



COUNCILWOMAN MONICA RODRIGUEZ
SEVENTH DISTRICT

June 26, 2024

Brian P. Kelly
CEO
California High-Speed Rail Authority
770 L Street, Suite 620
Sacramento, CA 95814

Dear Mr. Kelly,

As the Councilwoman of the Seventh District in the City of Los Angeles, I am submitting this additional comment letter concerning items revealed in the Final Palmdale to Burbank EIR (FEIR) for the California High Speed Rail (HSR) project (“Project”). Though Refined Alternative SR14 better addresses critical concerns about the Project’s impact on the foothills of our community through various *Impact Avoidance and Minimization Features*, there remains important impacts to consider around Portal 9 that need to be addressed. The concerns include: the extensive impacts on industrial and commercial jobs; relief options for existing residential uses with industrial zoning that will be affected by construction, and allowing the community to provide input for future haul route planning and mitigations.

Mitigating Impacts on Industrial & Commercial Jobs

HSR must ensure workforce development programs are included as part of the project to mitigate loss of commercial and industrial jobs lost due to property acquisitions.

As proposed, the FEIR includes the removal of up to 98 businesses through property acquisition, which represents up to 860 jobs displaced from Pacoima. This loss of industry would exacerbate the very low vacancy rate and extremely high rents for industrial real estate in the City of Los Angeles, and have a ripple effect in the local economy. Some sections within the FEIR describe workforce partnerships, namely sections *2.1 Offsetting Mitigation Measure #1: Construction Jobs and Opportunities, Training and Workforce Development* and *Offsetting Mitigation Measure #1: Construction Jobs and Opportunities, Training and Workforce Development*. While there is language to include construction and trade jobs, with various partners named, there is no explicit direction to include other industries that can be impacted by the elimination of that many jobs.

There must be learning from existing projects, like the East San Fernando Valley Light Rail Project, whose design/build contractors are implementing a training-to-employment program for

construction and office jobs on the project itself. Partnerships with the Building Trades must also be executed so there are apprenticeship opportunities that allow for paid job-training and sustained employment. Job training and placement programs are needed to retool these vital workers to help deliver this project. The community is enduring significant disruption and displacement for this project to be built and there must be strong protections in place to insure the Pacoima community is compensated.

Relief Options for Existing Residential Uses with Industrial Zoning

HSR Must Include Non-Conforming Residential Uses in Mitigation Programs.

Although the FEIR states that there are minimal residences impacted by the construction of Refined Route SR14, the impact of construction around Portal 9 should be considered more closely (Table 3.12-18). The Authority must establish a grandfathering of existing residential units that are zoned as industrial and which will be in close proximity to the creation of the portal on Montague Street. This is a crucial consideration because these homes are listed as ‘ZI-2355 Environmental Justice Improvement Area.’

The effects outlined in Section 3.4 *Noise and Vibration* establish that properties on Montague Street will be 78 feet from the “Closest Vibration Sensitive Receiver” used to estimate initial impact. All of these residences will be within 100 to 300 feet of a massive grading and spoils removal area for 6 years, in addition to experiencing general construction impacts. Eleven other homes on Bromwich Street are listed as industrial, which are within a similar distance (200-400 feet) of the portal. All other homes between Montague and Bromwich Streets will be subject to intensive construction noise and should be considered for inclusion in properties eligible for the Uniform Relocation Assistance and Real Property Acquisition Policies Act (URA) process in order to resolve the negative and drastic change in quality of life that will occur as a result of the project’s construction.

One crucial detail is the high population density of Pacoima when compared to the rest of the construction area, which must trigger noise monitoring to be included from the beginning of the project, not as stated currently (requiring complaints to initiate monitoring cite section). Additionally there is dire need for clarity on dust mitigation plans because of Portal 9’s location within Council District 7. There must be the reasonable assumption that there will be construction noise, so that these noise monitoring plans are developed early on in the construction planning process.

Community Input for Haul Route

HSR must consult with neighbors to develop haul route plans and community improvements.

While much of the project is underground, the spoils are largely directed to the Vulcan Landfill Sun Valley, located along Glenoaks Boulevard, which runs through the Council District 7. Combining the different project estimates, there could be periods of time during construction in

which 100+ truck trips of spoils per hour are planned for portions of Pacoima on the way to Vulcan Landfill Sun Valley, which is next to Council District 7's historic neighborhood of Stonehurst. Extensive use of conveyor belts directed from across the project to said landfill at Vulcan Landfill Sun Valley creates a number of other concerns due to a separate scope of work of setting up these systems. While this is innovative and reduces truck usage, dust mitigation efforts for the moving of millions of cubic feet of earth needs to be clarified. Existing conveyor belts exist at said landfill, but their operations are not clear from the FEIR.

There is a need for consultation with neighbors for beautification of the area around Portal 9 for its effects once the train is operational. These should go beyond the High-Speed Rail Authority's plans for sound barrier installation of 6 to 13 foot tall sound barriers prior to operations in places that can achieve 5 to 15 decibel reductions in sound. The area is already burdened by a large presence of rail noise to the West, used by METROLINK and thus shouldn't be exposed to more noise pollution going forward. Sound barriers and greenscaping are crucial for helping the community. The inclusion of Item 51 in *Appendix 5-B* creating a hotline with multilingual options is appreciated to allow real time updates to be flagged and update the community about the project.

The creation of community roundtables for public input is appreciated, as outlined in Items 58, 59, 60, and 61 of *Appendix 5-B*, but requires a more detailed commitment to ensure these touchpoints are standing and recurring for community involvement. A standing community advisory committee will inform project managers of important considerations regarding locations and timing of various scopes of work and hauling of materials. The precedent for establishing a community advisory committee and consulting with the community on a regular schedule is standard practice for a large-scale infrastructure project and would be beneficial to the HSR team. This would also prove invaluable in guiding previously mentioned aesthetic improvements around Portal 9.

The excavation portions of the scopes of construction planned in the Pacoima Reservoir area imply usage of a narrow road called Little Tujunga Canyon Road. Paving of this road in preparation for intense use under this construction project is highly encouraged for risk mitigation to the public. Currently this road is not maintained to support heavy construction vehicles that would place far more strain on the road.

While it is appreciated that multiple requests outlined in the previous letter were addressed in the response for the FEIR, many details have been ignored and are necessary for community engagement and well-being. Extensive development is planned across this area and includes projects that reap benefits of improved infrastructure and investment like the East San Fernando Valley Light Rail Project, but concurrent projects could create a wide variety of impacts in the community. We are calling for consultation with all relevant public agencies and stakeholders

who are going to be vying for laydown area, hauling routes, and more during similar construction time intervals. If not addressed, all of the infrastructure and transportation projects could be harmed.

I appreciate your consideration and expect to see these additional mitigations formally adopted. Should you have any questions please contact my Planning Director, Paola Bassignana at paola.bassignana@lacity.org.

Sincerely,

A handwritten signature in black ink that reads "Monica Rodriguez". The signature is fluid and cursive, with the first name being larger and more prominent than the last name.

Monica Rodriguez

Councilwoman, 7th District

Cc: Honorable Karen Bass, Mayor, City of Los Angeles
Honorable Luz Rivas, Assembly Member, 39th District
Honorable Caroline Menjivar, Senator, 20th District
LaDonna DiCamillo Southern California Regional Director, CHSR
Laura Rubio-Cornejo, General Manager, Dept. of Transportation, City of Los Angeles
Vince Bertoni, Planning Director, Dept. of City Planning, City of Los Angeles