



Appendix I
Public Comments and Responses

Madera Station Relocation Project

Prepared for:
San Joaquin Joint Powers Authority

949 Channel Street
Stockton, CA 95202

AECOM
Kaiser Center
300 Lakeside Dr
Oakland, CA 94612

January 2021

1. INTRODUCTION

The Draft Initial Study/Mitigated Negative Declaration (Draft IS/MND) for the Madera Station Relocation Project (Project) was circulated for public review on October 14, 2020 through November 16, 2020. A total of four comment letters were received, as well as eight comments during two online public meetings (in the form of webinars) held on November 5, 2020. Additionally, two comments submitted via the Project webpage were received.

This appendix is organized into three parts: 1) responses to comment letters received during the public review period; 2) responses to oral comments received during both public online webinars on November 5, 2020; and 3) responses to comments received via the Project webpage. Written responses are presented for all comments received during the public review period. Each comment letter, webinar comment, and Project webpage comment have been assigned a number code, and individual comments in each letter have also been coded to facilitate responses. For example, the letter from San Joaquin Valley Air Pollution Control District is identified as Comment Letter 3, with comments noted as 3-1, 3-2, etc. Copies of each comment letter are provided prior to each response in this Appendix. The comment letters are organized chronologically. Comments that present opinions about the project or that raise issues not directly related to the substance of the environmental analysis in the Draft IS/MND are noted but are not required to receive a detailed response. All comment letters, online webinar comments, and Project webpage comments received are listed in Table 1.

Table 1. List of All Comments Received

ID	From	Agency/Contact	Page
Comment Letter #1	Angel Reyna, President	Madera Community College	2
Comment Letter #2	Marven E. Norman, Executive Director	Inland Empire Biking Alliance	4
Comment Letter #3	Arnaud Marjollet, Director of Permit Services	San Joaquin Valley Air Pollution Control District	12
Comment Letter #4	H. Madrigal, Lieutenant Commander	Department of California Highway Patrol	29
Webinar Comment #1	Cherie Clark	cherie.clark@valleyair.org	33
Webinar Comment #2	Lavida Nash	teachthatrick@hotmail.com	34
Webinar Comment #3	Lavida Nash	teachthatrick@hotmail.com	35
Webinar Comment #4	Lavida Nash	teachthatrick@hotmail.com	35
Webinar Comment #5	Troy Hightower	thightower@tdhintl.net	37
Webinar Comment #6	Lavida Nash	teachthatrick@hotmail.com	37
Webinar Comment #7	Troy Hightower	thightower@tdhintl.net	37
Webinar Comment #8	Lavida Nash	teachthatrick@hotmail.com	37
Webpage Comment #1	Dennis Holschlag	hold26@hotmail.com	38
Webpage Comment #2	Juan Calderon	juanjalderon07@aol.com	38

2. RESPONSES TO COMMENT LETTERS

A total of four comment letters were received during the public review period of the Draft IS/MND for this Project.



Comment Letter 1

November 4, 2020

To Whom It May Concern:

On behalf of Madera Community College, we would like to submit the following into the record regarding the Madera Station Relocation:

We recently became the newest Community College in the California system and are the only higher education institution in Madera County. As a result of us becoming a full-fledged college, we will be able to offer athletics at our institution. We understand the current pandemic will limit our ability to move in this direction for now, but have plans to do so in the future. The ability to offer athletics will bring additional students and activities to our campus which will contribute to a higher volume of individuals on our campus. In the previous five years we saw our enrollment increase from 5,335 students in 2014-2015 school year to 7,889 students in the 2019-20 school year. This semester we had our highest enrollment to date with over 4,700 students, which is roughly about a 500-student increase from fall 2019. If we take into account our enrollment for the upcoming spring semester, enrollment could easily exceed 8,000 students for the current academic year.

1-1 Additionally, we anticipate our enrollment will continue to increase as we have two new facilities coming online at our campus via the Measure C bond. In January of 2020, we had a ribbon cutting for our Center for Agriculture and Technology (CAT) building, which was the first Measure C project to be completed. This building will allow us to offer more programs/courses in welding, plant science, maintenance and agricultural technology. The CAT building is roughly 10,000 square feet in size. The second Measure C project funded for our campus is Academic Village II, which will be about a 35,000 square foot project. This project is currently scheduled to be completed by fall of 2022. Academic Village II (AV-2) will allow us to increase our ability to serve more students. Our Nursing Program will be relocated into AV-2 and provide us with the ability to expand the number of students in the program. We recently hired an engineering faculty in anticipation that this program will have space in AV-2 to allow us to grow this program. As we grow with new programs and courses, AV-2 will have a larger library, computer lab, tutoring center and additional offices for faculty and staff.

Overall, we want to convey that our college has been growing and anticipate that it will continue to grow given our trends and new facilities. Please free to connect with me should you have any questions or need clarification based on information in this letter.

Respectfully,

Ángel Reyna

President

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Comment Letter 1

***Angel Reyna, President
Madera Community College***

Response 1-1

The letter submitted by Angel Reyna, President of the Madera Community College does not specifically make a comment on the content of the Draft IS/MND or on the environmental process. The letter contains information about recent achievements and projected goals within their institution. These achievements and goals combine will likely lead to an increase in the number of students that will attend. The Draft IS/MND makes note of the consistency of the Project with the goals of the Madera College Center Specific Plan in the Land Use evaluation and also discusses linkages between the Project and the Madera Community College in the Draft IS/MND Section 1 (Introduction) and Section 3.17 (Transportation). The comment is acknowledged for the record.



INLAND EMPIRE BIKING ALLIANCE

Comment Letter 2

20 October 2020

Dan Leavitt
San Joaquin Joint Powers Authority
949 East Channel Street
Stockton, CA 95202

Re: Madera Station Relocation Project Initial Study/Mitigated Negative Declaration (SCH #2020109008)

Dear Dan Leavitt,

I am writing on behalf of the Inland Empire Biking Alliance in response to the IS/MND which has been released for the Madera Station Relocation Project ("Project") that is being proposed in Madera. After reviewing the documents which have been prepared, I have the following comments regarding what is proposed.

- 2-1 As a bike advocacy organization, our biggest concern is for access of the station by bicyclists. Based on the drawings and information which is included in the documentation, we believe that this Project leaves a lot on the table in terms of providing reasonable access to the site. This is especially concerning because this Project is to construct a train station. A strong link and great access between bicycles and trains creates a virtuous cycle which improves usage of both modes, but it requires making the investment to provide seamless access and integration between the two modes.
- 2-2 Worryingly, the MND indicates that such a connection is not being invested in by this Project at any point. Section 2.2.5 Access Road indicates that there *not even sidewalks or bike lanes* would be included in the Phase 1 construction. And while section 2.3.5 indicates that Phase 2 would construct (presumably Class II) bike lanes and sidewalks along the access road, we are concerned that even though provided with what is effectively a blank canvas, that the opportunity for providing the best possible bike connection is not being utilized.
- 2-3 Earlier this year, Caltrans released its version of contextual bikeway guidance¹, joining the Federal Highway Administration² and NACTO³ in providing resources which can be used to plan and

¹ Flournoy, M. (2020). Contextual Guidance for the Selection of Bicycle Facilities. Retrieved from <https://dot.ca.gov/-/media/dot-media/programs/transportation-planning/documents/office-of-smart-mobility-and-climatechange/planning-contextual-guidance-memo-03-11-20-a11y.pdf>.

² Schultheiss, B., Goodman, D., Blackburn, L., Wood, A., Reed, D., & Elbech, M., (2019). Bikeway Selection Guide (FHWA-SA-18-077). Federal Highway Administration: Washington, DC. Retrieved from https://safety.fhwa.dot.gov/ped_bike/tools_solve/docs/fhwasa18077.pdf.

³ NACTO (2017). Designing for all ages & abilities: Contextual guidance for high-comfort bicycle facilities. National Association of City Transportation Officials. Retrieved from https://nacto.org/wp-content/uploads/2017/12/NACTO_Designing-for-All-Ages-Abilities.pdf.

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Comment Letter 2

- 2-3 construct low-stress bikeway networks. This guidance is crucial because a multitude of studies have established that the provision of such bike facilities is crucial to maximizing ridership by making biking the easy choice for as many people as possible⁴⁵⁶⁷. Thus, we would strongly urge that guidance to be applied to this project.
- 2-4 When that is done, it would almost certainly become rather evident that a separate bike facility is warranted. The likely best option in that regard is probably to provide a Class I bike path on the east side of the proposed access road. Doing so would ensure that people arriving to or leaving from either station would have a low-stress path for doing so, providing a strong link to build off of instead of becoming a weak point in the future as further development occurs. As noted in the Project documents, the long-term goal is to create a TOD village in the station area. Biking is an excellent solution for such a community to help keep car usage down and although the Project has already accounted for GHG and VMT impacts, providing good bikeways would extend those benefits even further.
- 2-5
- 2-6 Additionally, especially with the proliferation of e-bikes⁸⁹¹⁰¹¹¹², biking is a reasonable option to destinations a bit further afield than the planned TOD district directly adjacent the Project site. As depicted in Figure 1, a decent portion of Madera is within a five-mile radius of the station which is a reasonable biking distance and especially in terms of high-speed rail, offers an extremely competitive travel time to destinations around the state such as Bakersfield, Merced, or the Bay Area. Therefore,

⁴ Wang, H., Palm, M., Chen, C., Vogt, R., & Wang, Y. (2016). Does bicycle network level of traffic stress (LTS) explain bicycle travel behavior? Mixed results from an Oregon case study. *Journal of Transport Geography*, 57, 8–18. <https://doi.org/10.1016/j.jtrangeo.2016.08.016>

⁵ Wang, K., Akar, G., Lee, K., & Sanders, M. (2020). Commuting patterns and bicycle level of traffic stress (LTS): Insights from spatially aggregated data in Franklin County, Ohio. *Journal of Transport Geography*, 86, 102751. <https://doi.org/10.1016/j.jtrangeo.2020.102751>

⁶ Schoner, J. E., & Levinson, D. M. (2014). The missing link: bicycle infrastructure networks and ridership in 74 US cities. *Transportation (Dordrecht)*, 41(6), 1187–1204. <https://doi.org/10.1007/s11116-014-9538-1>

⁷ Geurs, Karst T, La Paix, Lissy, & Van Weperen, Sander. (2016). A multi-modal network approach to model public transport accessibility impacts of bicycle-train integration policies. *European Transport Research Review*, 8(4), 1–15. <https://doi.org/10.1007/s12544-016-0212-x>

⁸ Fitch, D. (2019). Electric assisted bikes (e-bikes) show promise in getting people out of cars. Davis, CA: UC Davis Institute of Transportation Studies. Retrieved online from <https://escholarship.org/uc/item/3mm040km>.

