

FILED
Superior Court Of California,
Sacramento
03/09/2022
tcrowther
By _____, Deputy
Case Number:
34-2022-80003821

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11 SUPERIOR COURT OF THE STATE OF CALIFORNIA
12 COUNTY OF SACRAMENTO - GORDON D. SCHABER COURTHOUSE

14 BURBANK-GLENDALE-PASADENA
15 AIRPORT AUTHORITY,

16 Petitioner,
17 v.

18 CALIFORNIA HIGH-SPEED RAIL
AUTHORITY; and DOES 1-10,

19 Respondents.

20 ROES 1-10,

21 Real Parties in Interest.
22

Case No. 34-2022-80003821-CU-WM-GDS

**PROOF OF SERVICE OF WRIT
PETITION ON ATTORNEY GENERAL**

(California Environmental Quality Act
[CEQA] Pub. Res. Code § 21000, et seq.;
Code of Civ. Proc. §§ 1085, 1094.5

Assigned for All Purposes To Hon.
Shelleyanne W. L. Change, Dept. 21

Action Filed: February 17, 2022

[Exempt from filing fees pursuant to Govt. Code § 6103]

RICHARDS WATSON GERSHON
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BY FAX



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March 4, 2022

VIA ELECTRONIC MAIL (CEQA@doj.ca.gov)

CEQA Coordinator
Office of the Attorney General
Environment Section
1300 "I" Street
Sacramento, CA 95814-2919

Re: ***Burbank-Glendale-Pasadena Airport Authority v. California High Speed Rail Authority, et al.***
(Sacramento County Superior Court Case No. 34-2022-80003821)

Dear CEQA Coordinator:

Enclosed please find a copy of the Petition for Writ of Mandate filed by the Burbank-Glendale-Pasadena Airport Authority ("BGPAA") on February 17, 2022 in the above-referenced action. This copy is provided to you in compliance with Public Resources Code Section 21167.7 and Code of Civil Procedure Section 388.

This litigation challenges the discretionary actions of the California High Speed Rail Authority ("CHSRA") to certify and approve the Final Environmental Impact Report/Environmental Impact Statement, State Clearinghouse No. 2014071073, that CHSRA prepared and certified under the California Environmental Act ("CEQA") (Pub. Resources Code § 21000, *et seq.*) for the Burbank to Los Angeles Project Section of the California High-Speed Rail System, and to set aside approvals and findings until such time as CHSRA fully complies with CEQA.

We would welcome the opportunity to discuss this matter further. Please do not hesitate to contact us should you have any questions or concerns.

Very truly yours,

A handwritten signature in black ink, appearing to read 'Ginetta L. Giovinco', with a long horizontal flourish extending to the right.

Ginetta L. Giovinco

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11 SUPERIOR COURT OF THE STATE OF CALIFORNIA
12 COUNTY OF SACRAMENTO

14 BURBANK-GLENDALE-PASADENA
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16 Petitioner,

17 v.

18 CALIFORNIA HIGH-SPEED RAIL
AUTHORITY; and DOES 1-10,

19 Respondents.

20 ROES 1-10,

21 Real Parties in Interest.
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Case No.

PETITION FOR WRIT OF MANDATE

(California Environmental Quality Act
[CEQA] Pub. Res. Code § 21000, *et seq.*;
Code of Civ. Proc. §§ 1085, 1094.5)

[Exempt from filing fees pursuant to Govt. Code § 6103]

PETITION FOR WRIT OF MANDATE

RICHARDS WATSON GERSHON
ATTORNEYS AT LAW - A PROFESSIONAL CORPORATION

BY FAX

1 Petitioner, Burbank-Glendale-Pasadena Airport Authority, alleges as follows:
2

3 **INTRODUCTION**

4 1. Through this action, petitioner Burbank-Glendale-Pasadena Airport Authority
5 (“BGPAA”) seeks a writ of mandate directed to respondent California High-Speed Rail
6 Authority (“CHSRA”) ordering CHSRA to set aside its certification of a Final
7 Environmental Impact Report/Environmental Impact Statement, State Clearinghouse No.
8 2014071073 (the “EIR”) that CHSRA prepared and certified under the California
9 Environmental Quality Act (“CEQA”) (Pub. Resources Code § 21000, *et seq.*) for the
10 Burbank to Los Angeles Project Section of the California High-Speed Rail System (the
11 “Project”), and to set aside all Project approvals and findings until such time as CHSRA
12 fully complies with CEQA.

