTORIA Avenue

City: San Bernardino State: CA Zip Code: 92408

Phone: (909) 478-0011 Cell: (909) 518-9867

Email: Springday54@msn.com FAX: ()

Are you a local business owner? Yes: No:

If so, please name the business: _____

Preferred Contact Method: (Please check one)

By Phone: Email: FAX: In Writing:

YOUR COMMENTS/QUESTIONS I'm truly excited for this project!! Light-rail fascinates me and I look forward to occasionally using this service. My only wish is that it would become reality sooner than later!!

Thank you for your input on the Redlands Passenger Rail Project.

To provide comments or questions, send an email to RPRP_Public_Comments@sanbag.ca.gov or call the project helpline at (855) SBR-RAIL / 727-7245.

CORONADO-1



2.5.15 KATHERINE CORONADO (CORONADO)

2.5.15.1 *Response to CORONADO-1*

The comment provides a statement of general support for the Project. This comment does not address the adequacy, content, or findings of the Draft EIS/EIR.



Samuel Crowe

SAMUEL CROWE – ATTORNEY AT LAW

1131 West Sixth Street, Suite 101
Ontario, CA 91762
Phone: (909) 391-9393 Fax: (909) 391-9398
sam@samcrowelaw.com

September 29, 2014

RECEIVED
OCT 02 2014
SAN BERNARDINO
ASSOCIATED GOVTS

San Bernardino Associated Governments
1170 W. 3rd Street
San Bernardino, CA 92410

Re: Mr. & Mrs. Gardner
136 S. Arrowhead Ave.
San Bernardino, CA 92408

Dear Sir,

This office represents Mr. and Mrs. Gardner who are the owners of the above referred to real property in San Bernardino, CA.

My clients have been advised that their property will be involved in the Redlands Passenger Rail Project.

If this is the case the continued use of this property is affected. Please advise as to whether my clients property is likely to be subject to acquisition.

CROWE-1

Respectfully,

Samuel Crowe

SPC/mg



2.5.16 SAMUEL CROWE (CROWE)

2.5.16.1 Response to CROWE-1

The commenter requests SANBAG to advise his legal clients if their property will be subject to acquisition as part of the Project. SANBAG acknowledges that Mr. and Mrs. Gardner have secured legal representation from the commenter. The Draft EIS/EIR discusses property acquisition in Section 3.2 under Effect 3.2-5 (page 3.2-36 through 3.2-40). As identified in Draft EIS/EIR Section 3.2, Mitigation Measure LU-1 (page 3.2-39), SANBAG shall provide just compensation consistent with the requirements of the Uniform Relocation Assistance and Real Property Acquisition Policies Act and California Relocation Act for properties to be acquired. The subject property located at 136 S. Arrowhead Avenue would be subject to property acquisition as part of the Project. As provided in Appendix D2 of the Draft EIS/EIR, the subject property (APN 0136-033-14) would be subject to a fee acquisition of approximately 13 square feet and a temporary construction easement (TCE) of approximately 161 square feet. These property encroachments would be required to facilitate the installation of a pedestrian gate and crossing along with the re-grading of the existing sidewalk. Please also refer to Master Response 8 regarding land acquisition associated with the Project. This comment does not address the adequacy or findings of the Draft EIS/EIR.



Monty Dill

October 1, 2014

Mr. Mitch Alderman
SANBAG
1170 W. 3rd Street, 2nd Floor
San Bernardino, CA 92410-1715

Re: Redlands Passenger Rail Project Draft EIR Comments

Dear Mr. Alderman:

I am taking the opportunity of suggesting an alternative location for the train layover facility currently proposed at the southwest area of California and I10 freeway.

I represent the Dill Lumber Company (DLC), which owns the land immediately adjacent to the south side of the existing rail road tracks and north of the Precious Times Antiques' building (1740 W. Redlands Blvd.) and vacant land north of Smart & Final on Redlands Blvd. Originally when was in operation at 1740 W. Redlands Blvd., we had intended to put in a rail line spur on that portion of vacant land for unloading box cars of lumber. This plan never occurred. However, this may be the correct time for an off line facility. There are many advantages for this location:

- 1) It is not in a highly visible location which is in the middle of the City's Emerald Necklace,
- 2) This location mitigates the Visual Quality / Aesthetics component by locating the facility behind existing businesses and away from a major off ramp that serves as a gateway for the shopping community,
- 3) This location would mitigate Noise / Vibration for the apartments to the west of the current proposed location since there isn't any residential type units for several blocks from the proposed location,
- 4) This alternative location would spread out the traffic count to the facility. Since it may be advantageous for employees to come off the California Street off ramp, if they are coming from the west, or use the Alabama Street off ramp if they are coming from the east.

We would appreciate your consideration of an alternative site for the layover facility. We would be glad to meet with you and answer any questions regarding this proposal.

Respectfully submitted,

Monty Dill
PO Box 9113
Redlands, CA 92375
909-798-9451

Cc: Tim Watkins
Justin Fornelli
Fred Dill
Russ Dill

DILL-1

DILL-2

DILL-3

DILL-4

DILL-5

DILL-6

2.5.17 MONTY DILL (DILL)

2.5.17.1 Response to DILL-1

The commenter, representing the Dill Lumber Company, is providing an alternative location for the Project train layover facility, located at 1740 West Redlands Boulevard in the City of Redlands. This request is based on the company's desire for the future construction of a rail line spur for unloading lumber from box cars. The commenter provides four points as support for the proposed location.

2.5.17.2 Response to DILL-2

The commenter expresses an opinion regarding the subject property's limited visibility based on its location within the City's Emerald Necklace. SANBAG appreciates the comment's suggestion for an alternative layover facility location and notes the history and prior development plans for the subject property located at 1740 West Redlands Boulevard in the City of Redlands. This property is not under consideration by SANBAG for any part of the Preferred Project. Any spur track connections to the property from SANBAG's right-of-way would require both SANBAG and BNSF's approval to facilitate future freight service. This comment does not address the adequacy or findings of the Draft EIS/EIR. This comment does not address the adequacy or findings of the Draft EIS/EIR.

2.5.17.3 Response to DILL-3

The commenter expresses an opinion that the suggested location would reduce visual quality and aesthetic impacts due to potential advantages of the property given its proximity away from major highway off-ramps. This comment does not address the adequacy or findings of the Draft EIS/EIR.

2.5.17.4 Response to DILL-4

The commenter expresses an opinion that the suggested location would reduce noise and vibration impacts. SANBAG notes the general absence of residential land uses surrounding the suggested location; however, there are several hotels/motels to the east which were considered noise sensitive land uses per the FTA's Noise and Vibration Manual (see Section 3.6 of the EIS/EIR). This comment does not address the adequacy or findings of the Draft EIS/EIR.

2.5.17.5 Response to DILL-5

The commenter expresses the suggested location would reduce employee traffic counts. This comment is not based on technical analysis and is speculative. This comment does not address the adequacy or findings of the Draft EIS/EIR.



John Egan-1

John G. Egan, P. E.
645 Fairway Drive
Redlands, CA 92373

August 27, 2014

Mr. L Dennis Michael, President
San Bernardino Associated Governments
1170 West Third Street
San Bernardino, CA 92410

Dear Mr. Michael:

In your consideration of the proposed Rail to Redlands I ask for your review and consideration of the several accompanying articles derived from the National Center for Policy Analysis(NCPA) concerning the cost and benefit of rail transit.

EGAN-1.1

While we are told by proponents of the many benefits, actual experience seems to belie the claims in many instances.

SANBAG publicity cites the “..often congested...” travel corridors between San Bernardino and Redlands. I have been driving the route on weekdays for over 40 years and have rarely experienced serious congestion in all of that time, and then only because of an accident.

EGAN-1.2

I was not able to find an estimated cost in any of the online information available, though it was indicated in the July 24th workshop that the estimated cost is \$242 million of our tax money. Your organization seems intent on proceeding with the rail investment even before alternative analyses are completed and regardless of even a minimal ridership projection. Then we taxpayers may be called upon to subsidize heavily for operation and maintenance. And what will be the source of the subsidy? I am not unaware that all public transportation modes require supplemental funding aside from fares, even the Interstate system, however the question looms, large I suggest, is a rail system even needed.

EGAN-1.3

EGAN-1.4

EGAN-1.5

I note that per the current schedule posted on the SANBAG/RTR website, that both the EIR and design are shown to be completed late in 2014. Seems that the rail-option design has been undertaken before the “Bus Rapid Transit” alternative environmental and economic analyses was completed.

EGAN-1.6



Pg. 2

Does current bus passenger usage between San Bernardino and Redlands indicate a heavy use necessitating an additional capacity mode which cannot be met more economically with an expanded bus fleet use? As indicated in one of the accompanying articles from the NCPA, buses can move as many, or more, than rail transit, for, less money, and, it is further alleged, emit less greenhouse gases per passenger mile. As seen in another article, autos would be a cheaper mode, to the extent of providing a new every year for many years.

EGAN-1.7

Has an economic analysis been made of prospective revenues and costs so that we will have some idea of subsidy required? Whatever the source, monies will need to be obtained and/or diverted from another use. A similar investment in the Omnitrans SBX bus route, also, a fixed route, also cost about \$200 million, I believe. It's ridership, cost, fare history and needed subsidy should be evaluated before any similar expenditure of our tax money is committed.

EGAN-1.8

Expanded bus transportation may make more logic, and most important, it's very flexible and much less costly. Routes and stops can be easily changed to accommodate changing residential demographics, and is not dependent upon high density development. And I call your attention to the "downside" of dense development cited in one of the NCPA writings. Certainly the rail corridor should be retained, as it's a potentially valuable asset. However implementing rail service between the two cities now seems extremely premature when there appears to be a more economical and flexible method.

EGAN-1.9

In summary, I request and ask of the Board that rigorous scrutiny be given to the costs and realistic usage estimates for the proposed RTR, that the more flexible and likely cheaper bus mode be seriously evaluated before the selection is made, though I fear it has already been done, regardless of prospective ridership and fare.

EGAN-1.10

Thank you for your consideration.

Sincerely,


John G. Egan

cc: All Board Members w/enclosures, list attached

Cheaper to Buy New Cars than Build Light Rail

Page 1 of 1



Ideas Changing the World

Cheaper to Buy New Cars than Build Light Rail

August 22, 2014

The Pinellas Suncoast Transit Authority (PSTA) serves Pinellas County, Florida. Currently funded by property taxes, the PSTA has proposed to switch its funding source to a sales tax. The switch would make tax revenues double, giving PSTA the funds to build a light-rail line and make its bus system larger. The proposal, writes Randal O'Toole of the Cato Institute, is unnecessarily expensive: light rail is inferior to bus service, which can transport passengers more comfortably for much less money.

PSTA does not have an impressive track record when it comes to predicting travel needs:

- Between 1991 and 2005, it increased its bus service by 46 percent yet gained no new riders.
- Moreover, there was a 17 percent decline in passenger miles.
- Average bus occupancy dropped by 44 percent.

The transit authority says it needs the tax revenue to deal with a growth in bus ridership that took place between 2008 and 2009. However, as of 2012, bus occupancy in Pinellas County was an average of 8 riders per bus, below the national average of 11 riders per bus. According to O'Toole, these numbers suggest that PSTA does not need the tax increase.

Significantly, the PSTA proposal is so off-balance in its costs and benefits that it would not have qualified for federal funding under last year's Department of Transportation rules.

O'Toole provides a shocking statistic: Building PSTA's light-rail line would be so expensive that it would be cheaper to give every new round-trip commuter that would otherwise use the light-rail system a new Toyota Prius, every single year for three decades.

Source: Randal O'Toole, "Review of Greenlight Pinellas," Cato Institute, August 14, 2014

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Ideas Changing the World

Bus Systems Are More Cost Effective than Rail Transit

August 8, 2014

Inspired by the prospect of federal funding, 30 cities across the nation are building rail transit lines. Unfortunately, the new rail lines are expensive and offer little additional carrying capacity.

Randal O'Toole of the Cato Institute has an alternative to rail transit: "rapid bus" systems. Such a bus system would be speedy and convenient. Running from neighborhoods into the downtown areas of cities, buses could reach more people than rail lines and transport more people for less money:

- Rail lines are limited in their ability to serve multiple areas, whereas buses can reach many more individuals throughout a city: A four-line light rail system can bring 36,000 people into a city's downtown center, while O'Toole gives the example of a rapid bus system that could bring in 140,000 per hour.
- A rapid bus system could offer more frequent, faster service with less need for transfers.
- Buses are more comfortable: When operating at capacity, more than half of the passengers on a rail line must stand. Yet two-thirds to three-fourths of bus riders can sit during transport.
- A rapid bus system is much less expensive to maintain than a rail system.

O'Toole shows why it is much cheaper to develop a rapid bus system instead of rail lines:

- The average urban area requires 52 miles of rail lines, and the average cost of one mile of rail line is about \$100 million, for a total of \$5.2 billion.
- In comparison, the capital costs for a high-frequency rapid bus system would only be \$110 million.

While O'Toole says that it wouldn't make sense for rapid bus systems to replace public transportation in cities like New York City with long-established subway systems, rapid bus systems could replace aging rail systems in places like Boston, Chicago and San Francisco.

Source: Randal O'Toole, "Rapid Bus: A Low-Cost, High-Capacity Transit System for Major Urban Areas," Cato Institute, July 30, 2014.

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Detroit's New 3-Mile Light-Rail Line

Page 1 of 1



Ideas Changing the World

Detroit's New 3-Mile Light-Rail Line

July 28, 2014

Construction on a \$137 million, 3.3-mile light rail line will begin in Detroit next week, reports Reason.com.

One quarter of Detroit households do not own cars, depending instead on the city's bus service. But rather than fund more buses, the city has decided to build a light rail line that makes little financial sense:

- Despite Detroit's size (139 square miles), the new rail line will not serve travelers beyond a three-mile stretch.
- Even if the rail cars were packed full with riders, the fare that has been proposed for the travel (\$1.50) would not cover operating expenses.

The federal government has given Detroit \$41 million in taxpayer subsidies to build light rail, and supporters have asked for another \$12 million for the project.

Unlike light rail, buses would be able to move in and out of neighborhoods, and for considerably less in operating and maintenance costs. Despite these realities, cities across the United States are moving to expensive, inefficient light-rail lines.

Source: Jim Epstein, "Is Detroit's New Light Rail Line America's Greatest Boondoggle?" Reason.com, July 24, 2014.

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Ideas Changing the World

DC's Transportation Plan: Discouraging Driving

June 20, 2014

Washington D.C.'s proposed transportation plan will reduce the mobility of DC residents, explains Randal O'Toole, senior fellow at the Cato Institute.

The District of Columbia's goal is to reduce auto commuting from 54 percent of all workers in the district to no more than 25 percent. How does the city council plan to do this? By instituting toll roads and cordon pricing.

- While properly designed tolls can relieve congestion, the district will likely design them wrong, says O'Toole, using them more as a punitive and fundraising tool rather than to relieve congestion.
- Cordon pricing charges drivers to drive within congested areas. Instituting such a system will only penalize suburban commuters and push jobs into the suburbs, rather than discourage people outside the district from driving.

The plan will substitute high-cost urban transit for low-cost driving, even though transit emits more greenhouse gases per passenger mile than driving does.

- The average car and light truck on the road in 2012 emitted 268 grams of carbon dioxide per passenger mile, compared to 285 grams per passenger mile emitted by Washington's transit system.
- In 2012, Washington's transit system cost \$1.20 per passenger mile, compared to the automobile cost of 25 cents per passenger mile.

The plan does not make sense. The real goal of the "MoveDC" plan, says O'Toole, is to reduce people's travel, which reduces mobility. City planners, for example, believe that placing a grocery store near a cluster of homes prevents the need to drive, but doing so also reduces the competition that the ability to drive to multiple stores creates.

Moreover, packing more people and services into smaller areas drives up property, housing and consumer prices and forces people to live in smaller homes.

Source: Randal O'Toole, "Move DC or Move Out of DC?" Cato Institute, June 6, 2014.

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Cities Move to More Costly and More Inefficient Rail Transit

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Ideas Changing the World

Cities Move to More Costly and More Inefficient Rail Transit

June 11, 2014

Cities across the country are building inefficient, expensive light-rail lines, according to a report from Randal O'Toole, senior fellow at the Cato Institute.

The term "light rail" is often mistaken as referring to weight, but in fact, light rail refers to people-moving capacity: light-rail lines provide low-capacity transit but are typically less expensive than higher capacity heavy rail.

The globe has seen an explosion in new rail transit that is somewhat of a hybrid of the two, providing low-capacity transit at high cost:

- Seattle is in the process of constructing a three-mile subway that costs almost six times as much per mile – \$600 million – as the average light-rail line, yet it has no more capacity than a light-rail line.
- Similarly, Honolulu is building a 20-mile rail line that is low-capacity yet twice as expensive (\$250 million per mile) as standard light-rail.
- A light-rail line currently being constructed in Salt Lake City costs more than \$50 million per mile. On average, light rail costs more than \$100 million per mile.
- This trend is not just an American one, as high-cost, low-capacity rail has popped up in India, Panama, Brazil and other Asian and Latin American countries.

Moreover, these expensive rail systems are not providing advantages over traditional transit:

- Light-rail trains with three cars can hold up to 450 people, more than a bus. However, most light-rail lines can run only 20 trains per hour. A single bus stop, on the other hand, can serve 42 buses per hour, and, by staggering stops, a street can serve more than 160 buses per hour.
- A bus with 40 seats and standing room for 20 people can move more than 10,000 passengers per hour, more than the 9,000 served by light-rail trains. Double-decker buses can move even more, up to 18,000 people per hour.
- The cost difference between the two is enormous: a double-decker bus costs \$650,000, while just one light-rail car costs \$4.5 million. Additionally, light-rail requires tracks, which cost more than \$50 million per mile to install, in addition to maintenance costs.

The problems with light-rail do not stop with the high costs. Because the costs are so expensive, transit agencies often stop bus service to low-income neighborhoods, making it more difficult for riders to get around.

Why are so many cities signing on to these inefficient projects? A federal fund, known as



Cities Move to More Costly and More Inefficient Rail Transit

http://www.ncpa.org/sub/dpd/index.php?Article_ID=24515&utm_sou...

New Starts, promises to pay a minimum of half the cost of new transit lines, and the more that cities spend, the more federal dollars they get. In short, O'Toole explains, cities are racing to build the most expensive rail lines possible.

Source: Randal O'Toole, "The Worst of Both: The Rise of High-Cost, Low-Capacity Rail Transit," Cato Institute, June 3, 2014; Randal O'Toole, "Light Rail is the Wrong Choice for Cities," June 3, 2014.

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2.5.18 JOHN G. EGAN (EGAN)

2.5.18.1 Response to EGAN-1.1

SANBAG appreciates the comment's provision of articles from the National Center for Policy Analysis (NCPA) related to the costs and benefits of rail transit. This comment does not address the adequacy or findings of the Draft EIS/EIR.

2.5.18.2 Response to EGAN-1.2

The comment provides observations relating to congestion conditions along major travel corridors between San Bernardino and Redlands. This comment is informational, expresses an opinion, and does not address the adequacy or findings of the Draft EIS/EIR.

2.5.18.3 Response to EGAN-1.3

The commenter states that he was unable to find an estimated cost for the Project in the online materials but indicates that a cost of \$242 million was cited during the July 24, public workshop. SANBAG was unable to verify the year of the workshop in which the cost estimate was provided. Pages 2-60 through 2-62 of the Draft EIS/EIR provide the construction and operational (annual) cost estimates for the Project. As stated in the Draft EIS/EIR, the Project's total construction cost is estimated at \$202 million while operations are estimated at \$7.9 million annually. Additional detail on these costs is provided in Appendix N of the Draft EIS/EIR. Please also refer to Master Response 6 for additional information on Project cost. This comment does not raise any issue related to the adequacy or findings of the Draft EIS/EIR.

2.5.18.4 Response to EGAN-1.4

The commenter opines that the lead agencies are intent on proceeding with the Project before alternative analysis and ridership projections are completed. SANBAG remains in the process of considering the alternatives and design options described in the Draft EIS/EIR for the Project. SANBAG has not made a formal decision on whether to approve or deny the Project. Such a decision will require a vote by the SANBAG Board of Directors at a formal public hearing. Please refer to Master Response 5 for additional discussion on ridership projections. This comment does not raise any issue related to the adequacy or findings of the Draft EIS/EIR.

2.5.18.5 Response to EGAN-1.5

The commenter questions whether a rail system is needed along the Redlands Corridor and if subsidies are needed for the Project. SANBAG's purposes and need for the Project is identified in Chapter 1 of the Draft EIS/EIR. This comment does not address the adequacy, or findings of the Draft EIS/EIR. The Project's cost information is provided in Master Response 6, Project Costs.

2.5.18.6 Response to EGAN-1.6

The commenter notes that the rail option design was undertaken before the Bus Rapid Transit environmental and economic analyses were completed. The commenter is directed to page 2-55 of the Draft EIS/EIR, which identifies the alternatives that were originally considered by SANBAG, but not carried forward for consideration in the Draft EIS/EIR. As provided in page 2-58, Bus Rapid Transit (BRT) was initially considered, but removed from consideration as a BRT mode alternative would not be capable of operating on the same track infrastructure as existing freight traffic. In addition, given that SANBAG is required to accommodate freight operations per its license agreement with the Burlington Northern Santa Fe Railroad (BNSF), the construction of a BRT system would require a wider corridor to accommodate both modes (e.g., BRT and freight), thus resulting in a substantially larger footprint and right-of-way need. Furthermore, as noted in the Draft EIS/EIR (page 2-59), the travel time savings under the BRT alternative would be less than the Project. This comment does not raise any issue related to the adequacy or findings of the Draft EIS/EIR.

2.5.18.7 Response to EGAN-1.7

The commenter summarizes information from NCPA articles regarding the advantages of using an expanded bus fleet or additional autos. Existing bus ridership for routes 8, 9, 15, and 19 are provided in Table 3.3-3 (see page 3.3-8) of the Draft EIR/EIR. If approved, SANBAG will work with Omnitrans to realign overlapping bus service to facilitate integration of the passenger rail operation with existing bus service (see Mitigation Measure TR-5 in Section 3.3.4 of the Draft EIS/EIR. This comment is informational and does not raise any issue related to the adequacy or findings of the Draft EIS/EIR.

2.5.18.8 Response to EGAN-1.8

The comment requests information associated with projected revenues and costs of the Project. Appendix N in the Draft EIS/EIR provides an economic and fiscal impact analysis for the Project. As provided on page 2-60 of the Draft EIS/EIR, SANBAG would leverage multiple federal, state, and local funding sources to construct the Project. Once constructed, SANBAG would fund the Project's operation through the use of Measure I (Rail) funds. Please refer to Master Response 6 for additional detail on Project cost. This comment does not raise any issue related to the adequacy or findings of the Draft EIS/EIR.

2.5.18.9 Response to EGAN-1.9

The commenter summarizes information from NCPA articles regarding the advantages of using an expanded bus fleet and asserts that expanded bus service could provide more flexibility with less cost as compared to the Project. This comment is informational, expresses an opinion, and does not raise any issues related to the content, adequacy, or findings of the Draft EIS/EIR.

2.5.18.10 Response to EGAN-1.10

The commenter requests that consideration be given to the anticipated costs and usages of the Project when compared to an alternative bus model to service the area. SANBAG appreciates



the commenter's willingness to express their concerns relating to the Project costs and ridership estimates. These considerations will be taken into account as part of the Board's consideration as to whether to approve or deny the Project. This comment expresses an opinion and does not raise any issue related to the adequacy or findings of the Draft EIS/EIR.



John Egan-2

1 REDLANDS PASSENGER RAIL PROJECT
2 TUESDAY, SEPTEMBER 9, 2014
3

4 PUBLIC COMMENTS

14
15 JOHN EGAN: What is going to be the cost of
16 the project? It is inferred that quiet zones are
17 included in the project. Are they included in that
18 cost? If not, what will be the estimated cost of the
19 quiet zone upgrades, and how many are anticipated?
20 And when will they be effected or constructed?

21 Two, was any estimate of projected ridership
22 and fare a factor in the decision to proceed with this
23 project?

24 What is the projected revenue versus
25 operation maintenance cost on an annual basis for the

} EGAN.2-1
} EGAN.2-2
} EGAN.2-3
} EGAN.2-4
} EGAN.2-5

Page 4

1 first ten years of the project? Knowing that a
2 subsidy will be required, what will be the source of
3 the subsidy for the project's operation?

4 (Address: John Egan, 1645 Fairway Drive,
5 Redlands, CA 92373; jegan@erscinc.com.)
6

7 (End of comments transcribed by the
8 Court Reporter.)

2.5.19 JOHN EGAN (EGAN-2)

2.5.19.1 Response to EGAN-2.1

The comment requests clarification on the Project's cost. The Project's construction cost is currently estimated at \$202 million (see page 2-60 of the Draft EIS/EIR). Annual operating expenditures are estimated at \$7.9 million. Please refer to Master Response 6 for more detail.

2.5.19.2 Response to EGAN-2.2

The comment requests clarification on the inclusion of quiet zones as part of the Project. The comment also requests clarification on if the quiet zones are included in the Project's costs. SANBAG is proposing the implementation of quiet zones as the primary form of mitigation for operational noise generated by passing trains (see Draft EIS/EIR page 2-31). Mitigation Measure NV-3 (see page 3.6-32 of the Draft EIS/EIR) identifies the locations where quiet zones are initially proposed. The cost of supplemental safety measures (SSMs) required to implement quiet zones is included in the Project's construction cost estimate. However, the final location and number at-grade crossings included within proposed quiet zones (and the associated costs) remains subject to additional negotiations between SANBAG and the Cities of San Bernardino and Redlands. Please refer to Master Response 3 for additional information on quiet zones.

2.5.19.3 Response to EGAN-2.3

The comment requests clarification on when the quiet zones would be constructed or implemented. The SSMs required to implement quiet zones would be installed during construction of the Project, so that they are operational prior to passenger train operations. This comment does not address the adequacy or findings of the Draft EIS/EIR.

2.5.19.4 Response to EGAN-2.4

The comment requests clarification on project ridership estimates and fares for the Project. Ridership projections were produced for the Project and are summarized on page 2-18 of the Draft EIS/EIR. As provided, 820 daily riders are projected for opening day in 2018 and 1,330 daily riders are projected for future conditions (2038). Appendix C of the Draft EIS/EIR contains additional detail on the ridership projections, including discussion of factors that may contribute to increased ridership in the future. Please refer to Master Response 5, Projected Ridership, for additional discussion on projected ridership estimates.

The Project's fare structure has yet to be determined and will be developed during the final design process of the Project is approved by the SANBAG Board of Directors. This comment does not address the adequacy or findings of the Draft EIS/EIR.

2.5.19.5 Response to EGAN-2.5

The comment requests clarification on the Project's projected revenue versus operational costs and the source of potential subsidies for the Project. Please refer to Response EGAN-2.1 and Master Response 6 for information on Project costs. Funding for operations will come from



Measure I (Metrolink/Rail Service) as indicated on page 2-60 of the Draft EIS/EIR. As indicated in Response EGAN-2.4, given that a fare structure has yet to be determined, SANBAG is unable to provide the relative contribution of fare box recovery to the Project's operating funding at this time.



Egan-3

Date: Sunday, September 28, 2014 3:10:37 PM

Gentlemen, Members of the Board:

I object to the Rail to Redlands both due to the lack of demonstrated need and the analysis displayed in the EIR/EIR document. And also because of the funding constraints, no alternative transportation modes are allowed to be considered!!

} EGAN-3.1

I understand that intense development can take place in the downtown area in the vicinity of the rail, thus the rail project is beneficial and is likely being supported by prominent developers, Krikorian, ESRI, and the University of Redlands, all of whom benefit, but leave the cost of the rail system O & M deficit of some \$3 million/year to the taxpayers, very few of whom will ever use the facility.

} EGAN-3.2

Additionally, the prospective development in downtown Redlands will be detrimental and out of character with Historic District designation of the area. And the City hopes to benefit from higher tax revenue at the expense of the, area character.

} EGAN-3.3
} EGAN-3.4

Impact of 50 trains per day crossing through the area is I believe understated.. This many trips will shut the crossings at Stuart and Orange, for example, for unacceptable frequencies and durations to seriously impact traffic. That aspect seems to also have been understated and analyzed.

} EGAN-3.5

And finally, the initial cost of the project is inadequately stated I believe, as construction loan costs and quiet zone costs are not included. Might this not change the benefit analysis?

} EGAN-3.6

John Egan
645 Fairway Drive
Redlands, CA

2.5.20 JOHN EGAN (EGAN-3)

2.5.20.1 Response to EGAN-3.1

The commenter expresses opposition to the Project. This comment expresses an opinion and does not raise any issues related to the adequacy, content, or findings contained in the Draft EIS/EIR.

2.5.20.2 Response to EGAN-3.2

The commenter states that the Project is supported by those who would benefit from its construction and operation and that the taxpayers will pay for most of the Project. The Draft EIS/EIR identified the purpose and need for the Project in Draft EIS/EIR Section 1.4 (see pages 1-3 through 1-6). Anticipated Project benefits would include providing a mobility alternative that would be capable of achieving shorter travel times compared to travel on congested roadways and improving connections to the regional multimodal transportation system to residents living and working in the area. This comment expresses an opinion and does not raise any issues related to the adequacy or findings contained in the Draft EIS/EIR. SANBAG notes that Project operations would be funded through Measure I funds, which were recently reauthorized by voters.

2.5.20.3 Response to EGAN-3.3

The commenter states that the Project will be detrimental and out of character with the historic designation of the area. Please refer to Master Response 11. The Project's effects to the Redlands Santa Fe Depot Historical District are considered in Section 3.12 of the EIS/EIR. Appendix M contains a more detailed evaluation of the Project's effects to the historical district per the requirements of Section 106 of the National Historical Preservation Act (NHPA). SANBAG and FTA have been in consultation with the State Historical Preservation Officer (SHPO) for the Project per the requirements of Section 106 and SHPO has concurred with the finding of no adverse effect as contained in the EIS/EIR.

2.5.20.4 Response to EGAN-3.4

The commenter states that the City of Redlands hopes to benefit from higher tax revenue at the expense of the area's character. This comment expresses an opinion and does not raise any issues related to the adequacy or findings contained in the Draft EIS/EIR.

2.5.20.5 Response to EGAN-3.5

The commenter states that the Project will cause serious traffic conditions at the proposed crossings. Traffic conditions for roadway intersections located along the railroad corridor were modeled for existing conditions (2012), opening day (2018), and future conditions (2038) as part of the traffic report prepared in support of the Draft EIS/EIR (see Master Response 13 and Appendix E). As provided in Section 3.3 of the Draft EIS/EIR (see Tables 3.3-7 and 3.3-12), numerous intersections operate at poor levels of service (LOS) with or without the Project. In instances where the traffic modeling indicates that the Project would degrade LOS, mitigation is



proposed (see Mitigation Measures TR-2 and TR-3). Please refer to Master Response 13 for additional discussion.

2.5.20.6 Response to EGAN-3.6

The comment states that the initial cost of the Project is not correctly stated due to the exclusion of construction loans and quiet zone costs. The commenter requests clarification on if the inclusion of construction loan and quiet zone costs would change the benefit analysis for the Project. As provided, the Project's total construction cost is estimated at \$202 million (Master Response 6). Additional detail on these costs is provided in Appendix N of the EIS/EIR. The cost estimate provided in Chapter 2 of the EIS/EIR reflects a pay-as-you-go funding scenario. If construction loans are pursued, the costs could be subject to change. Supplemental safety measures required to support the implementation of quiet zones are included in the project cost estimate.



William T. Farquhar



Thank you for your interest in the Redlands Passenger Rail Project.

San Bernardino Associated Governments (SANBAG) would like to accurately and personally address your questions and concerns. Please complete the contact information below and indicate the best way to reach you.

CONTACT INFORMATION

Name: William T. Farquhar

Street Address: 3224 Harding St.

City: Cardsbad State: CA Zip Code: 92008

Phone: (714) 718-4285 Cell: ()

Email: billshroyahoo.com FAX: ()

Are you a local business owner? Yes: No:

If so, please name the business: _____

Preferred Contact Method: (Please check one)

By Phone: Email: FAX: In Writing:

YOUR COMMENTS/QUESTIONS _____

Thank you for your input on the Redlands Passenger Rail Project.

To provide comments or questions, send an email to RPRP_Public_Comments@sanbag.ca.gov or call the project helpline at (855) SBR-RAIL / 727-7245.

} FARQUHAR-1



2.5.21 WILLIAM FARQUHAR (FARQUHAR)

2.5.21.1 *Response to FARQUHAR-1*

No written comment or question provided.



Monica Frame



Thank you for your interest in the Redlands Passenger Rail Project. San Bernardino Associated Governments (SANBAG) would like to accurately and personally address your questions and concerns. Please complete the contact information below and indicate the best way to reach you.

CONTACT INFORMATION

Name: Monica Frame
 Street Address: 812 College Ave
 City: Redlands State: CA Zip Code: 92374
 Phone: (909) 739077 Cell: ()
 Email: _____ FAX: ()
 Are you a local business owner? Yes: No:
 If so, please name the business: _____
 Preferred Contact Method: (Please check one)
 By Phone: Email: FAX: In Writing:

YOUR COMMENTS/QUESTIONS

My biggest concern is having straight tracks to L.A. + back and not having to stop in San Bernardino to wait and/or to change trains

} FRAME-1

Thank you for your input on the Redlands Passenger Rail Project.

To provide comments or questions, send an email to RPRP_Public_Comments@sanbag.ca.gov or call the project helpline at (855) SBR-RAIL / 727-7245.



2.5.22 MONICA FRAME (FRAME)

2.5.22.1 *Response to FRAME-1*

The commenter expresses interest in the integration of express service (e.g., Metrolink) trains as part of the Project's operations to avoid having to change trains in San Bernardino. This comment does not raise any issues related to the content and findings of the Draft EIS/EIR.



Elizabeth Franke

1	REDLANDS PASSENGER RAIL PROJECT
2	THURSDAY, SEPTEMBER 4, 2014
3	
4	PUBLIC COMMENTS
12	ELIZABETH FRANKE: I would like to say that
13	it is extremely important to me -- I would be very
14	disappointed in this project if there are no express
15	trains coming to the Redlands stops that would get a
16	person directly from Redlands into Los Angeles
17	without changing trains in San Bernardino.
18	(Address: 5325 Buena Vista St., Redlands 92374)

FRANKE-1



2.5.23 ELIZABETH FRANKE (FRANKE)

2.5.23.1 *Response to FRANKE-1*

The commenter expresses a preference in the integration of express service trains as part of the Project's operations to avoid having to change trains in San Bernardino. This comment expresses an opinion and does not raise any issues related to the adequacy, content, and findings of the Draft EIS/EIR.



Stacy Glaser

9-26-14

SANBAG

RE: 9th Street Closure

Gentlemen,

As we understand it, 9th Street is scheduled to be closed at the BNSF railroad Crossing. As you may know our packing house is South of the Railroad tracks on 9th Street. Trucks are currently arriving / departing from our packing house, by coming South on 9th, crossing the tracks and entering our packing house truck staging area. If the railroad crossings are closed, the only way for the trucks to ingress/egress Redlands Foothills will be via Redlands Blvd and turning North on 9th Street.

GLASER-1
GLASER-2

Considering that the average truck trailers loading our fruit is a 53 footer, making the turn onto and off of 9th Street can be very problematic. As a consequence, it is imperative that SANBAG make adjustments for long trucks turning left Northbound on to 9th and also turning right Westbound onto Redlands Blvd.

GLASER-3

As you may know Redlands Foothill Groves is the last active packing house in San Bernardino County. We have been here 90 years. Hundreds of local Orange Growers depend on our packing house to process and ship their fruit. Any hardship placed on our common carrier truckers will have an adverse impact on our fragile industry.

GLASER-4

Should you have any questions, at your convenience, please contact me on my cell phone 909-641-8090.