⁹ Fyhri, A., & Fearnley, N. (2015). Effects of e-bikes on bicycle use and mode share. *Transportation Research. Part D, Transport and Environment*, 36, 45–52. <https://doi.org/10.1016/j.trd.2015.02.005>

¹⁰ Astegiano, P., Fermi, F., & Martino, A. (2019). Investigating the impact of e-bikes on modal share and greenhouse emissions: a system dynamic approach. *Transportation Research Procedia*, 37, 163–170. <https://doi.org/10.1016/j.trpro.2018.12.179>

¹¹ Fyhri, A., Heinen, E., Fearnley, N., & Beate Sundfør, H. (2017). A push to cycling—exploring the e-bike's role in overcoming barriers to bicycle use with a survey and an intervention study. *International Journal of Sustainable Transportation*, 11(9), 681–695. <https://doi.org/10.1080/15568318.2017.1302526>

¹² Fyhri, A., & Beate Sundfør, H. (2020). Do people who buy e-bikes cycle more? *Transportation Research. Part D, Transport and Environment*, 86, 102422. <https://doi.org/10.1016/j.trd.2020.102422>



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Comment Letter 2

2-6 it would be rather advantageous to conduct additional study on what would be needed to extend low-stress bikeways out to the broader community, not limit it to the Access Road to Avenue 12.

2-7 The other reason to apply the guidance is due to safety. Although the MND indicates that no hazards due to design will be constructed, we also believe that the bike lanes are not the best decision from that standpoint either. While we are not advocating that bicyclists be banned from roads without bike lanes, we do have concerns that what is being proposed will not provide the best option from a safety standpoint. A separate facility reduces the safety concerns because it lowers the level of traffic stress, a metric which has been found to be correlated with bicyclist crashes and the severity of those crashes¹³.

2-8 Finally, no mention at all is made of bicycle parking. Although Amtrak allows bikes to be brought on board their trains, they do not have unlimited space and any appreciable increase in bike usage could result in a situation where bicyclists would be unable to travel. Additionally, the bicycle policies regarding bringing bicycles on board high-speed rail are completely unknown at this point. While certainly it might be overkill to expect a high-capacity facility with many thousands of spaces available such as the Dutch railway operator is building at their stations to be constructed, it seems short-sighted to not at a bare minimum, plan for the provision of decent bicycle parking as part of the Project. Yet, no mention is included anywhere in the documents at all. This really needs to be changed. It is important to include some sort of plans for bicycle storage facilities, perhaps to include flexible treatment of car parking spaces and allow their conversion to hold bikes instead. Doing so would help provide the transit users with a place to store their bicycles while on trips¹⁴, whether a daily commute to another part of the state or to fill the final mile from the train to the Madera Community College.

2-9 In summary, while the overall Project is promising due to the synergy created by bringing high-speed rail and Amtrak *San Joaquins* service together with local transit, the accommodation for bikes is seriously lacking and thwarts the potential of the transit mode. It is imperative that as a new-build project, the best standards are employed to ensure that the Project is able to live up to the promises that it provides and which are hoped to be achieved. Doing so would set a model of accessibility to be replicated in similar situations around the state and even nation and ensure that the relocated Madera Station is able to be a strong point to build off of for years into the future, not become a weak link in the puzzle in short order.

¹³ Chen, C., Anderson, J. C., Wang, H., Wang, Y., Vogt, R., & Hernandez, S. (2017). How bicycle level of traffic stress correlate with reported cyclist accidents injury severities: A geospatial and mixed logit analysis. *Accident Analysis and Prevention*, 108, 234–244. <https://doi.org/10.1016/j.aap.2017.09.001>

¹⁴ Martens, K. (2007). Promoting bike-and-ride: The Dutch experience. *Transportation Research. Part A, Policy and Practice*, 41(4), 326–338. <https://doi.org/10.1016/j.tra.2006.09.010>



INLAND EMPIRE
BIKING ALLIANCE

Comment Letter 2

Thank you for your time and attention to the response regarding this Project. If there are any additional questions, please do not hesitate to reach out.

Sincerely,

Marven E. Norman, Executive Director

CC: Forest Barnes & Jared Sanchez, CalBike



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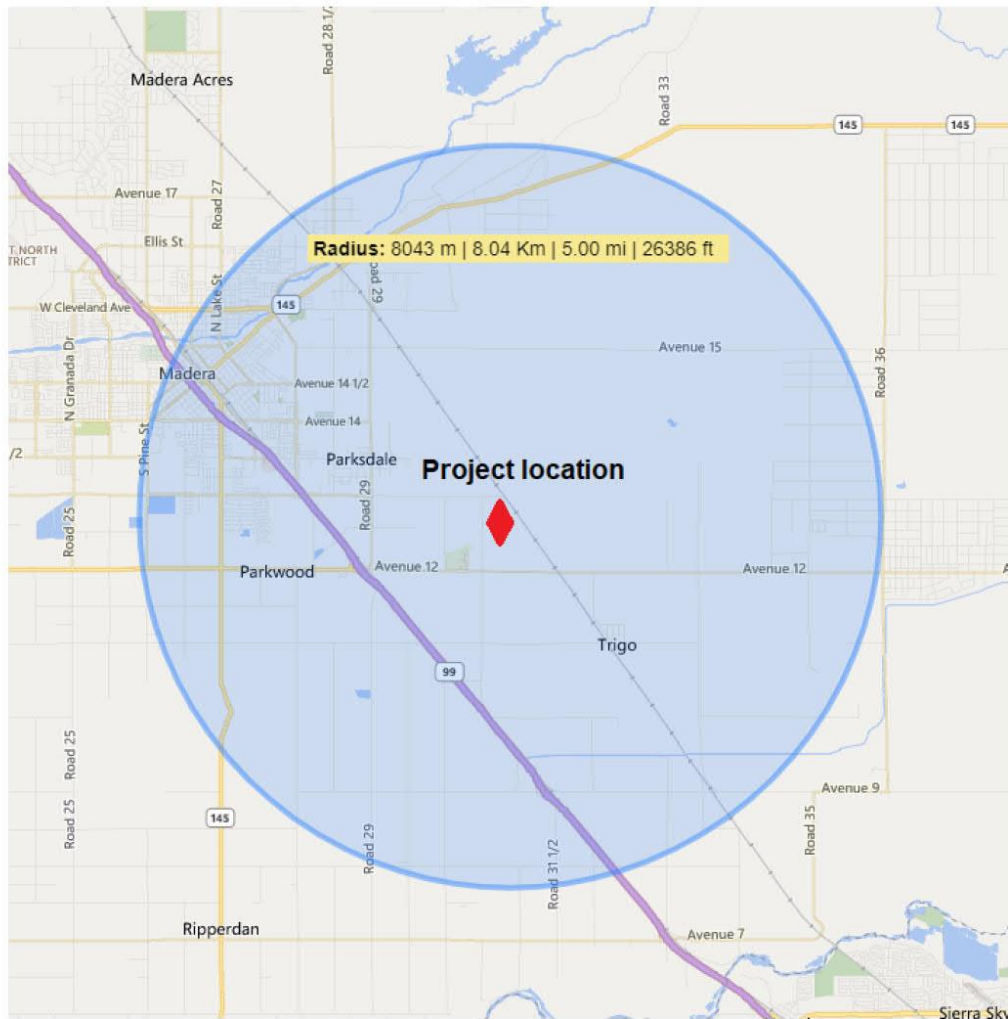


Figure 1. A five-mile radius around Project site encompasses several neighborhoods in Madera and other communities such as Madera Ranchos.

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Comment Letter 2

***Marven E. Norman, Executive Director
Inland Empire Biking Alliance***

Comment 2-1

I am writing on behalf of the Inland Empire Biking Alliance in response to the IS/MND which has been released for the Madera Station Relocation Project ("Project") that is being proposed in Madera. After reviewing the documents which have been prepared, I have the following comments regarding what is proposed.

As a bike advocacy organization, our biggest concern is for access of the station by bicyclists. Based on the drawings and information which is included in the documentation, we believe that this Project leaves a lot on the table in terms of providing reasonable access to the site. This is especially concerning because this Project is to construct a train station. A strong link and great access between bicycles and trains creates a virtuous cycle which improves usage of both modes, but it requires making the investment to provide seamless access and integration between the two modes.

Response 2-1

As a result of your comment, the Final IS/MND Section 2 Project Description has been modified to specifically state that the Phase 1 and Phase 2 configurations of the access road would include Class II bicycle lanes. This change in the Project Description was also made in Appendices A, B, C, D, and G. Furthermore, in Volume 2 (15% Engineering Drawings) of the Draft IS/MND, Pages 21 and 27 of the PDF document show cross sections of the access roads for Phase 1 and Phase 2, respectively. In addition, as a response to comments in this letter, specific bicycle storage facilities at the station are being added and called out in revised 15% engineering drawings for the Final IS/MND.

Comment 2-2

Worryingly, the MND indicates that such a connection is not being invested in by this Project at any point. Section 2.2.5 Access Road indicates that there not even sidewalks or bike lanes would be included in the Phase 1 construction. And while section 2.3.5 indicates that Phase 2 would construct (presumably Class II) bike lanes and sidewalks along the access road, we are concerned that even though provided with what is effectively a blank canvas, that the opportunity for providing the best possible bike connection is not being utilized.