13 **PARTIES**

14 2. Petitioner BGPAA is a joint powers agency, duly organized and existing
15 under and pursuant to the laws of the State of California. BGPAA is a separate government
16 agency created in 1977 under a joint powers agreement between the three cities of Burbank,
17 Glendale, and Pasadena for the sole purpose of operating the Hollywood Burbank Airport
18 (the “Airport”), located in the cities of Burbank and Los Angeles. The mission of BGPAA
19 is to provide state-of-the-art regional airport facilities and related services which are
20 efficient, safe, convenient, and user-friendly. BGPAA’s interests in this matter include
21 ensuring that the Project does not adversely impact the safety and security of the Airport’s
22 operations or adversely affect the Airport’s visitors, employees, and tenants.

23 3. Respondent CHSRA is, and at all times relevant to this proceeding was, an
24 independent state authority established by the California Legislature in 1996. CHSRA is
25 responsible for planning, designing, constructing, and operating the California High-Speed
26 Rail (“HSR”) System, a high-speed train system to serve the Los Angeles to San Francisco
27 mainline route as well as other major California cities. CHSRA is governed by a nine-
28 member board of directors. CHSRA is the Project sponsor and is the lead agency under

1 CEQA for the Project and the California HSR System as a whole. CHSRA, its staff, and
2 contractors and consultants working under its control and direction prepared the EIR for the
3 Project. CHSRA's Board of Directors certified the Final EIR and approved the Project.

4 4. BGPAA is ignorant of the true names and capacities, whether individual,
5 corporate, or otherwise, of the respondents named herein as Does 1 through 10, inclusive,
6 and BGPAA therefore sues these parties by their fictitious names. BGPAA will amend this
7 Petition to state the true names and capacities of each such fictitiously named respondent
8 when ascertained.

9 5. BGPAA is informed and believes, and thereon alleges, that at all times
10 material hereto, respondents Does 1 through 10, inclusive, were and now are either the
11 agents or principals of the other respondents, and of each other, or were and now are either
12 the owners, interest holders, or co-obligees of the other respondents and, in such capacity or
13 capacities, undertook the actions stated herein and stand to be directly affected by this
14 litigation.

15 6. BGPAA is ignorant of the true names and capacities, whether individual,
16 corporate, or otherwise, of the real parties in interest named herein as Roes 1 through 10,
17 inclusive, and BGPAA therefore sues these parties by their fictitious names. BGPAA will
18 amend this Petition to state the true names and capacities of each such fictitiously named
19 real party in interest when ascertained.

20 7. BGPAA is informed and believes, and thereon alleges, that at all times
21 material hereto, real parties in interest Roes 1 through 10, inclusive, were and now are
22 either the agents or principals of the other real parties in interest, and of each other, or were
23 and now are either the owners, interest holders, or co-obligees of the other real parties in
24 interest and, in such capacity or capacities, stand to be directly affected by this litigation.

25 **JURISDICTION AND VENUE**

26 8. This Court has jurisdiction over this matter pursuant to Public Resources
27 Code sections 21168, 21168.5, and 21168.9, and Code of Civil Procedure sections 1085 and
28 1094.5.

1 9. Venue is proper in this Court pursuant to Public Utilities Code section
2 185038.

3 **CEQA MANDATES**

4 10. "CEQA was enacted to advance four related purposes: to (1) inform the
5 government and public about a proposed activity's potential environmental impacts; (2)
6 identify ways to reduce, or avoid, environmental damage; (3) prevent environmental
7 damage by requiring project changes via alternatives or mitigation measures when feasible;
8 and (4) disclose to the public the rationale for governmental approval of a project that may
9 significantly impact the environment." (*California Building Industry Assn. v. Bay Area Air*
10 *Quality Management Dist.* (2015) 62 Cal.4th 369, 382.)