Best regards,

Terry Klenske

President

Redlands Foothill Groves

2.5.24 STACY GLASER (GLASER)

2.5.24.1 Response to GLASER-1

The comment states that 9th Street is proposed to be closed as part of the Project. SANBAG is proposing the closure of the 9th Street at-grade crossing as part of the Project per the recommendation of the California Public Utilities Commission (CPUC) (see Table 2-4 of the Draft EIS/EIR for additional details). The effects to traffic circulation are considered in Section 3.3 of the Draft EIS/EIR (see page 3.3-14 to 3.3-24). The closure of the at-grade crossing is currently not scheduled and remains subject to the approval of the SANBAG Board of Directors and the Redlands City Council. Please refer to Master Response 4 for additional discussion. This comment does not address the adequacy or findings of the Draft EIS/EIR.

2.5.24.2 Response to GLASER-2

The comment notes the closure of the 9th Street at-grade crossing would require a change in the route used by the commenter's packing house haul trucks to access the packing house truck staging area. Please refer to Master Response 4. This comment does not raise any issues related to the adequacy or findings of the Draft EIS/EIR.

2.5.24.3 Response to GLASER-3

The commenter states that the average truck trailer used to load fruit is 53 feet long. The comment also states that maneuvering this type of truck onto and off 9th Street is problematic from a turning radius perspective. The commenter requests that SANBAG make adjustments for long trucks turning left northbound onto 9th Street and also turning right westbound onto Redlands Boulevard. SANBAG notes the additional operational characteristics of the commenter's business establishment. It would appear that access to 9th Street could occur both from the west via Orange (and 6th) Streets or the east via University Street. From the University Street/I-10 interchange, trucks would be able to access 9th Street via right-turns only following Citrus Avenue to Redlands Boulevard. Similarly, trucks could exit 9th Street west via right-turns only following Redlands Boulevard to Orange (or 6th) Street. If the radius of right turn onto Redlands Boulevard (from 9th) is problematic, any improvements would be the responsibility of the City as this intersection is an existing roadway owned by the City. SANBAG will continue to coordinate with the City on this issue are part of the Project's final design. This comment does not raise any issues related to the adequacy or findings of the Draft EIS/EIR.

2.5.24.4 Response to GLASER-4

The comment states that the Redlands Foothill Groves is the last active packing house in San Bernardino County and that hundreds of local orange growers depend on the packing house to process and ship their fruit. The commenter states that impacts to common carrier truckers will have an impact on the orange industry. SANBAG notes the commenter's history of business. Please refer to Response GLASER-3.



George Grames-1

Date: Friday, September 26, 2014 11:55:21 AM

Mitch Alderman
SanBag Director of Transit and Rail
1170 W. 3rd Street 2nd Floor
San Bernardino, CA 92410

September 26, 2014

Mr. Alderman,

This email addresses the Rail to Redlands (RTR).

The RTR must be catering to special interests because it is difficult to conceive how the RTR would benefit the residents of Redlands. If the purpose of the rail line is to transport residents of Redlands it will come at a very high price!

} GRAMES-1.1

This project raises a number of questions:

1. What benefits to the residents of Redlands are anticipated?
2. Will 14 street crossings adversely effect the flow of traffic?
3. How will the vibrations of train operation effect the historic buildings adjacent to the track?
4. Will sound mitigation barriers detract from the appearance of our city?
5. Will a limited number of individuals benefit financially from the construction of this project?
6. After completion will the rail line be financial viable and self sustaining?
7. If not financially viable, will the rail line be subsidized by Redlands City taxes in addition to federal tax dollars?

} GRAMES-1.2
 } GRAMES-1.3
 } GRAMES-1.4
 } GRAMES-1.5
 } GRAMES-1.6
 } GRAMES-1.7
 } GRAMES-1.8

The future of the City of Redlands is of great concern to me, and no doubt to the residents of Redlands.

} GRAMES-1.9

Sincerely,

George Grames
9450 Jeffery Drive
Redlands, CA 92373

2.5.25 GEORGE GRAMES (GRAMES-1)

2.5.25.1 Response to GRAMES-1.1

The commenter provides an opinion that the Project is catering to special interests and does not understand how the Project will benefit the residents of Redlands. The Draft EIS/EIR identified the purpose and need for the Project in Draft EIS/EIR Section 1.4 (see pages 1-3 through 1-6). Anticipated Project benefits would include providing a mobility alternative that would be capable of achieving shorter travel times compared to travel on congested roadways and improving connections to the regional multimodal transportation system to residents. This comment expresses an opinion and does not raise any issues related to the adequacy or findings of the Draft EIS/EIR.

2.5.25.2 Response to GRAMES-1.2

The comment request clarification on what the Project benefits would be to the residents of Redlands. As mentioned in Response GRAMES-1.1, the benefits of the Project are outlined in Chapter 1, Purpose and Need, of the Draft EIS/EIR (see pages 1-3 through 1-6). Many of the benefits identified would apply to residents within the City of Redlands. This comment does not raise any issues related to the adequacy or findings of the Draft EIS/EIR.

2.5.25.3 Response to GRAMES-1.3

The comment requests clarification on if the proposed street crossings would affect traffic flow. The effects of train operations (and construction thereof) are described and analyzed in Section 3.3 of the Draft EIS/EIR. The analysis evaluates both traffic delay as result of the Project (see Effect 3.3-1, pages 3.3-14 to 3.3-24) and potential traffic safety hazards (see Effect 3.3-3, pages 3.3-26 to 3.3-28). Please refer to Master Response 13, Traffic Circulation, for additional discussion on traffic circulation.

2.5.25.4 Response to GRAMES-1.4

The comment requests clarification on train vibration impacts on historic buildings that are located adjacent to the train track. Both operational (i.e., trains) and construction-related (i.e., jack hammers) sources of vibration are considered in Sections 3.6 and 3.12 of the Draft EIS/EIR. As provided in Effect 3.6-2 of the Draft EIS/EIR (see pages 3.6-29 to 3.6-30), operational sources of vibration are not expected to adversely affect the structural integrity of adjacent historic structures (see Master Response 7). The potential effect of different types of construction equipment on historic structures are discussed on Draft EIS/EIR pages 3.6-29 and 3.12-23. Mitigation Measure CUL-1 is proposed to mitigate for these potential effects such that no adverse effect would result.

2.5.25.5 Response to GRAMES-1.5

The comment requests clarification on the visual impacts of the sound walls. The indirect visual effects of sound barriers are addressed in Section 3.4 of the Draft EIS/EIR (see pages 3.4-16 through 3.4-17 of the Draft EIS/EIR. Mitigation Measure VQA-4 which covers sound barrier

screening and surface treatments is proposed to minimize the visual effects of placing sound barriers. However, as provided in page 3.4-23 (and ES-8) of the Draft EIS/EIR, even following the application of this mitigation, the residual effect is considered significant and unmitigable. Refer to master Response 3, Mitigation for Train Noise, for additional discussion. The discussion on page 3.4-34 is revised as follows to clarify the magnitude and extent of sound barriers required in the absence of quiet zones.

With the implementation of Mitigation Measure NV-4, SANBAG may construct sound barriers at one or more locations within Landscape Units 1, 2, 3, 4, and 5. Sound barriers although effective in their reduction of noise levels, also create new long, linear physical obstructions in the landscape that could be considered disruptive visually to one or more individuals by eliminating existing middle or background views of moderate value. Figures 8-2A through 8-2H in Appendix H1 identify the locations of each sound barrier, which total approximately 23,910 linear feet (or 4.5 miles) in the absence of quiet zones (see Mitigation Measure NV-3). Even with the inclusion of surface treatments, the magnitude of these physical features would visually dominate the railroad corridor, where constructed in the absence of quiet zones, thereby resulting in an adverse effect under NEPA. Under CEQA, the proposed mitigation would not be sufficient in reducing the indirect impact of sound barriers in the absence of quiet zones and the residual impacts on the visual character of Landscape Units 2 and 5 is considered significant and unmitigable.

With the implementation of quiet zones as proposed in Mitigation Measure NV-3 in combination with other noise mitigation measures, including but not limited to sound barriers, and the vehicle type selected (e.g., DMU versus locomotive) the length of sound barriers would be substantially less. For example, under the locative vehicle option, the length of sound barrier would be reduced to 10,740 linear feet (or 2.2 miles) with the sound walls being more evenly distributed throughout the corridor (e.g., less than 1,000 feet). Under the DMU vehicle option, the length of sound barrier would be further reduced to 5,900 linear feet (or 1.1-mile). In this context and with the implementation of a quiet zone, the magnitude of the sound barriers would be substantially less, such that Mitigation Measure VQA-4 would be effective in minimizing the adverse effects of sound barriers under NEPA. Under CEQA, the visual impact would be reduced to a less than significant level.

2.5.25.6 Response to GRAMES-1.6

The comment requests clarification on if a limited number of individuals would financially benefit from this Project. The commenter is directed to Section 3.14 of the Draft EIS/EIR, which provides an evaluation of the Project's economic impacts and benefits. In general terms, the communities of both San Bernardino and Redlands would benefit from the Project's implementation. This comment does not raise any issues related to the content and findings of the Draft EIS/EIR.

2.5.25.7 Response to GRAMES-1.7

The comment requests clarification on if the Project would be financially viable and self sustaining. As provided on page 2-60 of the Draft EIS/EIR, funding for Project operations would come from Measure I (Metrolink and Rail Service). In addition, fare collected during the Project's



operation would go towards operational cost of the Project. Please refer to Master Response 6, Project Costs, for additional discussion.

2.5.25.8 Response to GRAMES-1.8

The comment requests clarification on if the Project would be subsidized by Redlands City taxes. Please refer to Response GRIMES-1.7.

2.5.25.9 Response to GRAMES-1.9

The commenter states that he is concerned with the future of the City of Redlands. This comment expresses an opinion and does not raise any issues related to the adequacy or findings of the Draft EIS/EIR.



George Grames-2

emailed: Councilmembers, City Manager, PIO, Press

ACE

RECEIVED

SEP 29 2014

REDLANDS CITY CLERK

Mayor Aguilar
City of Redlands
35 Cajon Street
Redlands, CA 92373

September 26, 2014

Mayor Aguilar,

This email addresses the Rail to Redlands (RTR).

The RTR must be catering to special interests because it is difficult to conceive how the RTR would benefit the residents of Redlands. If the purpose of the rail line is to transport residents of Redlands it will come at a very high price!

GRAMES-2.1

This project raises a number of questions:

1. What benefits to the residents of Redlands are anticipated?
2. Will 14 street crossings adversely effect the flow of traffic?
3. How will the vibrations of train operation effect the historic buildings adjacent to the track?
4. Will sound mitigation barriers detract from the appearance of our city?
5. Will a limited number of individuals benefit financially from the construction of this project?
6. After completion will the rail line be financial viable and self sustaining?
7. If not financially viable, will the rail line be subsidized by Redlands City taxes in addition to federal tax dollars?

GRAMES-2.2

GRAMES-2.3

GRAMES-2.4

GRAMES-2.5

GRAMES-2.6

GRAMES-2.7

GRAMES-2.8

The future of the City of Redlands is of great concern to me, and no doubt to the residents of Redlands.

GRAMES-2.9

Sincerely,

George Grames
9450 Jeffery Drive
Redlands, CA 92373



2.5.26 GEORGE GRAMES (GRAMES-2)

2.5.26.1 *Response to GRAMES-2.1 through 2.9*

The comments provided in Comment Letter GRAMES-2 are duplicative to those provided in Comment Letter GRAMES-1. Please refer to responses GRAMES-1.1 through GRAMES-1.9.



Donn R. Grenda-1



(909) 335-1896
(909) 335-0808 (fax)

STATISTICAL RESEARCH, Inc.
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Donn R. Grenda, Ph.D., RPA
President
dgrenda@sticrm.com

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ARCHAEOLOGY • ANTHROPOLOGY • HISTORY • HISTORIC ARCHITECTURE

the Redlands Passenger Rail Project.

San Bernardino Associated Governments (SANBAG) would like to accurately and personally address your questions and concerns. Please complete the contact information below and indicate the best way to reach you.

CONTACT INFORMATION

Name: Donn R. Grenda

Street Address: 1621 Garden St.

City: Redlands State: CA Zip Code: 92373

Phone: (909) 335-1896 Cell: (909) 322-8788

Email: dgrenda@sticrm.com FAX: ()

Are you a local business owner? Yes: No:

If so, please name the business: STATISTICAL RESEARCH, INC. (SRI)

Preferred Contact Method: (Please check one)

By Phone: or Email: Both Please FAX: In Writing:

YOUR COMMENTS/QUESTIONS 1) Request quiet zone @ orange st crossing and Ballast Mats | 2) who will do the historic bldg structural engineering study? | 3) no sound walls in Santa Fe Depot Hist. District. | 4) construction at night at orange st → eureka ave | 5) Mission Zanja is eligible for NCHRP - it is already listed! | 6) Packard Motor Sales Bldg 409 orange needs engineering study | 7) The ^{social} economic analysis fails to account for the cost of loans for construction (unless it requires no loan or is 0%) | 8) A analysis appears to have missed the National Register District. There is a "use" of the Depot.

Thank you for your input on the Redlands Passenger Rail Project.

I am trying to become a consulting Party under section 106

To provide comments or questions, send an email to RPRP_Public_Comments@sanbag.ca.gov or call the project helpline at (855) SBR-RAIL / 727-7245.

- GREENDA-1.1
- GREENDA-1.2
- GREENDA-1.3
- GREENDA-1.4
- GREENDA-1.5
- GREENDA-1.6
- GREENDA-1.7
- GREENDA-1.8
- GREENDA-1.9

2.5.27 DONN GRENDA (GRENDA-1)

2.5.27.1 Response to GRENDA-1.1

The comment requests the implementation of a quiet zone at Orange Street and the provision of ballast mats. The provision of ballast mats was included as part of Draft EIS/EIR Mitigation Measure NV-6. These measures are called out in Mitigation Measures NV-3 and NV-6, respectively. Please refer to Master Responses 2 and 3.

2.5.27.2 Response to GRENDA-1.2

The comment requests clarification on who will do the historic building structural study. SANBAG has not selected a contractor to complete the pre- and post-construction structural inventories as proposed in Mitigation Measure CUL-1. This comment does not address the adequacy or findings of the Draft EIS/EIR.

2.5.27.3 Response to GRENDA-1.3

The comment states opposition to the erection of sound barriers within the Redlands Santa Fe Depot Historic District. The installation of sound barriers within downtown Redlands and within the Redlands Santa Fe Depot Historic District are not planned. This comment does not raise any issues related to the content and findings of the Draft EIS/EIR. Please also refer to Response VERSTEEG-2.

2.5.27.4 Response to GRENDA-1.4

The commenter requests Project construction occurring in-between Eureka and Orange Streets in downtown Redlands to be conducted at night. Please refer to Response 2-10.

2.5.27.5 Response to GRENDA-1.5

The comment states that the Mission Zanja is eligible and listed on the National Register of Historic Places (NRHP). Please refer to Master Response 14.

2.5.27.6 Response to GRENDA-1.6

The comment states that the Packard Motor Sales Building should also be subject to a pre- and post-construction structural inventory (per Mitigation Measure CUL-1) due to the close proximity of the construction footprint along Orange Street, north of the tracks. The Packard Motor Company Sales Office building is not immediately adjacent to the ROW; it is located approximately 90 feet north of the track. The building is composed of reinforced concrete rather than brick masonry construction; but it does have a brick veneer at the east elevation. According to the 1991 Registration Form for the Redlands Santa Fe Depot District, the Packard Motor Company Sales Office building's brick veneer was restored just prior to 1991. It is also important to clarify that the type of construction along Orange Street in the vicinity of the Packard Motor Sales Building is significantly different from the construction proposed within SANBAG's right-of-way. Construction activities in SANBAG's right-of-way may include the use



of a vibratory roller, which is the main source of the potential vibratory impact to historic structures located immediately adjacent to SANBAG's right-of-way. In contrast, the construction activities anticipated along Orange Street (north of the tracks) would generally be limited to restriping. Therefore, the corresponding level of vibration would be much less and unlikely to affect the adjacent historic property and, therefore, is considered less than significant. For this reason, Mitigation Measure CUL-1 is not required for the Packard Motor Company Sales Office.

2.5.27.7 Response to GRENDA-1.7

The comment states that the socio-economic analysis fails to account of the cost of construction loans. The Project's construction cost is based on a pay-as-you-go funding scenario. Therefore, no debt service interest is included in the current cost.

2.5.27.8 Response to GRENDA-1.8

The comment states that the Section 4(f) analysis missed the National Register District since there is a "use" of the Redlands Santa Fe Depot (Depot). The Section 4(f) analysis completed for the Project considers the potential for "use" of both the Redlands Santa Fe Depot and other contributing properties within the District. The discussion of the Project's potential to result in a use of these historic properties is provided on pages 3.16-26 to 3.16-29 of the Draft EIS/EIR. As identified in Draft EIS/EIR page 3.16-26, the Build Alternatives would not result in a 4(f) use of the Depot or any property individually eligible or contributing to the eligibility of the historic district. In their August 14, 2014 letter, SHPO concurred that the project would have no adverse effect on historic resources.

2.5.27.9 Response to GRENDA-1.9

The commenter states that he will attempt to become a consulting party under Section 106 of the NHPA. This comment is informational and does not address the adequacy, content, or findings of the Draft EIS/EIR.



Donn Grenda-2



STATISTICAL RESEARCH, Inc.

ARCHAEOLOGY • ANTHROPOLOGY • HISTORY • HISTORIC ARCHITECTURE

September 5, 2014

RE: Request for Consulting Party Status on the Redlands Passenger Rail Project

Leslie T. Rogers
Regional Administrator
Federal Transit Administration
Region IX
201 Mission Street, Suite 1650
San Francisco, CA 94105

Dear Ms. Rogers:

I am an owner of the Cope Commercial Company Warehouse (36-017477), a contributing property to the Santa Fe Depot Historic District and an owner and president of Statistical Research, Inc., a cultural resources management firm that operates in the Cope Commercial Company Warehouse at 21 W. Stuart Ave. This structure is within the project APE. I am also a City of Redlands resident, a registered professional archaeologist, a member of the City of Redlands Historic and Scenic Preservation Commission, and the Vice President of the Redlands Conservancy. Finally, I am also a former member of the California State Historical Resources Commission (2005-2013). I have reviewed the draft EIS/EIR and have a number of questions and concerns regarding the project.

Demonstrated interest in the project:

I have a demonstrated interest in the project due to my economic relation to the undertaking and have concerns with the undertaking's effects on historic properties. I therefore, formally request to be a consulting party during Section 106 review. I believe my participation is important to the successful resolution of adverse effects to the numerous historic properties in Redlands and San Bernardino. I would appreciate meeting with the agency to discuss my concerns and share some creative ideas about alternatives. I outline the primary issue areas below.

Cultural Resources:

- 1) I believe inappropriate archaeological methods were employed to locate buried remains of Redlands Chinatown (CA-SBR-5314H). Shovel Test Units are designed to sample for artifacts and are inappropriate for locating buried features that are likely to exist in the area designated for a parking lot. Buried feature locations should have been targeted with mechanical stripping units.
- 2) A portion of the Mill Creek Zanja (CA-SBR-8092H) was determined not eligible to the NRHP. This is actually a formally listed linear resource. It was not excluded from the original nomination so is this portion going to be formally delisted from the NRHP?

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www.sricrm.com

GREندا-2.1

GREندا-2.2

GREندا-2.3

GREندا-2.4

Donn Grenda-2

The lack of integrity and setting argument needs to be balanced against what truly makes the zanja a historic property (i.e., water conveyance and its course). This property is a ditch that was constructed by Native Americans in 1819 to convey water. This portion is in its original location and still conveys water. In addition, there is an active project by the Redlands Conservancy to restore the setting to this portion of the zanja (replant trees and construct a trail). This National Register listed linear resource has not lost enough integrity to warrant ineligibility.

GRENDA-2.5

3) The Packard Motor Company Sales Office (36-017109) needs to be included in the engineering study recommended to assess the potential effects of noise/vibration of the other buildings in the Santa Fe Depot Historic District. The building is a contributing element to the district and is currently used as an antique store and medical/surgery clinic, both of which are extremely sensitive to vibration and noise. Construction along the tracks may be too far to qualify for the study but construction along Orange Street is immediately adjacent to the structure.

GRENDA-2.6

4) The train crossing at Orange Street should be a quiet zone and ballast mats and other vibration minimizing technologies should be installed throughout the historic district. Also, no sound walls should be constructed within the historic district. Fencing designed to enhance the appearance of the structures (i.e., period- and architecturally-appropriate fencing) should be used. For example, rod iron on a short brick or rock wall foundation would be more appropriate than chain link.

GRENDA-2.7

5) Native American Consultation appears inadequate. Sending letters without following up with telephone calls or physical visits is inappropriate. I would highly suggest that the agency actually speak to representatives from the San Manuel Band of Mission Indians and explain that a portion of the Mill Creek Zanja is considered ineligible for listing. The tribe has funded a number of projects along the zanja and the Native American community considers it an extremely important cultural resource.

GRENDA-2.8

Noise/Vibration concerns:

1) Orange Street Crossing is in within the Santa Fe Depot Historic District and should be quiet zone. I would like to discuss ways to reduce noise and vibration at the intersection and within the APE through the historic district. The tracks within the historic district should use ballast mats. Train horn blasts should be eliminated from the Orange Street crossing. Sound walls, however, should not be employed within the historic district.

GRENDA-2.9

2) Construction between Eureka and Orange should be conducted at night or the project should relocate the offices of Statistical Research, Inc. during construction. Our work hours are 8:00 am to 6:00 pm and the extreme noise and vibration inside the historic structure will be extremely disruptive to our work environment. We are the only daytime businesses that operate in a historic building immediately adjacent to the tracks and no residential properties are near the building.

GRENDA-2.10

Traffic:

1) Intersection improvements and traffic concerns at the Orange/Stuart Street intersection need to be addressed. A large parking garage adjacent to the historic district and the Cope Commercial Company Warehouse is one alternative for the Downtown Redlands station yet mitigation is not offered because a surface lot is also an alternative. Either parking solution will impact Redlands Chinatown which was missed during the evaluation phase due to inappropriate archaeological methods discussed above.

GRENDA-2.11

GRENDA-2.12



Donn Grenda-2

I look forward to working with all of the agencies and consulting parties to explore solutions that will meet your agency's needs. If you have any questions, please do not hesitate to email or call me at my Redlands office.

Sincerely,

Donn R. Grenda, Ph.D., RPA
President

cc: Carol Roland-Nawi, State Historic Preservation Officer
Dominique Paukowits, Federal Transit Administration
Hymie Luden, Federal Transit Administration
Kathleen Forrest, Office of Historic Preservation
Tim Brandt, Office of Historic Preservation
Tim Watkins, Public Affairs Office of San Bernardino Associated Governments

2.5.28 DONN R. GREYDA (GREYDA-2)

2.5.28.1 Response to GREYDA-2.1

The commenter indicates that he has reviewed and commented on the Draft EIS/EIR for the Project. This comment is introductory to other comments and is not a comment on the environmental analysis for the Project. The commenter also states that his property (located at 21 W. Stuart Street in the City of Redlands) is located within the Project's Area of Potential Effect (APE) and a contributing property to the Santa Fe Depot Historic District. This property is identified in Table 3.12-3 of the Draft EIS/EIR as a contributing property to the Santa Fe Depot Historic District. This comment does not raise any issue related to the adequacy or findings of the Draft EIS/EIR.

2.5.28.2 Response to GREYDA-2.2

The commenter indicates a demonstrated interest in the Project and requests to be a formal consulting party under Section 106. FTA, Region 9, retains the authority to approve or deny the commenter's request. FTA provided a letter response to the commenter's request on October 1, 2014. As provided, FTA determined that no additional consulting parties outside those originally identified under the requirements of Section 106 will be added given that the Project will result in no adverse effect. The State Historic Preservation Officer (SHPO) provided its concurrence with the determination of no adverse effect to historic properties on August 14, 2014 (see Appendix M of the Final EIS/EIR).

2.5.28.3 Response to GREYDA-2.3

The commenter asserts that inappropriate archaeological methods were used to locate buried remains of Redlands Chinatown (CA-SBR-5314H). Within an archaeological site that is listed on the National Register of Historic Places (NRHP) or eligible/presumed eligible for the listing on the NRHP, SHPO considers testing excavation in excess of 4 cubic meters an adverse effect for purposes of Section 106 compliance. The presence/absence testing plan for portions of CA-SBR-5314H within SANBAG ROW was designed in consultation with SHPO, resulting in a testing methodology of portions of the site within the SANBAG ROW that consisted of shovel test units not to exceed a total of 4 cubic meters of excavated material (Draft EIS/EIR Appendix M (Cultural Resources Technical Memorandum), SHPO letter dated January 14, 2013 and included as part of Appendix C of the Cultural Resources Technical Memorandum). SHPO approved the plan on June 3, 2013. SANBAG in coordination with FTA will ensure that Mitigation Measure CUL-4 is implemented, which specifies that full time construction monitoring for archaeological deposits will be conducted in the Project APE within the Redlands Chinatown site boundary as well as a 50-foot buffer on each side of the site boundary. SHPO concurred with this approach in its letter provided on August 14, 2014.

2.5.28.4 Response to GREYDA-2.4

The comment requests clarification on a portion of the Mill Creek Zanja (CA-SBR-8092H) determined to not be eligible for the NRHP. Please refer to Master Response 14.

2.5.28.5 Response to GRENDA-2.5

The comment provides a summary of the Zanja and asserts that the identified segment has not lost enough integrity to warrant ineligibility. The commenter also states that the Redlands Conservancy has an active project to restore the setting to the identified portion of the Zanja through tree replanting and trail construction. Please refer to Master Response 14.

2.5.28.6 Response to GRENDA-2.6

The comment states that the Packard Motor Company Sale Office (36-017109) needs to be included in the engineering study identified in Draft EIS/EIR Mitigation Measure CUL-1. The comment also states that the current uses in the building (antiques and medical/surgery clinic) are sensitive to vibration and noise. The commenter notes that the construction along the tracks may be too far to qualify for the study but construction along Orange Street is immediately adjacent to the building. As identified in Draft EIS/EIR Mitigation Measure CUL-1 (see page 3.12-41), structural evaluations will be conducted for the five specified District contributor buildings (Redlands Depot, Cope Commercial Company Warehouse, Haight Packing House, Redlands City Transfer, and the brick warehouse at 440 Oriental Avenue) subject to construction-related vibration effects due to their location adjacent to the ROW and/or their primarily brick-masonry construction and age. Please refer to Response GRENDA 1.6 for information pertaining to the Packard Motor Company Sales Office building and construction-related vibration effects.

2.5.28.7 Response to GRENDA-2.7

The comment requests the implementation of a Quiet Zone at Orange Street, installation of vibration minimizing technologies (e.g., ballast mats) throughout the Santa Fe Depot Historic District, avoidance of sound barriers within the historic district, and use of appropriate fencing types (i.e., rod iron) within the historic district. Please refer to Master Responses 1, 2, and 3.

2.5.28.8 Response to GRENDA-2.8

The commenter disagrees with the extent of Native American consultation provided for the Project and recommends that the lead agencies speak to representatives from the San Manuel Band of Mission Indians about the Mill Creek Zanja. Multiple outreach efforts from the lead agencies have been made since 2010 to solicit input from local Native American Tribes (see pages 6-4 through 6-6 of the Draft EIS/EIR and pages 3-7 through 3-9 of Appendix M of the Draft EIS/EIR). This includes direct coordination with Supervisor James Ramos, past Chairman of the San Manuel Band of Mission Indians, who chairs the Rail to Redlands Working Group. Please refer to Master Response 9 for additional information on Project outreach and noticing efforts and Master Response 14 for discussion of the Mill Creek Zanja.

2.5.28.9 Response to GRENDA-2.9

The comment recommends the implementation of a Quiet Zone at Orange Street, installation of vibration minimizing technologies (e.g., ballast mats) throughout the Santa Fe Depot Historic

District, and the avoidance of sound barriers within the historic district as ways to reduce noise and vibration within the APE. Please refer to Response GRENDA-2.7.

2.5.28.10 Response to GRENDA-2.10

The comment recommends that construction activities between Eureka Street and Orange Street be conducted at night or relocate the offices of Statistical Research, Inc. during construction due to concerns relating to construction noise during current business hours. The comment's request to complete construction activities between Eureka and Orange Streets during nighttime hours would be in conflict with Redlands Municipal Code (Section 8.06.090), which restricts construction activities to the hours between 7 AM and 6 PM during weekdays and Saturdays.

2.5.28.11 Response to GRENDA-2.11

The comment states that intersection improvements and traffic concerns at the Orange/Stuart Street intersection need to be addressed. Traffic conditions for the intersection of Orange Street and Stuart Avenue under existing conditions (2011), opening day (2018), and future conditions (2038) with and without the Project were modeled in the traffic report provided in Appendix E of the Draft EIS/EIR. Based on the modeling results, the Project would not result in a change in level of service (LOS) or exceed the volume to capacity ratio (V/C) in 2018. As provided in Tables 3.3-7 and 3.3-12 of the Draft EIS/EIR, the LOS for the Orange/Stuart intersection would operate at a LOS D during the PM peak hour with or without the Project under future conditions (2038). As a result, the Project's impact is less than significant.

2.5.28.12 Response to GRENDA-2.12

The comment states that an alternative location (which currently houses a parking garage) for the Downtown Redlands Station did not include mitigation for potential parking impacts. The commenter asserts that the Redlands Chinatown would be impacted due to inappropriate archaeological methods used. The Project currently proposed by SANBAG and the subject of the Draft EIS/EIR is separate from the Park Once Project proposed by the City of Redlands. Although the Project proposes to use parking facilities developed as part of the Park Once Project, as described on page 2-31 and Table 2-5 of the Draft EIS/EIR, if such facilities are not constructed by the City of Redlands, SANBAG would develop a smaller surface lot at the same location. The construction of a surface lot at this location would require compliance with Mitigation Measure CUL-4, which requires construction monitoring in the vicinity of the Redlands Chinatown resource during ground disturbing construction activities. Therefore, with the prescribed mitigation, the impact is considered less than significant. Please refer to Response GRENDA-2.3 for information relating to the archaeological methods used for Redlands Chinatown.



From: Donn Grenda <dgrenda@srircrm.com>
Date: September 3, 2014 at 3:09:47 PM PDT
To: Tim Watkins <twatkins@sanbag.ca.gov>
Cc: "Roland-Nawi, Carol@Parks" <Carol.Roland-Nawi@parks.ca.gov>
Subject: Request to be a consulting party under Section 106 for the Redlands Passenger Rail Project

Donn Grenda-3

Tim,

Thanks for getting back to me.

As a business and property owner in the project APE and as an occupant of a National Register listed property in the APE, I have a demonstrated economic and historic interest in the project and formally request to be a consulting party under Section 106 of the National Historic Preservation Act. I have numerous concerns about how the project will impact my ability to conduct business and the potential impacts to my fragile historic building immediately adjacent to the tracks.

GRENDA-3.1

I am currently writing down my concerns relating to noise and vibration, cultural resources (the Santa Fe Depot Historic District, Redlands Chinatown, and the Mission Zanja), traffic concerns, socioeconomic impacts, and the 4(f) analyses and will attend the public meeting tomorrow. I will, however, be out of the country for the next couple of weeks and may not get all of my concerns written down.

GRENDA-3.2

Please add me to the list of consulting parties. I would like to discuss my concerns with all involved.

On Sep 3, 2014, at 12:41 PM, "Donn Grenda" <dgrenda@srircrm.com> wrote:

Redlands Passenger Rail Project staff,

I left a message on the help line last week but nobody has returned my call. I am a property owner in the Santa Fe Depot Historic District, a business owner in the district, an archaeologist, and a member of the Redlands Conservancy and the City of Redlands Historic and Scenic Preservation Commission. I have reviewed the EIS and have a number of concerns and issues that I would like to discuss with someone from SANBAG.

GRENDA-3.3

I am planning to attend the public meeting tomorrow evening but the Historic and Scenic Preservation Commission has a meeting at 6:00 so I won't have enough time to talk about my concerns. I will be out of town for the meeting in San Bernardino. Please let me know when someone is available to discuss noise and vibration concerns, the cultural resources assessment, traffic mitigation, the socioeconomic study, and the 4(f) analysis.

GRENDA-3.4

Thank you,

Donn R. Grenda, Ph.D., RPA
President, Statistical Research, Inc.
P.O. Box 390
Redlands, CA 92373-0123



2.5.29 DONN R. GREENDA (GREENDA-3)

2.5.29.1 *Response to GREENDA-3.1*

Please refer to Response GREENDA-2.2.

2.5.29.2 *Response to GREENDA-3.2*

Please refer to Responses GREENDA-2.3, 2.4, 2.7, 2.11, and 2.12.

2.5.29.3 *Response to GREENDA-3.3*

Please refer to Response GREENDA 2.1. SANBAG responded to the commenter's email on September 3, 2014 to provide information on where the document can be downloaded from SANBAG's website.

2.5.29.4 *Response to GREENDA-3.4*

SANBAG notes the commenter's attendance at the Public Meeting on September 4, 2014. Issues related to traffic, cultural resources, socioeconomics, and Section 4(f) are addressed in Sections 3.3, 3.12, 3.14, and 3.16 of the Draft EIS/EIR, respectively.



Donn Grenda-4

Mitch,

We spoke at the recent public meeting in Redlands and I have just returned from my trip to Turkey and wanted to follow up on our conversation about a few issues concerning my historic building at 21 West Stuart. I understand the closing date for comments was yesterday but I have a few issues that I would like you, or someone from SANBAG to address. I understand your desire to have me write down my concerns but it would be preferable to have a SANBAG engineer/representative sit down with me to discuss my concerns.

GRENDA-4.1

One of the bigger problems is that I am not an engineer or physicist so I don't understand statements in the EIS like..."Thus, the response of humans, buildings, and sensitive equipment to vibration is described in this section in terms of the root-mean square (RMS) velocity level in VdB units relative to one micro-inch per second" (Section 3.6, EIS). I understand that an engineer will conduct of study to determine if anything needs to be done to ensure that the my building will not sustain damage during construction but the numbers are baffling to me. It seems like the construction vibration level of 0.995 inches/second PPV being nine times the corresponding damage criteria level of 0.12 inches/second PPV is excessive and will likely create impossible working conditions in my office. Similarly, predicted vibration levels for passing trains is 74 VdB and the damage threshold is 90 VdB. This seems very close to damaging levels and certainly too high for the Santa Fe Depot Historic District. I would like to discuss the vibration/noise issue with someone who can explain these numbers to me in plain English.

GRENDA-4.2

GRENDA-4.3

GRENDA-4.4

Orange Street Crossing is in within the Santa Fe Depot Historic District. I would like to discuss ways to reduce noise and vibration at the intersection and within the larger historic district APE. The tracks within the historic district should use ballast mats or resiliently supported ties to minimize vibration. Train horn blasts should be eliminated from the Orange Street crossing and sound walls should not be used within the historic district.

GRENDA-4.5

GRENDA-4.6

Finally, construction between Eureka and Orange should be conducted at night or the project should relocate the offices of Statistical Research, Inc. during construction. Our work hours are 8:00 am to

GRENDA-4.7



6:00 pm and the extreme noise and vibration inside the historic structure will be extremely disruptive to our work environment. My employees conduct tasks such as artifact analysis and report writing and constant vibration and noise will make our work nearly impossible. Thank you for listening to my concerns.

GREENDA-4.7
Continued

Sincerely,

Donn

Donn R. Grenda, Ph.D., RPA
President, Statistical Research, Inc.
P.O. Box 390
Redlands, CA 92373-0123

(909) 335-1896 (voice)
(909) 335-0808 (fax)

www.sricrm.com

2.5.30 DONN GREENDA (GREENDA-4)

2.5.30.1 Response to GREENDA-4.1

SANBAG notes the comment's concerns relate to the historic property located at 21 West Stuart Street and immediately north of SANBAG's right-of-way (ROW).

2.5.30.2 Response to GREENDA-4.2

The comment refers to vibration levels used in the Draft EIS/EIR. Please refer to Master Response 7, Vibration Assessment, for additional discussion regarding vibration.

2.5.30.3 Response to GREENDA-4.3

The comment refers to the Mitigation Measure CUL-1, which proposes a pre- and post-construction structural evaluation to address maximum allowable levels of vibration during construction and, if appropriate, any stabilization measures in conjunction with vibration monitoring. The commenter's subject property would be subject to this mitigation requirement.