Response 2-2

As a result of your comment, the Project Description in the Final IS/MND and Appendices A, B, C, D, and G has been modified to state that both Phase 1 and Phase 2 configurations of the access road would include Class II bicycle lanes. In Volume 2 (15% Engineering Drawings) of the Draft IS/MND, Pages 21 and 27 of the PDF document show cross sections of the access roads for Phase 1 and Phase 2, respectively. These cross sections show the bicycle lanes are included as part of the Project for both phases. Section 2.2.5 Access Road has been modified to correct this error. Sidewalks are still not part of the project due to the currently foreseeable development in the area. However, should development occur in the area along the proposed access road, part of this development would include pedestrian access via sidewalks.

Comment 2-3

Earlier this year, Caltrans released its version of contextual bikeway guidance, joining the Federal Highway Administration and NACTO in providing resources which can be used to plan and construct low-stress bikeway networks. This guidance is crucial because a multitude of studies have established that

the provision of such bike facilities is crucial to maximizing ridership by making biking the easy choice for as many people as possible. Thus, we would strongly urge that guidance to be applied to this project.

Response 2-3

Both Phase 1 and Phase 2 configurations of the access road would implement Class II bicycle lanes, which would meet the in the Caltrans Contextual Guidance for Preferred Bicycle Facilities standards. .

Comment 2-4

When that is done, it would almost certainly become rather evident that a separate bike facility is warranted. The likely best option in that regard is probably to provide a Class I bike path on the east side of the proposed access road. Doing so would ensure that people arriving to or leaving from either station would have a low-stress path for doing so, providing a strong link to build off of instead of becoming a weak point in the future as further development occurs.

Response 2-4

According to the Caltrans Contextual Guidance for Preferred Bicycle Facilities, a Class II bicycle lane would provide adequate bicycle infrastructure for this type of project. In addition, adding a separate bicycle path outside the proposed project footprint would likely result in more take of agricultural land that would need further mitigation of a 1:1 replacement of agricultural land. SJPA is working to minimize the footprint to reduce environmental impacts.

Comment 2-5

As noted in the Project documents, the long-term goal is to create a TOD village in the station area. Biking is an excellent solution for such a community to help keep car usage down and although the Project has already accounted for GHG and VMT impacts, providing good bikeways would extend those benefits even further.

Response 2-5

As discussed in Section 3.17 (Land Use) of the Draft IS/MND, while the Project does not include TOD development or propose any non-transportation development, the SJPA has a working partnership with local stakeholders that may have TOD as their development goal.

Comment 2-6

Additionally, especially with the proliferation of e-bikes, biking is a reasonable option to destinations a bit further afield than the planned TOD district directly adjacent the Project site. As depicted in Figure 1, a decent portion of Madera is within a five-mile radius of the station which is a reasonable biking distance and especially in terms of high-speed rail, offers an extremely competitive travel time to destinations around the state such as Bakersfield, Merced, or the Bay Area. Therefore, it would be rather advantageous to conduct additional study on what would be needed to extend low-stress bikeways out to the broader community, not limit it to the Access Road to Avenue 12.

Response 2-6

The scope of the Project is limited to the Relocated Station and the HSR Interim Operating Segment Station, as well as providing an access road to Avenue 12. Additional studies that are outside this scope are not being considered at this time. However, as SJPA has excellent working relationships with local stakeholders, we will pass on this recommendation to our local partners for consideration.

Comment 2-7

The other reason to apply the guidance is due to safety. Although the MND indicates that no hazards due to design will be constructed, we also believe that the bike lanes are not the best decision from that standpoint either. While we are not advocating that bicyclists be banned from roads without bike lanes, we do have concerns that what is being proposed will not provide the best option from a safety standpoint. A separate facility reduces the safety concerns because it lowers the level of traffic stress, a metric which has been found to be correlated with bicyclist crashes and the severity of those crashes.

Response 2-7

Please refer to Response 2-4 as to why a separate bicycle facility is not being considered for this Project.

Comment 2-8

Finally, no mention at all is made of bicycle parking. Although Amtrak allows bikes to be brought on board their trains, they do not have unlimited space and any appreciable increase in bike usage could result in a situation where bicyclists would be unable to travel. Additionally, the bicycle policies regarding bringing bicycles on board high-speed rail are completely unknown at this point. While certainly it might be overkill to expect a high-capacity facility with many thousands of spaces available such as the Dutch railway operator is building at their stations to be constructed, it seems short-sighted to not at a bare minimum, plan for the provision of decent bicycle parking as part of the Project. Yet, no mention is included anywhere in the documents at all. This really needs to be changed. It is important to include some sort of plans for bicycle storage facilities, perhaps to include flexible treatment of car parking spaces and allow their conversion to hold bikes instead. Doing so would help provide the transit users with a place to store their bicycles while on trips¹⁴, whether a daily commute to another part of the state or to fill the final mile from the train to the Madera Community College.

Response 2-8

SJJPA agrees that bicycle parking should be included in this Project. The station site figures have been revised to specifically call these elements out and text in the Final IS/MND has been added to clarify this.

Comment 2-9

In summary, while the overall Project is promising due to the synergy created by bringing high-speed rail and Amtrak San Joaquins service together with local transit, the accommodation for bikes is seriously lacking and thwarts the potential of the transit mode. It is imperative that as a new-build project, the best standards are employed to ensure that the Project is able to live up to the promises that it provides and which are hoped to be achieved. Doing so would set a model of accessibility to be replicated in similar situations around the state and even nation and ensure that the relocated Madera Station is able to be a strong point to build off of for years into the future, not become a weak link in the puzzle in short order.

Response 2-9

SJJPA appreciates the comments from the Inland Empire Bicycle Alliance. The comment is acknowledged for the record.

Comment Letter 3



November 16, 2020

Dan Leavitt
San Joaquin Joint Powers Authority
949 Channel Street
Stockton, CA 95202

Project: Madera Station Relocation Project

District CEQA Reference No: 20200919

Dear Mr. Leavitt:

The San Joaquin Valley Unified Air Pollution Control District (District) has reviewed the project referenced above from the San Joaquin Joint Powers Authority (Authority). The project consists of two phases, which include the relocation of the existing San Joaquin's Station in Madera from Madera Acres to a location near Avenue 12, as well as High Speed Rail (HSR) improvements to allow for future HSR service (Project). The Project is located west of Highway 99, between Avenue 11 and Avenue 13, with the majority of construction and operations taking place in the vicinity of Avenue 12, in Madera, CA.

Project Scope

The Project consists of two phases. Phase One of the Project, associated with the relocation of the existing San Joaquin's Train Station, includes the construction of a single side-loaded platform, approximately 600 feet in length, with canopy covers; a new station siding track approximately 2,330 feet long, a bus depot with eight bus bays, a 98-space parking lot, a new two-lane access road to provide access to the relocated station from Avenue 12 and connect to an underpass, small buildings for restrooms and storage for cleaning and maintenance supplies, a stormwater drainage system and a stormwater retention pond, a wastewater treatment system, and FRA-compliant diesel-based rolling stock trainsets.

Phase Two of the Project, associated with the HSR component of the Project, includes the construction of a single side-loaded 1,000 foot-long platform with canopy covers, a 14,600 foot-long siding track, additional crossover tracks totaling 17,300 feet, a new 250-foot long rail bridge, two 1,900 foot-long storage tracks, an overhead electrical contact system, a small transmission power substation, a 179-space parking lot, reconfiguration, relocation, and two-lane expansion of access road, with sidewalk and bike lanes, a new

Samir Sheikh
Executive Director/Air Pollution Control Officer

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Comment Letter 3

San Joaquin Valley Air Pollution Control District
District Reference No. 20200919
November 16, 2020

Page 2

3-1

underpass, buildings for station staff, support facilities, restrooms, and maintenance supplies, and additional wastewater facilities.

Based on information provided to the District, Project specific annual emissions from construction and operation emissions of criteria pollutants are not expected to exceed any of the following District significance thresholds: 100 tons per year of carbon monoxide (CO), 10 tons per year of oxides of nitrogen (NOx), 10 tons per year of reactive organic gases (ROG), 27 tons per year of oxides of sulfur (SOx), 15 tons per year of particulate matter of 10 microns or less in size (PM10), or 15 tons per year of particulate matter of 2.5 microns or less in size (PM2.5).

Other potential significant air quality impacts related to Toxic Air Contaminants (see information below under Health Risk Assessment), Ambient Air Quality Standards, Hazards and Odors, may require assessments and mitigation. More information can be found in the District's Guidance for Assessing and Mitigating Air Quality Impacts at: https://www.valleyair.org/transportation/GAMAQI_12-26-19.pdf

The District offers the following comments:

1) Project Related Criteria Pollutant Emissions

1a) Construction Emissions

3-2

Equipment exhaust, as well as fugitive dust emissions should be quantified. For reference, the District's annual criteria thresholds of significance for construction are listed above.

3-3

Although the construction-related emissions are expected to have a less than significant impact, the District suggests that the San Joaquin Joint Powers Authority (Authority) advise project proponents with construction-related exhaust emissions and activities resulting in less than significant impact on air quality to utilize the cleanest reasonably available off-road construction fleets and practices (i.e. eliminating unnecessary idling) to further reduce impacts from construction-related exhaust emissions and activities.

1b) Operational Emissions

3-4

Emissions from stationary sources and mobile sources should be analyzed separately. For reference, the District's annual criteria thresholds of significance for operational emissions are listed above.

Comment Letter 3

San Joaquin Valley Air Pollution Control District
District Reference No. 20200919
November 16, 2020

Page 3

1c) **Electric On-Site Off-Road and On-Road Equipment**

3-5

Since the Project consists of a train and HSR station, it may have the potential to result in increased use of off-road equipment (i.e. forklifts) and/or on-road equipment (i.e. mobile equipment for maintenance). The District recommends the Authority advise the project proponent to utilize electric or zero emission off-road and on-road equipment used on-site for this Project.

2) **Health Risk Screening/Assessment**

3-6

Located approximately 750 feet east of the Project, there is a sensitive receptor (residential unit). The Health Risk Assessment should evaluate the risk associated with sensitive receptors in the area and mitigate any potentially significant risk to help limit emission exposure to sensitive receptors.