11 11. To further these goals, CEQA requires an agency to prepare an EIR for any
12 proposed project that may have a significant effect on the environment. (Pub. Resources
13 Code §§ 21100(a), 21151(a), 21080(d), 21082.2(d).)

14 12. "An [EIR] is the public document used by the governmental agency to
15 analyze the significant environmental effects of a proposed project, to identify alternatives,
16 and to disclose possible ways to reduce or avoid the possible environmental damage." (14
17 Cal. Code Regs. § 15002(f); Pub. Resources Code, § 21002.1.) The EIR must clearly
18 identify and describe the project's significant effects on the environment. (14 Cal. Code
19 Regs. § 15126.2.)

20 13. "An accurate, stable and finite project description is the *sine qua non* of an
21 informative and legally sufficient EIR." (*County of Inyo v. City of Los Angeles* (1977) 71
22 Cal.App.3d 185.) Failure to adequately describe a project undermines CEQA.

23 14. The EIR must "describe feasible measures which could minimize significant
24 adverse impacts," and the "formulation of mitigation measures shall not be deferred until
25 some future time." (14 Cal. Code Regs. § 15126.4.)

26 15. "Under CEQA, an agency must solicit and respond to comments from the
27 public and from other agencies concerned with the project." (14 Cal. Code Regs.
28 § 15002(j).)

1 22. CHSRA and the Federal Railroad Administration (“FRA”) completed two
2 first-tier, programmatic environmental documents pursuant to CEQA and the National
3 Environmental Policy Act (“NEPA”) for the California HSR System and approved general
4 alignments and station locations for further study in second-tier, project-level documents.

5 23. CHSRA and FRA divided the California HSR System into individual project
6 sections for second-tier environmental analysis, one section of which is the Project.

7 24. CHSRA and FRA initially commenced preparation of a second-tier Palmdale
8 to Los Angeles Project Section Environmental Impact Report/Environmental Impact
9 Statement (“EIR/EIS”) in 2007 and subsequently split that section into two parts, leading to
10 preparation of a Burbank to Los Angeles Project Section EIR/EIS in 2014.

11 **The Burbank to Los Angeles Project Section**

12 25. The Project, part of Phase 1, is approximately 14 miles in length and traverses
13 urban, developed land. From the north, the Project begins at the proposed Burbank Airport
14 Station and travels south and southeast through the cities of Burbank, Glendale, and Los
15 Angeles, then descends into Downtown Los Angeles, where it terminates at Los Angeles
16 Union Station.

17 26. On November 15, 2018, the CHSRA Board of Directors designated the HSR
18 Build Alternative as CHSRA’s Preferred Alternative for the Project. The HSR Build
19 Alternative for the Project includes a new Burbank Airport Station and new HSR
20 infrastructure at Los Angeles Union Station.

21 27. CHSRA subsequently caused to be prepared a Draft EIR for the Project.

22 **CHSRA’s Environmental Review and Approval of the Project, and BGPAA’s**
23 **Repeatedly Stated Concerns**

24 28. CHSRA circulated the Draft EIR for the Project for a public review and
25 comment period from May 29, 2020 to July 16, 2020, and subsequently extended the
26 comment period to August 31, 2020.

27 29. During the public review and comment period, CHSRA received
28 approximately 1,300 individual comments, contained in 278 submissions, from the public

1 and government agencies regarding Project environmental impacts, alternatives, and
2 mitigation measures.

3 30. On August 31, 2020, BGPAA timely submitted a letter to CHSRA with its
4 comments on the Draft EIR and expressing its significant concerns about the Project and
5 the lack of adequate environmental review. BGPAA explained that the Draft EIR failed to
6 comply with the requirements of CEQA in that the Draft EIR failed to fully analyze,
7 disclose, and mitigate potential impacts Project impacts on the Airport, including to the
8 safety of the Airport's operations.