2.5.30.4 Response to GREENDA-4.4

The vibration analysis applies a worst-case vibration level of 0.210 PPV (or 94 VdB), which is representative of a vibratory roller (see Table 3.6-4). A vibration level of 0.995 PPV is not applied in the analysis (see pages 3.6-39 to 3.6-41) and SANBAG is not aware of an equipment type that generates a corresponding vibration level. Based on the vibration levels applied for the analysis of construction-related vibration, the vibration level applied exceeds the thresholds for fragile (0.20 PPV) and very fragile buildings (0.12 PPV), but not be the order of magnitude identified in the comment.

Please refer to Master Response 7, Vibration Assessment, for additional clarification on the analysis of Project-related operational vibration (i.e., passing trains).

2.5.30.5 Response to GREENDA-4.5

SANBAG notes the commenter's interest in minimizing operational-vibration related impacts from the Project to the Redlands Santa Fe Depot Historic District. As provided in Section 3.6.4 of the Draft EIS/EIR, SANBAG has proposed a range of mitigation measures to address noise and vibration, pending further site-specific acoustical testing, including the installation of ballast mats or compatible technologies.

2.5.30.6 Response to GREENDA-4.6

SANBAG notes the commenter's preference for the implementation of quiet zones at Orange Street as part of the Project. Please refer to Master Response 3.

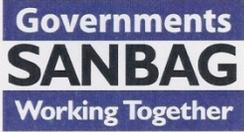


2.5.30.7 Response to GRENDA-4.7

Please refer to Response GRENDA-2.10.



James Hammond-1



Thank you for your interest in the Redlands Passenger Rail Project.

San Bernardino Associated Governments (SANBAG) would like to accurately and personally address your questions and concerns. Please complete the contact information below and indicate the best way to reach you.

CONTACT INFORMATION

Name: JAMES HAMMOND

Street Address: 1000 PACIFIC ST

City: REDLANDS State: CA Zip Code: 92373

Phone: (909) 552-8411 Cell: ()

Email: j.hammond@jhamon.com FAX: ()

Are you a local business owner? Yes: No:

If so, please name the business: _____

Preferred Contact Method: (Please check one)

By Phone: Email: FAX: In Writing:

YOUR COMMENTS/QUESTIONS Will current, unused, rail lines be used? If not, why not? Who owns old downtown train station? How much is he asking for it? How does it compare with cost of building new station next to old? Chooza beat out BCSF?

Thank you for your input on the Redlands Passenger Rail Project.

To provide comments or questions, send an email to RPRP_Public_Comments@sanbag.ca.gov or call the project helpline at (855) SBR-RAIL / 727-7245.

-] HAMMOND-1.1
-] HAMMOND-1.2
-] HAMMOND-1.3

2.5.31 JAMES HAMMOND (HAMMOND-1)

2.5.31.1 Response to HAMMOND-1.1

The comment requests clarification on if current unused rail lines would be utilized for the Project. SANBAG is proposing to construct the Project within its existing right-of-way. The existing rail and rail ties will be removed and disposed of or recycled in accordance with local, state, and federal regulations. Ballast and sub-ballast materials would be reused to the extent feasible. This comment does not address the adequacy or findings of the Draft EIS/EIR.

2.5.31.2 Response to HAMMOND-1.2

The comment requests clarification on current ownership of the old downtown train station. Based on the ownership information provided in Appendix D2 of the Draft EIS/EIR, the Redlands Santa Fe Depot (Depot) property is owned by Showprop Redlands LLC. The Project would require a TCE at the northeastern corner of the Depot property; however, no fee acquisition is proposed. This comment does not address the adequacy or findings of the Draft EIS/EIR.

2.5.31.3 Response to HAMMOND-1.3

The comment requests clarification on why a new train station would be built next to the old train station. The proposed platform for the Downtown Redlands Station would be located to the north of the tracks and west of the existing Depot (see Draft EIS/EIR, page 2-37 and Figure 2-4E on page 2-39). The current platform location was selected based on its connection to nearby parking (planned) and to avoid any alteration of the Depot. The Depot is a historic property listed on the National Register of Historic Places and, as a result, any changes to the Depot to accommodate a station platform would require a detailed evaluation along with consultation with the State Historic Preservation Officer (SHPO). Given that the platform would be required to have the same basic amenities regardless of its placement, the placement of the platform at the historic Depot would like entail greater costs due to the need to follow the Secretary of Interior's Standards for the Treatment of Historic Properties. This comment does not raise any issue related to the adequacy or findings of the Draft EIS/EIR.



James Hammond-2

James Hammond, Ph.D. Environment Consultant
1010 Pacific Street, Redlands, CA 92373 cell: 909-557-0591 email: ja.hammond@juno.com

TO:

Mitchell A. Alderman, P.E., Director of Transit & Rail programs. SANBAG
West 3rd Street, 2nd Floor, San Bernardino, CA 92410

SUBJECT: REDLANDS PASSENGER RAIL PROJECT

Dear Mr. Alderman,

According to information given on the meeting at ESRI on September 4, the extension of the light rail system will use **ONLY EXISTING RAIL RIGHTS OF WAY**, and extend to the Redlands old downtown station. I believe you told us that the old station was owned by a private company, so tha you would need to build another station next to it.

HAMMOND-2.1

Is this correct?

If that is what you are planning, I suggest a less expensive alternative.

BUY BACK THE OLD STATION. How much money does the current owner want for it?
EVALUATE THE COMPLETE COST OF BUILDING A NEW STATION AND ITS SUPPORTING STRUCTURES, PARKING AREA, AND NEW RAILS WITH NEW RIGHT OF WAY.
COMPARE COSTS. If the cost of building a new station is near, or exceeds the purchase price of the old one, then buy the old one.

HAMMOND-2.2

A FURTHER CONSIDERATION IS THE AGE OF THE OLD STATION. IT IS A REDLANDS HISTORICAL LANDMARK.

HAMMOND-2.3

You also stated that the rail line would be extended to the University of Redlands campus. Why stop there? The old system continued on into Mentone, and beyond.

HAMMOND-2.4

Thank You for your consideration,

James Hammond

2.5.32 JAMES HAMMOND (HAMMOND-2)

2.5.32.1 Response to HAMMOND-2.1

The comment states that information given on the public outreach meeting in September (year not provided) indicated that the light rail system would be constructed only within existing rail right-of-way (ROW) and adjacent to the Redlands Santa Fe Depot. As noted on page 2-43 of the Draft EIS/EIR, some property acquisitions would be required. Additionally, it is important to clarify that SANBAG has removed the light rail modal option from further consideration as provided on page 2-57 of the Draft EIS/EIR. As indicated on page 2-17 of the Draft EIS/EIR, the three modal options currently under consideration include two types of diesel locomotives (F-59 and MP-38) and a diesel multiple unit (DMU). Please also refer to Master Response 8 regarding land acquisition associated with the Project.

2.5.32.2 Response to HAMMOND-2.2

The comment requests clarification on the current ownership of the Redlands Santa Fe Depot (Depot). The comment also recommends comparing costs associated with buying back the Depot versus constructing a new station. As identified in Draft EIS/EIR Section 3.12 (page 3.12-26), the Depot is privately owned. The placement of the station platform at the existing Depot would require the same types of facilities as proposed under the Project, but would also require that SANBAG acquire the property, thereby adding to the station's expense. Additionally, since the Depot is listed on the National Register of Historic Places (NRHP), all improvements to the Depot would be required to follow the Secretary of Interior's guidelines for the Treatment of Historic Properties. This would result in additional costs for the proposed station. Based on these factors and considerations, the development of a station platform at the Depot would be more expensive than the station concept proposed as part of the Project.

2.5.32.3 Response to HAMMOND-2.3

The comment states that the age of the Depot should be taken into consideration and that the Depot is a Redlands Historical Landmark. Please refer to Response HAMMOND-2.2.

2.5.32.4 Response to HAMMOND-2.4

The comment requests clarification as to why the Project would stop at the University of Redlands campus and not continue on into the community of Mentone and beyond. The comment is correct in that passenger service would not be extended to the University of Redlands as part of the Project. No additional station stops were considered to the east of University Avenue as part of the EIS/EIR. This project is to address the transpiration needs of the Redlands Corridor as identified in SANBAG's Measure I Strategic Plan and the SCAG Regional Transpiration Plan (2012). Considering agency efforts to reduce air pollution and greenhouse gas emission to comply with state mandates and, if future demands warrant, service could be extended to the community of Mentone and beyond pending additional environmental analysis. This comment does not raise any issue related to the adequacy or findings of the Draft EIS/EIR.



Michael Harris

From: [Mitch Alderman](#)
To: [Meyer, Clint](#); [Angela Meluski](#); [Robert Chavez](#); [Justin Fomelli](#); [Boraks, Michael](#)
Subject: Fwd: Train
Date: Tuesday, September 09, 2014 11:41:21 AM

Begin forwarded message:

From: Michael Harris <michaelaharris40@icloud.com>
Date: September 9, 2014 at 10:59:13 AM PDT
To: "malderman@sanbag.ca.gov" <malderman@sanbag.ca.gov>
Subject: Re: Train

Waste of taxpayer \$. Like that bus that runs from cal state San Bdno to Loma Linda! What a waste!

] HARRIS-1

Sent from my iPhone

On Sep 9, 2014, at 10:53, Michael Harris <michaelaharris40@icloud.com> wrote:

Waste of taxpayer ?

M Harris

Sent from my iPhone



2.5.33 MICHAEL HARRIS (HARRIS)

2.5.33.1 *Response to HARRIS-1*

The comment expresses an opinion on the expenditure on money for the Project. The comment does not address the adequacy or findings of the Draft EIS/EIR.



Bill Hatfield

Hi Justin, thanks for taking the time to talk with me about the project. As I said on the call I and my fellow land owners would be very opposed to the closing of 7th and 9th streets. Without the use of these 2 streets we would be forced to send all of our repair and sales test drives onto busy Redlands Blvd. As it is now we require our employees to road test all service vehicles on 7th St to Stuart St, right on Stuart to 9th St and back to the dealership. We don't want our employees driving customer cars on Redlands Blvd anymore then required. It also is very problematic for all of our service customers to now be required to leave the service dept on 7th St and have to use Redlands Blvd. Making a left turn onto Redlands Blvd. is not easy or safe. At certain times of the day the traffic will back up on Redlands Blvd. from 6th St east to 7th and make it impossible to turn either way on Redlands Blvd. We also have many out of town customers who arrive via the 6th St Freeway off ramp and they use Stuart St to 7th and arrive that way to avoid Redlands Blvd.. Customers arriving from the west exit Eureka St and go straight ahead on Pearl to 6th go Right onto Stuart St to 7th and into the Service Dept. It seems to me these closures will add an additional traffic burden to an already busy Redlands Blvd.

Another problem I believe is being created with these closures is the creation of another divider between North and South Redlands, just as the Freeway divided the city many years ago. The area between 7th and 9th is already a depressed area and further isolating it will not help. What does this do to property values in that area now that there are no direct roads to them? Would this fly in a more affluent area?

- HATFIELD-1
- HATFIELD-2
- HATFIELD-3
- HATFIELD-4
- HATFIELD-5
- HATFIELD-6
- HATFIELD-7
- HATFIELD-8
- HATFIELD-9

I would be happy to personally walk with any of you to show you the real situation in our area. As a third generation Redlands I'm sorry no one took the time to get the property owners input on this, this is a BIG deal for us, and to find out at the last minute is quit frustrating. Thank you for your help on this matter.

Bill Hatfield
 Hatfield Buick GMC
 909-793-3238

2.5.34 BILL HATFIELD (HATFIELD)

2.5.34.1 Response to HATFIELD-1

The comment expresses opposition to the closing of 7th and 9th Streets in the City of Redlands. This comment states a preference and does not raise any issues related to the adequacy or findings of the Draft EIS/EIR.

2.5.34.2 Response to HATFIELD-2

The comment raises concerns as to the impact of the proposed closures of the at-grade crossings at 7th and 9th Streets on existing business operations. Please refer to Master Responses 3 and 4. SANBAG would also note that it appears that the current point of access necessitates traffic movements on and of Redlands Boulevard. Although alternative paths of travel are available for test drives that would minimize interactions with Redlands Boulevard, it appears that full avoidance would not be feasible even under existing conditions. More specifically, if operations were adjusted to take advantage of Central Avenue, test drives could continue to use a route consisting of right turn only movements. This new path of travel would originate on Redlands Boulevard (similar to existing conditions) and travel west to 6th or Orange Streets before turning right and proceeding north. At Stuart Street, travel would then proceed east via a right turn back to Church Street. At Church Street, travel would proceed south (via a right turn) to Central Avenue or E. State Street. At Central Street or E. State Street travel would proceed back west (via a right turn) to Redlands Boulevard (or 9th Street to Redlands Boulevard by Central Street). SANBAG will continue to reach out to the City and interested stakeholders during the Project's final design process in order to minimize disruptions to existing businesses.

2.5.34.3 Response to HATFIELD-3

The comment states that current traffic conditions on Redlands Boulevard limits people leaving the subject property in a safe or efficient manner. SANBAG notes the queuing observed by the commenter on Redlands Boulevard, between 6th and 7th Streets. Please refer to Response HATFIELD-2. This comment does not raise any issues related to the adequacy or findings of the Draft EIS/EIR.

2.5.34.4 Response to HATFIELD-4

The comment states that customers travelling to the subject property use alternative routes (which include the use of 7th Street) to reach the service department and avoid use of Redlands Boulevard. SANBAG completed traffic modeling in support of the traffic analysis provided in Section 3.3 of the Draft EIS/EIR (see Appendix E), which addresses operational traffic circulation. Please refer to Master Response 13. Based on the results of the modeling for the Project, intersections modeled along Redlands Boulevard at Eureka Street, Orange Street, and Citrus Avenue would operate at an acceptable level of service (LOS) during the morning and evening peak hours in both the opening day (2012) and future year conditions (2038).

2.5.34.5 Response to HATFIELD-5

The comment states that the closure of 7th and 9th Streets would add an additional traffic burden to Redlands Boulevard. Please refer to Master Response 4.

2.5.34.6 Response to HATFIELD-6

The comment states that the closure of 7th and 9th Streets will further contribute to the division between north and south Redlands. This issue is addressed in Section 3.2 of the Draft EIS/EIR (see pages 3.2-22 through 3.2-23 and 3.2-31 through 3.2-36). It is important to note that the existing railroad right-of-way is an established feature and transportation route that was in existence for more than 100 years. Existing development patterns within Redlands are partly a consequence of the railroad's presence (see page 3.2-23) and part of the existing condition. As provided on page 2.2-24 of the Draft EIS/EIR, if sound barriers are erected along the corridor, these features could result in further division of existing communities and this indirect effect would represent a significant adverse effect. However, if quiet zones are implemented in place of sound barriers, the Project's effect would not be adverse and considered less than significant.

2.5.34.7 Response to HATFIELD-7

The comment states that the area between 7th and 9th Street is economically depressed and that the closures will further exacerbate this condition. SANBAG prepared an economic impact analysis as part of the Draft EIS/EIR, which is provided in Appendix N. Property values were not specifically looked at as part of the study. However, over the long term and as discussed in Section 4.3.13 of the Draft EIS/EIR, with the implementation of other cumulative projects, other incremental economic benefits could result; however, the specific changes remain too speculative for analysis. Please refer to Master Response 15.

2.5.34.8 Response to HATFIELD-8

The comment requests clarification on property value impacts associated with the closure of 7th and 9th Streets. The commenter also inquires if the closures would happen in a more affluent area. Please refer to Master Response 15.

2.5.34.9 Response to HATFIELD-9

The commenter offers to meet with SANBAG staff to show existing conditions in the area. The commenter also states that property owners were not given an opportunity to provide input on the Project. Please refer to Master Response 9 (Project Noticing).



INLAND EMPIRE BIKING ALLIANCE

Inland Empire Biking Alliance

Mitchell A. Alderman, P.E.
Director of Rail & Transit Programs, SANBAG
1170 W. 3rd St., 2nd Floor
San Bernardino, CA 92410

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

Dear Mitch or Whom It May Concern,

The Inland Empire Biking Alliance has received the Notice of Availability of a Draft Environmental Impact Statement/Environmental Impact Report for the Redlands Passenger Rail Project, State Clearinghouse No. 2012041012 and we are providing the following response. In general, we at the Alliance have an overall favorable view of the concept of (re-)establishing passenger rail service further east in the San Bernardino Valley to Redlands. But while we do like the general concept, we have a few qualms about several small details of the project or its mitigation measures as currently planned. Unfortunately, the traffic analysis for this project was unable to take advantage of the CEQA guidelines focused on VMT instead of LOS, so even a project meant to reduce traffic ends up being constrained by it.

IEBA-1

IEBA-3

By far, the biggest issue that we have noticed is the addition of dedicated right turn lanes or pockets in various locations. In Appendix E, several intersections identified for mitigation treatments include the addition of the aforementioned facilities and we believe that these treatments amount to a decrease in performance for bicycle facilities according to the Effect Criteria in section 3.3.3.1 of Chapter 3. Specifically, the addition of right turn lanes at the intersection of Anderson St. and Redlands Blvd. as identified on page 2-20 of Appendix E, the right turn pockets as part of 6.2.3 #s 16, 17, 27, and 28, and the dual southbound rights on California St. as identified by 7.2.2 #2 all constitute hazards to riders and have an effect on road safety by creating unpredictable merging movements by bicyclists to avoid the dedicated right turn lanes and pockets. This results in an increased road hazard and we'd like SANBAG, Caltrans, and the respective cities to ensure that adequate accommodations for bicyclists are provided at all intersections that are changed in such a manner under the project.

IEBA-4

IEBA-5

IEBA-6

We are also concerned about the proposed widening of Orange Show Rd. at Waterman Ave. and the general enlargement of that entire intersection area as proposed by 6.2.3 #4 of Appendix E. Both thoroughfares are already intimidating for non-motorized users and the intersection of the two also provides an unsavory experience to those users. Considering its proximity to the proposed station at Waterman Ave., we would like to see a better solution chosen for the intersection that does not result in it expanding even more. Recent legislative advancements at the State and Federal levels mean that both

IEBA-7

P.O. BOX 9266 Redlands, CA 92375

www.iebike.org

909.800.4322



INLAND EMPIRE BIKING ALLIANCE

cycletracks and bike-specific signal heads can be used. We would be interested in seeing a solution for this intersection that incorporates both of those treatments.

IEBA-7
Continued

Figure 3.3-2 of the DEIS/EIR document shows a limited number of bicycle routes that remain unfinished at the moment, but the City of Redlands is in the process of developing and adopting a more comprehensive Bicycle Master Plan. Improvements identified in it include progress on the Class I Orange Blossom Trail and several miles of Class II bike lanes as well as the possibility for Class IV cycletracks, which have recently been authorized for use in the State by Governor Brown's signing of Assembly Bill 1193. We at the Alliance are supportive of the concept of cycletracks, but we would like to ensure that intersection treatments to meet LOS requirements do not result in inadequate facilities for bicycle riders.

IEBA-8

IEBA-9

We are also interested in the final design chosen for the intersection of the Santa Ana River Trail and the Project at the site of Bridge 3.4 over the Santa Ana River. We would like to see a solution that maximizes access time to the pathway for all users. We encourage SANBAG to continue to work with San Bernardino County Parks and San Bernardino County Flood Control District to identify a final design that would accomplish that goal and enhance the usability of the SART. Additionally, we would like to see a final design for Bridge 3.4 itself that includes provision for a bike/ped pathway along the side of the bridge that can continue on as a 'rail-with-trail' implementation that directly connects the Waterman Ave. Station with the SART to further enhance the RPRP corridor and the multimodal potential that it holds.

IEBA-10

IEBA-11

One area that is often overlooked in projects is accommodations for bikes during the construction process. We are pleased to see that several references were made to the topic and that a plan is in place to maintain connectivity during construction. We'd like to ensure that any detours necessary during construction provide a facility of equal or better quality for use by detour riders. Additionally, we would like SANBAG to oversee the placement of signage to ensure that it does not block any bikeways that are not being closed and create unsafe hazards in them.

IEBA-12

IEBA-13

Our final area of interest is in the bicycle parking that is to be included and provided at the train stations for riders. We would like to confirm that there will be parking available beyond the 62 'bike lockers' that are mentioned as being available throughout the total project. While some people will certainly bring their bikes on board the train, high-quality bike parking can also attract more users to arrive on two wheels. We would like to encourage SANBAG to use high-capacity designs that securely maximize storage while minimizing their footprint. We would also ask 'wave racks' be avoided as they have serious design flaws that severely reduce their capacity and security.

IEBA-14

IEBA-15

The Alliance looks forward to the successful completion of the project and the associated improvements that it will bring to the lives of those in the area. We hope to see an improvement in bicycling conditions in the area as a result of this project even though it is not directly a bike-related

IEBA-16



INLAND EMPIRE
BIKING ALLIANCE

project. The potential to reduce car trips and create a road environment that is more conducive for riding is appealing to us. Please feel free to contact us with any further questions, comments, or clarifications necessary. Thank you for your time.

IEBA-16
Continued

Sincerely,

Mark Friis, Executive Director

Dan Meier, President

Marven E. Norman, VP





2.5.35 INLAND EMPIRE BIKING ALLIANCE (IEBA)

2.5.35.1 Response to IEBA-1

The comment states that the Inland Empire Biking Alliance's (IEBA) received the notice of availability (NOA) for the Draft EIS/EIR, which was released and noticed on August 6, 2014. The comment also states general support for establishing passenger rail service along the Redlands Corridor. The comment does not raise any specific issues related to the content or findings of the Draft EIS/EIR.

2.5.35.2 Response to IEBA-2

The IEBA states general support for establishing passenger rail service along the Redlands Corridor, however, they have "qualms" regarding small details of the project and planned mitigation measures. This comment expresses an opinion and does not raise any specific issues related to the details and mitigation measures contained in the Draft EIS/EIR.

2.5.35.3 Response to IEBA-3

The comment notes that the Project traffic study was unable to take advantage of recent CEQA legislation (SB 743), which changes the focus on a CEQA traffic analysis from level of service (LOS or delay) to vehicle miles traveled (VMT). This comment expresses an opinion and does not raise any issues related to the adequacy or findings of the Draft EIS/EIR.

2.5.35.4 Response to IEBA-4

The comment expresses concerns related to the incorporation of dedicated right turn lanes (or pockets) at locations where traffic mitigation is proposed due to a potential decrease in performance of existing bicycle routes. The comment specifically cites the significance criteria in Section 3.3.3 relating the impacts to alternative forms of transportation. Improvements outlined in Mitigation Measures TR-2, TR-3, and TR-4 would be installed in compliance with City standards and would maintain existing bicycle facilities where they exist today. Additionally, SANBAG has modified Mitigation Measure TR-2 to include consideration to non-motorized forms of transportation.

2.5.35.5 Response to IEBA-5

The comment states that the addition of right turn lanes or pockets to select that constitute hazards to riders and road safety. SANBAG appreciates the commenter's identification of the bicycle safety concerns at the intersection of Anderson and Redlands Boulevard. Please refer to Response IEBA-4.

2.5.35.6 Response to IEBA-6

The commenter requests to maintain adequate accommodations for bicycles at all changed intersections as part of the Project. Note that bicycle facilities are included as part of the Project



(see Table 2-5 of the EIS/EIR) and SANBAG is cognizant of the need to integrate non-motorized forms of transportation into its projects. Please refer to Response IEBA-4.

2.5.35.7 Response to IEBA-7

The commenter expresses concerns to the further widening of the intersection of Waterman Avenue and Orange Show Road in San Bernardino as part of Mitigation Measure TR-2. The comment also states that both thoroughfares are not friendly to bicyclists and recommends that a better solution be chosen for the intersection that includes cycle tracks and bike-specific signal heads. The cited intersection is under the City of San Bernardino's jurisdiction. In its coordination with the City of San Bernardino as part of the Project's final design, SANBAG will inform the City of IEBA's concerns. Please refer to Response IEBA-4.

2.5.35.8 Response to IEBA-8

The commenter states that the Draft EIS/EIR identifies that a number of bicycle routes remain unfinished, including the Orange Blossom Trail, several miles of Class II bike lanes, and Class IV cycle tracks. SANBAG notes the preparation of a comprehensive Bicycle Master Plan by the City of Redlands. This comment does not address the adequacy or findings of the Draft EIS/EIR.

2.5.35.9 Response to IEBA-9

The commenter's states their general support for cycle tracks and concerns related to the degradation of bicycle facilities as a consequence of roadway improvements aimed at improving LOS to reduce vehicle delay. This comment does not address the adequacy or findings of the Draft EIS/EIR.

2.5.35.10 Response to IEBA-10

The commenter expressed an interest in the Santa Ana River Trail crossing at Bridge 3.4. The commenter also recommends the continued agency coordination between SANBAG, San Bernardino County Parks, and the San Bernardino County Flood Control District for the Santa Ana River Trail and its usability. As identified in Draft EIS/EIR Mitigation Measure PSC-1, SANBAG is coordinating the development of the trail and the crossing at the Santa Ana River Trail to enhance usability.

2.5.35.11 Response to IEBA-11

The commenter is interested in the final design chosen for the intersection of the Santa Ana River Trail and Project at the Bridge 3.4 site. The commenter recommends the provision of a trail connecting Waterman Station to the Santa Ana River Trail via a pedestrian bridge at Bridge 3.4. If the Project is approved, SANBAG would be interested in looking at funding options to cover the costs of such an addition, which would be subject to additional environmental review. This comment does not raise any issues related to the adequacy or findings of the Draft EIS/EIR.

2.5.35.12 Response to IEBA-12

The comment notes that the Draft EIS/EIR makes references to considering bicycle detours during construction. The comment requests that any detours necessary during construction provide a facility of equal or better quality for use by bicyclists. As identified in the Draft EIS/EIR Section 3.3 (see page 3.3-32), Mitigation Measure TR-1, includes preparation of a Traffic Management Plan that would include pre-planning, outreach, and signage indicating pedestrian and bicycle route detours during Project construction. SANBAG will require its contractor to make every accommodation possible for existing bike facilities during construction consistent with Mitigation Measure TR-1.

2.5.35.13 Response to IEBA-13

The commenter requests that SANBAG oversee the placement of construction signage to ensure that no unsafe hazards are created in existing bikeways and that bikeways that are to remain open are not blocked. SANBAG and the Cities of San Bernardino and Redlands will be responsible for ensuring that the signage installed or relocated in conjunction with the Project follows federal, state, and local standards, as applicable. This comment does not address the adequacy or findings of the Draft EIS/EIR.

2.5.35.14 Response to IEBA-14

The commenter requests clarification that adequate bike parking will be available beyond the 62 bike lockers located throughout the Project. As provided in Table 2-5 (page 2-36) of the Draft EIS/EIR, the Project would include up to 62 bicycle lockers distributed amongst the five station stops. If demand exceeds the proposed accommodations, sufficient area is included at each of the station platforms to allow for the future expansion of these facilities.

2.5.35.15 Response to IEBA-15

The commenter's requests the use high-capacity bicycle lockers and to avoid the use of "wave racks" due to safety and capacity concerns. This comment expresses an opinion and does not raise any issues related to the adequacy or findings contained in the Draft EIS/EIR.

2.5.35.16 Response to IEBA-16

The commenter expresses general support for alternative transportation and hopes to see an improvement in bicycling conditions in the area with implementation of the Project. This comment expresses an opinion and does not raise any issues related to the adequacy or findings contained in the Draft EIS/EIR.



Cecil Karstensen



Thank you for your interest in the Redlands Passenger Rail Project.

San Bernardino Associated Governments (SANBAG) would like to accurately and personally address your questions and concerns. Please complete the contact information below and indicate the best way to reach you.

CONTACT INFORMATION

Name: CECIL KARSTENSEN

Street Address: 1393 WARD WAY

City: MENLO PARK State: CA Zip Code: 94025

Phone: 909, 294-7221 Cell: 909, 384-2448

Email: MRCECILK@YAHOO.COM FAX: _____

Are you a local business owner? Yes: No:

If so, please name the business: _____

Preferred Contact Method: (Please check one)

By Phone: Email: FAX: In Writing:

YOUR COMMENTS/QUESTIONS *I am curious about ground cover or minimal landscaping within right-of-way. I realize people violate fencing.*

Thank you for your input on the Redlands Passenger Rail Project.

To provide comments or questions, send an email to RPRP_Public_Comments@sanbag.ca.gov or call the project helpline at (855) SBR-RAIL / 727-7245.

KARSTENSEN-1



2.5.36 CECIL KARSTENSEN (KARSTENSEN)

2.5.36.1 *Response to KARSTENSEN-1*

The comment requests clarification on landscaping or groundcover that would be placed within the right of way. The Project will avoid the placement of landscaping within the right-of-way to facilitate ongoing maintenance. Landscaping will be limited to the station platform locations and fencing will be used to discourage trespassing. This comment does not address the adequacy, content, or findings of the Draft EIS/EIR.



Deanna Kogel

Date: Saturday, September 27, 2014 2:32:07 PM

Dear Sirs,

I believe that the planned railway project will have tremendously negative impact on the City of Redlands. It will be intrusive visually and audibly and downgrade the City without any proven benefits other than growing the size of government and handing yet another bill to the taxpayers.

} KOGEL-1
} KOGEL-2
} KOGEL-3

Please do the math, consider the taxpayers and stop this project.

Sincerely,
Deanna Kogel



2.5.37 DEANNA KOGEL (KOGEL-1)

2.5.37.1 *Response to KOGEL-1.1*

The commenter states that the Project will have a negative impact on the City of Redlands. This comment expresses an opinion and does not raise any issues related to the adequacy or findings of the Draft EIS/EIR.

2.5.37.2 *Response to KOGEL-1.2*

The commenter states that the Project will be visually and audibly intrusive without any benefits to the taxpayers. Concerns related to changes aesthetics and visual resources as attributable to the Project are discussed in Section 3.4 of the EIS/EIR. Concerns related to noise and fiscal impacts are discussed in Sections 3.6 and 3.14, respectively. This comment expresses an opinion and does not address the adequacy or findings of the Draft EIS/EIR.

2.5.37.3 *Response to KOGEL-1.3*

The commenter requests consideration for the taxpayers and to not move forward on the Project. This comment expresses a preference and does not raise any issues related to the adequacy or findings of the Draft EIS/EIR.



Frank Kogel

Date: Sunday, September 28, 2014 7:54:55 PM

Hello:

I am writing to oppose Sanbags proposed Rail Line to Redlands,
I sincerely believe that:

- 1. This is an economically unsustainable venture requiring taxpayer subsidies to operate for little in return. It only will benefit a small special interest group.
- 2. There are serious safety concerns.
- 3. Traffic congestion will be increased by an order of magnitude.

Respectfully,
Frank Kogel

} KOGEL-2.1

} KOGEL-2.2

} KOGEL-2.3

} KOGEL-2.4



2.5.38 FRANK KOGEL (KOGEL-2)

2.5.38.1 *Response to KOGEL-2.1*

The commenter expresses opposition to the Project. This comment expresses an opinion and does not raise any issues related to the adequacy or findings contained in the Draft EIS/EIR.

2.5.38.2 *Response to KOGEL-2.2*

The commenter states that the Project is economically unsustainable and would require taxpayer subsidies to operate. This comment expresses an opinion and does not raise any issues related to the adequacy or findings contained in the Draft EIS/EIR.

2.5.38.3 *Response to KOGEL-2.3*

The comment states that there are serious safety concerns with the Project. Issues related to safety are considered, addressed, and mitigated in multiple sections of the Draft EIS/EIR, including Sections 3.3 (Transportation) and 3.15 (Safety and Security). See Master Responses 12 for additional information on Project safety and security.

2.5.38.4 *Response to KOGEL-2.4*

The comment states that traffic congestion will increase with the Project. Traffic conditions for roadway intersections located along the railroad corridor were modeled for existing conditions (2011), opening day (2018), and future conditions (2038) as part of the traffic report prepared in support of the Draft EIS/EIR (see Master Response 13 and Appendix E). As provided in Section 3.3 of the Draft EIS/EIR (see Tables 3.3-7 and 3.3-12), numerous intersections operate at poor levels of service (LOS) with or without the Project. In instances where the traffic modeling indicates that the Project would degrade LOS, mitigation is proposed to reduce the Project's impact to a less than significant level (see Mitigation Measures TR-2 and TR-3).



Larry Leonard

September 21, 2014

Mitch Alderman
SanBag Director of Transit and Rail
1170 W. 3rd Street 2nd Floor
San Bernardino, CA 92410

Dear Mr. Alderman:

After reading the Rail to Redlands (RTR) Environmental Impact Report (EIR) and other related SanBag documents I have the following concerns:

1. The RTR along with Metrolink are losing, unsustainable economic enterprises. The \$250 million build cost and \$3 million plus/year unending operating deficit are an unacceptable burden on the taxpayer. In addition, Metrolink ridership is in a downward spiral from the high in 2009 and operating budgets continue to increase (Rail Summary of 4/10/13 that shows a 32% increase in costs over 4 years). SanBag is doing the public a gross disservice by not fully revealing the costs of the RTR. Does SanBag have something to hide?
2. The noise of a train running through the middle of town will be objectionable. The noise barriers SanBag plans on erecting will be unsightly and result in a disruption of the common cohesion of the city. Why is it that the EIR does not fully describe the barriers and where they will be placed?
3. When the RTR is operating the proposed 24 trains per day it will interrupt 14 street crossings 336 times causing inconvenience, emergency services delays and ground traffic congestion. Redlands already has serious traffic issues at major arteries like Alabama Street. The RTR will only aggravate this problem. A detailed traffic management plan needs to be done and submitted for public comment.
4. The RTR will further contribute to a division of the community disrupting the common cohesion. Redlands has always had an "other side of the tracks" issue and the RTR will only exacerbate the problem.
5. The EIR did not pay enough attention to the problem of ground traffic and pedestrian safety. The spill back at grade crossing will cause serious congestion and safety hazards.
6. The EIR did not address the issue of property values and how they can be affected by the RTR. It is undeniable that the environment on either side of a railroad right of way is undesirable.
7. The EIR did not address the added costs to Redlands of policing the rail corridor and stations. This needs to be done and submitted for public comment.

- LEONARD-1
- LEONARD-2
- LEONARD-3
- LEONARD-4
- LEONARD-5
- LEONARD-6
- LEONARD-7
- LEONARD-8
- LEONARD-9
- LEONARD-10

Thank you for your consideration of this letter.

Sincerely,

Larry Leonard
30891 Alta Mira Dr.
Redlands, CA 92373

cc. Dennis Michael, Supervisor Ramos, Tim Watkins, Assemblyman Cook, Assemblyman Morrell, Mayor Aguilar, rpr_public_comments@sanbag.ca.gov

2.5.39 LARRY LEONARD (LEONARD)

2.5.39.1 Response to LEONARD-1

The commenter asserts that the RTR along with Metrolink services are unsustainable economic enterprises and that the \$250 million Project construction cost and \$3 million Project annual operational cost is a burden on taxpayers. The comment states incorrect Project costs. As provided on page 2-60 of the Draft EIS/EIR, the Project's construction cost is estimated at \$202 million with annual operating expenses estimated at \$7.9 million. This comment expresses an opinion and does not address the adequacy or findings of the Draft EIS/EIR.

2.5.39.2 Response to LEONARD-2

The comment provides information on existing Metrolink ridership and operating budgets. This comment does not raise an issue with the adequacy or findings of the Draft EIS/EIR.

2.5.39.3 Response to LEONARD-3

The commenter opines that SANBAG is not fully revealing the costs of the RTR. Please refer to Master Response 6, Project Costs, or additional details on the Project cost. This comment expresses an opinion and does not comment on the content, adequacy, or findings of the Draft EIS/EIR.

2.5.39.4 Response to LEONARD-4

The commenter states that the noise of a train coming through the middle of the City of Redlands will be objectionable. Section 3.6 of the Draft EIS/EIR provides an analysis of the Project's anticipated noise impacts along with mitigation measures proposed by SANBAG to reduce Project-related increases in noise. Please refer to Master Response 1 (Train Noise Impact Methodology), 2 (Mitigation for Train Noise), and 3 (Quiet Zones) for additional information regarding train noise.