A Health Risk Screening/Assessment identifies potential Toxic Air Contaminants (TAC's) impact on surrounding sensitive receptors such as hospitals, daycare centers, schools, work-sites, and residences. TAC's are air pollutants identified by the Office of Environmental Health Hazard Assessment/California Air Resources Board (OEHHA/CARB) that pose a present or potential hazard to human health. A common source of TACs can be attributed to diesel exhaust emitted from both mobile and stationary sources. List of TAC's identified by OEHHA/CARB can be found at: <https://ww2.arb.ca.gov/resources/documents/carb-identified-toxic-air-contaminants>

3-7

The District recommends the development projects be evaluated for potential health impacts to surrounding receptors (on-site and off-site) resulting from operational and multi-year construction TAC emissions.

- The District recommends conducting a screening analysis that includes all sources of emissions. A screening analysis is used to identify projects which may have a significant health impact. A prioritization, using the latest approved California Air Pollution Control Officer's Association (CAPCOA) methodology, is the recommended screening method. A prioritization score of 10 or greater is considered to be significant and a refined Health Risk Assessment (HRA) should be performed.

For your convenience, the District's prioritization calculator can be found at: http://www.valleyair.org/busind/pto/emission_factors/Criteria/Toxics/Utilities/PRIORITIZATION%20RMR%202016.XLS.

Comment Letter 3

San Joaquin Valley Air Pollution Control District
District Reference No. 20200919
November 16, 2020

Page 4

- The District recommends a refined HRA for future development projects that result in a prioritization score of 10 or greater. Prior to performing an HRA, it is recommended that development project applicants contact the District to review the proposed modeling protocol. A future development project would be considered to have a significant health risk if the HRA demonstrates that the project related health impacts would exceed the Districts significance threshold of 20 in a million for carcinogenic risk and 1.0 for the Acute and Chronic Hazard Indices, and would trigger all feasible mitigation measures. The District recommends that future development projects that result in a significant health risk not be approved.

3-8

For HRA submittals, please provide the following information electronically to the District for review:

- HRA AERMOD model files
- HARP2 files
- Summary of emissions source locations, emissions rates, and emission factor calculations and methodology.

More information on toxic emission factors, prioritizations and HRAs can be obtained by:

- E-Mailing inquiries to: hramodeler@valleyair.org; or
- Contacting the District by phone for assistance at (559) 230-6000; or
- Visiting the Districts website (Modeling Guidance) at:
http://www.valleyair.org/busind/pto/Tox_Resources/AirQualityMonitoring.htm.

3) Ambient Air Quality Analysis

3-9

An ambient air quality analysis (AAQA) uses air dispersion modeling to determine if emissions increases from a project will cause or contribute to a violation of the ambient air quality standards. For development projects the District recommends that an AAQA be performed for the project if emissions exceed 100 pounds per day of any pollutant.

If an AAQA is performed, the analysis should include emissions from both project specific permitted and non-permitted equipment and activities. The District recommends consultation with District staff to determine the appropriate model and input data to use in the analysis.

Comment Letter 3

San Joaquin Valley Air Pollution Control District
District Reference No. 20200919
November 16, 2020

Page 5

3-9 Specific information for assessing significance, including screening tools and modeling guidance is available online at the District's website www.valleyair.org/ceqa.

4) **District Rules and Regulation**

3-10 The District issues permits for many types of air pollution sources and regulates some activities not requiring permits. A project subject to District rules and regulation would reduce its impacts on air quality through compliance with regulatory requirements. In general, a regulation is a collection of rules, each of which deals with a specific topic. Here are a couple of examples, Regulation II (Permits) deals with permitting emission sources and includes rules such as District permit requirements (Rule 2010), and New and Modified Stationary Source Review (Rule 2201).

4a) **District Rules 2010 and 2201 - Air Quality Permitting for Stationary Sources**

3-11 Stationary Source emissions include any building, structure, facility, or installation which emits or may emit any affected pollutant directly or as a fugitive emission. District Rule 2010 requires operators of emission sources to obtain an Authority to Construct (ATC) and Permit to Operate (PTO) from the District. District Rule 2201 requires that new and modified stationary sources of emissions mitigate their emissions using best available control technology (BACT).

This Project may be subject to District Rule 2010 (Permits Required) and Rule 2201 (New and Modified Stationary Source Review) and may require District permits.

Prior to commencing construction on any permit-required equipment or process, a finalized Authority to Construct (ATC) must be issued to the Project proponent by the District. For further information or assistance, the project proponent may contact the District's Small Business Assistance (SBA) Office at (559) 230-5888.

4b) **District Rule 9510 (Indirect Source Review)**

3-12 The purpose of District Rule 9510 (Indirect Source Review) is to reduce the growth in both NOx and PM10 emissions associated with development and transportation projects from mobile and area sources associated with construction and operation of development projects. The rule encourages clean air design elements to be incorporated into the development project. In

Comment Letter 3

San Joaquin Valley Air Pollution Control District
District Reference No. 20200919
November 16, 2020

Page 6

3-12 case the proposed project clean air design elements are insufficient to meet the targeted emission reductions, the rule requires developers to pay a fee used to fund projects to achieve off-site emissions reductions.

The proposed Project is subject to District Rule 9510 because it will receive a project-level discretionary approval from a public agency and it is a transportation development that will equal or exceed two tons of NOx or two tons of PM10 (Section 2.4 District Rule 9510). When subject to the rule, an Air Impact Assessment (AIA) application is required no later than applying for project-level approval from a public agency. In this case, if not already done, please inform the project proponent to immediately submit an AIA application to the District to comply with District Rule 9510.

An AIA application is required and the District recommends that demonstration of compliance with District Rule 9510, before issuance of the first building permit, be made a condition of Project approval.

Information about how to comply with District Rule 9510 can be found online at:

<http://www.valleyair.org/ISR/ISRHome.htm>.

The AIA application form can be found online at:

<http://www.valleyair.org/ISR/ISRFormsAndApplications.htm>

3-13 In the event an existing building will be renovated, partially demolished or removed, the Project may be subject to District Rule 4002. This rule requires a thorough inspection for asbestos to be conducted before any regulated facility is demolished or renovated. Information on how to comply with District Rule 4002 can be found online at:

<http://www.valleyair.org/busind/comply/asbestosbultn.htm>.

4c) **District Regulation VIII (Fugitive PM10 Prohibitions)**

3-14 The Project will be subject to Regulation VIII. The project proponent is required to submit a Construction Notification Form or submit and receive approval of a Dust Control Plan prior to construction. Information on how to comply with Regulation VIII can be found online at:

http://www.valleyair.org/busind/comply/PM10/compliance_PM10.htm.

4d) **District Rule 9410 (Employer Based Trip Reduction)**

3-15 The proposed Project may be subject to District Rule 9410 (Employer Based Trip Reduction) if the Project would result in employment of 100 or more

Comment Letter 3

San Joaquin Valley Air Pollution Control District
District Reference No. 20200919
November 16, 2020

Page 7

3-15

"eligible" employees. District Rule 9410 requires employers with 100 or more "eligible" employees at a worksite to establish an Employer Trip Reduction Implementation Plan (eTRIP) that encourages employees to reduce single-occupancy vehicle trips, thus reducing pollutant emissions associated with work commutes. Under an eTRIP plan, employers have the flexibility to select the options that work best for their worksites and their employees.

Information about how District Rule 9410 can be found online at: www.valleyair.org/tripreduction.htm. For additional information, you can contact the District by phone at 559-230-6000 or by e-mail at etrip@valleyair.org

4e) Other District Rules and Regulations

3-16

The Project may also be subject to the following District rules: Regulation VIII, (Fugitive PM10 Prohibitions), Rule 4102 (Nuisance), Rule 4601 (Architectural Coatings), Rule 4641 (Cutback, Slow Cure, and Emulsified Asphalt, Paving and Maintenance Operations), and Rule 9120 (Transportation Conformity). In the event an existing building will be renovated, partially demolished or removed, the project may be subject to District Rule 4002 (National Emission Standards for Hazardous Air Pollutants).

3-17

The list of rules below is neither exhaustive nor exclusive. Current District rules can be found online at: www.valleyair.org/rules/1ruleslist.htm. To identify other District rules or regulations that apply to this Project or to obtain information about District permit requirements, the applicant is strongly encouraged to contact the District's Small Business Assistance (SBA) Office at (559) 230-5888.

If you have any questions or require further information, please contact Cherie Clark via e-mail at Cherie.Clark@valleyair.org or by phone at (559) 230-5940.

Sincerely,



Arnaud Marjollet
Director of Permit Services

AM: cc

Comment Letter 3

***Arnaud Marjollet, Director of Permit Services
San Joaquin Valley Air Pollution Control District***

Comment 3-1

The San Joaquin Valley Unified Air Pollution Control District (District) has reviewed the project referenced above from the San Joaquin Joint Powers Authority (Authority). The project consists of two phases, which include the relocation of the existing San Joaquin's Station in Madera from Madera Acres to a location near Avenue 12, as well as High Speed Rail (HSR) improvements to allow for future HSR service (Project). The Project is located west of Highway 99, between Avenue 11 and Avenue 13, with the majority of construction and operations taking place in the vicinity of Avenue 12, in Madera, CA.

Project Scope

The Project consists of two phases. Phase One of the Project, associated with the relocation of the existing San Joaquin's Train Station, includes the construction of a single side-loaded platform, approximately 600 feet in length, with canopy covers; a new station siding track approximately 2,330 feet long, a bus depot with eight bus bays, a 98-space parking lot, a new two-lane access road to provide access to the relocated station from Avenue 12 and connect to an underpass, small buildings for restrooms and storage for cleaning and maintenance supplies, a stormwater drainage system and a stormwater retention pond, a wastewater treatment system, and FRA-compliant diesel-based rolling stock trainsets.

Phase Two of the Project, associated with the HSR component of the Project, includes the construction of a single side-loaded 1,000 foot-long platform with canopy covers, a 14,600 foot-long siding track, additional crossover tracks totaling 17,300 feet, a new 250-foot long rail bridge, two 1,900 foot-long storage tracks, an overhead electrical contact system, a small transmission power substation, a 179-space parking lot, reconfiguration, relocation, and two-lane expansion of access road, with sidewalk and bike lanes, a new underpass, buildings for station staff, support facilities, restrooms, and maintenance supplies, and additional wastewater facilities.