9 31. By way of example, BGPAA raised specific concerns regarding the Project's
10 proposal to tunnel through Airport property, causing construction-related impacts and
11 disruption to the safety of Airport operations.

12 32. By way of further example, BGPAA likewise raised concerns regarding the
13 impacts of the proposed tunnel alignment passing near or under the Airport's new Regional
14 Intermodal Transportation Center ("RITC"), and the Project's potential to permanently
15 impact the RITC.

16 33. By way of further example, BGPAA also raised concerns regarding the
17 Project's lack of compliance with the governing Airport Layout Plan ("ALP"), which helps
18 to ensure that incompatible land uses that could affect the safety of airport operations do not
19 occur. BGPAA noted that CHSRA's proposed approach to deal with the Project's admitted
20 conflicts with the ALP was simply to propose "coordination with the [Airport] to amend the
21 current Airport Layout Plain (ALP) for any permanent construction-related facilities
22 required for the [Project], to be submitted to the FAA for approval." BGPAA explained
23 that this approach constitutes impermissibly deferred analysis, does not discuss or analyze
24 what amendments would be necessary or what impacts might result from the amendments,
25 and fails to address what happens if BGPAA objects to an amendment of its ALP or if
26 Federal Aviation Administration ("FAA") approval of an amendment is not granted.

27 34. On November 5, 2021, CHSRA issued the Final EIR for the Project, which
28 included responses to comments received on the Draft EIR.

1 35. CHSRA failed to provide adequate responses to BGPAA’s comments on the
2 Draft EIR, or to address several of the significant deficiencies in the environmental analysis
3 of the Project.

4 36. On January 18, 2022, BGPAA submitted a further letter to CHSRA in
5 connection with the Final EIR.

6 37. BGPAA explained that CHSRA’s responses to comments were inadequate,
7 and failed to constitute a good faith, reasoned analysis in response to BGPAA’s comments.

8 38. For example, BGPAA explained that the Final EIR engages in impermissibly
9 deferred analysis and mitigation regarding construction impacts on the Airport. In response
10 to BGPAA’s significant concerns regarding the adverse impacts on Airport operations
11 caused by CHSRA’s proposal to tunnel under Airport property, CHSRA intended only to
12 “work with the airport to develop a Construction Transportation Plan to minimize this
13 impact.” BGPAA explained that this response failed to fully analyze or mitigate
14 construction-related impacts, including potential impacts to the safety of Airport operations,
15 and instead only required preparation of a plan at an unspecified time in the future, with no
16 benchmark standards for what the plan must include or what will be required to avoid
17 significant impacts.

18 39. Similarly, BGPAA advised that the Final EIR’s responses regarding the
19 impacts of the proposed tunnel alignment passing near or under the Airport’s RITC
20 remained problematic, as the Final EIR responded to those comments by simply stating that
21 the “design is preliminary in nature and details will be determined during final design.”
22 BGPAA explained that this statement reflects the lack of a stable and finite project
23 description, and leaves open the significant possibility that new or greater impacts will
24 occur based on a change in project design for which there will be no formal, public review
25 of potential impacts.

26 40. BGPAA also stated that the Final EIR also assumed that the “final design
27 solution related to the RITC “will also address and resolve conflicts with the project’s
28 interface with airport facilities” but there was no assurance that these impacts and conflicts

1 will be resolved to the satisfaction of BGPAA, and that if they are not, there is no
2 mitigation in place to alleviate the Project's adverse impacts.

3 41. BGPAA likewise noted the lack of an adequate response on the concerns
4 regarding the ALP, which ignored the issue by stating only that the EIR "has been revised
5 to clarify the actions to be taken if an amendment is needed, including the process to obtain
6 FAA approval of the amendment." The issue, however, was not the process for requesting
7 an amendment to the ALP, but the ramifications if BGPAA does not support the requested
8 amendments or the FAA does not grant them. BGPAA again explained that the EIR failed
9 to address how impacts arising from inconsistency with the ALP in its final form would be
10 mitigated or avoided.