2.5.39.5 Response to LEONARD-5

The comment raises concerns related to the erection of sound barriers throughout the corridor and the disruption of community cohesion. The comment also states that the Draft EIS/EIR did not fully describe the sound barriers and respective locations. Erection of sound barriers is addressed in the Draft EIS/EIR from two perspectives: (1) division of communities and community cohesion (see Draft EIS/EIR Section 3.2 (pages 3.2-22 to 3.2-24), and (2) adverse effects to the existing visual character of the corridor (see Draft EIS/EIR Section 3.4 (pages 3.4-13 to 3.4.18)). As provided in these two respective sections of the Draft EIS/EIR and summarized in Section ES.8, Executive Summary, the erection of sound barriers could result in the physical division of established communities (see pages 3.2-40) and change the existing visual character of the railroad corridor (see page 3.4-23). The specific locations where sound barriers could be constructed with and without the implementation of quiet zones was provided in Draft EIS/EIR Appendix H1 (see Figures 8-2A through 8-2H and 8-3A through 8-3F).

2.5.39.6 Response to LEONARD-6

The commenter states that the Project will cause emergency service delays and ground traffic congestion on major arterial roads such as Alabama Street. The commenter requests that a detailed traffic management plan be developed and submitted for public comment. SANBAG has prepared a traffic report for the Project to evaluate the Project's operational effects on the local roadway network along the railroad corridor for existing conditions (2012), opening day (2018), and future conditions (2038). The complete report was prepared in coordination with the Cities of San Bernardino and Redlands and is provided in Appendix E of the Draft EIS/EIR. Section 3.3 of the Draft EIS/EIR provides a summary of the traffic report's findings and mitigation measures to address Project-related impacts to the roadway network, including Alabama Street. Delays in emergency services were analyzed in Draft EIS/EIR Section 3.13. As identified in the Draft EIS/EIR (see page 3.13-13), construction of the Project would have the potential to result in temporary delays in response times for fire, police, and emergency vehicles due to construction activities. However, implementation of Mitigation Measure TR-1 would minimize these effects. The Draft EIS/EIR also concludes that no adverse long-term operational effects associated with services ratios and responses times are anticipated with implementation of the Project (see page 3.13-14).

2.5.39.7 Response to LEONARD-7

The comment states that the Project will further contribute to a division of the existing community and disrupt community cohesion. The comment's concerns are addressed in Section 3.2 of the Draft EIS/EIR (see pages 3.2-22 through 3.2-23 and 3.2-31 through 3.2-36). It is important to note that the existing railroad right-of-way is an established feature and transportation route that was in existence for more than 100 years. Existing development patterns within the City of Redlands are partly a consequence of the railroad's presence (see Draft EIS/EIR page 3.2-23) and part of the existing condition. Both CEQA and NEPA require a public agency to evaluate changes to existing environmental conditions (or the human environment) as a result of a project. CEQA requires that existing conditions be set at the time a lead agency issues the notice of preparation (NOP), which is April 2012 for the Project.

As provided on page 2.2-24 of the Draft EIS/EIR, if sound barriers are erected along the corridor, these features could result in further division of existing communities and this indirect effect would represent a significant adverse effect. However, if quiet zones are implemented in place of sound barriers, the Project's effect would not be adverse and less than significant. Figures 8-2A through 8-2F provide the locations of potential sound barriers in the absence of quiet zones. Figures 8-3A through 8-3F provide the locations of potential sound barriers if quiet zones are implemented at the location identified in Mitigation Measure QZ-3.

2.5.39.8 Response to LEONARD-8

The comment asserts that ground traffic and pedestrian safety were not adequately covered in the Draft EIS/EIR. The comment also states that the queuing at the at-grade crossing will cause congestion and safety hazards. Ground traffic and pedestrian safety were addressed in Section 3.3 and 3.15 of the Draft EIS/EIR. Issues related to traffic congestion and safety hazards are addressed in Effects 3.3.1 and 3.3.3 in Section 3.3 of the Draft EIS/EIR. Mitigation Measures



TR-1, TR-2, TR-3, and TR-4 are proposed to minimize or avoid adverse affects that may result from the Project. Please refer to Response WONG-1.2 and Master Response 12 (Safety and Security) for additional information on Project safety and security.

2.5.39.9 Response to LEONARD-9

The commenter states that the Draft EIS/EIR did not address Project impacts on property values. Please refer to Master Response 15 (Property Values) regarding property values.

2.5.39.10 Response to LEONARD-10

The commenter states that the Draft EIS/EIR did not address additional costs of providing security personnel and patrols along the rail corridor and proposed stations. As provided on page 2-60 of the Draft EIS/EIR, SANBAG estimates that operating costs will average \$7.9 million annually. The cost for providing security for the Project facilities is considered in this estimate. The cost of constructing the necessary infrastructure (e.g., CCTV) to support safety and security is factored into the Project's construction cost, which is estimated at \$202 million. This comment does not raise any issue related to the adequacy or findings of the Draft EIS/EIR.



Rosa Lopez

1	REDLANDS PASSENGER RAIL PROJECT	
2	THURSDAY, SEPTEMBER 4, 2014	
3		
4	PUBLIC COMMENTS	
5		
6	ROSA LOPEZ: And the question or comment that] LOPEZ-1
7	I have is, Is my property going to be bought out by	
8	SANBAG? It's my property right at the end of Lugonia,	
9	2428 West Lugonia, Redlands.	
10	(Address: 2428 West Lugonia Avenue, Redlands 92374)	



2.5.40 ROSA LOPEZ (LOPEZ)

2.5.40.1 *Response to LOPEZ-1*

The comment requests clarification on if the commenter's property (located at 2428 West Lugonia Avenue in the City of Redlands) would be acquired by SANBAG as part of the Project. SANBAG has completed further investigation of this property location and was unable to find a property corresponding to 2428 West Lugonia Avenue. However, SANBAG was able to locate 2429 West Lugonia Avenue, which abuts SANBAG's ROW on the east, just south of Lugonia Avenue. SANBAG does not foresee a need to acquire any part of the subject property. However, SANBAG notes that it appears there are several physical encroachments in the form of secondary support structures (i.e., car port) that extend south of the subject property and into SANBAG's right-of-way. These encroachments would need to be removed as part of the Project.



Tamara Madai

Date: Monday, September 29, 2014 4:48:34 PM

Dear Dennis Michael:

I am opposed to the Rail to Redlands for the following reasons:

> Like all public transportation, it will continually have to be subsidized, in this case for probably \$3million a year, not to mention the cost, \$25million/mile, of getting it operational.

MADAI-1

> It is heavy rail with huge double decker cars nearly 16' in height and 85' in length, requiring an even larger locomotive, 68' long. For travel within Redlands and going only to San Bernardino, light rail would be much more suitable.

MADAI-2

> The large number of intersection crossings in Redlands (14) will be incredibly disruptive to car and truck traffic, and add considerably to the noise level in the town, even with the use of quieting materials such as ballast mats. If the train must come in, a light rail system like Trax in SLC where trains travel with the cars, not against them seems like a better option, in spite of higher initial costs.

MADAI-3

MADAI-4

MADAI-5

> The downtown, which the city council says it wants to preserve as a historic district, will become populated with stack and pack apartments, interfering with the historic feel of the town.

MADAI-6

:>The town has already has a cultural north/south divide. Efforts are being made to erased that, and the location of the incoming train tracks will be a hindrance to that effort.

MADAI-7

Respectively submitted,

Tamara Madai
725 San Mateo St.
Redlands, CA 92373

2.5.41 TAMARA MADAI (MADAI)

2.5.41.1 Response to MADAI-1

The commenter is opposed to the Project and asserts that the Project would continually have to be subsidized. This comment expresses an opinion and does not raise any issues related to the adequacy, content, or findings contained in the Draft EIS/EIR. Operational funds for the Project would come from the voter-approved Measure I sales tax (see pages 2-61 of the EIS/EIR).

2.5.41.2 Response to MADAI-2

The commenter expresses a preference for a light rail transit (LRT) vehicle instead of the Project. Note that SANBAG is considering a diesel multiple unit (DMU) vehicle option (see page 2-17 of the EIS/EIR), which is similar, but powered by a diesel engine. This comment does not address the adequacy or findings of the Draft EIS/EIR.

2.5.41.3 Response to MADAI-3

The comment states that the proposed crossings would be disruptive to car and truck traffic. Project-related effects to traffic circulation both during construction and operation are considered in Section 3.3, Transportation of the Draft EIS/EIR. Please also refer to Master Response 13, Traffic Circulation, for information on traffic circulation.

2.5.41.4 Response to MADAI-4

The comment states that the Project would add to noise levels in the City of Redlands even with the use of quieting materials such as ballast mats. Project-related effects to the existing ambient noise environment both during construction and once operational are considered in Section 3.6, Noise and Vibration, of the EIS/EIR. Also refer to Master Response 1 (Train Noise Impact Methodology) and 2 (Mitigation for Train Noise).

2.5.41.5 Response to MADAI-5

The commenter expresses a preference for a light rail system instead of the Project. Please refer to Response MADAI-2.

2.5.41.6 Response to MADAI-6

The commenter states that future high density development within Downtown Redlands would result in interferences with the historic feel of Downtown Redlands. Table 4-2 of the Draft EIS/EIR identifies future development within downtown Redlands as a reasonably foreseeable project. The Project itself would not result in new development in the downtown area beyond what it proposed in Chapter 2 of the Draft EIS/EIR. SANBAG acknowledges that the Project would facilitate new development in the area and, therefore, the Project's growth inducing effects are identified in Section 6.1 of the Draft EIS/EIR. Additionally, it is important to note, that any new development within the downtown area (or along the railroad corridor for that matter)



would be subject to the discretionary approval of the local jurisdiction along with additional environmental review.

2.5.41.7 Response to MADAI-7

The commenter states that the implementation of the Project would further exacerbate a perceived north/south divide in the community. The comment's concerns are addressed in Section 3.2 of the Draft EIS/EIR (see pages 3.2-22 through 3.2-23 and 3.2-31 through 3.2-36). It is important to note that the existing railroad right-of-way is an established feature and transportation route that was in existence for more than 100 years. Existing development patterns within Redlands are partly a consequence of the railroad's presence (see page 3.2-23) and part of the existing condition. As provided on page 2.2-24 of the Draft EIS/EIR, if sound barriers are erected along the corridor, these features could result in further division of existing communities and this indirect effect would represent a significant adverse effect. However, if quiet zones are implemented in place of sound barriers, the Project's effect would not be adverse and less than significant.



Aaron McCann

Date: Sunday, September 21, 2014 12:37:43 PM

Mr. Mitchell A. Alderman or Ms. Dominique Paukowits,

After briefly perusing the Redlands Passenger Rail Project, Draft EIS, I have some comments and suggestions. Improvement of transportation through the use and improvement of existing infrastructure seems beneficial to the environment and helps to meet increased transportation needs. I agree with and applaud the ES.5 rejection of Light Rail Transit and Bus Rapid Transit as this would require additional rail line or road infrastructure, increasing the footprint of the project and further impacting surrounding areas. On that note, I would urge further consideration of Alternative 3, Reduced Project Footprint, which would hopefully result in a greater amount of area remaining in an undeveloped, natural state.

MCCANN-1

MCCANN-2

MCCANN-3

Under table ES-2, Floodplains, Hydrology and Water Quality, I would suggest collaboration with the NRCS (Natural Resources Conservation Service) regarding any soil loss issues due to construction/rehabilitation of the rail line, construction of new facilities, etc. There have been some exciting and somewhat recent developments in the use of filter sock technology which could be useful [1]. Thank you for considering my suggestions and apologies if they are redundant or already considered actions.

MCCANN-4

[1] (2011): n. pag. *Utilization of Compost Filter Socks*. USDA, NRCS. Web. 21 Sept. 2014. <http://www.nrcs.usda.gov/Internet/FSE_DOCUMENTS/stelprdb1048852.pdf>.

Aaron McCann

Graduate Student, Virginia Tech, Master of Natural Resources Program



2.5.42 AARON MCCANN (MCCANN)

2.5.42.1 Response to MCCANN-1

The comment generally expresses support for the Project and does not comment on the adequacy or findings of the Draft EIS/EIR.

2.5.42.2 Response to MCCANN-2

The comment concurs with SANBAG's rejection of the Light Rail Transit (LRT) and Bus Rapid Transit (BRT) from further consideration in the Draft EIS/EIR due to the expanded footprint required to construct these modal alternatives. This comment expresses a preference and does not comment on the content, adequacy, or findings of the Draft EIS/EIR.

2.5.42.3 Response to MCCANN-3

The comment expresses a preference for the selection of Alternative 3, Reduced Project Footprint. This comment expresses a preference and does not comment on the content, adequacy, or findings of the Draft EIS/EIR.

2.5.42.4 Response to MCCANN-4

The comment recommends collaboration with the Natural Resources Conservation Service regarding soil loss issues during construction of the Project and looking into new filter sock technology. SANBAG will consider the comment's suggested erosion control technologies during the Project's final design phase. This comment does not raise any issue related to the adequacy or findings of the Draft EIS/EIR.



John Mills

Governments SANBAG Working Together

Thank you for your interest in the Redlands Passenger Rail Project.

San Bernardino Associated Governments (SANBAG) would like to accurately and personally address your questions and concerns. Please complete the contact information below and indicate the best way to reach you.

CONTACT INFORMATION

Name: John Mills

Street Address: 301 9th St #100

City: Redlands State: CA Zip Code: 92374

Phone: (909) 435-6976 Cell: ()

Email: john.mills@redlandsmill.com FAX: ()

Are you a local business owner? Yes: No:

If so, please name the business: The Redlands Mill

Preferred Contact Method: (Please check one)

By Phone: Email: FAX: In Writing:

YOUR COMMENTS/QUESTIONS

I own an office complex (60 offices) @ 301 9th St. I am a supporter of mass transit.

* minimize noise of horns/whistles * keep 9th Street open

H: Tim ☺ ✓

Thank you for your input on the Redlands Passenger Rail Project.

To provide comments or questions, send an email to RPRP_Public_Comments@sanbag.ca.gov or call the project helpline at (855) SBR-RAIL / 727-7245.

] MILLS-1
] MILLS-2
] MILLS-3



2.5.43 JOHN MILLS (MILLS)

2.5.43.1 Response to MILLS-1

The comment states that the commenter owns an office complex at 307 9th Street, in downtown Redlands, and is generally a supporter of mass transit. This comment does not address the adequacy, content, or findings of the Draft EIS/EIR.

2.5.43.2 Response to MILLS-2

The comment requests that SANBAG minimize Project-related operational noise from train horns and whistles. Please refer to Master Response 2. As proposed in Mitigation Measure NV-3, SANBAG is proposing the implementation of quiet zones to minimize operational noise resulting from the Project. Additionally, the selection of the DMU vehicle option will result additional noise reductions as documented in Draft EIS/EIR Table 3.6-7 (page 3.6-23). Please refer to Master Responses 3 regarding quiet zone mitigation.

2.5.43.3 Response to MILLS-3

The comment requests that the Project maintain the existing at-grade crossing at 9th Street. Please refer to Master Response 4.



Cheryl Moore

Page 2

1 REDLANDS PASSENGER RAIL PROJECT
2 TUESDAY, SEPTEMBER 9, 2014

3
4 PUBLIC COMMENTS

5
6 CHERYL MOORE: My name is Cheryl Moore. My
7 concern is it's going by an elementary school that my
8 grandkids go to. What is the impact on the school and
9 kids and everything, the noise and all that, and the
10 air quality? It's not going to be healthy for the
11 children whatsoever.

12 And San Bernardino does not have the
13 greatest air quality, so that is my biggest main
14 concern is the school children. And, like, I did not
15 see anybody from the school board here or principal
16 from the elementary school. Nobody is here, so I'm
17 just wondering if they really know what is going on.
18 That's my comment.

19 (Address: Cheryl Moore, 1857 Victoria,
20 San Bernardino, CA 92408.)

MOORE-1

MOORE-2

MOORE-3



2.5.44 CHERYL MOORE (MOORE)

2.5.44.1 Response to MOORE-1

The commenter is concerned that the Project is going by an elementary school that her grandchildren attend. Based on the commenter's address, SANBAG assumes the comment is referring to Victoria Elementary School located at 1505 Richardson Street in the City of San Bernardino.

2.5.44.2 Response to MOORE-2

The comment requests clarification on noise and air quality impacts to school children and Victoria Elementary School. Victoria Elementary School is represented as Receiver #30 in the noise and vibration analysis. As provided in Appendix H1 and H2 of the Draft EIS/EIR, operational noise levels would not adversely affect the school. As provided in Draft EIS/EIR Chapter 1 (Purpose and Need), regional air quality pollution is one of the primary drivers behind the Project. Please refer to Master Response 10 for additional information on Air Quality and Health Effects.

2.5.44.3 Response to MOORE-3

The comment notes that no staff from the Redlands Unified School District (RUSD) were present at the public meeting held on September 9, 2014. The commenter requests clarification on if school staff know about the Project. SANBAG has been in consultation with the RUSD as part of the Section 4(f) process as described in Section 3.16 of the EIS/EIR.



John F. Nash

Date: Tuesday, September 23, 2014 11:32:38 AM

104 San Marcos Ave.
Redlands, CA 92374
September 23, 2014

San Bernardino Associated Governments
Redlands Passenger Rail Project
1170 W. 3rd St., 2nd Fl.
San Bernardino, CA 92410-1715

TO WHOM IT MAY CONCERN:

304 North 9th Street between Redlands Bl. & Stuart Ave. is the main entrance for receiving & shipping fruit for Redlands Foothill Groves. The cooperative processed 619,656 field boxes (55lbs.) of fruit in the 2013 season. This fruit arrived in approximately 500 semi-truckloads (1,000 in-and-out trips for the field trucks). It was shipped out in over 2,000 orders requiring over 1,500 trips (3,000 in-and-out trips for 53 ft. over-the-road refrigerated semi-trucks. This fruit returned \$1,789,971 to 70 grower-members & provided an \$848,326 payroll for 45 employees.

] NASH-1

When 9th St. is closed at the MetroLink Tracks, all 4,000 trips will have to come in and out of 9th St. & Redlands Bl. That intersection & the portion of 9th St. which provides the only access to 301 & 304 9th St. need to be improved to accommodate that traffic.

] NASH-2

Otherwise, Redlands Foothill Groves should be compensated to move its specialized citrus processing equipment to another facility with the required atmospheric conditioning space.

] NASH-3

I am looking forward to the EIS & EIR.

Sincerely,
John F. Nash
(909)793-0865
jf.nash@verizon.net



2.5.45 JOHN F. NASH (NASH)

2.5.45.1 Response to NASH-1

The comment states that 9th Street between Redlands Boulevard and Stuart Avenue is the main receiving and shipping entrance for Redlands Foothill Groves. The comment also provides a description of the business operations occurring at 304 North 9th Street in downtown Redlands. This comment is informational and does not address on the adequacy or findings of the Draft EIS/EIR.

2.5.45.2 Response to NASH-2

The comment states that with the proposed closure of the 9th Street at-grade crossing, the business owner will be required to have trucks access their subject property from the south via the intersection of 9th Street and Redlands Boulevard. The comment notes that this intersection requires improvements in order to facilitate the level of access required during packing season, which may include up 4,000 trips. However, from the comment, it is not clear on the duration of time in which these trips are occurring (i.e., daily or weekly). Although this intersection was not specifically modeled in the traffic report (see Draft EIS/EIR Appendix E), the intersections to the east and west of this intersection (Redlands Boulevard/ Citrus Avenue and Redlands Boulevard/Orange Street) operate at acceptable levels of service during peak hours with the Project in the opening year (2018) and future conditions (2038) scenarios. Please refer to Master Response 4 for additional discussion.

2.5.45.3 Response to NASH-3

The comment states that if improvements to the 9th Street/Redlands Boulevard intersection are not feasible, that Redlands Foothill Groves requests compensation for relocating to another facility with appropriate atmospheric condition space. Please refer to Master Responses 4. This comment does not address the adequacy or findings of the Draft EIS/EIR



Lucy Nielson

1	REDLANDS PASSENGER RAIL PROJECT
2	THURSDAY, SEPTEMBER 4, 2014
3	
4	PUBLIC COMMENTS
17	
20	LUCY NIELSON: Well, basically, I would
21	like to know how this is going to impact my area
22	because one of the stopovers is going to be at the
23	<u>university. I live on College Avenue.</u> I know there
24	might be a lot of noise with the trains, the tracks,
25	maybe some debris, parking problems. I'm wondering

NIELSON-1

NIELSON-2



1	how often the trains are going to run: If it's going	NIELSON-2 Continued
2	to run up to 10:00 or 11:00 o'clock at night and start	
3	at 5:00 or 6:00 o'clock in the morning. Will that	
4	affect my sleep pattern and quality of life?	
5	<u>Will people really use this system?</u> What	NIELSON-3
6	<u>will the cost of a ticket be?</u> Is there going to be an	NIELSON-4
7	<u>express train to Los Angeles? That's very important.</u>	NIELSON-5
8	And bottom line is what is this going to cost Redlands	NIELSON-6
9	if Measure I and other forms of financial services do	
10	not cover the 250 million dollars that it might	
11	<u>cost -- and above?</u> Basically, will there be enough	NIELSON-7
12	jobs in this area to support this 250 million dollar	
13	system when we have Ontario Airport, which has lost	
14	10,000 jobs and 47 percent of their flying to Los	NIELSON-8
15	<u>Angeles? Will this system be able to sustain itself?</u>	
16	Will people use this system into Los Angeles?	NIELSON-9
17	Basically, that's where they want to end up anyway.	
18	So how viable is that?	
19	(Address: 816 College Avenue, Redlands 92374)	

2.5.46 LUCY NIELSON (NIELSON)

2.5.46.1 Response to NIELSON-1

The comment states that the commenter lives on College Avenue and near the proposed University of Redlands Station. The commenter also requests clarification on how the Project would impact her area. Chapter 3 of the Draft EIS/EIR provide an analysis of the potential environmental impacts that could result from the Project (see Sections 3.1 through 3.17). Based on the distance of the commenter's subject property from the railroad corridor, it is unlikely that the Project would significantly impact to the subject property. This comment does not raise any issue related to the adequacy or findings of the Draft EIS/EIR.

2.5.46.2 Response to NIELSON-2

The commenter states that there are concerns with train noise, train debris, and parking issues. The commenter also requests clarification on how often the trains will run and if the train schedule will affect sleeping patterns. The commenter is directed to pages 3.6-14 to 3.6-17, Noise and Vibration, for a discussion of Project-related construction and operational noise effects. Please also refer to Master Response 1, Train Noise Impact Methodology, for information on train noise. Each station stop would include sufficient parking to accommodate projected ridership for each of the stations (see Draft EIS/EIR Table 2-5 (page 2-36).)

As provided in Table 2-1, SANBAG is proposing to operate on 30-minute headways during peak hours and one hour headways thereby resulting in 25 daily round trips. Although no specific schedule has been developed; during normal operations, trains could start between 5 and 6 in the morning and discontinue prior to 11 p.m.

2.5.46.3 Response to NIELSON-3

The comment requests clarification on if people would use the proposed Project. Ridership estimates for the Project are provided on page 2-18 of the Draft EIS/EIR. These estimates are based on the Ridership Report, which is provided as Appendix C to the Draft EIS/EIR. Please also refer to Master Response 5, Projected Ridership, for additional information on projected ridership.

2.5.46.4 Response to NIELSON-4

The comment requests clarification on how much a ticket to ride the train would be. SANBAG has yet to determine the fare structure for the Project. Fares will be dependent on the Project's final design construction and operating costs. This comment does not address the adequacy or findings of the Draft EIS/EIR.

2.5.46.5 Response to NIELSON-5

The comment requests clarification on if an express train to Los Angeles is proposed as part of the Project. As provided in the Draft EIS/EIR on page 2-17, SANBAG is proposing the integration of an express train service that would travel from Downtown Redlands to Los

Angeles Union Station. This comment does not address the adequacy or findings of the Draft EIS/EIR.

2.5.46.6 Response to NIELSON-6

The comment requests clarification on how much the Project will cost to the City of Redlands if Measure I and other funding mechanisms are not available. As provided on page 2-60 of the Draft EIS/EIR, the Project's construction cost is estimated at \$202 million with annual operating costs estimated at \$7.9 million annually thereafter. Based on SANBAG's current revenue projections using a combination of federal, state, and local funds, sufficient funding exists to construct the project. Operations would be funded through Measure I Metrolink/Rail Service. If for whatever reason funding under Measure I becomes unavailable, SANBAG would look to other funding sources to continue operations. However, given the recent reauthorization of Measure I this scenario is considered unlikely.

2.5.46.7 Response to NIELSON-7

The comment requests clarification on if there will be enough jobs in the area to support the Project when there is Ontario Airport. The commenter also provides statistics about reductions in passenger travel at Ontario Airport. The commenter is directed to Section 3.14 of the Draft EIS/EIR, which provides employment projections for the region. The Project is not proposing to provide passenger rail service to Ontario Airport. This comment does not address the adequacy or findings of the Draft EIS/EIR.

2.5.46.8 Response to NIELSON-8

The comment requests clarification on if the Project will be able to sustain itself during operations. Operations would be funded through Measure I Metrolink/Rail Service as described in the Draft EIS/EIR (see page 2-60). Please refer to Master Response 6, Project Costs, for information on Project cost.

2.5.46.9 Response to NIELSON-9

The comment requests clarification on if the Project will be used by people wanting to travel to Los Angeles and how viable is the Project. The Project would offer direct train service to Los Angeles Union Station. Please refer to Master Response 6, Project Costs.



Victor M. Parker, Sr.



Thank you for your interest in the Redlands Passenger Rail Project.

San Bernardino Associated Governments (SANBAG) would like to accurately and personally address your questions and concerns. Please complete the contact information below and indicate the best way to reach you.

CONTACT INFORMATION

Name: Victor M. Parker Sr

Street Address: 11934 4th St.

City: Yucaipa State: CA Zip Code: 92399

Phone: (626) 376 7919 Cell: (626) 376 7919

Email: vmParker1@gmail.com FAX: ()

Are you a local business owner? Yes: No:

If so, please name the business: VCTS Property Solutions

Preferred Contact Method: (Please check one)

By Phone: Email: FAX: In Writing:

YOUR COMMENTS/QUESTIONS Please keep informed. What are plans to incorporate public usage of the historic Redlands Rail Depot?

Thank you for your input on the Redlands Passenger Rail Project.

To provide comments or questions, send an email to RPRP_Public_Comments@sanbag.ca.gov or call the project helpline at (855) SBR-RAIL / 727-7245.

} PARKER-1



2.5.47 VICTOR M. PARKER, SR. (PARKER)

2.5.47.1 Response to PARKER-1

The comment requests clarification on if there are plans for public use of the Redlands Santa Fe Depot. As described in Chapter 2 of the Draft EIS/EIR, SANBAG is proposing the placement of the Downtown Redlands Station and Platform to the north of the tracks and west of the existing Redlands Santa Fe Depot. As provided in Section 3.12 of the Draft EIS/EIR, the Project would have no adverse effect to the Depot property. At this time, SANBAG is not proposing any public uses at the Depot. This comment does not address the adequacy or findings of the Draft EIS/EIR.



Sandra Peterson

Date: Tuesday, August 26, 2014 2:03:14 PM

To whom it may concern

I am a property owner in downtown Redlands, between Pearl and Stewart Street.
My concern is how the project will affect us property owners?
Will property be taken by eminent domain?
Are we commercial real estate?
What is our timeline?
Thank you for taking time to answer my questions.

] PETERSON-1
] PETERSON-2
] PETERSON-3
] PETERSON-4

Sandra Ingro Peterson
(909)229-8420

2.5.48 SANDRA PETERSON (PETERSON)

2.5.48.1 Response to PETERSON-1

The comment requests clarification on how the Project will affect property owners. The environmental effects of the Project are disclosed in Chapters 3, 4, and 5 of the Draft EIS/EIR. These environmental effects, the corresponding significance determinations, and mitigation, if required, are summarized in Table ES-2 of the Draft EIS/EIR. This comment does not address the adequacy, content, or findings of the Draft EIS/EIR.

2.5.48.2 Response to PETERSON-2

The comment asks if property will be taken through eminent domain with implementation of the Project. The Project would require the acquisition of small amounts of private property. Appendix D2 in the Draft EIS/EIR provides a list of potential property acquisitions and temporary construction easements required for the Project based on preliminary engineering. These areas will be refined during final design of the Project and minimized, where feasible, consistent with Mitigation Measure LU-1 in the Draft EIS/EIR. Please also refer to Master Response 8, Land Acquisition, regarding land acquisition associated with the Project. This comment does not raise any issue related to the adequacy or findings of the Draft EIS/EIR.

2.5.48.3 Response to PETERSON-3

The comment asks if the property in question is commercial real estate. Without an address or assessors parcel number (APN), SANBAG is unable to confirm the commenter's question regarding the land use designation for their property. Based on the mapping provided in Figure 3.2-4 of the Draft EIS/EIR, areas between Pearl Avenue and Stuart Street, west of 6th Street, are designated for commercial uses according to the Downtown Redlands Specific Plan. This comment does not address the adequacy, content, or findings of the Draft EIS/EIR.

2.5.48.4 Response to PETERSON-4

The comment requests clarification on the Project's timeline. As provided in Chapter 2 of the Draft EIS/EIR, SANBAG plans on starting construction in 2015 with passenger train operations starting in 2018. This comment does not raise any issue related to the adequacy or findings of the Draft EIS/EIR.



Tony Raley-1

Mr. Fornelli,

In regards to this rail project and the closing of 7th and 9th street I must protest. 7th street has always carried a lot of traffic to both my business and that of Hatfield Buick next door.

] RALEY-1.1

I own the building at 215 E Redlands blvd (corner of 7th and Redlands blvd and also own and operate the motorcycle business of Honda/Yamaha/Husqvarna of Redlands. For workmen's comp issues we are required to avoid the main thoroughfares whenever possible and try to make our test rides all right hand turns . by closing 7th street we will be forced onto Redlands Blvd which is not the best option.

] RALEY-1.2
] RALEY-1.3

Also many of our customers arrive with their Personal water craft and Atv's on trailers and would require them to have to turn around in a very tight area and reenter Redlands Blvd.

] RALEY-1.4

Next is trucking, I get about 3 semi truck deliveries a week and Hatfield also does which would require the trucks to either back up 7th from Redlands blvd, or back into Redlands blvd to leave the premises or, park on Redlands blvd to unload in the traffic. Putting the public and our employees in harm's way.

] RALEY-1.5

While I am 100% in agreement with your project I can't agree with shutting down these vital thoroughfares. I believe that the property owners should have been contacted prior to the meetings to address them in a public manner. I was not notified and neither was Bill Hatfield.

] RALEY-1.6
] RALEY-1.7

Please feel free to call if I can clarify any details.
Thank you for your attention to this matter

Tony Raley
Pres/General Manager
Honda/Yamaha of Redlands
909-793-2833

2.5.49 TONY RALEY (RALEY-1)

2.5.49.1 Response to RALEY-1.1

The comment objects to the closure of 7th and 9th Street at-grade crossings in the City of Redlands. The commenter states that 7th Street has provided access to the commenter's business as well as to Hatfield Buick adjacent to the subject property. As provided in Master Response 4, Closure of Existing At-Grade Crossings, this closure was proposed for closure based on safety recommendations from the California Public Utilities Commission (CPUC). This comment does not raise any issues related to the adequacy or findings of the Draft EIS/EIR.

2.5.49.2 Response to RALEY-1.2

The comment provides the location of the commenter's property owned and operated by the commenter at 215 E Redlands Boulevard (at the corner of 7th Street). This comment does not address the adequacy or findings of the Draft EIS/EIR.

2.5.49.3 Response to RALEY-1.3

The comment states the closure of the 7th Street at-grade crossing would require a change in the route used for test drives. SANBAG understand that the partial closure of the 7th Street at-grade crossing would require operational changes by local businesses. At the commenter's location, access north to Stuart Avenue via 7th Street would no longer be possible. However, an alternate path of travel exists. From 7th Street, test drives could still be routed along Redlands Boulevard west to Orange (or 6th) Street. At Orange (or 6th) Street, test drives could proceed north to E. Stuart Avenue where they would travel east to Church Street. At Church Street, test drives would travel south to E. State Street where test drives would head back to the west to Redlands Boulevard and back to 7th Street. Additionally, operations could also use a similar path of travel provided in Response HATFIEID-2. This comment does not raise any issues related to the adequacy or findings of the Draft EIS/EIR.

2.5.49.4 Response to RALEY-1.4

The comment notes potential operational difficulties with turning movements by vehicles with trailers. Please refer to Response RALEY-3 and Master Responses 4 and 13. This comment does not raise any issues related to the adequacy or findings of the Draft EIS/EIR.

2.5.49.5 Response to RALEY-1.5

The comment states that the subject property and adjacent business have semi-truck deliveries three times a week. With the closure of 7th Street, these semi-truck deliveries would have to utilize other access points and Redlands Boulevard to deliver goods which present a safety concern for employees and drivers. Please refer to Response GLASER-3.



2.5.49.6 Response to RALEY-1.6

The commenter generally supports the Project with the exception of the closure of the at-grade crossings on 7th and 9th Streets.

2.5.49.7 Response to RALEY-1.7

The comment states that the commenter and other property owners were not notified about the Project prior to the public meetings. NOAs were sent out to all adjoining properties along SANBAG's right-of-way. As provided in Master Response 9, SANBAG has gone beyond the noticing requirements of both CEQA and NEPA to solicit comments from individuals, organizations, and agencies since early 2012.



Tony Raley-2



September 26, 2014

James Ramos

Third District Supervisor San Bernardino County
San Bernardino County Government Center
385 N Arrowhead Ave, Fifth Floor
San Bernardino, CA 92415-0110
September 26, 2014

RE: Closing of 7th and 9th street due to Redlands passenger rail project

In regards to this rail project and the closing of 7th and 9th Street, I must protest. 7th Street has always carried a lot of traffic to both my business and that of Hatfield Buick next door.

RALEY-2.1

I own the building at 215 E. Redlands Blvd (corner of 7th and Redlands Blvd.) I also own and operate the motorcycle business of Honda/Yamaha/Husqvarna of Redlands. For workmen's comp issues we are required to avoid the main thoroughfares whenever possible, and try to make our test rides all right hand turns. By closing 7th Street we will be forced onto Redlands Blvd. which is not the best option.

RALEY-2.2

RALEY-2.3

Also many of our customers arrive with their personal watercraft and Atv's on trailers. This closure would require them to have to turn around in a very tight area and re-enter Redlands Blvd.

RALEY-2.4

Next issue is trucking. I get about 3 semi truck deliveries a week, Hatfield also does which would require the trucks to either back up 7th from Redlands Blvd., or back into Redlands Blvd to leave the premises; or park on Redlands Blvd to unload in the traffic, putting the public and our employees in harm's way.

RALEY-2.5

While I am 100% in agreement with your rail project, I can't agree with shutting down these vital thoroughfares. I believe that the property owners should have been contacted prior to the meetings, to address them in a public manner. I was not notified and neither was Bill Hatfield.

RALEY-2.6

RALEY-2.7

Please feel free to call if I can clarify any details.

Thank you for your attention to this matter.

Tony Raley
President/General Manager
Honda Yamaha Husqvarna of Redlands
909-793-2833



2.5.50 TONY RALEY (RALEY-2)

2.5.50.1 Responses to RALEY-2.1 to RALEY-2.7

Comment Letter RALEY-2 is duplicative of Comment Letter RALEY-1. Please refer to Responses Raley-1.1 through Raley-1.7.



James and Julie Rock

Date: Saturday, September 27, 2014 6:11:09 PM

We are the owners of the property at 610 E Stuart Ave. Redlands, that is identified in the forementioned document as a historic property within the Area of Potential Effects. It is noted that although the historic home is set back from the railroad right of way, it is adjacent to it and will be substantially impacted by noise although no sound wall is proposed to protect it although similar properties are, including the Baptist church a few hundred feet down Stuart and the apartment house around the corner on Church. This is a single family residence that is occupied by a family member. The house is of single wall construction with little to no sound proofing. Since the neighborhood is very quiet, it has never been necessary.

The structural integrity of the house could also be impacted by vibration. It is quite fragile having a post and beam foundation that is over 100 years old.

Other concerns include air quality. Construction equipment as well as the use of Diesel engines will degrade current air quality.

Since purchasing the house many years ago we have demolished quixotic additions that detracted from the historic integrity as well as other improvements. It is also noted in the document that since the plans have not been finalized, no acquisition plans have been developed. Obviously we would like to know what Sanbag's intentions are as soon as possible so we can address additional issues.