Based on information provided to the District, Project specific annual emissions from construction and operation emissions of criteria pollutants are not expected to exceed any of the following District significance thresholds: 100 tons per year of carbon monoxide (CO), 10 tons per year of oxides of nitrogen (NOx), 10 tons per year of reactive organic gases (ROG), 27 tons per year of oxides of sulfur (SOx), 15 tons per year of particulate matter of 10 microns or less in size (PM10), or 15 tons per year of particulate matter of 2.5 microns or less in size (PM2.5).

Other potential significant air quality impacts related to Toxic Air Contaminants (see information below under Health Risk Assessment), Ambient Air Quality Standards, Hazards and Odors, may require assessments and mitigation. More information can be found in the District's Guidance for Assessing and Mitigating Air Quality Impacts at: https://www.valleyair.org/transportation/GAMAQI_12-26-19.pdf

Response 3-1

The comment provides an introduction to San Joaquin Valley Air Pollution Control District (SJVAPCD) comments. Responses to those comments are provided below in Responses to Comments Nos. 3-2 through 3-17. The comment is acknowledged for the record.

Comment 3-2

Equipment exhaust, as well as fugitive dust emissions should be quantified. For reference, the District's annual criteria thresholds of significance for construction are listed above.

Response 3-2

The Project's construction-related exhaust and fugitive dust emissions are estimated and shown in Tables 3.3-1 and 3.3-2 and Tables 3.3-5 and 3.3-6. The emission presented in these tables include equipment exhaust emissions and fugitive dust emissions. Additional modeling assumptions and details are provided in Appendix E.

Comment 3-3

Although the construction-related emissions are expected to have a less than significant impact, the District suggests that the San Joaquin Joint Powers Authority (Authority) advise project proponents with construction-related exhaust emissions and activities resulting in less than significant impact on air quality to utilize the cleanest reasonably available off-road construction fleets and practices (i.e. eliminating unnecessary idling) to further reduce impacts from construction-related exhaust emissions and activities

Response 3-3

Mitigation Measure (MM) MM-AQ-1 has been revised to state that the construction contractor shall utilize equipment that meets, at a minimum, Tier 4 CARB/EPA off-road emissions standards. In addition, MM-AQ-1 has been revised to require that the construction contractor implements construction practices to further reduce impacts from construction-related activities, including minimizing idling times and maintaining and properly tuning construction equipment in accordance with manufacturer specifications. All new text is underlined, and deleted text is shown in strikethrough.

MM-AQ-1: Implement advanced emissions controls for off-road equipment and best construction practices. SJPA shall require that the construction contractor for all off-road equipment greater than 50 horsepower have engines that, at a minimum, meet Tier ~~3~~ 4 Final CARB/EPA off-road emission standards, if commercially available. Lesser tier engines shall be allowed on a case-by-case basis when the contractor has documented that no Tier ~~3~~ 4 final engine equipment or emissions equivalent retrofit equipment is available for a particular equipment type that must be used to complete construction. Documentation shall consist of signed written statements from at least two construction equipment rental firms or equivalent. In addition, SJPA shall require that the construction contractor implement the following measures:

- Limit idling times shall be minimized either by shutting equipment off when not in use or reducing the maximum idling time to 5 minutes (as required by the California airborne toxics control measure Title 13, Section 2485 of California Code of Regulations [CCR]). Clear signage shall be provided for construction workers at all access points.
- All construction equipment shall be maintained and properly tuned in accordance with manufacturer's specifications. All equipment shall be checked by a certified mechanic and determined to be running in proper condition prior to operation.

Comment 3-4

Emissions from stationary sources and mobile sources should be analyzed separately. For reference, the District's annual criteria thresholds of significance for operational emissions are listed above.

Response 3-4

As described in Section 3.3 (Air Quality) of the Draft IS/MND, the Project would not result in any increase in San Joaquin rail service. Capacity enhancements along the BNSF Corridor to accommodate this increase in service from seven to eight daily roundtrips trains are either already completed or in construction by BNSF and would be completed regardless of whether the Madera Station is relocated or not. The San Joaquin would stop at the Relocated Station but the overall criteria pollutant emissions from train operations would not change with the relocation of the Station. In addition, the Project would not result in any increase in planned HSR train service. Current plans developed by the CHSRA include 18 daily roundtrip trains and the addition of a stop in Madera would not change the amount of HSR service. Further, Project operations are not anticipated to include any stationary sources. As such, since the Relocated Station is expected to capture higher ridership for the San Joaquin than the Existing Station at Madera Acres, operational emissions associated with operation of the Project is anticipated to generate a beneficial impact to air quality in the region by reducing VMT and the associated criteria air pollutants in the region.

Comment 3-5

Since the Project consists of a train and HSR station, it may have the potential to result in increased use of off-road equipment (i.e. forklifts) and/or on-road equipment (i.e. mobile equipment for maintenance). The District recommends the Authority advise the project proponent to utilize electric or zero emission off-road and on-road equipment used on-site for this Project.

Response 3-5

A Mitigation Measure (MM) has been added to utilize electric or zero-emission off-road and on-road equipment for on-site activities including mobile equipment for maintenance (MM-AQ-3).

MM-AQ-3: Operational Equipment. SJPA shall utilize electric or zero-emission off-road equipment, as reasonably available, for equipment required for on-site activities including mobile equipment for maintenance activities.

Comment 3-6

Located approximately 750 feet east of the Project, there is a sensitive receptor (residential unit). The Health Risk Assessment should evaluate the risk associated with sensitive receptors in the area and mitigate any potentially significant risk to help limit emission exposure to sensitive receptors.

Response 3-6

This receptor is located 750 feet east of the northern trackwork associated with Phase 2 of the Project and approximately 1.3 miles from the proposed station facilities of the Project. Response to the recommendation to perform a Health Risk Assessment is shown in Response 3-7.

Comment 3-7

A Health Risk Screening/Assessment identifies potential Toxic Air Contaminants (TAC's) impact on surrounding sensitive receptors such as hospitals, daycare centers, schools, work-sites, and residences. TAC's are air pollutants identified by the Office of Environmental Health Hazard Assessment/California Air Resources Board (OEHHA/CARB) that pose a present or potential hazard to human health. A common source of TACs can be attributed to diesel exhaust emitted from both mobile and stationary sources. List of TAC's identified by OEHHA/CARB can be found at:

<https://ww2.arb.ca.gov/resources/documents/carb-identified-toxic-air-contaminants>

The District recommends the development projects be evaluated for potential health impacts to surrounding receptors (on-site and off-site) resulting from operational and multi-year construction TAC emissions.

- The District recommends conducting a screening analysis that includes all sources of emissions. A screening analysis is used to identify projects which may have a significant health impact. A prioritization, using the latest approved California Air Pollution Control Officer's Association (CAPCOA) methodology, is the recommended screening method. A prioritization score of 10 or greater is considered to be significant and a refined Health Risk Assessment (HRA) should be performed.

For your convenience, the District's prioritization calculator can be found at:

http://www.valleyair.org/busind/pto/emission_factors/Criteria/Toxics/Utilities/PRIORITIZATION%20RMR%202016.XLS.

Response 3-7

The SJVAPCD has a prioritization calculator which can be utilized for a conservative risk representation based on receptor proximity. This prioritization procedure primarily relies on three parameters to estimate a prioritization score: emissions, potency or toxicity, and the proximity of potential receptors (CAPCOA 2016). The prioritization scoring procedures and the District's prioritization calculator are intended for use for operational emissions with calculations assuming a 30-year risk period in calculating residential cancer risk. As such, the SJVAPCD's prioritization calculator, is not intended for use for construction-related emissions, which are short-term, discrete sources of emissions that would cease upon completion. Construction-related emissions of Phase 1 and Phase 2 are anticipated to last approximately 12 months and 24 months, respectively, and would cease upon completion of the Project. We have used this tool as recommended by SJVAPCD for this response. Of note, the use of the SJVAPCD's prioritization calculator for the construction-related emissions of the Project is conservative.

As described in Section 3.3.3, the nearest sensitive receptor to the Project Footprint is a single-family residence approximately 750 feet east of the northern trackwork associated with Phase 2 of the Project and approximately 1.3 miles from the proposed station facilities. Since Phase 1 construction-related activities are confined to the proposed station facilities and access road providing access to the Relocation Station facilities from Avenue 12, associated emissions would occur at a distance of at least 1.3 miles, or over 2,000 meters away. As described in Response to Comment No. 3-3 above, MM-AQ-1 has been revised to require the construction contractor to utilize equipment equipped with Tier 4 final off-road engines. Off-road construction equipment with Tier 4 interim engines would typically result in an additional 77 to 97 percent reduction in PM_{2.5} emissions from the use of Tier 1-3 equipment, depending on the horsepower of the equipment (SCAQMD 2005). As shown in Appendix E, construction activities of Phase 1 are anticipated to result in approximately 162 pounds of exhaust-related PM_{2.5} emissions during the 12-month construction phase. Using a receptor proximity distance of at least 2,000

meters and using PM_{2.5} as a surrogate for diesel PM, the maximum score would be 0.37 for the Phase 1 construction activities. Since this prioritization score is less than 10, construction activities of Phase 1 would not expose the sensitive receptor to significant emissions of diesel PM and a refined HRA is not required for Phase 1 of the Project.

Some Phase 2 construction-related activities will occur at a distance as close as 750 feet away from the nearest sensitive receptor. Site work and rail work would be completed in segments along the proposed alignment. Due to the nature of these construction activities, similar to a moving assembly line, trucks and off-road equipment would move along the alignment and a majority of the emissions would occur at distances greater than 750 feet and would not occur as a constant plume of emissions from the Project area. The entire length of the new station siding track associated with Phase 2, from the turnout locations at the north and south would be approximately 14,600 feet in length. Approximately 1,485 feet of siding track would be constructed within a 750-foot radius of the sensitive receptor. Therefore, a majority of the emissions would occur at a receptor proximity distance greater than 750 feet. General site work, trackwork, and installation of the Overhead Contact System (OCS) and signaling system would be completed in segments along the existing rail alignment; similar to a moving assembly line. Therefore, trucks and off-road equipment would not operate within the same distance of the sensitive receptor for an extended period of time.