11 42. Due to these significant issues and deficiencies with the Final EIR, BGPAA
12 requested that CHSRA revise and recirculate the EIR.

13 43. The CHSRA Board of Directors held a two-day public meeting on January
14 19, 2022 and January 20, 2022, at which it considered certifying the Final EIR, approving
15 the Preferred Alternative for the Project, and adopting Findings of Fact, a Statement of
16 Overriding Considerations, and a Mitigation Monitoring and Enforcement Plan ("MMEP").

17 44. BGPAA's representative participated in the meeting and provided testimony
18 on January 19, 2022 during the public comment portion of the meeting, again asking
19 CHSRA to refrain from taking any action on the Project and its Final EIR and to instead
20 revise and recirculate a legally adequate EIR.

21 45. On January 20, 2022, the CHSRA Board of Directors voted to certify the
22 Final EIR for the Project, and to approve the Preferred Alternative, the CEQA Findings of
23 Fact, the Statement of Overriding Considerations, and the MMEP for the Project, including
24 but not limited to its adoption of Resolution #HSRA 22-01, #HSRA 22-02, and #HSRA 22-
25 03.

26 46. BGPAA is informed and believes, and thereon alleges, that CHSRA filed a
27 Notice of Determination ("NOD") for the Project on January 21, 2022, which was received
28 by the State Clearinghouse on January 21, 2022.

COMPLIANCE WITH PREREQUISITES

1
2 47. BGPAA has performed any and all conditions precedent to the filing of this
3 lawsuit, and has fully exhausted its administrative remedies by participating in CHSRA's
4 administrative processes related to certification of the EIR, to the extent that those
5 processes were available, including BGPAA's submittal of letters to CHSRA on August 31,
6 2020 and January 18, 2022, and its testimony on January 19, 2022.

7 48. BGPAA has requested that CHSRA not approve the Project as proposed and
8 not certify the legally inadequate Final EIR, and therefore any further attempts to pursue
9 administrative remedies would be futile or do not exist.

10 49. BGPAA has complied with Public Resources Code section 21167.5 and, prior
11 to filing this lawsuit, has sent to CHSRA written notice of BGPAA's intent to file this
12 lawsuit.

13 50. BGPAA will comply with the requirements of Public Resources Code section
14 21167.7 and Code of Civil Procedure section 388 by mailing a copy of this Petition to the
15 California Attorney General.

16 51. BGPAA has no plain, speedy or adequate remedy in the ordinary course of
17 law unless this Court grants the requested writ of mandate to require CHSRA to comply
18 with its duties under the law and to set aside its certification of the Final EIR and Project
19 approval. In the absence of such remedies, CHSRA's approvals and actions will remain in
20 effect, in violation of CEQA.

21 52. If CHSRA is not enjoined from undertaking acts in furtherance of the Project,
22 BGPAA will suffer irreparable harm from which there is no adequate remedy at law in that
23 the Project area and surrounding areas will be irrevocably altered and significant adverse
24 impacts on the environment will result. BGPAA also has been harmed by CHSRA's failure
25 to provide an environmental document that accurately and fully discloses, analyzes, and
26 mitigates the Project's impacts.

27 53. This lawsuit has been commenced within any applicable time limits as set
28 forth in the California Code of Civil Procedure and California Public Resources Code.

FIRST CAUSE OF ACTION

(Failure to Comply with the California Environmental Quality Act)

[Pub. Resources Code § 21000, *et seq.*]

(Against Respondent California High-Speed Rail Authority)

54. BGPAA hereby incorporates by reference the allegations contained in paragraphs 1 through 53 above, as though set forth in full herein.

55. The EIR violates CEQA and fails as an informational document because it does not adequately identify, analyze, disclose, or mitigate the Project's potentially significant impacts on the Airport, including impacts on the safety of the Airport's operations.

56. The EIR violates CEQA in that it engages in impermissible deferred analysis and mitigation regarding construction impacts on Airport property and operations.

57. The EIR violates CEQA in that it engages in impermissible deferred analysis and mitigation regarding the impacts of the proposed tunnel alignment passing near or under the Airport's RITC.