} ROCK-1
 } ROCK-2
 } ROCK-3
 } ROCK-4
 } ROCK-5
 } ROCK-6

Sincerely, James and Julie Rock
 1216 W Highland Ave. Redlands, Ca 92373
 Sent from my iPad

2.5.51 JAMES AND JULIE ROCK (ROCK)

2.5.51.1 Response to ROCK-1

The comment states that the commenter's subject property (located at 610 East Stuart Street in the City of Redlands) identified as a historic property and is located within the area of potential effects (APE) delineated for the Project. As identified in Draft EIS/EIR Table 3.12-4 (Architectural Properties Eligible for Listing on the National Register), the subject property is identified as being potentially eligible for the National Register of Historic Properties and is within the Project's APE. The comment is informational and does not comment on the adequacy, content, or findings of the Draft EIS/EIR.

2.5.51.2 Response to ROCK-2

The commenter states that the subject property (a single family residence) is adjacent to the railroad right of way and would be substantially impacted by noise associated with the Project. The commenter also states that no sound wall is proposed for the subject property but sound walls for other properties in the area are proposed (Baptist Church on Stuart Avenue and the apartment complex on the corner of Church Street). SANBAG notes that the subject property is used for residential uses, but designated commercial/industrial according to the Downtown Redlands Specific Plan (see Draft EIS/EIR Figure 3.2-4). This is likely the reason it was not categorized as a residential use when the noise analysis was being prepared in support of the Draft EIS/EIR. Receiver# 57 is the closest modeled receiver to the property at 610 E. Stuart but represents a receiver located at a further distance from the project. Based on Draft EIS/EIR Draft EIS/EIR Appendix H1 and H2 (see Table 6-1), the closest distance to the Project identified for Receiver#57 is 250 feet. The subject property is approximately 75 feet from the Project right of way. Based on the analysis provided in Draft EIS/EIR Appendix H1 and H2 (see Table 6-1), a representative receiver for Project-related noise at the subject property would be receiver #54 based on the distance between the building and the rail line. The closest distance to the Project identified for Receiver #54 is 75 feet. Therefore, this receptor location was added to Receiver #54 in Appendix H1 and H2. In addition, this minor refinement is reflected in Tables 3.6-6 and 3.6-7 of the Final EIS/EIR.

As provided in in Tables 3.6-6 and 3.6-7 of the Final EIS/EIR, the unmitigated noise impact at receiver #54 is considered "severe." However, with the implementation of quiet zones, no noise impact would result. Without the implementation of a quiet zone, another form of noise mitigation, such as a sound barrier, would be required for this location to reduce the noise impact. Revised Figure 8-2G in Appendix H reflects the placement of a sound barrier along the subject property's southern property line based on the property's Category 2 land use. However, with the implementation of quiet zones, no noise impact would result. If quiet zones are not implemented, a sound barrier as proposed under Mitigation Measure NV-4 would be required to minimize noise-related impacts to a less than significant level.

2.5.51.3 Response to ROCK-3

The comment notes the house is of historic construction and contains no soundproofing. Based on the results of the analysis, the implementation of Mitigation Measure NV-3 (Quiet Zones)

would effectively minimize noise levels to a less than significant level. See Response ROCK-4 for additional detail.

2.5.51.4 Response to ROCK-4

The commenter is concerned that the house could be impacted by vibration resulting from the Project. The Draft EIS/EIR provides a general assessment of vibration-related damage to adjacent structures from both construction and operation of the project. When assessing affects related to operational-sources of vibration, the analysis provided in the Draft EIS/EIR (see pages 3.6-30 to 3.6-31) considers three forms of vibration-related impacts: (1) vibration-related damage, (2) groundborne noise, and (3) vibration-related annoyance. Construction impacts are considered separately and in the contest of vibration-related damage and vibration-related announce.

As provided in FTA's Guidance, damage from vibration is rare and generally tied to unique circumstances, such as older historic structures and site geology, such as the presence of shallow bedrock or stiff clay soils (FTA 2006). However, as provided in Section 3.9 of the Draft EIS/EIR (see page 3.9-19), the geologic conditions underlying the railroad corridor are comprised of alluvium relatively young in origin and, therefore, these types of underlying soil condition are unlikely. Based on these geologic conditions, the vibration analysis assumes that soil conditions are "normal" (as opposed to efficient) (see Draft EIS/EIR Appendix H1 and H2).

Construction activities can produce varying degrees of ground vibration depending on the equipment and methods employed and the soil conditions within the area. The analysis provided in Effect 3.6-2 of the Draft EIS/EIR applies construction vibration levels associated with a vibratory roller at 0.210 peak particle velocity (PPV). This type of equipment would be used in conjunction with construction activities in downtown Redlands, which includes historic structures (and the subject property). Based on criteria presented in FTA's Noise and Vibration Manual (2006) fragile buildings and extremely fragile buildings are subject to damage when vibration exceeds 0.20 PPV (approximately 100 vibration decibels (VdB)) and 0.12 PPV (approximately 95 VdB), respectively. Based on construction occurring within a distance of 70 feet from the residential structure, it is unlikely that vibration levels to exceed these thresholds. However, vibration-related annoyance from construction activities could be significant, thereby requiring implementation of Mitigation Measures NV-1 and NV-2.

During Project operations and as provided Table 6-5 of Draft EIS/EIR Appendix H1, the predicted vibration level from rail pass-bys at the Redlands Depot would be approximately 74 VdB, which would be substantially lower than the corresponding damage criteria level of 90 VdB (see Appendix H1). Therefore, given that the structure on the subject property is setback considerably further (e.g., 70 feet), no adverse effect would result. Given that the project involves surface transportation infrastructure, ground-borne vibration impacts would not result. However, as provided in the Draft EIS/EIR (see page 3.6-30), based on modeling completed for the Project, adverse effects associated with vibration-related annoyance would result at the subject property from train operations. To minimize vibration annoyance from train operations, SANBAG is proposing the placement of ballast matts or similar technologies per Mitigation Measure NV-5 in the EIS/EIR. With this mitigation, vibration-related impact would not be



adverse (or significant). Please refer to Draft EIS/EIR Appendix H1 and H1 and Master Response 7, Vibration Assessment, for additional detail.

2.5.51.5 Response to ROCK-5

The commenter is concerned about air quality impacts associated with the Project's construction and operation. Emissions from construction equipment and from Project operation were considered for all locations along the railroad corridor. As provided on page 3.5-17 to 3.5-18 of the Draft EIS/EIR, emissions resulting from construction equipment and Project operation would be less than the applied thresholds developed by the South Coast Air Quality Management District (SCAQMD). In addition, as identified in Draft EIS/EIR Table 3.5-12 (see page 3.5-23), air quality health risks associated with Project construction and operation would be below the identified thresholds developed by the SCAQMD. No significant air quality impact would result.

2.5.51.6 Response to ROCK-6

The comment notes alterations to the structure located on the subject property. The commenter requests clarification on acquisition needs for the Project. The Draft EIS/EIR discusses property acquisition in Section 3.2 under Effect 3.2-5 (page 3.2-36 through 3.2-40). As identified in Draft EIS/EIR Section 3.2, Mitigation Measure LU-1 (page 3.2-39), SANBAG shall provide just compensation consistent with the requirements of the Uniform Relocation Assistance and Real Property Acquisition Policies Act and California Relocation Act for properties to be acquired. As provided in Appendix D2 of the Final EIS/EIR, the subject property located at 610 East Stuart Street is not listed for and would not be subject to property acquisition as part of the Project. Please also refer to Master Response 8, Land Acquisition, regarding land acquisition associated with the Project. This comment does not address the adequacy or findings of the Draft EIS/EIR.



Wayna Sparks

Page 2

1 REDLANDS PASSENGER RAIL PROJECT
 2 TUESDAY, SEPTEMBER 9, 2014
 3
 4 PUBLIC COMMENTS
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 22 WAYNA SPARKS: The train is going to come
 23 directly behind my house. I'm not crazy about it:
 24 Riffraff hanging out. If they are interested in
 25 buying my property, you know, maybe for a fairway

SPARKS-1
 SPARKS-2
 SPARKS-3
 SPARKS-4
 SPARKS-5
 SPARKS-6

Page 3

1 through or something, I'm willing to talk to them to
 2 negotiate because I'm going to sell and put my house
 3 up on the market. I can't do the train. My husband
 4 works nighttime, and I am there by myself with
 5 grandkids with me. I grew up with a train track
 6 behind my house as a kid, and the air quality was
 7 affected.
 8 I'm right down from the school. My
 9 granddaughters are going there. If they are
 10 interested in purchasing my property, please give me a
 11 call and talk to me.
 12 (Address: Wayna Sparks, 1857 E. Victoria
 13 Avenue, San Bernardino, CA 92408.)
 14

2.5.52 WAYNA SPARKS (SPARKS)

2.5.52.1 Response to SPARKS-1

The comment states that the Project alignment is located adjacent to the commenter's subject property at 1857 East Victoria Avenue in San Bernardino. This comment is informational and does not raise any issue related to the adequacy or findings of the Draft EIS/EIR.

2.5.52.2 Response to SPARKS-2

The comment expresses concerns related to "riffraff" frequenting the area once the Project is operational. Mitigation Measure SS-1 is proposed to address concerns related to safety and security through the preparation of a Safety and Security Management Plan (SSMP). Please also refer to Master Response 12 regarding Project safety and security.

2.5.52.3 Response to SPARKS-3

The commenter requests clarification on property acquisition for the subject property. The Draft EIS/EIR discusses property acquisition in Section 3.2 under Effect 3.2-5 (page 3.2-36 through 3.2-40). As identified in Draft EIS/EIR Section 3.2, Mitigation Measure LU-1 (page 3.2-39), and SANBAG shall provide just compensation consistent with the requirements of the Uniform Relocation Assistance and Real Property Acquisition Policies Act and California Relocation Act for properties to be acquired. As provided in Appendix D2 of the Final EIS/EIR, the subject property located at 1857 East Victoria Avenue is not listed for and would not be subject to property acquisition as part of the Project. Please also refer to Master Response 8 regarding land acquisition associated with the Project. This comment does not address the adequacy or findings of the Draft EIS/EIR.

2.5.52.4 Response to SPARKS-4

The commenter has concerns related to air quality associated with Project operations. As provided on page 2-17 of the Draft EIS/EIR, SANBAG is proposing the use of locomotives or a DMU that meets EPA's Tier IV standards. The use of this technology will minimize emissions of both criteria air pollutants and toxic air contaminants, such that Project-related emissions would not exceed criteria established by the South Coast Air Quality Management District (SCAQMD). Please refer to Master Response 10 for additional discussion.

2.5.52.5 Response to SPARKS-5

The comment states that the commenter's subject property is located north of Victoria Elementary School. This comment does not address the adequacy or findings of the Draft EIS/EIR.

2.5.52.6 Response to SPARKS-6

The comment states that if there is interest in purchasing the subject property, to contact the commenter. This comment does not address the adequacy or findings of the Draft EIS/EIR.



Dan Sumpter

Date: Monday, September 29, 2014 11:24:18 AM

Tim,

As a long standing and continuing customer currently being serviced weekly by the BNSF on the Redlands spur, please accept the following comments and questions.

When will the effect start?

How long will we be affected?

Will we return to the present conditions?

At the public meeting on September 9th, I was told by one of the PE's that our Company would be made whole. What exactly does that mean?

When do you think we can get answers to these questions?

Given the scope of the project, there is no doubt that it will interrupt our current flow of materials and we are very concerned about what will need to be done to maintain our production. The sooner we can plan around these interruptions, the better. Please contact me as soon as possible to discuss. Thank you.

} SUMPTER-1
} SUMPTER-2
} SUMPTER-3
} SUMPTER-4
} SUMPTER-5
} SUMPTER-6

*Sincerely,
Dan Sumpter*

*White Flyer Targets
Reagent Chemical & Research, Inc.
1454 So. Sunnyside Avenue
San Bernardino, CA 92408
Tel: 909 796-4059
Fax: 909 796-0780
dsumpter@reagentchemical.com*

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2.5.53 DAN SUMPTER (SUMPTER)

2.5.53.1 Response to SUMPTER-1

The commenter requests clarification on when Project construction would occur. Project construction is planned for late 2015 through 2018. Revenue operations would start in late 2018. See pages 2-17 and 2-45 of the Draft EIS/EIR. This comment expresses an opinion and does not raise any issues related to the adequacy or findings contained in the Draft EIS/EIR.

2.5.53.2 Response to SUMPTER-2

The commenter requests clarification on how long Project construction would occur. Please refer to Response SUMPTER-1. This comment expresses an opinion and does not raise any issues related to the adequacy or findings contained in the Draft EIS/EIR.

2.5.53.3 Response to SUMPTER-3

The commenter requests clarification on when existing service conditions on the Redlands spur would be restored. SANBAG intends to maintain existing freight service on the branch line consistent with its operating agreement with Burlington North Santa Fe (BNSF) Railway Company both during construction, to the maximum extent feasible, and during passenger operations (see pages 2-45 of the Draft EIS/EIR). During the construction of Bridge 3.4, SANBAG may be required to transload existing freight shipments; however, this would be a temporary occurrence and freight traffic would resume following construction. This comment does not address the adequacy or findings of the Draft EIS/EIR.

2.5.53.4 Response to SUMPTER-4

The commenter requests clarification on a statement provided at the September 9th public meeting. Please refer to Response SUMPTER-3. This comment does not address the adequacy or findings of the Draft EIS/EIR.

2.5.53.5 Response to SUMPTER-5

The commenter requests clarification on when these questions would be answered. SANBAG is currently negotiating the terms of an agreement with BNSF and will be able to provide the commenter with additional information once those negotiations are complete. This comment does not raise any issues related to the adequacy or findings of the Draft EIS/EIR.

2.5.53.6 Response to SUMPTER-6

The commenter has concerns related to interruptions in freight traffic during construction. As provided in Response SUMPTER-3 and SUMPTER-5, SANBAG intends to maintain freight traffic throughout construction with the possible exception of Bridge 3.4 and is currently negotiating the terms of an agreement with BNSF regarding existing freight service. This comment does not address the adequacy or findings of the Draft EIS/EIR.



Valerie

From: [Valerie](#)
To: rprp_public_comments@sanbag.ca.gov
Subject: Rail to Redlands concerns
Date: Friday, September 26, 2014 2:36:57 PM

Mitch:

I would like to express some concerns I have regarding the Rail to Redlands project:

1. Traffic congestion near the 14 rail crossings
2. Noise from the 24 trains per day
3. Negative effect on property values

Sincerely,
Lifetime Resident of Redlands

} VALERIE-1
 } VALERIE-2
 } VALERIE-3



2.5.54 VALERIE (VALERIE)

2.5.54.1 Response to VALERIE-1

SANBAG appreciates the commenter taking the time to express their concerns as they relate to the Project. The commenter has concerns about traffic congestion near the 14 proposed rail crossings. Traffic congestion is addressed in Section 3.3 of the Draft EIS/EIR. The analysis evaluates both traffic delay as result of the Project (see Effect 3.3-1, pages 3.3-14 to 3.3-24) and potential traffic safety hazards (see Effect 3.3-3, pages 3.3-26 to 3.3-28). Please refer to Master Response 13, Traffic and Circulation.

2.5.54.2 Response to VALERIE-2

The commenter has concerns about Project train noise. Project-related train noise is evaluated in Section 3.6 of the Draft EIS/EIR (see Impact 3.6-1 on pages 3.16-14 through 3.16-17). Please refer to Master Responses 1, Train Noise Impact Methodology, and 2, Mitigation for Train Noise, for additional discussion on train noise.

2.5.54.3 Response to VALERIE-3

The commenter has concerns about the Project's effect on property values in the area. Please refer to Master Response 15, Property Values.



Jim VerSteeg



Thank you for your interest in the Redlands Passenger Rail Project.

San Bernardino Associated Governments (SANBAG) would like to accurately and personally address your questions and concerns. Please complete the contact information below and indicate the best way to reach you.

CONTACT INFORMATION

Name: Jim Ver Steeg

Street Address: 300 E, STUART AVE.

City: Redlands State: CA Zip Code: 92374

Phone: 909.792.3830 Cell: ()

Email: _____ FAX: ()

Are you a local business owner? Yes: No:

If so, please name the business: FRANKLIN'S GARAGE

Preferred Contact Method: (Please check one)

By Phone: Email: FAX: In Writing:

YOUR COMMENTS/QUESTIONS What are the latest plans to close streets at 7th St. and Stuart Ave, next to my business location?

Where do you plan to install noise walls between 7th street and Church streets?

Thank you for your input on the Redlands Passenger Rail Project.

To provide comments or questions, send an email to RPRP_Public_Comments@sanbag.ca.gov or call the project helpline at (855) SBR-RAIL / 727-7245.

} VERSTEEG-1

} VERSTEEG-2



2.5.55 JAMES VERSTEEG (VERSTEEG)

2.5.55.1 Response to VERSTEEG-1

The comment requests clarification on the proposed plans to close streets at 7th Street and Stuart Avenue. Please refer to Master Response 4, Closures at Existing At-Grade Crossings. As provided on Table 2-4 of the Draft EIS/EIR, SANBAG is proposing the closure of the 7th Street at-grade crossing as part of the Project. A pedestrian crossing (with safety gates) would be maintained at this current at-grade crossing as part of the Project. This comment does not raise any issue related to the adequacy or findings of the Draft EIS/EIR.

2.5.55.2 Response to VERSTEEG-2

The comment requests clarification on soundwall installation between 7th Street and Church Street. SANBAG is proposing the implementation of quiet zones are the primary noise mitigation measure for the Project. The installation of sound barriers within downtown Redlands and within the Redlands Santa Fe Depot Historic District are not planned. Please refer to Master Responses 2, Mitigation for Train Noise, and 3, Quiet Zones, for additional information on soundwalls.



Andrew Walters

Andrew M. Walters
1503 Webster Street
Redlands CA 92374
(530) 400-2948

September 25, 2014

Mitchell A. Alderman
Director of Transit & Rail Programs
San Bernardino Associated Governments
1170 W. 3rd Street, 2nd Floor
San Bernardino, CA 92410

Dear Mr. Alderman:

This letter is in response to the request for comments as part of the public review process for the Draft EIR/EIS for the Redlands Passenger Rail Project (August 2014), prepared by the Federal Transit Administration (FTA) and San Bernardino Associated Governments (SANBAG). As the environmental document is extremely large, my review focused only on the cultural resources and cumulative impacts sections, as this is my area of professional expertise and personal interest.

At the outset, I wish to convey that I am by no means opposed to the project. As a resident of Redlands I can see the benefit of extension of rail services to Redlands and in fact would likely ride the train to work myself. However, I am concerned that cultural resources concerns were not adequately balanced into the transportation planning and environmental review process. As both NEPA and NHPA Section 106 are procedural laws and both contain a public or consulting party review and disclosure process, this is very important.

I also feel it necessary to disclose that I have 16 years of professional experience in cultural resource management in which time I have developed some knowledge of the NHPA Section 106 and NEPA processes.

I offer the following comments:

WALTERS-1



Andrew M. Walters
September 25, 2014

General:

1. The documents indicate that NHPA Section 106 consultation is ongoing. If that is the case, future consultation efforts should consider a re-evaluation of several cultural resources including the Mill Creek Zanja and Kite Shaped Track as these resources have higher potential for eligibility than conveyed in the Cultural Resources Technical Memorandum (June 2014). If NHPA Section 106 consultation has been closed, consideration should be given to reopening it in light of the information provided below.

WALTERS-2

Consultation efforts:

2. The Federal Highway Administration (FHWA) and the Federal Transit Administration (FTA) have jointly issued an Interim Policy on Public Involvement. Have the goals and objectives of this policy been met? (http://www.fta.dot.gov/15154_226.html)

WALTERS-3

I attended the public meeting at ESRI on September 4, 2014. The presentation was informative and the cookies were good. However, the aftermath, when members of the public were afforded the opportunity to ask questions, seemed rather chaotic. It did not appear that enough project staff were truly available to answer questions, as there was one guy standing in the corner to answer all environmental questions. While standing in line to ask questions, I spoke with several members of the public who seemed a little exasperated or confused that they were expected to pick up and review a multi-volume environmental document on the spot, of which there appeared to only be one copy on hand. I left without having my own questions answered. Was this truly an opportunity for the public to meaningfully receive information and comment on the environmental document?

WALTERS-4

3. The Cultural Resources Technical Memorandum (June 2014) indicates that consultation was undertaken pursuant to 36 CFR Part 800.4(a)(3), but was an adequate effort made to identify interested parties or actual consulting parties under 36 CFR Part 800.3(f)? It appears that one letter was sent out to numerous organizations on April 4, 2012 or October 30, 2012 with no subsequent follow up. Acknowledged, in the cultural resources management world this is a generally accepted minimal “good faith effort.” However, is the spirit and intent of the ACHP regulations being met? First, experience has shown that more organizations will respond if they know how to respond and the process is at least minimally explained to them. Second, it would seem reasonable to extend a little more effort in identifying interested parties or actual consulting parties in a community such as Redlands that has a large historic district that will clearly be affected by the project and that community has a known historic preservation constituency. In *A Citizen’s Guide to Section 106 Review*, the Advisory Council on Historic Preservation clearly gets to the point: “In addition to seeking the views of the public, federal agencies must actively

WALTERS-5

WALTERS-6



Andrew M. Walters
September 25, 2014

consult with certain organizations and individuals during review. This interactive consultation is at the heart of Section 106 review.”

WALTERS-6
Continued

Inventory and evaluation efforts under NHPA Section 106 (Cultural Resources Technical Memorandum (June 2014)):

4. Archaeological site CA-SBR-14744H: This site is an historic period trash scatter located at least partially within the APE on the fringe of Redlands Santa Fe Depot Historic District. This site was identified by Caltrans (FHWA) for the related and adjacent Park Once Transit Center Project, the footprint of which is also located with the APE for the Redlands Passenger Rail Project. The Cultural Resources documents for the Park Once Project are pending, however one is cited in the references section (Mason 2012), a document that was never approved by Caltrans. However, it was Caltrans intent to recommend the site as eligible under NRHP Criterion D and seek SHPO concurrence. No mention of this site appears in the project documentation. The site has a trinomial, documentation should be at the information center. Has an adequate effort been undertaken to identify cultural resources within the APE?

WALTERS-7

5. The AT&SF Kite Shaped Track is a figure-eight shaped rail line, the Eastern Loop of which is within the APE for the current undertaking. The DPR form prepared for the project states that the KST is not eligible under NRHP Criterion A because it lacks integrity due to the fact that the citrus groves have been lost, there has been economic development adjacent the tracks, the La Grande station in Los Angeles has been demolished, and promotional signage has been removed. This is a valid argument, but only tells part of the story:

WALTERS-8

The portion of the KST in the APE extended from the NRHP eligible Santa Fe Depot in San Bernardino to the NRHP Eligible Santa Fe Depot in Redlands. It is curious that the actual rails connecting two NRHP eligible historic properties were not given a higher level of consideration.

There are at a minimum several intact historic period sections of rails and rail related features along the Eastern Loop of the KST. In Redlands, for example, the rails in front of the NRHP eligible depot are date stamped 1904 and some of the toe plates are stamped 1910, the same year the depot was completed. This would seem to constitute original materials retaining integrity of setting, workmanship, design, materials, etc. Similarly, what has been termed an Archimedes screw used for loading/unloading grain is located on the tracks east of Texas Street. Such features would indicate a higher level of integrity along the Eastern Loop of the KST than recognized on the DPR form.

WALTERS-9

Andrew M. Walters
September 25, 2014

The above argument regarding rail segments that retain integrity can be extended to several of the KST bridge crossings. The Santa Anna River Bridge and Warm Creek bridge do not appear to be individually eligible. However, their eligibility was not even considered as contributing elements to the larger linear resource, the Kite Shaped Track to which they may have contributed to its integrity.

WALTERS-10

The cultural resources studies for the Redlands Park Once Project, which are in process by Caltrans, were prepared to find the section of the KST within the Redlands Santa Fe Depot Historic District eligible as a contributor to the District. Albeit the original District nomination did not include the tracks in front of the depot, however, that documentation was prepared two decades ago, and perhaps should it should be updated more thoroughly. As we know, NRHP documentation prepared in the 1990s and before did not use the same guidance and methodology we use today, and greater consideration should have been given to reevaluation of such resources. Nevertheless, in regard to contributing features/characteristics of an historic property, 36 CFR Part 800.5(a)(1) states: “Consideration shall be given to all qualifying characteristics of a historic property, including those that may have been identified subsequent to the original evaluation of the property’s eligibility for the National Register.”

WALTERS-11

Under NRHP Criterion A, the KST is considered only as a tourist train. However there are other events that should be considered. What about the influence of the KST on the growth of Redlands? Wealthy Angelenos or Easterners bought homes in Redlands or retired to Redlands to take up the citrus industry. Perhaps Redlands has a larger stock of high style residences than many other cities in the area for this reason. Further research may well indicate there are other potential “events” that should be considered under Criterion A.

The DPR evaluates the KST in its entirety, including areas far removed from Redlands that have clearly lost integrity. I understand it is standard operating procedure to evaluate the totality of a resource. However, in addition to evaluating the totality, perhaps it would be productive to use the Eastern Loop, a section that retains a reasonable amount of integrity, as the largest remaining segment of the resource that retains some integrity and find it eligible under Criterion A?

WALTERS-12

It may be worthwhile to point out that large cultural resources, particularly linear features, often lack integrity because projects proposed by different agencies over time have determined segment after segment not-eligible, usually based on the argument that the segment lacks integrity, regardless of whether or not there is any significance. Any type of linear infrastructure, be it a road, rail line, canal, etc., must change over time to meet the needs of its constituency and it should be recognized that change is expected



Andrew M. Walters
September 25, 2014

particularly in an urban setting. The real question should be does the property retain its overall historic character and integrity rather than dissecting the details. This would require more of a balancing between significance and integrity: for a resource that may have demonstrable significance, you can give a little leeway on integrity.

WALTERS-12
Continued

- 6. The Mill Creek Zanja: According to the Cultural Resources Technical Memorandum, the original NRHP Nomination does not include the portion of the Zanja that is in the current APE located west of Division Street, nor does it clearly address integrity. However, the original NRHP nomination form actually distinguishes the 6 miles of the Zanja east of the Redlands business district as being included in the nomination. The subject segment of the property is located east of the business district and was included in the original nomination. In addition, there is a picture of the segment of the Zanja within the APE included in the original nomination. I would contend therefore, that the segment in the APE is part of the NRHP eligible Mill Creek Zanja.

WALTERS-13

In the technical memorandum the argument that is typically used to find sections of linear resources not eligible (the portion in the APE lacks integrity because it has been upgraded over the years) was used. It should be considered that this methodology, which is technically adequate for lesser properties as it has been used repeatedly in the past, does not actually manage the resource or truly evaluate its significance: it piecemeals linear resources and does not consider the totality of the resource. It is conceivable that over time as several projects apply this methodology, that the resource will be chipped away one small piece at a time. It also sets a precedent for the next project to come along to do the same thing, chipping away another piece of the resource. Maybe this is also a cumulative effects/impacts issue?

WALTERS-14

As mentioned above in regard to the Kite Shaped Track, more flexibility should be used In assessing integrity of resources that are clearly significant. After all, how many 1820 zanjias or water conveyance features that old of any kind are there in California, Southern California, the Inland Empire? One could actually argue that even though the Zanja has suffered a loss of integrity, it is of such overwhelming significance that minor integrity losses of sections of the waterway should not matter much at all.

WALTERS-15

Simply put, linear resources are living resources that change over time. Change over time is expected and does not always mean a loss of integrity, but simply that it has changed. Does the resource maintain how it has historically been used and does it function in a same or similar manner? Can the American public understand its historic significance through how it continues to appear and operate? For linear resources, location and design are the primary means of evaluating both significance and effects. Is it in the same



Andrew M. Walters
September 25, 2014

location? Is the design generally the same? Consider relooking at the Zanja through this perspective, which is commensurate with the level of significance of the resource.

WALTERS-15
Continued

Finding of Effect 106 (Cultural Resources Technical Memorandum (June 2014)):

- 7. Section 5.0 states that one of five railway stations will be located within the Redlands Santa Fe Depot Historic District. While the FOE provides a reasonable argument that direct effects will not cause an adverse effect on the District or any of its contributors, 36 CFR Part 800.5 Criteria Examples iv and v, which relate more to indirect effects, are not addressed at all.
- 8. In addition, 36 CFR Part 800.5(a)(1) states “Adverse effects may include reasonably foreseeable effects caused by the undertaking that may occur later in time, be farther removed in distance or be cumulative.” While it may be debatable what is meant by “cumulative effects” in this Section 106 context, nothing is mentioned here or in the Cumulative Impacts chapter of the EIR/EIS to show that either cumulative effects under NHPA Section 106, or cumulative impacts under CEQA or NEPA were given any real consideration.
- 9. The primary argument that is made here is that construction related vibration could cause an adverse effect to the Redlands Santa Fe Depot Historic District. Therefore, structural evaluations will be required for five buildings. With implementation of unspecified stabilization measures from those evaluations that all meet the Secretary of the Interior’s Standards for the Treatment of Historic Properties, there will be no adverse effect to any of the buildings. This is a conclusion that will likely occur, but should be substantiated with actual analysis. More in-depth analysis should be provided to demonstrate what the stabilization measure are (maybe examples) and how they meet the SOIS Standards.

WALTERS-16

WALTERS-17

WALTERS-18

Cumulative Effects:

- 10. Cumulative impacts analysis regarding the Redlands Santa Fe Historic District is inadequate. It appears what the analysis is saying is that due to the application of one mitigation measure, CUL-1 for structural Evaluations which is intended to mitigate project level vibration impacts, there will be no cumulative impact under CEQA or NEPA. The No adverse Effect Finding is for Section 106, which does not mean there is no effect, it means that there is an effect, but that effect has been determined to be not adverse. But the project will still have an effect on the district that needs to be analyzed cumulatively with other past present and future projects under NEPA (and CEQA) (incremental impact of multiple actions).
- 11. The analysis provided in Section 4.3.11 does not even follow the methodology outlined in Section 4.1. Actually, Caltrans has great guidance available online for preparing

WALTERS-19

WALTERS-20



Andrew M. Walters
September 25, 2014

cumulative impacts analyses (“Guidance for Preparers of Cumulative Impact Analysis Approach and Guidance,” http://www.dot.ca.gov/ser/cumulative_guidance/approach.htm)

WALTERS-20
Continued

12. Consider that the Proposed project will add a railway station within the Redlands Santa Fe Depot Historic District, thus modifying, or impacting, albeit in a minor way, the District. In addition to that, the Redlands Park Once Project will construct a multi-story parking garage immediately adjacent to the district, causing at a minimum, indirect effects that may or may not be considered adverse. In addition to that, the Redlands Promenade is another large development on the fringe of the District that will result in some type of effect, at least indirect. Further, there is no clear mention of past projects that have impacted the District, such as construction of the Krikorian Theater and large parking lot within the District. In addition, all these developments will increase traffic within and near the district, and possible cause other effects. The EIR/EIS should provide an adequate analysis in accordance with the definition of cumulative impacts provided in Section 4.1.1 and 4.1.2.

WALTERS-21

Thanks you for the opportunity to comment on the environmental document and technical studies.

Sincerely,

Andrew M. Walters

- c. Dominique Paukowitz, Community Planner, Federal Transportation Administration
- Kathleen Forrest, Historian, Office of Historic Preservation

2.5.56 ANDREW WALTERS (WALTERS)

2.5.56.1 Response to WALTERS-1

The comment is introductory to other comments and provides the commenter's credentials. The comment also states the commenter's general support for the Project and concerns related to the analysis of cultural resources in the Draft EIS/EIR. The commenter's concerns associated with cultural resources are addressed in Responses WALTERS-1 through WALTERS-21 respectively.

2.5.56.2 Response to WALTERS-2

The comment states that the Draft EIS/EIR indicates National Historic Preservation Act (NHPA) Section 106 consultation is ongoing. The commenter disagrees with the findings of the Cultural Resources Technical Memorandum prepared for the Project and asserts that the Mill Creek Zanja and the Kite Shaped Track be re-evaluated for eligibility under Section 106 of the NHPA. At the time of the release of the Draft EIS/EIR on August 6, 2014, NHPA Section 106 consultation was ongoing. Since the release of the Draft EIS/EIR, SHPO issued a concurrence letter to FTA for the Project on August 14, 2014. Therefore, the Final EIS/EIR includes SHPO's concurrence with the eligibility determination and findings of effect for the Mill Creek Zanja and the Kite Shaped Track as provided in the Cultural Resources Technical Memorandum provided in Appendix M of the Draft EIS/EIR. As indicated in SHPO's concurrence letter, based on the information provided in the Cultural Resources Technical Memorandum, SHPO concurs with SANBAG's and FTA's determination that the AT&SF Kite Shaped Track is not eligible for listing on the NRHP. Similarly, SHPO concurs with SANBAG's and FTA's determination that the segment of the Mill Creek Zanja within the APE was determined to not be eligible to the NRHP due to lack of integrity and setting. Please refer to Master Response 14, Mill Creek Zanja.

2.5.56.3 Response to WALTERS-3

The comment states that the Federal Highway Administration (FHWA) and FTA have jointly issued an Interim Policy on Public Involvement. The commenter requests clarification on if the goals and objectives of this policy have been met. SANBAG's outreach activities through the release of the Draft EIS/EIR have generally exceeded the goals and policies outlined in FTA's Interim Guidance on Public Involvement. Specifically, SANBAG and FTA prepared a public involvement plan for the Project, which is provided as Appendix B to the Draft EIS/EIR. The public involvement plan documents the activities SANBAG has undertaken to inform the public of the Project up to the release of the Draft EIS/EIR. Additionally, numerous outreach activities have been conducted in conjunction with the release of the Draft EIS/EIR. Please refer to Master Response 9, Project Noticing, for additional information on public noticing for the Project.

2.5.56.4 Response to WALTERS-4

The comment provides a narrative on the commenter's experience at and feedback on the format of the public meeting on September 4, 2014. Four scoping meetings were conducted prior to the release of the Draft EIS/EIR and two meeting were held concurrent with the 45-day



public review period. In addition, the Draft EIS/EIR was available on the SANBAG website and printed hard copies made available at various locations within the Project area.

2.5.56.5 Response to WALTERS-5

The comment requests clarification on if an adequate effort was made to identify interested parties or consulting parties under 36 CFR Part 800.3(f) and if the Advisory Council on Historic Preservation (ACHP) regulations were being met for the Project. SANBAG and FTA have completed extensive consultation as part of the Section 106 and NEPA processes consistent with the goals and objectives of the ACHP. Draft EIS/EIR Section 6.0 (see page 6-4) and Appendix M (Cultural Resources Technical Memorandum) includes information on consultation with interested parties. Specifically, Appendix C (Consultation with Interested Parties) of the Cultural Resources Technical Memorandum identifies that Section 106 consultation opportunities were afforded to the Chinese Historical Society of Southern California, the Redlands Conservancy, the California Office of Historic Preservation (SHPO), the Native American Heritage Commission, the San Manuel Band of Mission Indians, the Ramona Band of Cahuilla Mission Indians, the Gabrielino/Tongva San Gabriel Band of Mission Indians, the Morongo Band of Mission Indians, the Serrano Nation of Indians, and the Soboba Band of Mission Indians. SANBAG and FTA have effectively integrated the Section 106 and NEPA review processes for the Project thereby fulfilling the goals as set for in NEPA and the Council on Environmental Quality (CEQ) regulations, and by the ACHP in its Section 106 regulations.

2.5.56.6 Response to WALTERS-6

The commenter recommends that additional outreach and coordination efforts be made in identifying interested or consulting parties or organizations within the community of Redlands due to community interest in potential impacts to the Redlands Historic District. The comment also provides an excerpt from *A Citizen's Guide to Section 106 Review*. SANBAG and FTA have made several attempts to solicit input from the public and local organizations as part of the Section 106 process. Please refer to Response WALTERS-5 for information associated with consulting parties as part of the Section 106 process. In addition, there were multiple public outreach and scoping meeting conducted for the Project and the Draft EIS/EIR was made available online and at various physical locations for public comment and input during the comment review period. Please refer to Chapter 6 of the Draft EIS/EIR (pages 6-1 through 6-13) and Master Response 9, Project Noticing, for additional detail on outreach activities and Project noticing that occurred during the preparation for the Draft EIS/EIR for the public and local organizations.