As shown in Appendix E, construction activities of Phase 2 are anticipated to result in a maximum annual emission total of approximately 267.03 pounds. Assuming 10 percent of the emissions (the proportion of trackwork located within the 750-foot radius [e.g., 1,485 feet divided by 14,600 feet, multiplied by 100]) would be located at a receptor proximity distance of 750 feet, the maximum score using the District's prioritization tool would be 2.47 for Phase 2 construction activities. In addition, conservatively assuming that approximately 50 percent of the remaining emissions would occur within the 500 to 1,000-meter receptor proximity distance, the maximum prioritization score would be 3.05. Finally, assuming that the remaining emissions would occur within the 1,000 to 1,500-meter receptor proximity distance, the maximum score would be 0.83. The total maximum prioritization score would be 6.35, lower than the maximum prioritization score of 10. Therefore, Phase 2 construction activities would not expose the sensitive receptor to significant emissions of diesel PM and a refined construction-related HRA is not required for Phase 2 of the Project. Section 3.3.3 of the Final IS/MND has been revised to incorporate this screening analysis.

Regarding operational emissions, as described in Section 3.3 (Air Quality) of the Draft IS/MND, the Project would not result in an increase in San Joaquin or HSR train service levels. In addition, the analysis reviewed other recently submitted environmental documents for similar projects, including the Valley Rail Sacramento Extension Project, approved in October 2020 (SJPA 2020). The Valley Rail Sacramento Extension Project includes construction of a new station along State Route 12 in Lodi and comprises of new passenger rail service (approximately 14 one-way trips between Stockton Downtown/ACE Station and the proposed Natomas/Sacramento Airport station). As explained in more detail in Section 3.3 of the Valley Rail Sacramento Extension Project Final EIR, the excess cancer risk attributed to railway operational sources (i.e. locomotives) within 1 kilometer north and south of Lodi Station would be approximately 3.62 in a million, below the threshold of 20 in a million (SJPA 2020). The HRA for the Valley Rail Sacramento Extension Project included passenger train activities, such as locomotive movement and idling and connecting shuttle service. Considering that the Lodi Station is also located within the San Joaquin Valley Air Basin, it can be assumed that the meteorological conditions would be similar to the Project. Since the receptor location associated with the Madera Station Relocation Project would be located at a distance farther than the receptor locations analyzed in the Valley Rail Sacramento Extension Project Final EIR, and the Project would not result in an increase in

train activity, it can be assumed that Project operations would not result in a significant health risk. Therefore, a refined HRA related to operations is not required for either Phase 1 or Phase 2 of the Project.

Comment 3-8

The District recommends a refined HRA for future development projects that result in a prioritization score of 10 or greater. Prior to performing an HRA, it is recommended that development project applicants contact the District to review the proposed modeling protocol. A future development project would be considered to have a significant health risk if the HRA demonstrates that the project related health impacts would exceed the District's significance threshold of 20 in a million for carcinogenic risk and 1.0 for the Acute and Chronic Hazard Indices, and would trigger all feasible mitigation measures. The District recommends that future development projects that result in a significant health risk not be approved.

For HRA submittals, please provide the following information electronically to the District for review:

- HRA AERMOD model files
- HARP2 files
- Summary of emissions source locations, emissions rates, and emission factor calculations and methodology.

More information on toxic emission factors, prioritizations and HRAs can be obtained by:

- E-Mailing inquiries to: hramodeler@valleyair.org; or
- Contacting the District by phone for assistance at (559) 230-6000; or
- Visiting the District's website (Modeling Guidance) at:
http://www.valleyair.org/busind/pto/Tox_Resources/AirQualityMonitoring.html

Response 3-8

Please refer to Response 3-7. As described in Response 3-7, Project construction activities would not result in a prioritization score of 10 or greater during construction activities. Furthermore, operational activities are also not anticipated to result in a significant health risk. Therefore, a refined HRA is not required for this Project.

Comment 3-9

An ambient air quality analysis (AAQA) uses air dispersion modeling to determine if emissions increases from a project will cause or contribute to a violation of the ambient air quality standards. For development projects the District recommends that an AAQA be performed for the project if emissions exceed 100 pounds per day of any pollutant.

If an AAQA is performed, the analysis should include emissions from both project specific permitted and non-permitted equipment and activities. The District recommends consultation with District staff to determine the appropriate model and input data to use in the analysis.

Specific information for assessing significance, including screening tools and modeling guidance is available online at the District's website www.valleyair.org/ceqa.

Response 3-9

As shown in Tables 3.3-2 and 3.3-6 of the Draft IS/MND, with implementation of MM-AQ-1 and MM-AQ-2, construction-related emissions would not exceed 100 pounds per day of any pollutant. Therefore, consistent with Guidance for Assessing and Mitigating Air Quality Impacts (GAMAQI, SJVAPCD 2015), since emission increases would not exceed 100 pounds per day after implementation of all enforceable measures, an ambient air quality analysis is not required.

Comment 3-10

The District issues permits for many types of air pollution sources and regulates some activities not requiring permits. A project subject to District rules and regulation would reduce its impacts on air quality through compliance with regulatory requirements. In general, a regulation is a collection of rules, each of which deals with a specific topic. Here are a couple of examples, Regulation II (Permits) deals with permitting emission sources and includes rules such as District permit requirements (Rule 2010), and New and Modified Stationary Source Review (Rule 2201).

Response 3-10

This comment introduces the Comments 3-11 through 3-17 regarding SJVAPCD Rules and Regulations. Responses to those comments are provided below in Responses 3-11 through 3-17.

Comment 3-11

Stationary Source emissions include any building, structure, facility, or installation which emits or may emit any affected pollutant directly or as a fugitive emission. District Rule 2010 requires operators of emission sources to obtain an Authority to Construct (ATC) and Permit to Operate (PTO) from the District. District Rule 2201 requires that new and modified stationary sources of emissions mitigate their emissions using best available control technology (BACT).

This Project may be subject to District Rule 2010 (Permits Required) and Rule 2201 (New and Modified Stationary Source Review) and may require District permits.

Prior to commencing construction on any permit-required equipment or process, a finalized Authority to Construct (ATC) must be issued to the Project proponent by the District. For further information or assistance, the project proponent may contact the District's Small Business Assistance (SBA) Office at (559) 230-5888.

Response 3-11

As the project goes through the development process, the applicability of each of the SJVAPCD Rules will need to be determined and if they are applicable, SJJPA will be required to comply with them.

Comment 3-12

The purpose of District Rule 9510 (Indirect Source Review) is to reduce the growth in both NO_x and PM₁₀ emissions associated with development and transportation projects from mobile and area sources associated with construction and operation of development projects. The rule encourages clean air design elements to be incorporated into the development project. In case the proposed project clean air design elements are insufficient to meet the targeted emission reductions, the rule requires developers to pay a fee used to fund projects to achieve off-site emissions reductions. The proposed Project is subject to District Rule 9510 because it will receive a project-level discretionary approval from a public agency, and it is a transportation development that will equal or exceed two tons of NO_x or two tons of PM₁₀ (Section 2.4 District Rule 9510). When subject to the rule, an Air Impact Assessment (AIA) application is required no later than applying for project-level approval from a public agency. In this case, if not already done, please inform the project proponent to immediately submit an AIA application to the District to comply with District Rule 9510.

An AIA application is required and the District recommends that demonstration of compliance with District Rule 9510, before issuance of the first building permit, be made a condition of Project approval.

Information about how to comply with District Rule 9510 can be found online at:
<http://www.valleyair.org/ISR/ISRHome.htm>.

The AIA application form can be found online at:
<http://www.valleyair.org/ISR/ISRFormsAndApplications.htm>

Response 3-12

This comment states that the proposed Project is subject to District Rule 9510 because it will receive a project-level discretionary approval from a public agency, and it is a transportation development that will equal or exceed two tons of NO_x or two tons of PM₁₀ (Section 2.4 District Rule 9510). When subject to the rule, an Air Impact Assessment (AIA) application is required no later than applying for project-level approval from a public agency. SJJPA would submit an AIA application as required. Proof of compliance and payment of any offsite mitigation fees would be made a condition of approval prior to issuance of grading permits by the County of Madera.

Comment 3-13

In the event an existing building will be renovated, partially demolished or removed, the Project may be subject to District Rule 4002. This rule requires a thorough inspection for asbestos to be conducted before any regulated facility is demolished or renovated. Information on how to comply with District Rule 4002 can be found online at: <http://www.valleyair.org/busind/comply/asbestosbultn.htm>.

Response 3-13

The Project does not involve any demolition or renovation of an existing building; therefore, the District Rule 4002 would not be applicable.

Comment 3-14

The Project will be subject to Regulation VIII. The project proponent is required to submit a Construction Notification Form or submit and receive approval of a Dust Control Plan prior to construction. Information on how to comply with Regulation VIII can be found online at:
http://www.valleyair.org/busind/comply/PM10/compliance_PM10.htm.

Response 3-14

This comment states that the Project will be subject to Regulation VIII (Fugitive PM₁₀ Prohibitions) and would be required to submit and receive approval of a Dust Control Plan prior to construction. As described in Section 3.3.2 of the Draft IS/MND, implementation of Regulation VIII Control Measures would be required.

Comment 3-15

The proposed Project may be subject to District Rule 9410 (Employer Based Trip Reduction) if the Project would result in employment of 100 or more “eligible” employees. District Rule 9410 requires employers with 100 or more “eligible” employees at a worksite to establish an Employer Trip Reduction Implementation Plan (eTRIP) that encourages employees to reduce single-occupancy vehicle trips, thus reducing pollutant emissions associated with work commutes. Under an eTRIP plan, employers have the flexibility to select the options that work best for their worksites and their employees.