58. Similarly, the EIR violates CEQA in that it fails to include a stable and finite project description with respect to the Project's design and implications for permanent adverse impacts to the RITC. The EIR's impermissible approach leaves open the significant possibility that new or greater impacts will occur based on a change in Project design for which there will be no formal, public review of potential impacts. The EIR also assumes that a final design solution will address and resolve the Project's conflicts with Airport facilities. The EIR fails to address how it is known that these impacts and conflicts will be resolved and, if they are not, what mitigation will be imposed to alleviate impacts.

59. The EIR violates CEQA in that it engages in impermissible deferred analysis and mitigation regarding the Project's conflicts with the ALP by proposing to determine if there is a concern or impact at a later time, failing to discuss or analyze what ALP amendments would be necessary or what impacts might result from the amendments, and by failing to address the ramifications if BGPAA objects to an amendment of its ALP or if

1 FAA approval is not granted. The EIR fails to discuss or analyze how CHSRA intends to
2 deal with unmitigated impacts arising from inconsistency with the ALP in its current form.

3 60. CHSRA has failed to comply with CEQA in that the Final EIR reveals that
4 there are significant issues with the Project that remain unanalyzed and unmitigated.

5 61. CHSRA has violated CEQA by ignoring several of the concerns that BGPAA
6 raised in its comments on the Draft EIR regarding the Project's impacts on safety of the
7 ongoing public-serving operations at the Airport. CHSRA's responses to BGPAA's
8 comments are vague and conclusory and fail to provide a good faith, reasoned analysis in
9 response, in violation of CEQA.

10 62. CHSRA has failed to comply with CEQA in that the Final EIR is deficient yet
11 CHSRA has refused to revise and recirculate the EIR for public review and comment.

12 63. CHSRA has failed to comply with CEQA and other applicable laws in that
13 the Findings and Statement of Overriding considerations that CHSRA did make and adopt
14 are inadequate and not supported by substantial evidence.

15 64. BGPAA has incurred attorneys' fees in preparing and filing this lawsuit and
16 will incur attorneys' fees in an amount not yet known in prosecuting this lawsuit and this
17 cause of action.

18 **PRAYER FOR RELIEF**

19 WHEREFORE, petitioner, Burbank-Glendale-Pasadena Airport Authority, prays for
20 the following relief:

21 1. For a peremptory writ of mandate, issued under the seal of this Court,
22 commanding Respondent California High-Speed Rail Authority, forthwith, to vacate, annul,
23 and set aside its certification of the Final Environmental Impact Report/Environmental
24 Impact Statement, State Clearinghouse No. 2014071073, for the Burbank to Los Angeles
25 High-Speed Rail Project Section, including Resolution #HSRA 22-01, #HSRA 22-02 and
26 #HSRA 22-03.

27 2. For a peremptory writ of mandate, issued under the seal of this Court,
28 commanding Respondent California High-Speed Rail Authority to set aside any and all

1 decisions approving any project or discretionary action ostensibly in reliance upon the Final
2 Environmental Impact Report/Environmental Impact Statement, State Clearinghouse No.
3 2014071073, or in furtherance of the Project.

4 3. For a peremptory writ of mandate, issued under the seal of this Court,
5 commanding Respondent California High-Speed Rail Authority to fully comply with
6 CEQA prior to certifying any future EIR for the Project or approving the Project.

7 4. For a stay and/or temporary restraining order, preliminary injunction and/or
8 permanent injunction restraining and enjoining Respondent California High Speed Rail
9 Authority from taking any action in reliance upon the certification of the Final
10 Environmental Impact Report/Environmental Impact Statement, State Clearinghouse No.
11 2014071073, or in furtherance of the Project, until such time as its fully complies with
12 CEQA.


13 5. For its costs of suit herein.

14 6. For its attorneys' fees, pursuant to Code of Civil Procedure section 1021.5.

15 7. For such other and further relief as the Court may deem just in the
16 circumstances.