2.5.56.7 Response to WALTERS-7

The comment provides a summary of Archaeological Site CA-SBR-14744H and mentions that the site is partially within the Area of Potential Effect (APE) of the Redlands Santa Fe Depot Historic District. The commenter asserts that the site was identified by Caltrans as part of the Park Once Transit Center Project (Park Once) of which the footprint is located within the APE for the Project. The commenter requests clarification on if an adequate effort was made to identify cultural resources within the Project APE. The San Bernardino Archaeological Information Center conducted two separate cultural resources record searches for the proposed

Project; neither record search produced information for cultural resource studies or site records associated with the Park Once project. No site record for site CA-SBR-14744H was included in the records search results, presumably because the site record had not yet been submitted to the information center (2012). Both record searches delineated site CA-SBR-5314H (Redlands Chinatown site) as encompassing the Park Once project area. Information was provided that the Park Once project cultural resource studies had been completed by ECORP, but had not been approved by Caltrans. This area is included in the analysis as part of the Redlands Chinatown site and as such, FTA will ensure that Mitigation Measure CUL-4 is implemented. Mitigation Measure CUL-4 specifies that full time construction monitoring for archaeological deposits will be conducted in the project APE within the Redlands Chinatown site boundary as well as a 50-foot buffer on each side of the site boundary. SHPO concurred with this approach in its letter provided on August 14, 2014.

2.5.56.8 Response to WALTERS-8

The comment provides information on the AT&SF Kite Shaped Track (KST) and a summary of the DPR form prepared for the KST. The commenter generally agrees that the conclusions made for the KST are valid but questions why the KST portion connecting the Santa Fe Depot in San Bernardino to the Santa Fe Depot in Redlands were not given a higher level of consideration. The 1991 Registration Form for the Redlands Santa Fe Depot Historic District did not include the KST segment running through district as a contributing element. The evaluation of the KST segment found that the resource lacked sufficient integrity of setting, feeling, and association for NRHP or CRHR listing mainly due to adjacent development and the elimination of the citrus groves that were crucial to its significance. SHPO concurred with this finding in its letter provided on August 14, 2014 (see Appendix M).

2.5.56.9 Response to WALTERS-9

The comment states that there are some remaining features along the KST that would seem to contribute to the remaining integrity of the KST segment than what is currently recognized on the DPR form. While some materials dating to the period of the KST's period of passenger operation (1893-1938) may be present, the evaluation of the KST found that the resource lacked sufficient integrity of setting, feeling, and association for CRHR or NRHP listing mainly due to adjacent development and the elimination of the citrus groves that were crucial to its significance. SHPO concurred with this finding in its letter provided on August 14, 2014.

2.5.56.10 Response to WALTERS-10

The comment states that several of the KST bridge crossings (specifically the Santa Ana River Bridge and the Warm Creek Bridge) would seem to contribute to the remaining integrity of the KST segment. These bridges do not appear to be contributors to a NRHP-eligible or CRHR-eligible linear resource because the KST was determined not to be eligible. Please refer to Response WALTERS-9.

2.5.56.11 Response to WALTERS-11

The comment states that Caltrans' Park Once Project may determine the KST segment within the Redlands Santa Fe Depot Historic District eligible as a contributor the District. The commenter also recommends that that NRHP documentation for the KST segment be updated and reevaluated per current NRHP's guidance and methodology. Please refer to Response WALTERS-9.

2.5.56.12 Response to WALTERS-12

The commenter agrees that the DPR form prepared for the KST evaluates the KST in its entirety. The commenter provides information on how linear features, such as the KST, can be evaluated for overall historic character and integrity. As previously stated in Response WALTERS-8 and WALTERS-9, the evaluation of the KST found that the resource does not maintain its overall historic character and integrity due to diminished setting, feeling, and association, the results of adjacent development and the elimination of the citrus groves that were crucial to its significance. SHPO concurred with this finding in its letter provided on August 14, 2014.

2.5.56.13 Response to WALTERS-13

The comment provides a summary of the conclusions made about the Mill Creek Zanja in the Cultural Resources Technical Memorandum. The commenter disagrees with the conclusions made in the Cultural Resources Technical Memorandum about the Mill Creek Zanja segment eligibility determination. Please refer to Master Response 14.

2.5.56.14 Response to WALTERS-14

The commenter does not agree with the methodology used to determine the Mill Creek Zanja segment eligibility determination. The commenter asserts that this type of methodology piece-meals linear resources and could cause a cumulative impact. Please refer to Master Response 14 regarding Zanja segment eligibility determination. The evaluation did not challenge the eligibility of, or chip away at, the portion of the Zanja east of Division Street, about which the 1976 Nomination Form was unequivocal. The resource as a whole was segmented to exclude portions of the original Zanja course when nominated for listing on the NRHP in 1976.

2.5.56.15 Response to WALTERS-15

The commenter recommends that more flexibility and consideration be given in assessing the integrity of the Mill Creek Zanja. Please refer to Master Response 14.

2.5.56.16 Response to WALTERS-16

The comment states that the Finding of Effect for Section 106 provides a reasonable argument the direct effects would not cause an adverse effect on the Historic District or any of its contributors. The commenter asserts that 36 CFR Part 800.5 Criteria Examples IV and V which deal with indirect effects are not addressed in the Draft EIS/EIR. Regarding Criteria Examples



IV, the cultural resources study concluded that the Preferred Undertaking will not involve activities that will change the character of the historic district's or any of its contributor's use or physical features. Regarding Criteria Example V, the cultural resources study also concluded that the Preferred Undertaking does not involve any activities that would introduce such elements that diminish the integrity of the historic district or any of its contributor's significant historic features. The rail line adjacent to the District was in operation during the District's period of significance (1889-1941). Therefore, reintroducing rail service will not diminish the integrity of the district. SHPO concurred with this Finding of Effect in its letter of August 14, 2014 (see Appendix M).

2.5.56.17 Response to WALTERS-17

The commenter asserts that the Draft EIS/EIR did not address cumulative effects associated with the NHPA Section 106, CEQA, or NEPA processes. The cumulative effects of the Project are considered both in the context of Section 106 discussion in Chapter 4.3.11 of the Draft EIS/EIR for CEQA/NEPA. As stated in the Draft EIS/EIR (page 3.12-43 to 3.12-44), although the Project would have an "effect" on the historic district; however, with the application of the proposed Mitigation Measure CUL-1, the effect would not be adverse under Section 106 or NEPA. In considering the Project's cumulative impact to the historic district under CEQA, the implementation of proposed Mitigation Measure CUL-1 would be effective in minimizing the Project-related impacts to a less than significant level such that they would not be cumulatively considerable. Notwithstanding this circumstance, SANBAG acknowledges that other future projects could also result in incremental effects to the historic district; however, these projects would also be subject to separate Section 106 review and any supporting mitigation requirements.

2.5.56.18 Response to WALTERS-18

The comment states that the Draft EIS/EIR calls for structural evaluations to be conducted for the five identified buildings within the Redlands Santa Fe Depot Historic District to address construction related vibration. The commenter requests that additional information be provided regarding stabilization measures that would be employed and how such measures would meet the Secretary of the Interior's Standards for the Treatment of Historic Properties. As stated in Draft EIS/EIR Mitigation Measure CUL-1 (see page 3.12-41), a qualified engineer will prepare structural evaluations for the five identified buildings. SANBAG will ensure that the structural evaluations are conducted properly and that any stabilization measures implemented as recommended by the structural evaluations will be temporary (installed only during construction), or, if permanent, will meet the Secretary of the Interior standards for the treatment of historic properties. Prior to any vibration-causing construction activities, SANBAG will ensure that any temporary stabilization measures recommended by the structural evaluations are properly implemented, and that any permanent stabilization measures recommended are implemented in accordance with Secretary of the Interior Standards and in coordination with SHPO. Mitigation Measure CUL-1 was revised to reflect these refinements as noted below. SHPO concurred with this approach in its letter provided on August 14, 2014 (see Appendix M of the Final EIS/EIR).

CUL-1 Structural Evaluations. In order to determine the structural stability of the Redlands Depot, Cope Commercial Company Warehouse, Haight Packing House, Redlands City Transfer, and the brick warehouse at 440 Oriental Avenue, structural evaluations shall be prepared by a qualified engineer selected by SANBAG for these five ~~four~~ buildings prior to the commencement of construction. The structural evaluations will also address maximum allowable levels of vibration during construction and, if appropriate, will recommend reduced levels of stabilization in conjunction with vibration monitoring. Qualified recommendations within the structural evaluation shall be adhered to, as appropriate. Permanent stabilization will follow the Secretary of the Interior's guidelines for the treatment of historic properties and will be coordinated with SHPO. ~~;~~ ~~—~~ ~~—~~ If the buildings are temporarily stabilized for the duration of construction activities, ~~when removed,~~ the buildings will be restored to their pre-construction condition when the temporary stabilization measures are removed.

These refinements to Mitigation Measure CUL-1 are intended to clarify information included in the Draft EIS/EIR and do not change the analysis or conclusions made in the Draft EIS/EIR.

2.5.56.19 Response to WALTERS-19

The commenter states that the cumulative impacts analysis for the Redlands Santa Fe Historic Depot is inadequate. Please refer to Response WALTERS-17 and Master Response 11. The cumulative impact analysis for the Redlands Santa Fe Depot is adequate and follows the methodology outlined in page 4-2 of the EIS/EIR. As provided on page 4-34, the cumulative analysis indicates that Project construction could result in indirect effects to adjacent historical structures that could be cumulatively considerable under NEPA and CEQA. However, through the application of Mitigation Measure CUL-1, these cumulative effects would be minimized such that they would not be cumulatively considerable. Refer to Master Response 11 for additional discussion.

2.5.56.20 Response to WALTERS-20

The commenter states that the analysis provided in Draft EIS/EIR Section 4.3.11 does not follow the methodology outlined in Draft EIS/EIR Section 4.1. The commenter also states that Caltrans has good guidance for preparing cumulative analysis. The cumulative analysis provided in Section 4.3.11 follows the methodology laid out on page 4.2 of the Draft EIS/EIR. All cumulative projects inventoried for the Project are listed in Table 4-1 of the Draft EIS/EIR to set the cumulative and future project context within the Cumulative Study Area delineated in Figure 4-1. The cumulative analysis considers the cumulatively considerable effect of the Project's contribution to adverse effects to the historic district. With the incorporation of the project-level mitigation, the Project's effects would not be cumulatively considerable. SHPO concurred with the findings of effect to the district as provided in Appendix M of the Final EIS/EIR.

2.5.56.21 Response to WALTERS-21

The commenter states that the placement of the Downtown Redlands Station within the Redlands Santa Fe Depot Historic District will modify the Redlands Santa Fe Depot Historic



District. The commenter also states that past, current and future projects (such as the Park Once Project, Redlands Promenade Project, Krikorian Theater and parking lot) within the District would result in cumulative impacts to the District which should be analyzed as defined in Draft EIS/EIR Sections 4.1.1 and 4.1.2. The placement of the proposed platform is intended to synchronize with the parking structure proposed by the City of Redlands. As provided in Section 3.12 of the Draft EIS/EIR, SANBAG and FTA have concluded that the Project, including the placement of the station platform, would result in no adverse effect to historic properties, including the District. SHPO concurred with this determination in a correspondence letter provided to FTA on August 14, 2014 (see Appendix M). Other reasonably foreseeable projects within downtown Redlands would be subject to the Downtown Redlands Specific Plan (see Table 4-1, #7). All new development would be subject to the policies and implementation standards contained in the Specific Plan. These policies would be expected to include provisions for the preservation of the district's integrity as development occurs.



Sam Wong-1

Date: Saturday, September 06, 2014 9:54:33 AM

Begin forwarded message:

From: Mitch Alderman <MAlderman@sanbag.ca.gov>
Date: September 6, 2014 at 9:52:57 AM PDT
To: S Wong <sbswong@gmail.com>
Subject: Re: Redlands Passenger Rail Project

As with all questions and comments received during this review period of the draft EIS/EIR, I will send your email to our consultant who is gathering these and will write responses in the final EIS/EIR. Thank you for taking the time to review the project.

Mitch

On Sep 6, 2014, at 8:34 AM, "S Wong" <sbswong@gmail.com> wrote:

Dear Mr. Alderman,

I received and reviewed the single page information sheet during the meeting at ESRI Sept 5 (updated version Sept 2014). I noticed the 4 project benefits ("creates a reliable transit alternative, provides connectivity to regional transit services, reduces traffic congestion, improves air quality, supports private investment"). However, I could not find anything about the project's downsides (or "challenges") that SANBAG will attempt to mitigate. For example, do you anticipate increased dynamic population movement (of course, you should) and its associated transient, homeless, and criminal elements as clearly seen with the addition of BART stations, DC-Metro stations, etc. What other downsides have you explored and made attempts to mitigate them?

WONG-1.1

What are the specific measures will be deployed in mitigating criminal behavior at the stations in Redlands and the immediate (1 mile radius) area of the stations?

WONG-1.2

(Criminal behavior to include crimes against individuals, groups of people, and property)

I also noticed that there are no stations serving Loma Linda area. As you may or may not know, Veterans come from all areas of southern California and many rely on public transportation to come to the VA. It appears that the SANBAG specifically ignored service to the Veterans. It also appears that the three stations within Redlands are all in very close proximity to ESRI-related facilities. Is there a reason for this?

WONG-1.3

What is the initial and on-going projected cost for developing and sustaining safety and security of the stations in Redlands?

WONG-1.4



Although SANBAG indicated the revenue streams to include CMAQ, 5307 & 5309 grants, Prop 1B, Transportation Development Act, and Measure I, I am unsure what is meant by "Private Sector" funds. Is the latter voluntary? Is information about "Private Sector" funds publicly available?

WONG-1.5

Your prompt, clear, and detailed response would be greatly appreciated.

Thank you.

Sam Wong, MD FACP
Assistant Professor of Medicine

2.5.57 SAM WONG (WONG-1)

2.5.57.1 Response to WONG-1.1

The commenter states that the Draft EIS/EIR identifies project benefits but does not discuss the downsides of the Project. The comment requests clarification related to information about increased dynamic population movement with associated transient, homeless, and criminal impacts that can be associated with these type of transit projects. The Draft EIS/EIR provides an analysis of the Project's adverse effects and, where identified, proposes mitigation to avoid, minimize, or lessen the adverse effect (see Table ES-2). In the context of foreseeable population movement(s), the Project in of itself would not directly increase population or encourage development along one portion of the corridor as opposed to others. However, SANBAG acknowledges that other cumulative projects may result in these types of changes (see pages 4-37 to 4-38 of the Draft EIS/EIR). Additionally, as provided in Draft EIS/EIR Chapter 5, SANBAG acknowledges that the Project itself would remove an obstacle for future growth in the region; however, the timing, location, and types of development remain speculative at this time. This comment does not address the adequacy or findings of the Draft EIS/EIR.

2.5.57.2 Response to WONG-1.2

The comment requests clarification on the type of measures that would mitigate for criminal activities at stations in the City of Redlands and immediate (1 mile radius) area of the stations. The Draft EIS/EIR (page 3.15-12) notes that necessary design elements per FTA guidelines (e.g., surveillance, sufficient line of sight, etc.) would be integrated to deter criminal acts and protect passengers, employees and the community. In addition, to address security concerns for the Project, Mitigation Measure SS-1 is proposed and would require SANBAG to prepare a Safety and Security Management Plan for the Project, which covers the track alignment, bridges, parking areas, and station platforms. This Safety and Security Management Plan would include coordination and measures with local safety and crime prevention authorities. These measures may include, but are not limited to, closed-circuit surveillance, private security personal, provision of sufficient lighting, and integration with local law enforcement. Measures extending beyond these areas would be coordinated with the local jurisdiction. Please also refer to Master Response 12, Safety and Security, for additional information on Project safety and security.

2.5.57.3 Response to WONG-1.3

The commenter notes that there are no stations proposed for the Loma Linda area, specifically serving the Veterans Administration (VA) population. The commenter opines that SANBAG ignored service to veterans and that three proposed stations within Redlands are in close proximity to ESRI-related facilities. SANBAG expects that the Project would benefit all users, including veterans, by developing transit backbone that could interlink with other forms of alternative transportation (i.e., bikes, buses, etc.). Additionally, once the backbone infrastructure is installed as part of the Project, other station stops could be added to the route, including California Street, subject to future environmental review. The station locations considered in the Draft EIS/EIR were selected based on ridership estimates as provided in Appendix C of the



Draft EIS/EIR. Although a station stop at California Street was considered by SANBAG early during the alternatives development process, the ridership projections did not demonstrate a need for a station at California Street at this time. However, once the Project is constructed and subject to additional environmental review, SANBAG is most certainly interested in adding additional station stops in the future pending increases in ridership demands. Please also refer to Response LL-2. This comment does not address the adequacy or findings of the Draft EIS/EIR.

2.5.57.4 Response to WONG-1.4

The comment requests clarification on what the initial and on-going project costs would be for maintaining safety and security at the proposed stations. As provided on page 2-60 of the Draft EIS/EIR, SANBAG estimates that operating costs will average \$7.9 million annually. The cost for providing security for the Project facilities is considered in this estimate. The cost of constructing the necessary infrastructure (e.g., CCTV) to support safety and security is factored into the Project's construction cost, which is estimated at \$202 million.

2.5.57.5 Response to WONG-1.5

The comment requests clarification on what "Private Sector" funds are, and how would such funds be publicly available. SANBAG expects to receive private funding support for the design and construction of the stations proposed at University Street (University of Redlands) and New York Street (ESRI). The funding contributions from these private entities remains undetermined and subject to SANBAG's approval of the Project and final design of the station facilities. This comment does not address the adequacy or findings of the Draft EIS/EIR.



Sam Wong-2

Date: Sunday, September 28, 2014 9:39:15 PM

Safety and Security

What is being planned for safety and security at each of the stations and along the rail line (individual incidents, mass threats) and prevention?]

WONG-2.1

What is the initiating / development and on-going operational cost associated?]

WONG-2.2

What funding stream will be used for this?]

Surrounding property values

What is the estimated adverse impact on the value of businesses and home property 1 mile radius from each station and along the rail line?]

WONG-2.3

Mitigating traffic before and during construction

What plans will be effected (not affected) to mitigate the anticipated expansion of traffic in the roads leading to and from the stations to be built?] Are the traffic-mitigating plans synchronized with the anticipated flood control construction?]

WONG-2.4

WONG-2.5

Transit Oriented Development Funds

Has anyone or any entity expressed interest or questioned anything about TOD funds related to this project?]

WONG-2.6

If so, who or what entity?]

Safety for children

Has this project taken into consideration of any adverse impact on school-age children such as children crossing the tracks on their way to school or a school-sponsored function, noise level during school hours (understanding the noise degradation with distance from the tracks as well as crossing horns), etc.?]

WONG-2.7

WONG-2.8

Flexibility and adaptability of trains versus other mass-transit vehicles

Is there a direct comparative analysis of the trains versus other modes of mass-transit vehicles?]

WONG-2.9

I understand that the SBX buses are more flexible to re-routing than the trains.]

Are there plans to re-route trains in the event of evolving ridership demands?]

WONG-2.10

If so, what are the costs and the cost of implementing these plans?]

How long would it take to implement the plans?]

WONG-2.11

How does the R2R address the need for Veterans who travel from the immediate area to the VA for non-hospital based care?]

WONG-2.12

Thank you for your attention to this and your response to my questions.

Sam Wong, MD FACP
Assistant Professor of Medicine

2.5.58 SAM WONG (WONG-2)

2.5.58.1 Response to WONG-2.1

The comment expresses interest in learning more about what is planned in terms of safety and security improvements at the proposed stations. Please refer to Response WONG-1.2 and Master Response 12, Safety and Security, for information related to Project safety and security.

2.5.58.2 Response to WONG-2.2

The comment requests clarification on the construction and operational costs for the Project. The commenter also requests clarification on the funding sources that would be used for the Project. Please refer to Master Response 6, Project Costs, for information on Project costs. Additional detail on these costs is provided in Appendix N of the EIS/EIR.

2.5.58.3 Response to WONG-2.3

The commenter requests clarification on the Project's impacts to property values in vicinity of the Project. Please refer to Master Response 15, Property Values, for information pertaining to property values.

2.5.58.4 Response to WONG-2.4

The comment requests clarification on traffic mitigation measures that would be employed during construction and operation of the Project. Traffic generated to and from the proposed stations is considered in the traffic analysis (see Draft EIS/EIR Appendix E). SANBAG has proposed Mitigation Measure TR-1 to minimize and reduce impacts to the existing roadway system as a result of Project construction. This measure requires coordination with local jurisdictions (e.g., City of Redlands) to maximize opportunities for coordinating construction activities.

2.5.58.5 Response to WONG-2.5

The comment requests clarification on traffic controls during the construction of the flood control improvements. Construction related traffic effects are considered in Impact 3.3-1 of the Draft EIS/EIR. Please refer to Response WONG-2.4.

2.5.58.6 Response to WONG-2.6

The comment expresses interest in whether transit oriented development (TOD) funds are being pursued for the Project. SANBAG is not proposing the use of TOD funding for the Project. As described in Chapter 2 of the Final EIS/EIR, the Project does not in of itself propose any form of TOD-form of development. As acknowledged in Section 6.1 of the EIS/EIR, the Project would facilitate TOD forms of development once operational. This comment does not address the adequacy or findings of the Draft EIS/EIR.

2.5.58.7 Response to WONG-2.7

The comment requests clarification on if the Draft EIS/EIR analyzed safety impacts on school children crossing tracks on the way to school. SANBAG takes safety seriously and the safe movement of school-aged children across the proposed track infrastructure is of utmost importance. Draft EIS/EIR Mitigation Measures TR-3 and TR-4 (see page 3.3-33 through 3.3-34) require the implementation of safety measures in coordination with the recommendations from the California Public Utilities Commission (CPUC). Please refer to Master Response 12, Safety and Security, for additional information on Project Safety and Security.

2.5.58.8 Response to WONG-2.8

The comment requests clarification on if the Draft EIS/EIR analyzed noise impacts to school facilities during school hours. Noise levels resulting from both construction and operation of the Project are considered in Section 3.6 of the Draft EIS/EIR. The noise analysis follows FTA's Guidance (2006), which categorizes schools as Category 3 land uses. As such, these noise sensitive uses are considered where they occur throughout the railroad corridor. Please refer to Master Response 1, Train Noise Impact Methodology, for additional discussion.

2.5.58.9 Response to WONG-2.9

This comment inquires as to the flexibility of trains versus other alternative forms of transit and does not raise any issues related to the content or findings of the Draft EIS/EIR. SANBAG considered multiple transit vehicles for the Project, including diesel multiple units (DMU). Other transit modes that were considered, but not carried forward into the Draft EIS/EIR for analysis, are identified in Section 2.5 of the Draft EIS/EIR.

2.5.58.10 Response to WONG-2.10

The commenter asserts that the SBx buses are more flexible to re-routing than trains. The commenter asks if there are plans to re-route trains in the event of evolving ridership demands and what would be the cost for implementing those plans. The Project does not include plans to re-route trains. Any plans or projected costs/schedule to re-route trains would be subject to additional environmental review. This comment does not address the adequacy or findings of the Draft EIS/EIR.

2.5.58.11 Response to WONG-2.11

The comment requests clarification on how long it would take to implement any plans for re-routing trains. Please refer to Response WONG-2.10.

2.5.58.12 Response to WONG-2.12

The comment requests clarification on how the Project would serve veterans travelling to the VA for non-hospital based care. Please refer to Response WONG-1.3.



3.0 MINOR CHANGES AND UPDATES TO THE DRAFT EIS/EIR

Since the release of the Draft EIS/EIR, minor updates to the description of alternatives considered, the evaluation of environmental effects, and mitigation measures presented in the Draft EIS/EIR have been made as a part of SANBAG's ongoing coordination with agencies with jurisdiction over the Project. The changes described here do not change the conclusions presented in the Draft EIS/EIR. These changes are intended to clarify and update the description of the Build Alternatives and Design Options considered, and to ensure that the Project is carried out in a manner consistent with the laws and policies governing the project area and the resources in it.

Where changes to the text of the Draft EIS/EIR have been made, the modifications are shown in the response. Text additions are shown in double-underline and text deletions are shown in ~~strike through~~. Text changes are referenced by the page number, paragraph on that page, and the major heading under which the text falls. If a figure was revised, the figure number was changed to include "Revised" (i.e., Revised Figure 3.6-1), and a description of the revision is included in this appendix.

Revisions and updates to the EIS/EIR also included the modification of appendices. The modifications are described in this appendix, and the title of the appendix was modified to include "Revised" (i.e., Revised Appendix B, Air Quality).

Each section below identifies the minor changes and edits to each chapter of the Draft EIS/EIR are by chapter below. If no changes or edits are proposed, this fact is noted.

3.1 SIGNATURE PAGE: COMBINED FINAL EIS/RECORD OF DECISION

After consideration of the comments received on the Draft EIS/EIR, FTA decided to issue a single document that combines the Final EIS and Record of Decision (ROD) pursuant to the Moving Ahead for Progress in the 21st Century Act (Public Law 112-141, 126 Stat. 405, Section 1319[b]). The ROD is included in the Final EIS/EIR as Appendix R. In addition, the following addition is made to the EIS/EIR to include a citation to Public Law 112-141 which allows FTA to file a combined Final EIS and ROD.

National Environmental Policy Act of 1969, §102 (42 United States Code [USC] §4332); Federal Transit Law (49 USC §5301[e], §5323[b], and §5324[b]); Public Law 112-141, 126 Statute 405, Section 1319(b); 49 USC §303 (formerly Department of Transportation Act of 1966 §4[f]); National Historic Preservation Act of 1966, §106 (16 USC §470f); Executive Order 11990 (Protection of Wetlands); Executive Order 11988 (Floodplain Management); Executive Order 12898 (Environmental Justice); California Environmental Quality Act, Public Resources Code 21000 et seq.; and the State of California's California Environmental Quality Act Guidelines, California Administrative Code, 15000 et seq.



3.2 COVER, TITLE PAGE, SIGNATURE PAGE, AND ABSTRACT

“Draft Environmental Impact Statement/Environmental Impact Report” is replaced with “Final Environmental Impact Statement and Record of Decision/Environmental Impact Report.”

3.3 EXECUTIVE SUMMARY

The Introduction on page ES-1 is revised as follows:

This document is a joint Environmental Impact Statement/Environmental Impact Report (EIS/EIR) and Record of Decision (ROD) intended to comply with both the National Environmental Policy Act (NEPA) and the California Environmental Quality Act (CEQA). This EIS/EIR was prepared by the Federal Transit Administration (FTA), Region 9, as Federal lead agency under NEPA and the San Bernardino Associated Governments (SANBAG), as lead agency under CEQA. This EIS/EIR was prepared as a “project” EIS/EIR to evaluate the environmental impacts or effects associated with implementing the Redlands Passenger Rail Project (RPRP or Project).

On August 6, 2014, SANBAG released the Draft EIS/EIR for public review and comment. The comment period closed on September 29, 2014. The Draft EIS/EIR evaluated the potential environmental effects of the Project and considered three alternatives, three design options, and three vehicle technology options. Two public meetings were at held on September 4 and 9, 2014 to receive public input on the Draft EIS/EIR. Written comments were received from federal, state, regional and local agencies, as well as from organizations and individuals; comments were also received during the public meetings. SANBAG and FTA considered the comments received on the Draft EIS/EIR.

The Final EIS/EIR consists of the entire Draft EIS (Volumes I through IX), the comments, responses to comments, and revisions to the Draft EIS/EIR (Volume X), the Mitigation Monitoring and Reporting Program (MMRP), and Record of Decision (ROD) (Volume XI).

The following text was added to page ES-7 to reflect SANBAG's selection of a Locally Preferred Alternative. This resulted in a shifting of the numbering for the subsequent sections from ES-6 to ES-12 to ES-7 through ES-13.

ES.6 LOCALLY PREFERRED ALTERNATIVE

SANBAG has considered comments received on the Draft EIS/EIR and, where appropriate, updates made to the description of the Preferred Project Alternative, its anticipated impacts, and proposed mitigation measures. The Preferred Project Alternative, as described in the Final EIS/EIR with the integration of Design Options 2 (Use of Existing Layover Facilities) and 3 (Waterman Avenue Station), is SANBAG's Locally Preferred Alternative (LPA) that will be carried forward for approval in conjunction with the certification of the Final EIR by SANBAG and issuance of the Final EIS and Record of Decision (ROD) by FTA. Based on a combination of public comment and SANBAG's consideration of environmental effects as provided in the Final EIS/EIR, SANBAG has selected the Diesel Multiple Unit (DMU) as the locally preferred vehicle option for the LPA. Additionally, SANBAG has selected to implement quiet zones as the preferred noise mitigation for the LPA per the Memorandum of

Understanding (MOU) it has executed with the Cities of Redlands and San Bernardino on February 4, 2015.

Page ES-8 was revised to include updates from FTA and SANBAG's consultations with USFWS and SHPO under Section 7 of the ESA and Section 106 of the NHPA, respectively.

- **Biological Resources.** The Project would include construction activities within the vicinity of the Santa Ana River. The Santa Ana River includes suitable habitat for federally listed species, including least Bell's vireo, and is identified as critical habitat for federally listed species including the San Bernardino kangaroo rat and Santa Ana sucker. SANBAG and FTA are currently in consultation with the U. S. Fish and Wildlife Service (USFWS) and attempting to avoid or minimize potential adverse effects to listed species. USFWS provided its biological opinion for the Project on in February 2015.
- **Cultural Resources.** Multiple cultural resources are located within the Area of Potential Effect (APE) for the Project. These resources include, but are not limited to, the Redlands Santa Fe Depot, Second Baptist Church, and Redlands Chinatown. SANBAG and FTA are currently in consultation with the California State Historic Preservation Officer (SHPO) and attempting to avoid or minimize potential adverse effects to local cultural and historic resources. SHPO provided its concurrence with the eligibility determinations and findings of effect provided in Section 3.12 on August 14, 2014.

Page ES-8 was revised to reflect SANBAG's execution of an MOU with the Cities of Redlands and San Bernardino.

....measures, this EIS/EIR acknowledges that SANBAG may not have complete control over their implementation (i.e., quiet zones) and/or the measures trigger other indirect environmental effects (i.e., sound barriers). Based on these circumstances, this EIS/EIR identifies a full range of noise mitigating measures for the Project. As described under ES-6, SANBAG has proposed the implementation of corridor-wide quiet zones per the executed MOU (February 4, 2015) and Mitigation Measure NV-3 combined with the selection of the DMU vehicle option as part of the LPA.

Page ES-8, third bullet was revised to reflect noise impacts determinations in Sections 3.6.4 and 5.6 of the Draft EIS/EIR.

- Noise (Permanent increase in ambient noise from passing trains and construction).

Page ES-9, fourth paragraph is revised to reflect a reduction if the footprint for the Preferred Project Alternative.

Of the Build Alternatives and Design Options considered, Alternative 3, Reduced Project Footprint, would minimize adverse effects to biological resources, including those in the vicinity of ~~the Santa Ana River~~ and the Mission Zanja Flood Control channel.

Table ES-1 is modified to reflect SHPO's concurrence with the findings of effect for the proposed undertaking. The following test is added to page ES-14.



On August 14, 2014, SHPO concurred that the Project would have no adverse effect the Redlands Santa Fe Historic District and contributing properties, including the Redlands Santa Fe Depot, Second Baptist Church, Victoria Elementary School and Redland Lawn Bowling Club. to the following historic properties.

Section ES.12 (now ES.13) was revised to reflect SANBAG’s release of the Final EIR and FTA’s release of a combined Final EIS/ROD.

This Final EIS/EIR is being distributed to interested agencies, stakeholder organizations, and individuals who commented on the Draft EIS/EIR. This distribution ensures that interested parties have an opportunity to express their views regarding the environmental effects of the Project, and to ensure that information pertinent to permits, authorizations, and approvals is provided to decision makers for the lead agencies and CEQA responsible and trustee agencies. This document is available for review by the public during normal business hours at SANBAG’s Office during normal business hours. The document will also be available on SANBAG’s website at: <http://sanbag.ca.gov/projects/redlands-transit.html>. ~~Written comments should be sent to the following address:~~

Mitchell A. Alderman
Director of Transit & Rail Programs
San Bernardino Associated Governments
1170 W. 3rd St., 2nd Floor
San Bernardino, CA 924104

~~If comments are provided via e-mail, please include the project title in the subject line, attach comments in MS Word format, and include the commenter’s U.S. Postal Service mailing address. Email comments should be directed to: RPRP_Public_Comments@sanbag.ca.gov.~~

Two public meetings were held during the Draft EIS/EIR public review period~~A joint public meeting on the draft EIS/EIR will be conducted by SANBAG and FTA on:~~

1. September 4, 2014, 5:00-7:00 PM, at the ESRI Café, 380 New York Street, Redlands, CA 92373; and
2. September 9, 2014, 5:00-7:00 PM, at the Hotel, 285 East Hospitality Lane, San Bernardino, CA 92408

SANBAG and FTA have reviewed and assembled all of the comments received on the Draft EIS/EIR, including those received at the public meetings, and prepared responses to address significant environmental issues raised in the comments. These responses are included in Appendix P and summarized in Chapter 7 of the EIS/EIR.

Following completion and publication of the Final EIR, the SANBAG Board of Directors will hold a public hearing to consider certification of the EIR and to decide whether or not to approve the LPA, at which time the public and interested agencies and organizations may comment on the Project. SANBAG’s Board of Directors will consider certification of the Final EIR, including the findings of effect, and adoption of the Project’s mitigation monitoring and reporting program (MMRP) at its regularly scheduled meeting at 10:00 AM, Wednesday, March 4, 2015. A notice of determination (NOD) will then be filed. If the Board approves the

LPA (or another alternative), it will adopt written findings of fact for each significant environmental impact identified in the EIR; a statement of overriding considerations, if needed; and a MMRP. The proposed MMRP is included as Appendix Q.

After consideration of the comments received on the Draft EIS/EIR, FTA decided to issue a single document that combines the Final EIS and ROD pursuant to the Moving Ahead for Progress in the 21st Century Act (Public Law 112-141, 126 Stat. 405, Section 1319[b]). NEPA regulations require that the federal agency prepare a concise public record of its decision (40 Code of Federal Regulations [CFR] Section 1505.2). The ROD notifies the public of the agency's selection of an alternative to be carried forward for more detailed engineering and design, and the rationale for that decision. The ROD is included in the Final EIS/EIR as Appendix R.

Table ES-2 is revised to reflect minor changes and edits to the mitigation measures proposed in Chapter 3 (see below).

3.4 CHAPTER 1 - PURPOSE AND NEED

The last paragraph on page 1-1 is revised to reflect the inclusion of Chapter 7, Responses to Comments on the Draft EIS/EIR, in the Final EIS/EIR.

This EIS/EIR is comprised of ten chapters with supporting appendices. The purpose and need of the Project is outlined in this chapter (Chapter 1). The alternatives and design options considered in the environmental analysis along with those rejected from further environmental analysis are discussed in Chapter 2, *Alternatives Considered*. Chapter 3 provides an environmental analysis of the environmental issue areas. Chapter 4 provides a discussion of the cumulative effects that could result from the Project in conjunction with other reasonably foreseeable projects. Chapter 5 provides a discussion of the other statutory considerations pursuant to CEQA and NEPA. Chapter 6 outlines the public and agency outreach efforts by SANBAG and FTA, Chapter 7 provides a summary of the comments received on along with the minor changes and edits to the Draft EIS/EIR, and Chapters 78 through 124 include the references, list of preparers, acronyms and abbreviations, and an index.

The paragraph below is added to page 1-3 to clarify the organization of the Final EIS/EIR appendices.

Appendices A through O provide public outreach and notification materials and technical data, studies, and reports used in support of the environmental analysis. Appendix P contains a complete list of letters received on the Draft EIS/EIR and responses to individual comments. Appendix Q contains the SANBAG's proposed Mitigation Monitoring and Report Program (MMRP). Appendix R contains FTA's Record of Decision (ROD) document that was filed in the Federal Register on February 20, 2015.

3.5 CHAPTER 2 - ALTERNATIVES CONSIDERED

The third paragraph on page 2-1 is revised to reflect the current stage of the Project's development.