Information about how District Rule 9410 can be found online at: www.valleyair.org/tripreduction.htm. For additional information, you can contact the District by phone at 559-230-6000 or by e-mail at etrip@valleyair.org

Response 3-15

The Project is not anticipated to result in employment of 100 or more employees, and therefore not subject to District Rule 9410. If this changes as the Project is further developed, then it would be subject to this regulation.

Comment 3-16

The Project may also be subject to the following District rules: Regulation VIII, (Fugitive PM₁₀ Prohibitions), Rule 4102 (Nuisance), Rule 4601 (Architectural Coatings), Rule 4641 (Cutback, Slow Cure, and Emulsified Asphalt, Paving and Maintenance Operations), and Rule 9120 (Transportation Conformity). In the event an existing building will be renovated, partially demolished or removed, the project may be subject to District Rule 4002 (National Emission Standards for Hazardous Air Pollutants).

Response 3-16

This comment summarizes other potentially applicable rules including: Regulation VIII, (Fugitive PM₁₀ Prohibitions), Rule 4102 (Nuisance), Rule 4601 (Architectural Coatings), Rule 4641 (Cutback, Slow Cure, and Emulsified Asphalt, Paving and Maintenance Operations), Rule 9120 (Transportation Conformity) and Rule 4002 (National Emission Standards for Hazardous Air Pollutants). As the project goes through the development process, the applicability of each of the SJVAPCD Rules will need to be determined and if they are applicable, SJJPA will be required to comply with them.

Comment 3-17

The list of rules below is neither exhaustive nor exclusive. Current District rules can be found online at: www.valleyair.org/rules/1ruleslist.htm. To identify other District rules or regulations that apply to this Project or to obtain information about District permit requirements, the applicant is strongly encouraged to contact the District's Small Business Assistance (SBA) Office at (559) 230-5888.

If you have any questions or require further information, please contact Cherie Clark via e-mail at Cherie.Clark@valleyair.org or by phone at (559) 230-5940.

Response 3-17

The commenter states that the aforementioned list of rules is neither exhaustive nor exclusive. The commenter strongly encourages the project proponent to contact the SJVAPCD's Small Business Assistance Office, to ensure that the project proponent complies with all applicable SJVAPCD rules. SJJPA intends to comply with SJVAPCD's rules and obtain any necessary permits and comply with the applicable rules.

State of California-Transportation Agency

GAVIN NEWSOM, Governor

DEPARTMENT OF CALIFORNIA HIGHWAY PATROL

3051 Airport Drive
Madera, CA 93637
(559) 675-1025
(800) 735-2929 (TT/TDD)
(800) 735-2922 (Voice)

Comment Letter 4



November 11, 2020

Governor's Office of Planning & Research

File No.: 450.13721.14540.Area/20-300

November 12, 2020

STATE CLEARINGHOUSE

State Clearinghouse
1400 Tenth Street, Room 121
Sacramento, CA 95814

RE: SCH #2020109008

I was recently requested to review the Request for Review of the Initial Study and Mitigated Negative Declaration environmental documents related to the proposed Madera Station Relocation Project, in the Madera Area. The California Highway Patrol's (CHP) interest in commenting surrounds our concerns for the sustained ability to provide for the safety, service and security, of those we serve. My review raised the following concerns:

- 4-1 1. Heavy construction dust so near the State Route 99 Corridor is a serious traffic safety concern. Dust carried to the west by even light winds can adversely affect visibility on the freeway. Proper worksite dust management can help mitigate this concern.
- 4-2 2. The Madera Area is an agricultural community. This means the outdoor workforce is large. Pathogens, such as Valley fever (coccidioidomycosis), carried in construction dust, are a concern for all who live, work and travel in the Madera Area. Proper worksite dust management can help mitigate this concern.

If there are any questions, please do not hesitate to contact Sergeant Corben Whitney at (559) 675-1025.

Sincerely,

H. MADRIGAL, Lieutenant
Commander

Attachments

cc: Central Division
Special Projects Section

Safety, Service, and Security



An Internationally Accredited Agency

**ENVIRONMENTAL IMPACT REPORT
EVALUATION/RESPONSE CHECKLIST
FOR AREA/SECTION**

Reference: General Order 41.2

	Action	Reference GO 41.2
<input checked="" type="checkbox"/>	Review memorandum for the due date(s).	
<input checked="" type="checkbox"/>	Determine if the proposed project might impact local operations and/or public safety. Examples include: housing developments, large commercial projects, large recreational developments or expansions, landfill or quarry operations, hazardous materials storage and/or dump sites, highway construction/improvement projects, new schools, airport improvements, annexations/incorporations, off-highway vehicle facilities, and Indian gaming facilities.	Page 5
<input checked="" type="checkbox"/>	Review environmental impact documents to identify issues or concerns with possible impact to departmental operations (i.e., increased response times, enforcement, emergency services, service calls, telecommunications, public safety).	
Responses		
<input checked="" type="checkbox"/>	If comments are advisable:	
<input checked="" type="checkbox"/>	Correspondence should focus primarily on traffic safety, congestion, or other impacts to the CHP's mission; however, Areas shall not indicate to the lead agency that additional personnel, facilities, vehicles, etc., are a means to mitigate departmental service issues.	Page 7
<input checked="" type="checkbox"/>	Ensure the State Clearinghouse number (SCH#) is included in all correspondence.	
<input checked="" type="checkbox"/>	Comments shall be provided directly to the lead agency and emailed to State Clearinghouse at state.clearinghouse@opr.ca.gov no later than the designated due date. Provide a copy to Special Projects Section (SPS) via e-mail.	
	For project tracking purposes, SPS must be notified of Area/Section's assessment of the project. After mailing your comments to the SCH or lead agency, send a scanned copy via e-mail to SPS.	
<input checked="" type="checkbox"/> N/A	If no impact is determined:	
<input checked="" type="checkbox"/> N/A	Via e-mail, please respond "no impact to _____ Area's local operations and/or public safety by SCH# _____ was identified," by the designated SCH due date to the SPS analyst listed on the Environmental Document Review and Response memorandum. Ensure the SCH# is included.	

State of California

Transportation Agency

Memorandum

Date: November 2, 2020

To: Central Division

From: **DEPARTMENT OF CALIFORNIA HIGHWAY PATROL**
Special Projects Section

File No.: 063.A10212.A14585.Noc.Doc

Subject: ENVIRONMENTAL DOCUMENT REVIEW AND RESPONSE
SCH# 2020109008

Special Projects Section (SPS) recently received the referenced "Notice of Completion" environmental impact document from the State Clearinghouse (SCH).

Due to the project's geographical proximity to Central Division, please use the attached checklist to assess its potential impact to local Area operations and public safety. If it is determined that departmental input is advisable, your written comments referencing the above SCH number must be sent to the lead agency and emailed to state.clearinghouse@opr.ca.gov. Your written comments must be received by SCH no later than **November 16, 2020**. For reference, additional information can be found in General Order 41.2, Environmental Impact Documents.

For project tracking purposes, SPS must be notified of Central Division's assessment of the project (including negative reports). Please e-mail a copy of Division's response to Associate Governmental Program Analyst Mary Uhazi at muhazi@chp.ca.gov. For questions or concerns, please contact Ms. Uhazi at (916) 843-3370.

Christina Narvaez for
L. NARVAEZ, SSM III
Commander

Attachments: Checklist
Project File

Safety, Service, and Security
CALIFORNIA HIGHWAY PATROL



An Internationally Accredited Agency

Comment Letter 4

***H. Madrigal, Lieutenant Commander
Department of California Highway Patrol***

Comment 4-1

Heavy construction dust so near the State Route 99 Corridor is a serious traffic safety concern. Dust carried to the west by even light winds can adversely affect visibility on the freeway. Proper worksite dust management can help mitigate this concern.

Response 4-1

The Project will be subject to San Joaquin Valley Air Quality Control District's Regulation VIII (Fugitive PM10 Prohibitions) and would be required to submit and receive approval of a Dust Control Plan prior to construction. Section 3.3.2 of the Draft IS/MND describes that implementation of Regulation VIII Control Measures would be required.

Comment 4-2

The Madera Area is an agricultural community. This means the outdoor workforce is large. Pathogens, such as Valley fever (coccidioidomycosis), carried in construction dust, are a concern for all who live, work and travel in the Madera Area. Proper worksite dust management can help mitigate this concern.

Response 4-2

Please refer to Response 4-1.

3. RESPONSES TO WEBINAR COMMENTS RECEIVED DURING THE ONLINE PUBLIC MEETINGS

Two online public meetings (i.e. webinars) were held during the Draft IS/MND public review period to solicit comments from interested parties. A morning webinar and evening webinar were held on November 5, at 10:30 a.m. and 6:00 p.m. The content of both of these meeting was the same. At both meetings, an overview of the Project and the results of the Draft IS/MND were presented. Following the presentation, the question and answer portion of the webinar began. The format of this question and answer portion involved the public submitting their written comment and the staff responding verbally. The responses provided at the time of the online webinar were intended to help clarify comments but were not intended to serve as the official response to these comments. Participants were informed that their comments would be responded to officially in the Final IS/MND. Three members of the public provided oral comments on the Initial Study/Mitigated Negative Declaration during the webinars. These comments and the responses provided are detailed in this section. Comments are presented in the order they were received during the webinars.

Webinar Comment 1

Comment Made by: Cherie Clark (cherie.clark@valleyair.org)

Can you please provide methodology used to determine that the VMTs will be reduced, when one goal of the project is to increase ridership?

Response to Webinar Comment 1

As described in further detail in Appendix G (Ridership Technical Memorandum Ridership Memo), the Vehicle Miles Traveled (VMT) estimates were derived from the ridership forecasts for each phase of the Project.

For Phase 1 of the Project, VMT was calculated separately for riders who would be switching to the Relocated Station (from the Existing Station in Madera Acres or from the existing Fresno Station) and for new riders generated by Phase 1 of the Project. It was calculated that riders who would be switching to the Relocated Station, there would be an overall net VMT increase. This was due to the fact that, while not all these riders would have longer trips to get to the Relocated Station (than from the previous station they utilized), on average it was determined their trip lengths (primarily via automobile) to get to the Relocated Station would increase slightly. A factor representing this estimated average increase in VMT for the riders switching to the Relocated was applied and multiplied by the estimated ridership of these riders, thereby increasing automobile emissions slightly.

