



April 11, 2022

California High-Speed Rail Authority  
Attn: Draft 2022 Business Plan  
770 L Street, Suite 620 MS-1  
Sacramento, CA 95814

**Subject:** San Bernardino County Transportation Authority (SBCTA) comments on the Draft of the 2022 High Speed Rail Business Plan

Dear Colleagues at the California High Speed Rail Authority:

This letter provides San Bernardino County Transportation Authority's (SBCTA's) response to the Draft of the 2022 High Speed Rail Business Plan issued by the California High Speed Rail Authority (CHSRA) on February 8, 2022. SBCTA serves as the County Transportation Commission for San Bernardino County, the largest county geographically in the continental United States with a population of 2.2 million. Our members consist of the county's 24 cities plus the County of San Bernardino.

The focus of our review of the Draft 2022 Business Plan was on the same topic for which we provided comment letters on both the Draft and Revised Draft of the 2020 Business Plan: the proposed BNSF Intermodal Facility in Colton and the Lenwood Staging Tracks in Barstow. These facilities are said to be necessary to enable two high speed rail (HSR) tracks to be incorporated into the BNSF rail corridor for the Los Angeles to Anaheim HSR segment. Prior communication has highlighted the degree of concern that SBCTA and our local agency partners have over the impact of this project on our disadvantaged communities and overall transportation network. A description of the BNSF facilities in Colton and Barstow appeared in the 2020 Draft Business Plan, but was removed by the Authority in the Revised Draft, and then reinstated on page 80 of the Final 2020 Business Plan following our comment letters.

We particularly appreciate the re-inclusion of the reference to the Colton and Barstow facilities in the 2020 Business Plan because we do not want the Authority and the HSR proponents to lose sight of the significant impact these major freight facilities will have on our local disadvantaged communities, particularly the significant impact of the Colton Intermodal Facility on the communities in Colton, Rialto, and San Bernardino. If the BNSF Intermodal Facility in Colton had been a stand-alone project with its own environmental document, it would have received a much higher level of attention than it is receiving now.

We have noticed that the 2022 Business Plan was cut back to 83 pages in length from the 147 pages of the 2020 Business Plan. In doing so, reference to the Colton and Lenwood facilities has again been removed. The 2022 Business Plan comes in a year that will be critical for consideration

of the Colton and Lenwood facilities, given the expected release of the draft environmental documents for the Los Angeles to Anaheim segment. While cities may have been managing to live with the growth in warehouse/distribution centers and all the other components of the Southern California supply chain, the communities along I-10 and other freight corridors are being stressed more than ever.

It is unfortunate that the Authority has not been willing to share more information on the Colton and Lenwood facilities with local communities, given the likely magnitude of the impacts of these new facilities. While the Authority contends that the proposed strategy will be of overall regional and statewide benefit, the localized impacts in Colton residential areas and on our transportation system will be severe. The problem we have is that we will not know any of the details until the draft EIS/EIR is released, after which we will have a maximum of 60 days to digest, analyze, and respond.

Therefore, we request that the Authority once again re-include the discussion of the Colton Intermodal Facility and the Lenwood Staging Tracks in the 2022 Business Plan so that the significance of this impact does not get lost. This is even more appropriate when one considers that the Colton Intermodal Facility and Lenwood Staging Tracks have become part of the CEQA Project Description now incorporated into the High Speed Rail Project.

Further, the Climate Action Plan for Transportation Infrastructure (CAPTI), highlights the importance of community engagement early in the project development process. An example is Strategy S3, which states:

- S3. Elevate Community Voices in How We Plan and Fund Transportation Projects – The strategy states, in part: *“This strategy aims to create improved and more transparent transportation planning processes and practices, while also coordinating across state agencies to develop standards and practices for meaningful engagement and provision of technical assistance resources to those most impacted by projects ....”*

While we recognize that the Colton and Lenwood facilities were incorporated into the CEQA Project Description at a time when the Authority was already in the middle of the environmental process (this happens at times), the extent of community outreach involved included only the Notice of Preparation (NOP) and two virtual scoping meetings in early September 2020, plus some one-on-one agency meetings at which very little information about the project was revealed. Relative to the scale of the proposed BNSF intermodal facility (purported to be larger than the existing BNSF intermodal facility in San Bernardino), this would be considered a minimalist approach to community engagement, inconsistent with the principles CalSTA has itself espoused through CAPTI.

There are some aspirational statements of the collaborative intentions of the Authority in the Draft 2022 Business Plan, such as:

- Last paragraph in column 1, page 60: *“Maintaining dialogue and communication with legislators, community leaders, agencies and all stakeholders, from local to federal to international, is imperative to maximize the understanding and support of the Authority*

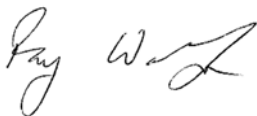
*and its work. Open and transparent continuous communication is critical when working with these external parties.”*

- Third paragraph on page 63 in the Environmental Review and Permitting section reads: *“The environmental review process is a critical opportunity for members of the public and all stakeholders to understand and comment upon the Authority’s design, anticipated construction, and likely operational impacts.... The Authority remains highly committed to our responsibility to collaborate with these stakeholders to find balanced and equitable solutions.”*

However, these statements are contained in Chapter 4, entitled “Strengthening Risk Management.” In other words, the communities in San Bernardino County that will be most impacted by the HSR project are thought of as a risk, not really as parties with whom the Authority can have transparent, collaborative communications to help shape a project before the commitments become locked in as part of the environmental process. Communications have unfortunately taken place primarily through a more formal exchange of notices and response letters, plus several SBCTA meetings with Authority and BNSF staff. As stated earlier, the Authority felt that little information could be provided until the release of the draft environmental documents, with stakeholders left to review a large volume of data in the compressed 60-day timeframe for review and comment.

While SBCTA is committed to continued collaboration with the Authority and our agency partners in Southern California, it would be disingenuous of us not to also point out the major concerns we have about the likely impacts to the communities we represent. Both SBCTA and the San Bernardino Council of Governments (SBCOG) have the same 29-member Board, and together we are highlighting our concerns and the continued need for open dialogue on how to avoid, minimize, and mitigate the impacts of this project, should it move forward.

Sincerely,



Raymond W. Wolfe  
Executive Director

Cc: Tom Richards, Chair, CHSRA  
Toks Omishakin, CalSTA