~~The Moving Ahead for Progress in the 21st Century (MAP-21) Act became effective in October 2012, and eliminated the AA as a standalone requirement in the project approval process. With MAP-21, agencies now may rely on the review of alternatives during the metropolitan planning organization (e.g., Southern California Association of Governments [SCAG]) planning and NEPA environmental review processes. Based on this direction, SANBAG is proposing the Redlands Passenger Rail Project (RPRP or Project) as the means to implement a new mode of transit service to serve key markets in the Redlands Corridor while still accommodating freight service in the corridor and is considering several alternatives and design options for the Project in this EIS/EIR. SANBAG and FTA released the draft environmental impact statement and environmental impact report (EIS/EIR) for public review and comment on August 6, 2014. The public and agency review and comment period closed on September 29, 2014. This final EIS/EIR has been prepared to respond to comments received on the Draft EIS/EIR for the Project per the requirements of NEPA (40 CFR 1503(a) and CEQA (CEQA Guidelines, Section 15008(c)).~~

Figure 2-1D (Revised) is revised to reflect the modification of the construction footprint to exclude bank improvements from the western-most section of the Mission Zanja Flood Control Channel in order to reduce adverse impacts to suitable habitat for listed species, including LBV.

The second to last sentence in the last paragraph on page 2-19 is revised to remove reference to a 10 percent nominal increase.

~~In assuming a nominal ten percent increase, Ridership projections in future conditions (2038) would ~~to~~ increase to 1,330 daily trips (see Appendix C). Projections beyond these initial estimates based on future cumulative projects are discussed in Chapter 4, Cumulative Effects. These ridership projections assume no changes in existing bus routes.~~

Additional text was added to the second paragraph on page 2-31 to include discussion of the MOU executed between SANBAG and the Cities of Redlands and San Bernardino:

SANBAG has entered into a Memorandum of Understanding (MOU) dated February 4, 2015, with the Cities of San Bernardino and Redlands that outlines each entities roles and responsibilities to facilitate the implementation of "corridor-wide" quiet zones.

This page 2-43 is revised to reflect an additional easement for the project:

The physical improvements associated with the Project may require up to 58 partial property acquisitions, up to 4 full property acquisitions, up to ~~3432~~ roadway easements (roadway, temporary construction, sidewalk, utility, and alley vacations), and potentially two (2) business relocations.

The acreage subject to construction-related ground disturbance in the first paragraph on page 2-45 is revised to reflect the reduction of the Project's construction footprint, just east of the Santa Ana River.

Construction of the Project may begin in 2015 and take up to 36 months to complete. Construction would proceed generally from the west of E Street to the SAR and similarly from the SAR east to the University of Redlands. In total, the anticipated construction disturbance area is estimated at ~~134.973~~ acres. Of this total construction area, up to 10 acres could be subject to disturbance during the course of construction on any given day.



Figure 2-6B (Revised) is revised to reflect the modification of the construction footprint to exclude bank improvements from the western-most section of the Mission Zanja Flood Control Channel.

The acreage under Design Option 1 construction footprint for the Project facilities and alternate train layover facility was updated.

Under Design Option 1, the construction footprint for the Project facilities and alternate train layover facility would be approximately ~~143.3~~140.9 acres.

The acreage under Design Option 2 construction footprint for the Project facilities and alternate train layover facility was updated.

Design Option 2 the construction footprint would be reduced to approximately ~~127.4~~127.5 acres.

The acreage under Design Option 3 construction footprint for the Project facilities and alternate train layover facility was updated.

Design Option 3 the construction footprint would be reduced to approximately ~~1396~~1396.6 acres.

Figure 2-10 (Revised) is revised to reflect Omnitrans' revised operational budget expenditures based on its adopted 2015 - 2020 Short Range Transit Plan.

3.6 CHAPTER 3 - ENVIRONMENTAL ANALYSIS, CONSEQUENCES, AND MITIGATION

3.6.1 SECTION 3.1 INTRODUCTION TO THE JOINT NEPA/CEQA ANALYSIS

No changes or edits are proposed.

3.6.2 SECTION 3.2 LAND USE, PLANNING, AND COMMUNITIES

Page 3.2-33, first paragraph is revised to restate the anticipated construction-related impacts to traffic in terms of temporary closure in terms of weeks and not months.

Temporary sidewalk and street closure locations have not yet been defined at the current stage of design and, therefore, it is possible that some locations may be subject to prolonged closures that could range from a few days to several ~~months~~weeks.

Table 3.2-9 is revised to include discussion of potential easement requirements on adjacent parcels.

Table 3.2-9. Summary of Acquisitions and Relocations by Alternative and Design Options

	Alternative 1 (No Build)	Alternative 2 (Preferred Project)	Alternative 3 (Reduced Project Footprint)	Design Option 1 (Train Layover Facility - Waterman Avenue)	Design Option 2 (Existing Layover Facilities)	Design Option 3 (Waterman Avenue Rail Station)
TCEs*	0	60	60	60	60	60
Easements (Roadway)	0	<u>3432</u>	<u>3432</u>	<u>3432</u>	<u>3432</u>	<u>3432</u>

Page 3.2-37, second paragraph is revised to include discussion of potential easement requirements on adjacent parcels.

None of the potential full property acquisitions would require a relocation of an existing business or residence. However, the Build Alternatives and Design Option 1 would result in the displacement of numerous structures or facilities during the construction phase to accommodate TCEs or the Project’s ROW requirements. Additionally, easements may be necessary from adjacent landowners to facilitate access following the closure of one or more at-grade crossings. Under NEPA, these effects are considered adverse. Under CEQA, this impact is considered significant. Mitigation Measure LU-1 (Minimize Project Land Requirements and Comply with Federal and State Relocation Laws) is proposed to mitigate this construction-related effect.

Page 3.2-39 is modified to include reference to Mitigation Measure NV-7.

3.6.3 SECTION 3.3 TRANSPORTATION

Mitigation Measures TR-1 is revised on page 3.3-33 in response to comments provided by the City of Redlands.

TR-1 Prepare and Implement a Traffic Management Plan. SANBAG shall prepare a Traffic Management Plan prior to the start of construction, and the provisions of the Traffic Management Plan shall be implemented prior to, and during construction, as appropriate, to address traffic considerations of pedestrian and bicycle access and safety, and vehicular flow. The objective of the Traffic Management Plan will be to reduce construction related effects to traffic, non-motorized forms of transportation (i.e., bicycle and pedestrians), and existing public transit (i.e., buses) and will include the following:

- Construction detour plans and designated construction truck access routes for each phase of construction;
- Maintain maximum travel lane capacity to the greatest extent possible during construction periods and provide advanced notice to drivers or roadway changes or closures;
- Signage indicating the construction limits, access routes, and entrances to individual business sites and community facilities that may be affected

by construction activities. In addition, the construction contractor would supply “open for business” signs to encourage normal business activity during construction;

- Pre-planning, outreach, and signage indicating pedestrian and bicycle routes detours;
- Coordination with public transit service providers, as necessary;
- Heavy trucks and other construction transport vehicles shall avoid the busiest commute hours to the greatest extent possible (weekdays 7 a.m. to 8 a.m. and 5 p.m. to 6 p.m. – High traffic intersections (greater than 10,000 ADT) – 6:30 a.m. to 8:30 a.m. and 4:30 p.m. to 6:30 p.m.);
- Early notification to emergency service providers and area drivers of any road closures or detours and the time frames of the closures or detours. This information will be posted in a local newspaper, via SANBAG’s web site and will be updated on a monthly basis;
- Coordination with the Cities of San Bernardino, Loma Linda, and Redlands for community events in the area to accommodate crowds and road closures;
- Pavement damage resulting from project construction will be repaired prior to the completion of construction; and
- SANBAG shall maximize opportunities for coordinated construction and installation of improvements that occurs outside the SANBAG ROW with the Cities of San Bernardino, Loma Linda, and Redlands to the greatest extent practicable.

Mitigation Measures TR-2 is revised on page 3.3-35 in response to comments provided by the IEBA to include consideration for existing pedestrian and bicycle facilities.

TR-2 Existing LOS and V/C Year 2018 and 2038 Impact Roadway Improvements.

As part of the Project construction, SANBAG shall coordinate with the appropriate agency in which the intersection improvement is located (Cities of San Bernardino, Loma Linda, Redlands, or Caltrans) to pay SANBAG’s “fair share” of the identified roadway improvements prior to the start of operations of the Project in 2018:

- ***California Street and I-10 Eastbound Off-Ramp*** – SANBAG shall coordinate with Caltrans to fund its fair share of construction for a ramp improvement to include a right-turn pocket. The existing right-turn lane will become a shared right-turn lane to accommodate the high number of right turns. The improvements will include replacing existing pedestrian and bicycle facilities, where present.

SANBAG shall provide its fair share for the funding of the following improvements prior to the year 2038:

- **California Street and I-10 West On-Ramp** – SANBAG shall coordinate with Caltrans to fund its fair share to the construction of a dual southbound right and a dual northbound left turn pocket. The improvements will include replacing existing pedestrian and bicycle facilities, where present.
- **Alabama Street and Industrial Avenue** – SANBAG shall coordinate with the City of Redlands to stripe an exclusive westbound right turn lane with 50-feet of storage to accommodate a high number of right turns. The improvements will include replacing existing pedestrian and bicycle facilities, where present.

Mitigation Measures TR-4 is revised on page 3.3-35 in response to comments provided by the City of Redlands.

TR-4 Recommended Pre-Signals for Queuing. Prior to the start of operations, pre-signals shall be implemented at the following grade crossing locations and shall be operational prior to the start of 2018:

- Eastbound I-10 Ramps and California Street crossing;
- Industrial Park Avenue and Alabama Street crossing; and
- Redlands Boulevard and Tennessee Street crossing.

Prior to 2038 and if warranted based on future intersection operations (as determined through reevaluation in 5-year increments by SANBAG following procedures in the Los Angeles Metropolitan Transportation Authority (MTA) Grade Crossing Policy for Light Rail Transit), pre-signals will be implemented at the following grade crossing locations:

- Waterman Avenue and Orange Show Road Crossing (Northbound Approach);
- Orange Show Road and Waterman Avenue Crossing (Eastbound Approach);
- Redlands Boulevard and California Street Crossing; and
- Redlands Boulevard and Alabama Street Crossing.

3.6.4 SECTION 3.4 VISUAL QUALITY AND AESTHETICS

Mitigation Measure VQA-1 is revised in response to a comment from the City of Redlands.

VQA-1 Screening of Construction Staging Areas. For construction staging areas within 500 feet of a residence, park, or educational facility, the contractor will be required to shield the staging area to the extent feasible and coordinate with the local jurisdiction regarding the type and method of screening, which may include but is not limited to, the use of fence slats, netting, or mesh or tarps. SANBAG shall limit construction to daylight hours to the extent possible. If nighttime

lighting or construction is necessary, the SANBAG shall ensure that unshielded lights, reflectors, or spotlights are not located and directed to shine toward or be directly visible from adjacent properties or streets. To the extent possible, SANBAG shall minimize the use of nighttime construction lighting within 500 feet of existing residences. This measure shall be identified on grading plans and in construction contracts.

VQA-3 Tree Replacement. Prior to construction, SANBAG shall have a registered arborist conduct a tree survey to identify native and ornamental trees requiring removal outside SANBAG's ROW. The arborist will identify measures to avoid and minimize indirect impacts on trees, where feasible, and develop a plan for the replacement of trees that cannot be avoided. The plan will include planting and irrigation design details and a weaning schedule for the establishment period. Trees with a diameter at breast height of 12 inches or greater will be replaced at a minimum ratios of 1:1 and consistent with City of Redlands and San Bernardino standards.

The last sentence on page 3.4-34 is revised to clarify the magnitude and extent of sound barriers required in the absence of quiet zones.

With the implementation of Mitigation Measure NV-4, SANBAG may construct sound barriers at one or more locations within Landscape Units 1, 2, 3, 4, and 5. Sound barriers although effective in their reduction of noise levels, also create new long, linear physical obstructions in the landscape that could be considered disruptive visually to one or more individuals by eliminating existing middle or background views of moderate value. Figures 8-2A through 8-2H in Appendix H1 identify the locations of each sound barrier, which total approximately 23,910 linear feet (or 4.5 miles) in the absence of quiet zones (see Mitigation Measure NV-3). Even with the inclusion of surface treatments, the magnitude of these physical features would visually dominate the railroad corridor, where constructed in the absence of quiet zones, thereby resulting in an adverse effect under NEPA. Under CEQA, the proposed mitigation would not be sufficient in reducing the indirect impact of sound barriers in the absence of quiet zones and the residual impacts on the visual character of Landscape Units 2 and 5 is considered significant and unmitigable.

With the implementation of quiet zones as proposed in Mitigation Measure NV-3 in combination with other noise mitigation measures, including but not limited to sound barriers, and the vehicle type selected (e.g. DMU verse locomotive) the length of sound barriers would be substantially less. For example, under the locative vehicle option, the length of sound barrier would be reduced to 10,740 linear feet (or 2.2 miles) with the sound walls being more evenly distributed throughout the corridor (e.g. less than 1,000 feet). Under the DMU vehicle option, the length of sound barrier would be further reduced to 5,900 linear feet (or 1.1 mile). In this context and with the implementation of a quiet zone, the magnitude of the sound barriers would be substantially less, such that Mitigation Measure VQA-4 would be effective in minimizing the adverse effects of sound barriers under NEPA. Under CEQA, the visual impact would be reduced to a less than significant level.

3.6.5 SECTION 3.5 AIR QUALITY AND CLIMATE CHANGE

The first paragraph on page 3.5-5 and Table 3.5-2 are modified to reflect USEPA's recent change in the SCAB's attainment stats for PM₁₀.

The SCAQMD has divided the SCAB into air monitoring areas and maintains a network of air quality monitoring stations located throughout the SCAB. The Study Area is located in the Central San Bernardino Valley Monitoring Area (Source Receptor Area [SRA] 34) (see Appendix G1). With respect to NAAQS, the Study Area is located in an area designated "extreme nonattainment" for ozone, "~~serious nonattainment~~" for PM₁₀, "nonattainment" for PM_{2.5}, "~~serious maintenance~~" for CO and PM₁₀, and "attainment" for NO₂, SO₂, and Pb (see Table 3.5-2). Based on this attainment status, the air pollutants of greatest concern in San Bernardino County are O₃ and PM₁₀ and a conformity determination is required for the Project. In general, the worst air quality conditions occurs in the southwestern portion of San Bernardino County, including the Study Area, due to presence of the San Bernardino, San Jacinto, and San Gabriel Mountains, which restrict air movement further east.

Table 3.5-2. Federal and State Attainment Status for the San Bernardino County Portion of the South Coast Air Basin

Pollutants	Federal Classification	State Classification
O ₃ (1-hour standard)	--	Nonattainment
O ₃ (8-hour standard)	Extreme Nonattainment	--
PM ₁₀	Serious Non Attainment/ Maintenance	Nonattainment
PM _{2.5}	Nonattainment	Nonattainment
CO	Serious Maintenance	Attainment
NO ₂	Unclassified/Attainment	Non Attainment
SO ₂	Attainment	Attainment
Pb	<u>Unclassified/Attainment*</u>	Attainment*

Source: Appendix G1

The second paragraph on page 3.5-11 is revised to reflect USEPA's recent change in the SCAB's attainment stats for PM₁₀.

However, because the Project would be located in an area classified as a nonattainment or maintenance area for both the PM₁₀ and PM_{2.5} standards, a determination must be made as to whether it would result in a PM hot spot.

Page 3.5-15, Section 3.5, Effect 3.5-1, fourth paragraph is revised as follows to reflect FHWA's approval of SCAG's FTIP (2013).

Under federal and state mandates, SCAG is tasked with developing a FTIP and RTP every 4 years. The Project, which extends from the San Bernardino Transit Center and E Street Metrolink Station to the University of Redlands approximately Wabash/Colton Avenue is listed as project number 2013190120064012 within SCAG's 2013~~4~~ FTIP and ~~draft 2013~~



~~FTIP RTP ID 4TR0101 in SCAG's 2012 RTP/SCS (Appendix G1). The 2013⁴ FTIP (Amendment #19) was adopted by SCAG on June 16, 2014September 2, 2010 and was found to conform by FHWA on July 17, 2014December 14, 2010. SCAG's draft 2013 FTIP was adopted by SCAG on September 19, 2012. The 2012-2035 RTP was adopted by SCAG on April 4, 2012 and found to conform by FHWA on June 4, 2012. The Federal Highway Administration and FTA determined that the 2012-2035 RTP/SCS through Amendment No. 1 and the 2013 FTIP through Amendment No. 13-04 (adopted on June 6, 2013) conformed to the SIP on July 15, 2013.~~

Page 3.5-16, Section 3.5, Effect 3.5-1, second and third paragraphs are revised as follows to reflect the composition of Omnitrans bus fleet and the SCAG Transportation Conformity Working Group's (TCWG) determination that the Project is not a Project of Air Quality Concern (POAQC):

The Project involves both a new local transit service along a dedicated roadway and extension of diesel regional passenger rail service. The Project is considered to be a "regionally significant project"¹ under 40 CFR 93.101; however, it would not result in an adverse number of diesel vehicles that would congregate at a single location. ~~In addition, d~~ Dispersion modeling conducted for the vehicle technologies under consideration for the Project indicates that rail emissions associated with the Build Alternatives and Design Options would not exceed the PM_{2.5} nor would the PM₁₀ NAAQS, see Table 3.5-5 below. Interconnecting bus transit is powered by compressed natural gas (CNG) and, therefore, would not represent a significant source of PM₁₀ or PM_{2.5} emissions that could incrementally add to the emissions estimates presented in Table 3.5-5.

Consequently, the Project is not considered a POAQC for PM₁₀/PM_{2.5} and the CAA and 40 CFR 93.116 requirements were met without a hot-spot analysis. Confirmation of this determination ~~will~~ was made during SCAG's Transportation Conformity Working Group's (TCWG) interagency consultation (IAC) with the appropriate local, state, and federal agencies on October 3, 2014, and the final analysis will be identified in the final environmental document. There would be no adverse effect under NEPA. A less than significant impact would occur under CEQA.

3.6.6 SECTION 3.6 NOISE AND VIBRATION

The description of the existing noise environment is modified on page 3.3-6 to identify areas east of 7th Street along Stuart Avenue is Redlands.

MP 8.5 to 10. This portion of the Study Area is comprised mainly of commercial land uses zoned Commercial (C) per the Downtown Redlands Specific plan; however, several residences exist along Stuart Avenue, from east of Eureka Street to Church Street, zoned Medium Density Residential (MDR). A historic church also exists in this area, just west of 9th

¹ Regionally significant projects are those projects that serve regional transportation needs. Regionally significant projects can include projects that provide access to areas outside region, such as a highway, major activity centers in region, such as a sports complex, major planned developments, such as a new retail mall, and transportation terminals, such as a train depot.



Street and north of the railroad. Residences also exist to the south of the railroad corridor, along Central Avenue between 9th Street and the I-10, and are zoned MDR per the Redlands Zoning map. Scattered residences are also located north of the railroad along Stuart Avenue, east of 7th Street. East of the I-10, residences of varying densities are located to the north and south of the railroad corridor. Additionally, Sylvan Park and the University of Redlands are located north of the railroad corridor and zoned as Open Space and Public Institutional (PI) per the Redlands Zoning map.

Page 3.6-17, first paragraph, is revised to reflect the representation of six noise sensitive receptors for Receiver #54

Table 3.6-6 presents an estimation of existing noise conditions and Project noise impacts using a locomotive driven trainset with and without the implementation of quiet zones based on the methodology presented in Section 3.6.3.2. A complete list of all modeled receivers is presented in Appendix H1. As presented in Table 3.6-6, moderate impacts from rail noise would occur at a total of 21 receivers representing 115 Category 2 land uses, and three Category 3 land uses, including a church, a public park, and the University of Redlands. Severe impacts from rail noise would occur at a total of 22 receivers representing ~~863~~ Category 2 land uses. Noise levels with the addition of the Project using a locomotive vehicle type are illustrated in Figures 3.6-4A through 3.6-4B.

Page 3.6-17, second paragraph, was revised to reflect the representation of six noise sensitive receptors for Receiver #54.

As shown in Table 3.6-7, under the DMU vehicle option, moderate impacts from rail noise would occur at a total of 19 receivers representing 104 Category 2 land uses, and three Category 3 land uses. Similar to the locomotive driven trainset severe impacts from rail noise would occur at a total of 22 receivers representing ~~863~~ Category 2 land uses. Noise levels for the Project using a DMU vehicle type are illustrated in Figures 3.6-4A through 3.6-4B.

Page 3.6-17, third paragraph, was revised to introduce the new noise mitigation measures.

Under CEQA, this impact is significant. Mitigation Measures NV-3 (Establish Quiet Zones), NV-4 (Construct Sound Barriers), NV-5 (Wayside Rail Lubrication), and NV-7 (Provide Building Noise Insulation to Severe- and Moderate-Impact Residences) are proposed to minimize operational noise associated with the movement of passenger trains along the rail corridor.

Table 3.6-6 is revised to reflect the representation of six noise sensitive receptors for Receiver #54.



Table 3.6-6. Existing and Projected Noise Levels (Locomotives)

Receiver #	Receiver Location Description	Land Use Category	Jurisdiction General Plan Land Use and Zoning	Number of Noise-Sensitive Sites Represented	Existing Noise Exposure (dBA Ldn)	Closest Distance to Project (Feet)	Project Noise Exposure (dBA Ldn)	FTA Level of Noise Impact without Quiet Zone	Project Noise Exposure (dBA Ldn) With Quiet Zone Implementation	FTA Level of Noise Impact ² With Quiet Zone Implementation
MP 8.5 to MP 10: Texas Street to east of North University Street (Project End)										
54	50' to 100' n of alignment, w of 9th St	Residential/2	Downtown Redlands Specific Plan (DRSP) Commercial/ Industrial	36	67	75	68	Severe Impact	62	No Impact

Table 3.6-7 is revised to reflect the representation of six noise sensitive receptors for Receiver #54.

Table 3.6-7. Existing and Projected Noise Levels (DMU Option)

Receiver #	Receiver Location Description	Land Use Category	Jurisdiction General Plan Land Use and Zoning	Number of Noise-Sensitive Sites Represented	Existing Noise Exposure (dBA Ldn)	Closest Distance to Project (Feet)	Project Noise Exposure (dBA Ldn)	FTA Level of Noise Impact without Quiet Zone	Project Noise Exposure (dBA Ldn) With Quiet Zone Implementation	FTA Level of Noise Impact ³ With Quiet Zone Implementation
MP 8.5 to MP 10: Texas Street to east of North University Street (Project End)										
54	50' to 100' n of alignment, w of 9th St	Residential/2	Downtown Redlands Specific Plan (DRSP) Commercial/ Industrial	36	67	75	68	Severe Impact	59	No Impact

² Represents FTA Impact criteria.

Page 3.6-32, Mitigation Measure NV-7 is added to provide SANBAG an additional option for mitigating noise impacts at locations where sound barriers might be ineffective or impractical.

NV-7 Provide Building Noise Insulation to Severe- and Moderate-Impact Residences. For the ten residential structures represented by Receivers 3, 22, and 41, SANBAG will offer to install sound insulation. Treatments may include sealing and relocating vents, caulking and sealing gaps in the building façade and installing new doors and windows that are specially designed to meet acoustical transmission-loss requirements. Acoustical performance ratings are published in terms of Sound Transmission Class (STC) for these special windows. A minimum STC rating of 39 will be used on any window exposed to the noise source.

Page 3.6-34, second paragraph, is revised to reflect the representation of six noise sensitive receptors for Receiver #54.

The Build Alternatives and Design Options would result in a permanent increase in ambient noise levels as a result of passenger train operations. Implementation of Mitigation Measure NV-3 would require SANBAG to design 13 grade crossings for quiet zones as a means to reduce locomotive horn noise at crossings. Designing the at-grade crossing for the application of quiet zones would reduce moderate impacts at 14 receivers representing 49 Category 2 land uses and severe impacts at four receivers representing ~~144~~ Category 2 land uses for a locomotive driven trainset. Noise levels following the implementation of quiet zones for a DMU vehicle option would reduce moderate impacts at an additional 10 receivers representing ~~274~~ Category 2 land uses and severe impacts at an additional four receivers representing 11 Category 2 land uses. Noise levels with Project operations and following the implementation of quiet zones is illustrated in Figures 3.6-5A through 3.6-5B. As a result, Mitigation Measure NV-3 would be capable of achieving desired reductions in operational noise but would ultimately require the approval of the City of San Bernardino and the City of Redlands to adopt the quiet zones at each of these locations. Hence, the implementation of the measures is partly beyond SANBAG's jurisdiction and, thus, full implementation cannot be assumed for the purposes of this analysis. For this reason, SANBAG has entered into a Memorandum of Understanding (MOU), dated February 4, 2014, with the Cities of San Bernardino and Redlands to memorialize each agency's roles and responsibilities towards the implementation of quiet zones.

In addition to Mitigation Measure NV-3, Mitigation Measure NV-4 proposes the construction of sound barriers to further minimize operational noise effects. With the implementation of quiet zones, the installation of up to 10,740 linear feet of sound noise barriers for receivers 3, 4, 8, 9, 13, 14, 15, 17, 18, 19, 22, 23, 24, 31, 39, 41, 61, and 68 (representing 60 Category 2 land uses) would further reduce operational noise effects. The locations of the noise barriers are illustrated in Figures 8-2A through 8-2J of Appendix H1 and Figures 1A through 1F of Appendix H2 for sound barrier locations without implementation of quiet zones for the locomotive driven trainset and DMU, respectively. Figures 8-3A through 8-3J of Appendix H1 and Figures 1A through 1F of Appendix H2 illustrate the location of sound barriers with implementation of quiet zones for the locomotive driven trainset and DMU, respectively. Under a DMU with quiet zone scenario, the total length would be reduced to 5,900 linear feet.



Figures 3.6-5A and 3.6-5B are revised to correctly reflect the impact determinations provided in Appendix H2 for the DMU vehicle option.

Page 3.6-36 second paragraph, the total linear feet of sound barrier was included for the DMU vehicle option.

Further, in the event that quiet zones are not implemented, noise impacts would be greater, thus requiring the construction of sound barriers in more locations. The number of sound barriers would increase from 10 sound barriers to 23, thereby more than doubling the Project's potential financial expenditure for sound barriers. In total, up to 23,910 linear feet of sound barrier would be required for a locomotive or DMU in the absence of quiet zones.

3.6.7 SECTION 3.7 BIOLOGICAL AND WETLAND RESOURCES

Page 3.7-1 includes the addition of the Mitigation Monitoring Plan as Appendix I5 and the U.S. Fish and Wildlife Service Biological Opinion (Appendix I6).

The information and findings contained in this section are based on a Biological Resources Technical Report (BTR; Appendix I1), Wetland Delineation and Preliminary Jurisdictional Determination (Appendix I2), Biological Assessment (BA; Appendix I3), correspondence with the U. S. Fish and Wildlife Service (USFWS; Appendix I4), Mitigation Monitoring Plan (Appendix I5), and the USFWS Biological Opinion (Appendix I6).

Table 3.7-1 is revised as follows to reflect the issuance of USFWS's biological opinion (BO) for the Project:

The Federal Endangered Species Act (ESA) defines and lists species as "endangered" or "threatened" and provides regulatory protection for the listed species. Listed species were detected during focused species surveys within the Study Area and, therefore, consultation with U. S. Fish and Wildlife Service (USFWS) under Section 7 will be required for the Project. FTA initiated formal Section 7 consultation with the USFWS on January 21, 2014. The USFWS concurred with FTA's effects determinations and issued a Biological Opinion (BO) in February 2015 Refer to Appendix I6 for additional information.

Table 3.7-2 is revised to include a small area of Riversidean alluvial fan sage scrub (RAFSS) habitat, which was previously mapped SCWRF and disturbed vegetation mapping units.

Table 3.7-2. Existing Vegetation Communities within the Project Study Area

Vegetation Communities	Study Area Acreage
Disturbed Habitat	24.5054
Disturbed Wetland	0.02
Eucalyptus Woodland	2.78
Flat-top Buckwheat Scrub (disturbed)	0.91
Mulefat Scrub	0.04
Non-Jurisdictional Ditch	1.31
Non-Native Grassland	61.90



Vegetation Communities	Study Area Acreage
Non-Vegetated Channel	29.22
Oak Woodland	9.62
Orchards and Vineyards	5.28
Southern Cottonwood Willow Riparian Forest	8.217
Southern Willow Scrub	0.64
Tamarisk Scrub	0.47
<u>Riversidean alluvial fan sage scrub</u>	<u>0.10</u>
Urban/Developed	388.88
Total	533.88

Source: Appendix I1

Figure 3.7-1 (Revised) is revised to reflect a modification to the construction footprint to exclude bank improvements from the western-most section of the Mission Zanja Flood Control Channel in order to reduce adverse impacts to suitable habitat for listed species, including LBV.

Page 3.7-8 is revised to incorporate discussion of the Final Phase 1 Report: Upper Santa Ana River Habitat Conservation Plan (HCP), March 2014:

The Project does not occur within an approved Habitat Conservation Plan (HCP), Natural Community Conservation Plan (NCCP), or other approved local, regional, or state habitat conservation plan. The nearest adopted HCP area, which is located east and north of the Study Area in the cities of Highland and Redlands, is part of the Upper Santa Ana River Wash Land Management and Habitat Conservation Plan.

USFWS in cooperation with the San Bernardino Valley Municipal Water District (and other stakeholders) are proposing the implementation of a mitigation and conservation strategy for the Upper Santa Ana River HCP. To date, most of the focus on mitigation and conservation related to this HCP has been on the Santa Ana sucker (ICF 2014). Possible Santa Ana sucker restoration sites and translocation sites have been identified and will be further evaluated to be included as a part of the mitigation and conservation strategy. None of these contemplated restoration sites occur with the Project Study Area.

Page 3.7-16, first and fourth paragraphs, and page 3.7-21, third paragraph, are revised to reflect the inclusion of Mitigation Measure BIO-7.

Mitigation Measures BIO-1, BIO-4, and BIO-7 are proposed to mitigate this effect.

Pages 3.7-16 and 3.7-17 are revised to reflect the modification of the construction footprint to exclude bank improvements from the western-most section of the Mission Zanja Flood Control Channel.

Alternative 2 – Preferred Project and Design Options

Direct Effects from Temporary Construction

Implementation of the Preferred Project and Design Options would result in direct impacts to waters of the U.S. as result of the placement of fill materials or excavation within jurisdictional waters of the U.S. and state, including wetlands, within the railroad corridor. Based on preliminary engineering, total effects to waters of the U.S., including wetlands, are estimated at ~~6.0780~~ 6.495.71 acres. Of this total, permanent effects to USACE jurisdiction for the Preferred Project and the Design Options total up to ~~0.340.30~~ 0.921.65 acres with the remaining ~~6.495.71~~ 5.574.06 acres subject to temporary effects of which 0.02 acres consists of disturbed wetlands. A majority of these effects occur at the SAR, Twin Warm-Creek (Historic), and along the Mission Zanja Channel (Appendix I1). Direct effects to USACE jurisdictional areas are considered adverse under NEPA. Under CEQA, this is considered a significant impact. Mitigation Measure BIO-6 (Secure Clean Water Act Section 404 Permit and Implement All Permit Conditions to Ensure No Net Loss of Functions of Wetlands, Other Waters of the U.S., and Waters of the State) is proposed to mitigate effects to USACE jurisdictional areas.

Additionally, construction of the Preferred Project and the Design Options would result in effects to a total of ~~46.3914.7~~ 45.4713.05 acres of CDFW jurisdiction with temporary effects occurring to up to ~~45.4713.05~~ 42.3312.18 acres, of which includes ~~42.3312.18~~ 42.3312.18 acres of non-vegetated channel. Permanent effects to CDFW jurisdiction would occur on the remaining ~~0.921.65~~ 3.142.87 acres of which include ~~0.506~~ 0.506 acres of non-vegetated channel. Based on these combined construction-related impacts, the Project has the potential to result in adverse effects to state-protected wetlands through direct fill or excavation, and hydrological interruption. Direct effects to CDFW jurisdictional areas are considered a significant impact under CEQA. Mitigation Measure BIO-6 is proposed to mitigate this effect.

Pages 3.7-18 is revised to reflect the modification of the construction footprint to exclude bank improvements from the western-most section of the Mission Zanja Flood Control Channel.

Impacts to USACE and CDFW jurisdictional areas under the Reduced Project Footprint Alternative would occur similar to the Preferred Project and Design Options; however, the jurisdictional areas subject to direct impacts would be reduced as a function of the alternative's intent (i.e., reduce the Project's physical footprint). Based on preliminary engineering, total effects to waters of the U.S., including wetlands are estimated at ~~5.409~~ 5.409 acres. Of this total, permanent effects to USACE jurisdiction for the Reduced Project Footprint total up to ~~0.3024~~ 0.3024 acres with the remaining ~~4.8979~~ 5.1065 acres subject to temporary effects.

Under the Reduced Project Footprint, up to ~~42.0413.1~~ 42.0413.1 total acres of CDFW jurisdiction would be impacted with permanent effects totally up to ~~0.791.65~~ 0.791.65 acres, which includes ~~0.4352~~ 0.4352 acres of non-vegetated channeled. Temporary effects would occur within the remaining ~~11.454~~ 11.454 acres, which includes 10.32 acres of non-vegetated channel.

The Reduced Project Footprint Alternative 3 reduces temporary and permanent effects to USACE jurisdictional areas by ~~1.390.92~~ 1.390.92 and 0.10 acres, respectively, compared to the Preferred Project and the Design Options. Compared to Preferred Project, this alternative

reduces temporary effects to CDFW jurisdictional areas by ~~4.26~~1.26 acres. Although this alternative reduces the acreage of jurisdictional areas affected, direct effects to jurisdictional areas would still occur and permanent impacts would be the similar. Effects to USACE and CDFW jurisdictional areas are considered adverse under NEPA. This is considered a significant impact under CEQA. Mitigation Measure BIO-6 is proposed to mitigate this effect.

Page 3.7-20, third paragraph is revised to include the RAFSS habitat acreage and changes and the addition of mitigation measure BIO-7.

The construction of the Project under Alternative 2 and the Design Options would result in temporary and permanent effects to the following 12 vegetation communities: disturbed habitat (DH), disturbed wetland (DW), eucalyptus woodland (EW), Flat-top buckwheat scrub (FBS), (non-jurisdictional ditch (NJD), non-native grassland (NNG), non-vegetated channel (NVC), oak woodland (OW), orchards and vineyards (OV), southern cottonwood willow riparian forest (SCWRF), southern willow scrub (SWS), Riversidean alluvial fan sage scrub (RAFSS), and urban/developed (UD). With the exception of SCWRF, RAFSS, and SWS, the remainder of the vegetation communities are not identified as sensitive natural communities by CDFW and effects (temporary and permanent) would not be considered adverse. Of the 8.91 acres of sensitive vegetation communities within the Study Area, approximately ~~3.35~~1.53 acres of SCWRF (Temporary: ~~2.83~~ 0.62 acres, Permanent: ~~0.52~~0.96 acres), 0.05 acre of RAFSS (Temporary: 0.05 acre), and 0.12 acre of SWS (Temporary: 0.10 acres, Permanent: 0.02 acres) would be affected by the physical footprint for the Preferred Project and the Design Options. The physical disturbance to sensitive vegetation communities is considered an adverse effect under NEPA. Under CEQA, this is considered a significant impact. Mitigation Measures BIO-4 and BIO-7 is are proposed to mitigate effects to sensitive communities.

Page 3.7-22, third paragraph is revised to include the RAFSS habitat acreage and updates from project-related permitting.

Compared to Preferred Project and Design Options, Alternative 3 provides no reduction in the acreage of impact to sensitive vegetation communities. ~~Approximately 1.24 acres of SCWRF would be directly affected compared to 3.35 acres under the Preferred Project and Design Options, which is a reduction of 2.11 acres. Approximately 0.12 acres of SWS and 0.1 acre of RAFSS would be affected under both the Preferred Project and the Reduced Project Footprint. Based on these considerations, although the effects are slightly reduced under this alternative, effects related to sensitive vegetation communities would still occur. Similar to the Preferred Project, the direct effect to sensitive vegetation communities is considered an adverse effect under NEPA. Under CEQA, this is considered a significant impact. Mitigation Measures BIO-4 and BIO-7 are proposed to mitigate this effect.~~

Mitigation Measure BIO-3 is revised per comments received from CFDW.