For new San Joaquin riders generated from Phase 1 of the Project, it was calculated that a much larger VMT reduction would be realized than the slight VMT increase from the riders switching to the Relocated Station, thereby providing an overall reduction in VMT. The overall reduction of VMT was calculated based on the follow factors:

- The majority of each new train trip taken by new San Joaquins riders would replace trips that would have been taken via automobile. Furthermore, riders utilizing the San Joaquins are

generally traveling very long distances (throughout California), which increases the amount of VMT reductions.

- VMT reduction from the new trips was calculated to be much greater than the small increase from shifting of some of the passengers.
- VMT reduction was multiplied by the estimated increase in ridership, which was determined to be significant due to the location of the Relocated Station, which would serve a large catchment area of existing and future population.

For Phase 2 of the Project, HSR service would replace the San Joaquins. As a result, ridership was estimated to increase significantly over the ridership from Phase 1 of the Project due to faster service, better on-time performance, and more frequent service compared with San Joaquins service in Phase 1 (i.e. 18 roundtrips/day for HSR service as compared to 8 roundtrips/day for San Joaquins service). Based on this significant increase in ridership in Phase 2, a further reduction in VMT was calculated over and above Phase 1.

The following factors were included in the calculation of additional VMT reduction in Phase 2 compared with Phase 1 as follows:

- No change in the VMT change associated with riders shifting from the San Joaquins to HSR service, as it was assumed previous riders would still use the new HSR service in lieu of the previous San Joaquins service from the Relocated Station.
- For new riders as a result of the HSR service in Phase 2, an average corresponding distance was calculated for each trip based on geography and expected travel patterns. The estimated number of new riders was multiplied by the estimated average distance for these new trips.

Following the determination of the additional VMT reduction as a result of Phase 2 over Phase 1, the estimated Phase 1 VMT reduction was added to the estimated Phase 2 VMT reduction to come to a total VMT reduction for Phase 2 above the “No-Build” condition.

Webinar Comment 2

Comment Made by: Laida Nash (teachthatrick@hotmail.com)

What will happen to the existing rail station located on road 26? It will have the potential to become an eyesore.

Response to Webinar Comment 2

As presented in Section 2 Project Description of the Draft IS/MND, the existing Madera San Joaquins Station will no longer be served by San Joaquin trains once service commences at the Relocated Madera Station. The Project does not include plans to demolish any structures, as the property belongs to Madera County, not SJPA. At this time, there are no known plans for reuse of the existing Madera Station.

Webinar Comment 3

Comment Made by: Lavida Nash (teachthatrick@hotmail.com)

Who is in control of the very excessive noise level currently here on road 26?

Response to Webinar Comment 3

The comment is regarding excessive noise level on Road 26. SJPA has no jurisdiction over road use nor any noise levels associated with operations of vehicles on Road 26. SJPA recommends contacting the City of Madera or Madera County (depending on the part of Road 26 where the excessive noise is experienced) to have further discussion on Road 26 traffic. Implementation of this Project would result in the existing Madera Station at Road 26 being decommissioned. Consequently, the Project would not increase traffic along Road 26.

Webinar Comment 4

Comment Made by: Lavida Nash (teachthatrick@hotmail.com)

Not to beat a dead horse or anything, but WHY does Amtrak have to honk so many times (as much as 15 times, yes I counted) while still PARKED at the station? It is beyond excessive!

Response to Webinar Comment 4

Whistle signals are defined by railroad operating rules set forth by the Federal Railroad Administration (FRA). The whistle/horn (used interchangeably) may be used as a signaling device for railroad operations or as a warning device for the safety of railroad workers and the general public. Below is a chart of the basic whistle signals from the current General Code of Operating Rules. It is important to note that operating rules and the Federal Code of Regulations allow that the whistle may be used at any time as a warning regardless of any whistle prohibitions (i.e. quiet zone).

- While trains are dwelling at the station platform:
 - The engineer will blow two long blasts while standing still in a station before moving forward, as well as ring the engine bell.
 - Other whistle signals that might be heard while a train is standing in a station, but that aren't always necessary in the course of normal operations, are:
 - One long blast to indicate brakes are set,
 - Two short blasts to acknowledge communication from a crew member, or
 - Three short blasts to indicate the train will back up.

Note that in the case of the current Madera station, eastward (southward) movement begins so close to the Road 26 road crossing (approximately 80 feet from station platform southern end) that the required signal for the road crossing is typically started before the train begins to move.
- While trains are approaching the platform from the north (no grade crossing in the vicinity to the north of the platform);
 - The horn would only be blown in this case as a warning if someone were near the tracks, though the engine bell must be rung while entering a station.

- Frequency of horn usage in each situation:
 - While basic signals are defined as in the chart below, it is ultimately the discretion of the engineer.

Sound	Indication
(1) Succession of short sounds	Use when persons or livestock are on the track at other than road crossings at grade. In addition, use to warn railroad employees when an emergency exists, such as a derailment. When crews on other trains hear this signal, they must stop until it is safe to proceed.
(2) —	When stopped: air brakes are applied, pressure equalized.
(3) — —	Release brakes. Proceed.
(4) o o	Acknowledgment of any signal not otherwise provided for.
(5) o o o	When stopped: back up. Acknowledgment of hand signal to back up.
(6) o o o o	Request for signal to be given or repeated if not understood.
(7) — — o —	<p>When approaching public crossings at grade with the engine in front, sound signal as follows:</p> <p>A. At speeds in excess of 45 MPH, start signal at or about the crossing sign but not more than 1/4 mile before the crossing.</p> <p>B. At speeds of 45 MPH or less, start signal at least 15 seconds, but not more than 20 seconds, before entering the crossing.</p> <p>C. If no crossing sign start signal at least 15 seconds, but not more than 20 seconds before entering crossing but not more than 1/4 mile before the crossing.</p> <p>D. If movement starts less than 1/4 mile from a crossing, signal may be sounded less than 15 seconds before the crossing when it is clearly seen traffic is not approaching the crossing, traffic is not stopped at the crossing or when crossing gates are fully lowered.</p> <p>Prolong or repeat signal until the engine completely occupies the crossing(s).</p>
(8) — o	<p>Approaching men or equipment on or near the track, regardless of any whistle prohibitions.</p> <p>After this initial warning, sound whistle signal (4) intermittently until the head end of train has passed the men or equipment.</p>

Dashes (-) indicate long blasts
Circles (o) indicate short blasts.

Implementation of this Project would result in the existing Madera Station at Road 26 being decommissioned. Although the trains that are part of the existing San Joaquins service would continue to use whistles as they approach the Road 26 at-grade crossing, there would be no other whistles blown as there would no longer be any train service at the existing Madera Station. Therefore, train whistle noise should be reduced at Road 26 once the relocated station is in service.

Webinar Comment 5

Comment Made by: Troy Hightower (thightower@tdhintl.net)

What is the length of track from where the track switches from HSR to the north to where it switches back to HSR in the South?

Webinar Comment 5 Response

The length of the track from north turnout to south turnout is approximately 14,000 feet.

Webinar Comment 6

Comment Made by: Lavida Nash (teachthattrick@hotmail.com)

How close to the college will the new rail be? Will it be within walking distance?

Response to Webinar Comment 6:

The Madera Community College is located approximately two miles from the proposed relocated Madera Station. It is a bit longer if you include the distance to walk to the different buildings within the campus area. As discussed in Section 2 Project Description, the Project includes bus bays that can accommodate existing and any proposed expansion of bus service in the area. In addition, the new access road proposed under Phase 1 and 2 would have Class II bicycle lanes included to allow for multi-modal access to the new station.

Webinar Comment 7

Comment Made by: Troy Hightower (thightower@tdhintl.net)

Thank you. I am not concerned about the length. It is interesting to see someone is actually planning to switch on/off HSR tracks.

Response to Webinar Comment 7:

With any HSR station, you develop a station track that is off to the side of the mainline which allows the mainline train to bypass the station. There may be some cases where trains run on these tracks but don't stop at this station.

Webinar Comment 8

Comment Made by: Lavida Nash (teachthattrick@hotmail.com)

You mentioned some of the project monies will (Phase 2, I think) will not be provided. Where will the monies come from to complete the entire project. In other words, will there be an increase in taxes (property)?

Response to Webinar Comment 8:

At this time, there is no funding for Phase 2 of the Project. As Phase 1 is developed, SJJPA will continue to look for funding. SJJPA will work with local and state partners to seek additional state, federal, and other funding sources to complete this project. However, SJJPA has no authority to increase property taxes and, thus, cannot implement this type of measure to pay for completion of Phase 2 of this Project.

4. RESPONSES TO COMMENTS RECEIVED VIA PROJECT WEBPAGE

SJJPA received two additional comments via the Madera Relocation Project webpage.

Webpage Comment 1

Date: Thursday, October 29, 2020 8:33:54 AM

Name: Dennis Holschlag

Email: hold26@hotmail.com

Message:

I am interested in this project and where it may relocate... Seems to me that the ave 12 location is a bit too far south of town ... Other locations that might be better is ave 17 or ave 15 areas

Response to Webpage Comment 1:

Prior to the environmental review process, SJJPA had been in discussions with key stakeholders, such as Madera County, the City of Madera, and the Madera CTC in terms of the best fitting location for a relocated station. As discussed in the Draft IS/MND Introduction Section and in the Land Use Section, the proximity to State Route 99 via Avenue 12 is a big factor for the selection of this location, as well as being located near existing transit service (along Avenue 12). In addition, with the Madera Community College and the anticipated development in the area, the relocation of the Madera Station to Avenue 12 site would best be accessed and have beneficial impacts to air quality by reducing vehicle miles traveled regionally.

Webpage Comment 2

Date: Friday, November 6, 2020 4:53:15 PM

Name: Juan calderon

Email: juanjcalderon07@aol.com

Message:

the station should be located in central.madera. you can add a stop at avenue 12 and avenue 17.

Response to Webpage Comment 2:

Please refer to Response to Website Comment 1. Based on the planned operations of the San Joaquins and future HSR service for Madera, only one stop is proposed.