17
18 Dated: February 17, 2022

RICHARDS, WATSON & GERSHON
A Professional Corporation
GINETTA L. GIOVINCO
DARRELLE M. FIELD

21 By: 
22 GINETTA L. GIOVINCO
23 Attorneys for Petitioner
24 BURBANK-GLENDALE-PASADENA
AIRPORT AUTHORITY

25 **[PURSUANT TO CODE OF CIVIL PROCEDURE SECTION 446, THIS PETITION**
26 **IS DEEMED VERIFIED BY OPERATION OF LAW.]**

RICHARDS WATSON GERSHON
ATTORNEYS AT LAW - A PROFESSIONAL CORPORATION

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PROOF OF SERVICE

Burbank-Glendale-Pasadena Airport Authority v. California High-Speed Rail Authority
Sacramento County Superior Court Case No. 34-2022-80003821

I, Marcella Correa, declare:

I am a resident of the State of California and over the age of eighteen years and not a party to the within action. My business address is 1 Civic Center Circle, PO Box 1059, Brea, California 92822-1059. On March 4, 2022, I served the within document(s) described as:

COVER LETTER TO ATTORNEY GENERAL AND COPY OF WRIT PETITION

on the interested parties in this action as stated below:

CEQA Coordinator
Office of the Attorney General
Environment Section
1300 "I" Street
Sacramento, CA 95814-2919
CEQA@doj.ca.gov

California High-Speed Rail Authority
770 L Street, Suite 620
Sacramento, CA 95814
Minming.Wu@hsr.ca.gov

Respondent, California High-Speed Rail Authority

(BY E-MAIL) By transmitting a true copy of the foregoing document(s) to the e-mail addresses set forth above.

I declare under penalty of perjury under the laws of the State of California that the foregoing is true and correct.

Executed on March 4, 2022, at San Dimas, California.



Marcella Correa

Marcella Correa

From: Marcella Correa
Sent: Friday, March 4, 2022 3:50 PM
To: 'ceqa@doj.ca.gov'; 'minming.wu@hsr.ca.gov'
Cc: Ginetta Giovinco; Pamela Saunders
Subject: Burbank-Glendale-Pasadena Airport Authority v. California High-Speed Rail Authority (34-2022-80003821)
Attachments: BGPAA v. CHSRA - Cover Ltr. to Attorney General re Writ Petition.PDF

Attached please find Ms. Giovinco's correspondence regarding the above-referenced matter.

Marcella Correa
Legal Secretary



RICHARDS WATSON GERSHON

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Legal Secretary to Paula Gutierrez Baeza, Cassandra D. Lo and Kyle H. Brochard

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PROOF OF SERVICE

Burbank-Glendale-Pasadena Airport Authority v. California High-Speed Rail Authority
Sacramento County Superior Court Case No. 34-2022-80003821-CU-WM-GDS

I, Pamela Saunders, declare:

I am a resident of the State of California and over the age of eighteen years and not a party to the within action. My business address is 350 South Grand Avenue, 37th Floor, Los Angeles, California 90071. On March 8, 2022, I served the within document(s) described as:

PROOF OF SERVICE OF WRIT PETITION ON ATTORNEY GENERAL

on the interested parties in this action as stated below:

CEQA Coordinator
Office of the Attorney General
Environment Section
1300 "I" Street
Sacramento, CA 95814-2919

(BY MAIL) By placing a true copy of the foregoing document(s) in a sealed envelope addressed as set forth above. I placed each such envelope for collection and mailing following ordinary business practices. I am readily familiar with this Firm's practice for collection and processing of correspondence for mailing. Under that practice, the correspondence would be deposited with the United States Postal Service on that same day, with postage thereon fully prepaid at Los Angeles, California, in the ordinary course of business. I am aware that on motion of the party served, service is presumed invalid if postal cancellation date or postage meter date is more than one day after date of deposit for mailing in affidavit.

I declare under penalty of perjury under the laws of the State of California that the foregoing is true and correct.

Executed on March 8, 2022, at Los Angeles, California.



Pamela Saunders

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