BIO-3 MBTA Covered Species. Prior to habitat removal during the avian breeding season (February 15-August 31), a qualified biologist shall conduct a pre-construction nest survey (in suitable areas) no more than 3 days prior to ground disturbing activities for migratory birds ~~prior to construction~~. Pre-construction

surveys will be performed year-round between MP 3.3 and 4.0 with the timing and implementation be done in coordination with the CDFW and USFWS. Should an active nest of any MBTA covered species occur within or adjacent to the project impact area, a 100-foot buffer (300 feet for raptors) shall be established around the nest and no construction shall occur within this area until a qualified biologist determines the nest is no longer active or the young have fledged.

Mitigation Measure BIO-4 Section 3 is updated to include RAFSS habitat.

Prior to construction, SANBAG shall delineate the construction area (including staging and laydown areas) between Mile Posts 3.3 and 4.0 and erect exclusionary construction fencing along the perimeter of the identified construction area to protect adjacent sensitive habitats (SWS, SCWRF, RAFSS, and Santa Ana wooly star).

Mitigation Measure BIO-6 to include the RAFSS habitat to the CDFW Riparian mitigation ratios.

- CDFW Riparian
 - Permanent: 3:1 (SWS, RAFSS, and SCWRF)

Mitigation Measure BIO-7 is added to incorporate Conservation Measure 2 from the Biological Assessment (see Appendix I3) and in response to CFDW's comment regarding consideration of RAFSS.

BIO-7 Reseeding for Wooly Star. Seeds from the closest known occurrences of woolly-star plants found both upstream and downstream of Bridge 3.4 shall be collected in the fall prior to construction of the SAR crossing. If construction activities require the loss of the single wooly-star at the SAR crossing, the collected seeds will be broadcast in the temporary impact areas, near the impacted woolly-star plant, after construction activities are complete and soils have been restored to pre-Project contours.

- a. Seed collection and broadcast methodologies will be proposed by a qualified seed collector approved by the Service prior to seed collection in a Santa Ana Woolly-Star Management Plan.
- b. Seed harvest shall be from a minimum of three plants per collection location, limited to no more than 50 percent of the available seeds from any one woolly-star plant.
- c. Seeds shall be held at the appropriate temperature and humidity for the shortest length of time necessary prior to planting.
- d. Planting of seeds shall be coordinated to occur prior to the first rains of the season, typically during early fall.
- e. If the woolly-star plant known in the Project area is avoided, collected seeds will be hand broadcast near the parental plants where they were collected.

If SANBAG confirms that removal of the one individual is required during final design, SANBAG will purchase ILF or mitigation credits from a qualified mitigation program to address the Project's temporal affect on woolly-star during the up to three-year construction period. Credits will be purchased to cover affects to the on-site individual and off-site parental plants.

3.6.8 SECTION 3.8 FLOODPLAINS, HYDROLOGY, AND WATER QUALITY

The first sentence in the last paragraph on page 3.8-34 is revised to reflect a reduction in the acreage of the Project's construction limits.

During construction, the total disturbed area affected by the Build Alternatives and Design Options would be up to 141.63 acres over the course of 36 months.

The first sentence in the last paragraph on page 3.8-36 is revised to reflect a reduction in the acreage of the Project's construction limits.

Implementation of the Build Alternatives and Design Options would include substantial construction activity over an area of up to 137.640 acres (depending on alternative and design option) and would include ballast removal, track and bridge installation, drainage improvements, grading, and revegetation..

3.6.9 SECTION 3.9 GEOLOGY, SOILS, AND SEISMICITY

Mitigation Measure GEO-1 is revised as follows:

GEO-1 Prepare Final Geotechnical Report for the Project and Implement Recommended Measures. A Final Geotechnical Report shall be prepared to verify conditions identified in the Preliminary Geotechnical Evaluation prepared for the Project and to support the refinement of the Project's final design. Facility design for all Project components along the alignment shall comply with the site-specific design recommendations as provided by a licensed geotechnical or civil engineer to be retained by SANBAG. The final geotechnical and/or civil engineering report shall address and make recommendations on the following:

3.6.10 SECTION 3.10 HAZARDOUS WASTE AND MATERIALS

No changes or edits are proposed.

3.6.11 SECTION 3.11 ENERGY

No changes or edits are proposed.

3.6.12 SECTION 3.12 CULTURAL AND HISTORIC RESOURCES

The first paragraph on page 3.12-1 is revised as follows to reflect SHPO's concurrence letter received on August 14, 2014:



This section provides a description of the existing cultural and historical resources within the defined Area of Potential Effect (APE) and describes applicable Federal, State, and local regulations. Potential adverse effects to cultural and historical resource as a result of the Build Alternatives and Design Options are considered in this section and, if necessary, mitigation is proposed in instances where adverse effects are identified. The findings and conclusions presented in this section are based on the Cultural Resources Technical Memorandum (ICF 2014d), which is provided as Appendix M. On August 14, 2014, the State Historic Preservation Officer (SHPO) concurred with both the eligibility determination and the effects analysis as presented in this section (see Appendix M). ~~Concurrence of resource eligibility and effects determinations are pending conclusion of ongoing SHPO consultation.~~

Table 3.12-1, under the State Office of Preservation, the date was changed.

The Office of Historic Preservation implements the policies of the NHPA on a statewide level. The SHPO is an appointed official who implements historic preservation programs within the state's jurisdictions. FTA initiated consultation with SHPO per the requirements of Section 106 for the Project on August 12, 2012 and delegated section 106 coordination to SANBAG. Appendix M contains the correspondence between SHPO, FTA, and SANBAG through ~~July~~ November 2014.

Page 3.12-10 and Table 3.12-4 the date of the SHPO concurrence of eligibility determination was added. The architectural properties eligible for listing on the national register status was updated to reflect.

3S. ~~Deemed potentially eligible~~ for the NRHP based on the current survey

On August 14, 2014, the SHPO concurred with eligibility determinations provided in Table 3.12-4.

Table 3.12-4 is revised to reflect SHPO's concurrence with the architectural properties identified as eligible for listing on the National Register. Footnote 1 is modified as follows:

¹ ~~Eligibility determinations pending SHPO concurrence~~ SHPO concurred with eligibility determinations on August 14, 2014.

Table 3.12-5 is revised to reflect SHPO's concurrence with the eligibility determination provided for archaeological resources in the Project APE. Footnote 2 is modified as follows:

Site	Description	Status ¹
CA-SBR-7168	Gage Canal	6Y. Not eligible for CRHR or NRHP based on previous evaluation by others (<u>1995</u>)
CA-SBR-8092H	Mill Creek Zanja	6Z. Portion of the resource within the ROW found not eligible for CRHR or NRHP based on a lack of integrity and setting as a result of the current survey and evaluation ²
P-36-11856H	Elephant Orchards Packing House Site	6Y. Not eligible for CRHR or NRHP based on previous evaluation by others (<u>2005</u>)



Site	Description	Status ¹
CA-SBR-5314H	Redlands Chinatown	N/A. Site not detected in the APE; therefore, eligibility criteria could not be applied. Portions of the site outside SANBAG's ROW are assumed to be eligible for the CRHR or NRHP. ²
CA-SBR-5313H	Redway House	N/A. Site not detected in the APE; therefore, eligibility criteria could not be applied. Portion of the site outside SANBAG's ROW are assumed to be eligible for CRHR or NRHP. ²

² ~~SHPO concurred with eligibility determinations on August 14, 2014. Eligibility determinations pending SHPO concurrence.~~

The first paragraph on page 3.12-15 is revised as follows to reflect SHPO's concurrence letter received on August 14, 2014:

The following section is based on resource eligibility recommendations and effects analysis presented in the technical memorandum prepared for the Project (Appendix M). ~~SHPO Concurrence of with the resource eligibility and effects determinations are pending conclusion of ongoing SHPO consultation on August 14, 2014.~~

Mitigation Measure CUL-1 is revised to indicate that structural evaluations will be performed at five buildings (not four).

CUL-1 Structural Evaluations. In order to determine the structural stability of the Redlands Depot, Cope Commercial Company Warehouse, Haight Packing House, Redlands City Transfer, and the brick warehouse at 440 Oriental Avenue, structural evaluations shall be prepared by a qualified engineer for these five ~~four~~ buildings prior to the commencement of construction. The structural evaluations will also address maximum allowable levels of vibration during construction and, if appropriate, will recommend reduced levels of stabilization in conjunction with vibration monitoring. Qualified recommendations within the structural evaluation shall be adhered to, as appropriate. Permanent stabilization will follow the Secretary of the Interior's guidelines for the treatment of historic properties; if the buildings are temporarily stabilized for the duration of construction activities, when removed, the buildings will be restored to their pre-construction condition when the stabilization measures are removed.

3.6.13 SECTION 3.13 PARKLANDS, COMMUNITY SERVICES, AND OTHER PUBLIC FACILITIES

Mitigation Measure PCS-1 is revised per the request of the San Bernardino County.

PCS-1 Coordinate Trail Planning with Local Jurisdictions. SANBAG will implement the following activities to minimize Project-related conflicts with proposed trails:

- Santa Ana River Trail - SANBAG shall coordinate final design and construction of Bridge 3.4 with the San Bernardino County Department of

Public Works, Transportation Design Division, and Parks and Recreation Department to integrate the trail as contemplated in the SANBAG's Non-Motorized Transportation Plan (2011) (NMTP), so as to maintain its planned future continuity along the Santa Ana River. If the trail is constructed and operational in advance of the bridge structure, SANBAG will maintain trail access during the course of construction, to the extent feasible. In instances, where trail closures are required the construction contractor will be required to minimize the duration of the closure and support the County with any noticing, outreach, or implementation of temporary detours.

- Orange Blossom Trail - SANBAG shall update the NMTP (2011) as part of its next cycle update, to include the realignment of the trail segment of the Orange Blossom Trail that is currently shown as being located within the railroad right-of-way, so as to not conflict with the proposed project. SANBAG will coordinate with the City of Redlands and the County Flood Control District to determine available rights-of-way for the placement of the trail and, if necessary, realign the trail to take advantage of connections via existing roadway and other public right-of-ways.

3.6.14 SECTION 3.14 ECONOMIC AND FISCAL IMPACTS

No changes or edits are proposed.

3.6.15 SECTION 3.15 SAFETY AND SECURITY

Mitigation Measure SS-1 is revised per the request of the City of Redlands.

SS-1 Develop Safety and Security Management Plan. Prior to construction, SANBAG shall coordinate and consult with local safety and crime prevention authorities to develop a Safety and Security Management Plan (SSMP) for the track alignment, bridges, parking facilities, and station areas. The SSMP shall include a station surveillance element to be developed in coordination with the local jurisdiction and private properties owners, as applicable. If a non-FRA compliant DMU vehicle type is selected for the Project, the SSMP shall include a plan element that includes appropriate levels of safety as may be necessary to facilitate a shared-use operation.

3.6.16 SECTION 3.16 SECTION 4(F) RESOURCES

Footnote 3 in Tables 3.16-1 and 3.16-2 is revised as follows:

- ³ Only if sound barriers are constructed per Mitigation Measures NV-4. With the adoption of the MOU for the implementation of quiet zones, sound barriers in the vicinity of the Section 4(f) resource would not be constructed under the Preferred Project Alternative.

Page 3.16-10 through 11, the last sentence was updated to state the following.

Prior to preparation and release of this EIS/EIR, a formal response concerning the contents of the notification letter and potential Section 4(f) use of Meadowbrook Park and

Meadowbrook Fields was not received by SANBAG. ~~Coordination with the City of San Bernardino remains ongoing in parallel with the environmental review process.~~

The last sentence in the second paragraph on page 3.16-14 and the last sentence in the next to last paragraph on the same page are revised as follows to reflect SANBAG's coordination with the Redlands Unified School District.

SANBAG submitted a response letter following the release of the Draft EIS/EIR on September 24, 2014 indicating that SANBAG and the City of Redlands would be entering into a MOU to facilitate the implementation of quiet zones. The MOU was adopted on February 4, 2014. ~~Coordination with RUSD remains ongoing in parallel with the environmental review process.~~

Figure 3.16-3 is revised to reflect a change in the construction footprint along the Mission Zanja Flood Control Channel.

The last sentence in the third paragraph on page 3.16-18 is revised as follows to reflect SANBAG's coordination with the San Bernardino County Parks and Recreation Department.

SANBAG submitted an additional letter following the release of the Draft EIS/EIR on September 24, 2014. The County provided a concurrence letter on November 6, 2014. On November 6, 2014, the County submitted a reply indicating their concurrence with the use determinations provided in the response letter and Draft EIS/EIR. ~~Coordination with the San Bernardino County Parks and Recreation Department remains ongoing in parallel with the environmental review process.~~

The last sentence in the fifth paragraph on page 3.16-21 is revised as follows to reflect SANBAG's coordination with RUSD.

SANBAG submitted a response letter following the release of the Draft EIS/EIR on September 24, 2014 indicating that SANBAG and the City of Redlands would be entering into a MOU to facilitate the implementation of quiet zones. The MOU was adopted on February 4, 2014. ~~Coordination with RUSD remains ongoing in parallel with the environmental review process.~~

The last sentence in the fourth paragraph on page 3.16-25 is revised as follows to reflect SANBAG's coordination with the City of Redlands.

SANBAG submitted a response letter following the release of the Draft EIS/EIR on September 24, 2014 indicating that SANBAG and the City of Redlands would be entering into a MOU to facilitate the implementation of quiet zones. The MOU was adopted on February 4, 2014. ~~Coordination with the City of Redlands remains ongoing in parallel with the environmental review process.~~

The last paragraph on page 3.16-25 is revised as follows to reflect SANBAG's coordination with the City of Redlands.

With the implementation of mitigation measures, the impacts would be de minimis. The City of Redlands concurred with this determination in February 2015 (see Appendix O).

The first paragraph on page 3.16-26 is revised to reflect SHPO's concurrence with the findings of effect under Section 106 as presented in Section 3.12.

Section 3.12, Historic and Cultural Resources, identifies the cultural and historic properties within the Project APE. This section identifies the historic resources that occur within APE that qualify for protection under Section 4(f), ~~pending concurrence from SHPO~~, and have a potential to result in a Section 4(f) use (see Table 3.16-2). Based on those historic resources identified in Table 3.16-2, this section evaluates the potential for the Build Alternatives and Design Options to result in a direct use, temporary occupancy, or constructive use under Section 4(f).

The last sentence in the fourth paragraph on page 3.16-28 is revised as follows to reflect SHPO's concurrence with the findings of effect under Section 106 as presented in Section 3.12.

~~SHPO concurred with this determination with the implementation of Mitigation Measure CUL-1 on August 14, 2014 (see Appendix M). This finding is subject to the completion of consultation with SHPO in accordance with Section 106 of the NHPA (see Section 3.12).~~

The last sentence in the seventh paragraph on page 3.16-29 is revised as follows to reflect SHPO's concurrence with the findings of effect under Section 106 as presented in Section 3.12.

~~SHPO concurred with this determination with the implementation of Mitigation Measure CUL-1 on August 14, 2014 (see Appendix M). This finding is subject to the completion of consultation with SHPO in accordance with Section 106 of the NHPA (see Section 3.12).~~

The last sentence in the first paragraph on page 3.16-31 is revised as follows to reflect SHPO's concurrence with the findings of effect under Section 106 as presented in Section 3.12.

~~SHPO concurred with this determination with the implementation of Mitigation Measure NV-3 on August 14, 2014 (see Appendix M). However, if quiet zones are not implemented, this finding remains is subject to further the completion of consultation with SHPO in accordance with Section 106 of the NHPA (see Section 3.12).~~

The last sentence in the second paragraph on page 3.16-33 is revised as follows to reflect SHPO's concurrence with the findings of effect under Section 106 as presented in Section 3.12.

~~SHPO concurred with this determination with the implementation of Mitigation Measure NV-3 on August 14, 2014 (see Appendix M). However, if quiet zones are not implemented, this finding remains subject to written concurrence from further consultation with SHPO.~~

The last sentence in the fifth paragraph on page 3.16-34 is revised as follows to reflect SHPO's concurrence with the findings of effect under Section 106 as presented in Section 3.12.

~~SHPO concurred with this determination with the implementation of Mitigation Measure NV-3 on August 14, 2014 (see Appendix M). However, if quiet zones are not implemented, this finding is remains subject to further to the completion of consultation with SHPO in accordance with Section 106 of the NHPA (see Section 3.12).~~

Pages 3.16-33 and 3.16-34, Redlands Lawn bowling, first and fourth paragraphs in this section are revised to reference the correct figure in Section 3.12:

The Redlands Lawn Bowling Club is located at the southeast end of Sylvan Park in Redlands. It consists of a large grass green for lawn bowling and three structures set at the north end of the lawn as described in Section 3.12. Grass lawn, mature trees, and mature shrubs surround the perimeter of the bowling green (see Figure 3.12-~~75~~). Section 3.12 provides additional description on this historic property.

Temporary Occupancy. Similar to the discussion for Sylvan Park, improvements along the southern border of the Lawn Bowl Alley would be required to facilitate construction of the Built Alternatives (see Figure 3.12-~~75~~).

The last sentence in the third paragraph on page 3.16-35 is revised as follows to reflect SHPO's concurrence with the findings of effect under Section 106 as presented in Section 3.12.

~~SANBAG and FTA currently remain in consultation with SHPO per the requirements of Section 106 of the NHPA and FTA's procedures for implementing NEPA. On August 14, 2014, SHPO concurred that the Project would have no adverse effect to historic properties. SHPO also concurred that the segment of the Mill Creek Zanja within the APE is not eligible to the NRHP due to lack of integrity and setting. SHPO concurred with the NRHP-eligibility determinations for the Redlands Lawn Bowling Alley, the Second Baptist Church, and Victoria Elementary School. SHPO concurred with the Project's findings of effect as presented in Section 3.12.~~

The last sentence in the third paragraph on page 3.16-35 is revised as follows to reflect SHPO's concurrence with the findings of effect under Section 106 as presented in Section 3.12.

Additionally, SANBAG is ~~currently in~~ and FTA ~~consultation~~ with SHPO for cultural and historic properties that would be subject to potential use

3.6.17 SECTION 3.17 ENVIRONMENTAL JUSTICE

Page 3.17-19 and 3.17-26 are revised to reflect the inclusion of Mitigation Measure NV-7.

As part of the mitigation measures proposed in Section 3.6, Noise and Vibration, Mitigation Measures NV-3, NV-4 (Construct Sound Barriers), NV-5 (Wayside Rail Lubrication), NV-6 (Use Ballast Mats, Resiliently Supported Ties, or Measures of Comparable Effectiveness on Portions of the Rail near Sensitive Receivers), and NV-7 (Provide Building Noise Insulation to Severe- and Moderate-Impact Residences).

Page 3.17-26 is revised to reflect the completion of additional public meetings during the public comment review period for the Draft EIS/EIR.

In conjunction with the release of the Draft EIS/EIR for public review, SANBAG ~~will hold~~held public meetings concurrent with the ~~45-day~~ public review period. The public meetings ~~will were~~ be held on:

1. September 4, 2014, 5:00–7:00 PM, at the ESRI Café, 380 New York Street, Redlands, CA 92373; and
2. September 9, 2014, 5:00–7:00 PM, at the Hotel, 285 East Hospitality Lane, San Bernardino, CA 92408

In addition to receiving written comments on the Draft EIS/EIR, SANBAG and FTA will be had a court reporter in attendance to transcribe encouraging-verbal comments during the public meeting, on the content and findings of the draft EIS/EIR. Spanish and American sign language (ASL) translators were also in attendance. Responses to the comments provided are contained in Appendix P of the Final EIS/EIR.

3.6.18 CHAPTER 4 - CUMULATIVE EFFECTS

The fourth paragraph on page 4-13 is revised to include the new noise mitigation measure.

These adverse effects would be cumulatively considerable under NEPA. Under CEQA, these impacts are considered cumulatively significant. Mitigation Measures NV-3 (Establish Quiet Zones), NV-4 (Construct Sound Barriers), NV-5 (Wayside Rail Lubrication), ~~and~~ NV-6 (Use Ballast Mats, Resiliently Supported Ties, or Measures of Comparable Effectiveness on Portions of the Rail near Sensitive Receivers), and NV-7 (Provide Building Noise Insulation to Sever- and Moderate-Impact Residences) are proposed to minimize adverse effects to land use compatibility.

The first sentence in the third paragraph on page 4-20 is revised as follows to reflect USEPA's re-designation of the SCAB as "maintenance" for PM-10.

The SCAB is currently in extreme nonattainment for O₃, ~~serious nonattainment~~ maintenance for particulate matter less than 10 microns (PM₁₀), nonattainment for particulate matter less than 2.5 microns (PM_{2.5}), serious maintenance for CO under NAAQS, and nonattainment for O₃, PM₁₀, PM_{2.5}, and NO₂ under CAAQS.

The second sentence in the third paragraph on page 4-20 is revised as follows to reflect USEPA's re-designation of the SCAB as "maintenance" for PM-10.

The Project is listed in a conforming RTP and FTIP and is, therefore, consistent with the AQMP and SIP. The SCAB is currently classified as extreme nonattainment for ozone, ~~serious nonattainment~~ maintenance for PM₁₀, nonattainment for PM_{2.5}, serious maintenance for CO under NAAQS, and nonattainment for ozone, PM₁₀, PM_{2.5}, and NO₂ under CAAQS.

The second to last sentence in the fourth paragraph on page 4-25 is revised to reference Mitigation Measure BIO-7.

However, through the implementation of Mitigation Measures BIO-1 (Pre-Construction Survey - Conduct Preconstruction Survey for Special Status Plants and Wildlife and, if Found, Implement Avoidance and Compensation Measures), BIO-2 (LBV), ~~and~~ BIO-4 (Protection of Sensitive Plants and Habitats, and BIO-7 (Re-seeding for Woolly Star), no net loss of these resources would occur. Following the application of the prescribed mitigation, cumulative impacts would not be adverse under NEPA and less than significant under CEQA.

The last paragraph on page 4-25 is revised to include the Riversidean alluvial fan sage scrub (RAFSS) as a sensitive habitat and the revisions to mitigation measure BIO-7.

Implementation of the Project would result in effects to sensitive vegetation communities such as Southern Willow Scrub (SWS), Riversidean alluvial fan sage scrub (RAFSS), and

Southern Cottonwood Willow Riparian Forest (SCWRF) as a result of bridge replacements, track improvements, and bank reinforcement within the Mission Zanja Channel. Implementation of other cumulative projects, such as the SAR Trial, I-10 HOV, and SBCFCD's Long-Term Maintenance Program, are anticipated to result in similar effects to sensitive vegetation communities (e.g., SWS, RAFSS, and SCWRF). Absent mitigation, a loss to valuable habitat and associated sensitive vegetation communities from Project construction and other cumulative projects would be considered an adverse effect under NEPA. Under CEQA, this impact would be cumulatively significant. However, through the implementation of Mitigation Measures BIO-1 (Pre-Construction Survey - Conduct Preconstruction Survey for Special Status Plants and Wildlife and, if Found, Implement Avoidance and Compensation Measures), BIO-2 (LBV), ~~and~~ BIO-4 (Protection of Sensitive Plants and Habitats), and BIO-7 (Reseeding for Woolly Star), no net loss of these resources would occur.

The last and third to the last sentences in the first paragraph on page 4-26 is revised as follows to reference Mitigation Measure BIO-7.

Implementation of the Project would result in a direct effect to one federally endangered Santa Ana River woolly star individual located immediately south of the existing Bridge 3.4 located in the SAR. The plant is a single individual that is not part of a larger population in the Study Area, and is located approximately 0.7 miles downstream from the closest, locally established population. Although the direct effect to the individual Santa Ana River woolly star may be unavoidable, it would not be considered a cumulative adverse effect to the species' population as a whole with the application of Mitigation Measures BIO-1, ~~and~~ BIO-4, and BIO-7. Given that other projects considered in the cumulative analysis would be required to mitigate for direct and indirect impacts to the Santa Ana River woolly star population, the cumulative effect of the Project would not be adverse under NEPA. Under CEQA, this significant impact would not be cumulatively considerable with implementation of Mitigation Measures BIO-1, ~~and~~ BIO-4, and BIO-7.

The first sentence of the second paragraph on page 4-26 is revised to include RAFSS as a sensitive habitat for zoological communities.

Implementation of the Project would result in direct effects to SWS, RAFSS, and SCWRF, which are habitats that support the federally endangered LBV and other sensitive avian species such as yellow warbler and those protected under the MBTA.

The second sentence of the last paragraph on page 4-26 is revised based on updates during the initial permitting process.

Total permanent impacts to USACE jurisdictional areas are estimated at up to 0.3941 acres (Preferred Project) and 0.921.34 acres for CDFW jurisdiction.

The second paragraph on page 4.2-37 is revised as follows:

None of the potential full property acquisitions would require a relocation of an existing business or residence. However, the Build Alternatives and Design Option 1 would result in the displacement of numerous structures or facilities during the construction phase to accommodate TCEs or the Project's ROW requirements. Additionally, easements may be

necessary from adjacent landowners to facilitate access following the closure of one or more at-grade crossings. Under NEPA, these effects are considered adverse. Under CEQA, this impact is considered significant. Mitigation Measure LU-1 (Minimize Project Land Requirements and Comply with Federal and State Relocation Laws) is proposed to mitigate this construction-related effect.

3.6.19 CHAPTER 5 - OTHER STATUTORY CONSIDERATIONS

The second to last sentence of the first paragraph on page 5-18 is revised based on updates during the initial permitting process.

This reduction would reduce temporary and permanent impacts to USACE and CDFG jurisdictional areas by 4.550.29 and 0.291.20 acres respectively.

3.6.20 CHAPTER 6 - PUBLIC OUTREACH AND COORDINATION

The last sentence in the first paragraphs on page 6-5 is revised as follows to reflect ongoing consultation with SHPO and its concurrence with the eligibility determinations and findings of effect.

On April 24, 2013, SHPO concurred with the revised APE and on June 4, 2013, SHPO approved the testing plan for archaeological resources within Redlands Chinatown. On August 14, 2014, SHPO concurred that the Project would have no adverse effect to the following historic properties:

~~SANBAG is currently in consultation with SHPO for the following historic and archaeological properties:~~

- Redlands Santa Fe Historic District and contributing properties, including the Redlands Santa Fe Depot;
- Second Baptist Church;
- Victoria ~~elementary~~ Elementary School; and
- Redlands Lawn Bowling Club;
- ~~Mill Creek Zanja; and~~
- ~~Redlands Chinatown.~~

The following paragraph is added to page 6-6 to reflected SHPO's concurrence letter, dated August 14, 2014.

The Gage Canal and Elephants Orchards Packing House have been previously determined not to be eligible for the NRHP. On August 14, 2014, SHPO concurred that the segment of the Mill Creek Zanja within the APE is not eligible to the NRHP due to lack of integrity and setting. SHPO also concurred that portions of the Redway House and Redlands Chinatown within the Project APE were not eligible for the NRHP and, therefore, the proposed undertaking would result in no adverse effect.



SANBAG provided a preliminary draft of the Cultural Resources TM to SHPO for review and comment on August 20, 2013. SHPO provided comments on the preliminary draft Cultural Resources TM on October 9, 2013. On July 28, 2014, SANBAG provided a response letter and updated Cultural Resources TM to SHPO. The Cultural Resources TM (Revised) provided in Appendix M of this EIS/EIR was subsequently updated in response to SHPO's concurrence letter on August 14, 2014 and reflects minor updates in response to requested by SHPO's comments.

The third paragraph on page 6-7 is revised remove the Orange Blossom Trail and San Bernardino Gold Club as 4(f) resources.

In accordance with 23 CFR – Part 774, FTA and SANBAG are required to coordinate with entities having jurisdiction or ownership over existing or planned park and recreation amenities, including trails. On August 1, 2012, letters were mailed to provide notice that improvements associated with the Project would occur in close proximity to resources owned and/or managed by the following entities:

- City of Redlands: East Valley Corridor Multi-Purpose Trail, Jennie Davis Park, Orange Blossom Trail, and Sylvan Park
- City of San Bernardino: Meadowbrook Fields and Meadowbrook Park
- ~~Redlands Conservancy: Orange Blossom Trail~~
- Redlands Unified School District: Victoria Elementary School (Victoria Park), Franklin Elementary School, and Orangewood High School
- San Bernardino County Parks and Recreation Department: Santa Ana River Trail
- ~~San Bernardino Golf Club: San Bernardino Public Golf Course~~

The last sentence of the fourth paragraph on page 6-6 is revised to identify additional 4(f) correspondence that occurred during the public review period for the draft EIS/EIR.

Coordination letters were also sent out on September 24, 2014 during the Draft EIS/EIR public review period. The San Bernardino County Parks and Recreation Department provided a concurrence letter on November 6, 2014. A copy of the Section 4(f) notification letters are provided in Appendix O.

An additional statement was added to the fifth paragraph on page 6-7 to reflect consultation with USFWS under Section 7 of the ESA.

On May 13, 2014, USFWS requested and was granted a 60-day extension until July 21, 2014. An additional request for a subsequent 30-day extension to August 21, 2014 was filed on July 23, 2014.

Due to overlapping Federal and State listings for both LBV and Woolly star, coordination on the mitigation for these species was conducted with the California Department of Fish and Wildlife (CDFW) in December 2014 and January 2015. USFWS issued the final BO in February 2015, which is included as Appendix I6.

On Page 6-7 additional information was updated to show the community outreach meetings that were conducted.

During the initial planning phase of the Project, including the initial Alternatives Analysis (AA) phase and the subsequent Strategic Plan phases, public involvement activities were primarily focused on public meetings to engage the public at key milestones. During the AA phase of the project, ~~one two~~ public meeting ~~was were~~ held on September 13, 2010 at the City of Redlands - ESRI Café, to present alternative transit modes (commuter rail, light rail, diesel multiple units and bus rapid transit) being considered for the Project, and transit-oriented land use development scenarios. A second round of informational meetings was conducted on May 11, 2011 at the City of Redlands - ESRI Café and May 12, 2011 at the Santa Fe Depot in San Bernardino.

Pages 6-9 and 6-10 were revised to incorporate Section 6.6.5 Notice of Availability as follows:

6.6.5 NOTICE OF AVAILABILITY

The Notice of Availability (NOA) of the Draft EIS/EIR was published in the Federal Register on August 15, 2014. In addition, on August 6, 2014, the NOA for the Project's Draft EIS/EIR was filed with the San Bernardino County Clerk's Office, State Clearinghouse, and sent to the mailing list (i.e., government agencies, interested parties, and property owners and mailing addresses for all parcels adjacent to the nine-mile stretch of the Project). The NOA was noticed via an email blast, SANBAG's Home Page, and in the San Bernardino Sun and the Redlands Daily Facts. Copies of the Draft EIS/EIR, including the NOA, were also mailed to each of the Participating and Cooperating Agencies in the NEPA process (which also included Responsible Agencies as defined by CEQA). The public review period for the Draft EIS/EIR concluded on September 29, 2014.

A copy of the Draft EIS/EIR was available for public review at the following locations:

- SANBAG – 1170 West 3rd Street, 2nd Floor, San Bernardino, CA
- City of San Bernardino – 300 North D Street, 3rd Floor, San Bernardino, CA
- City of Redlands, Development Services Department, Planning Division – 210 East Citrus Avenue, Redlands, CA
- Norman F. Feldheim Public Library – 555 West 6th Street, San Bernardino, CA
- University of Redlands Library – 1249 E. Colton Avenue, Redlands, CA.

An electronic version of the document was also made available on <http://www.sanbag.ca.gov>.

The second and third paragraphs on page 6-11 were revised as follows to document the public meetings held during the draft EIS/EIR review period.

In conjunction with the release of the Draft EIS/EIR for public review, SANBAG ~~will hold~~ held additional public meetings concurrent with the ~~45-day~~ public review period. The public meetings ~~will be~~ were held on:

1. September 4, 2014, 5:00–7:00 PM, at the ESRI Café, 380 New York Street, Redlands, CA 92373; and



2. September 9, 2014, 5:00–7:00 PM, at the Hotel, 285 East Hospitality Lane, San Bernardino, CA 92408

In addition to receiving written comments on the Draft EIS/EIR, SANBAG and FTA will be ~~encouraging~~ had a report reporting in attendance to transcribe verbal comments during the public meeting on the content and findings of on the Draft EIS/EIR. Both a Spanish and ASL interpreter were also in attendance at each of the meetings.

The first paragraph on page 6-12 was revised to include the addition of Appendix A5, Public Notices.

A list of newspapers and advertisement publication dates is provided in Table 6-2. A representative sampling of the advertisements and notifications is present as Appendix A5, Public Notices.

The last sentence in the first paragraph on page 6-12 was revised as follows.

Based on the combined outreach efforts through the NOP and NOI comment periods, the outreach team ~~has developed~~ a targeted list of approximately 200 agency/key stakeholder contacts to receive a mailing of the Draft EIS/EIR to inform them of its availability along with an opportunity to provide comments during the ~~45-day~~ public review period.

Pages 6-14 was revised to incorporate Section 6.7 Accommodations for Minority, Low-Income, and Persons with Disabilities as follows:

Display advertisements were advertised in Spanish and translations were provided at the scoping meetings. Both a Spanish and American Sign Language (ASL) interpreter were in attendance at each of the meetings.

3.6.21 CHAPTER 7 – SUMMARY OF RESPONSES TO COMMENTS ON THE DRAFT EIS/EIR (NEW)

Chapter 7 of the Final EIS/EIR contains a list of the comments received on the Draft EIS/EIR, a summary of the comments received, and master responses to commonly raised topics by individual commenters. This chapter is new and was not contained in the Draft EIS/EIR.

3.6.22 CHAPTER 8 – REFERENCES

Chapter 7 of the Draft EIS/EIR was moved to Chapter 8 for the integration of Chapter 7, Responses to Comments on the Draft EIS/EIR.

The following reference was added to Figure 2-10 (Revised) to support the discussion on page 2-61.

Omnitrans 2014. Omnitrans 2015 - 2020 Short Range Transit Plan. 2014

3.6.23 CHAPTER 9 – LIST OF PREPARERS

Chapter 8 of the Draft EIS/EIR was moved to Chapter 9 for the integration of Chapter 7, Responses to Comments on the Draft EIS/EIR.



3.6.24 CHAPTER 10 – LIST OF ACRONYMS AND ABBREVIATIONS

Chapter 9 of the Draft EIS/EIR was moved to Chapter 10 to allow for the integration Chapter 7, Responses to Comments on the Draft EIS/EIR.

3.6.25 CHAPTER 11 – INDEX

Chapter 10 of the Draft EIS/EIR was moved to Chapter 11 to allow for the integration of Chapter 7, Responses to Comments on the Draft EIS/EIR.

3.6.26 APPENDICES

Appendix A3 was updated to include the public notice of FTA’s consideration of the combined Final EIS and ROD.

Appendix A5 was added to include the public notices posted for the proposed project.

Appendix D2 was revised to reflect the current land acquisitions, displacements, and relocations required.

Appendix G1 was revised to reflect the SCAG TCWG’s concurrence with the analysis and determination that the Project is not a project of air quality concern.

Appendix H and H1 were revised to add three additional Category 2 for Receiver #54.

Appendix I1 was revised to incorporate comments from the California Department of Fish and Wildlife.

Appendix I4 was modified to include the draft biological opinion (BO) forwarded from U. S. Fish and Wildlife Service on December 18, 2014.

Appendix I5 was added to provide an updated version of SANBAG’s proposed mitigation monitoring plan (MMP).

Appendix I6 was added to include the USFWS Final BO.

Appendix M was revised to incorporate comments from the State Historic Preservation Officer (SHPO) and its concurrence with the eligibility determinations and findings of effect for the proposed undertaking.

Appendix O was revised to incorporate additional correspondence with the City of Redlands, San Bernardino County, and the Redlands Unified School District.

A new Appendix P was added that includes the Comment Letters on the Draft EIS/EIR, responses to those comments, and minor changes and edits to the Draft EIS/EIR.

A new Appendix Q was added that includes the Mitigation Monitoring and Reporting Program for the Project.

A new Appendix R was added that includes FTA’s Record of Decision.



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