CALIFORNIA High-Speed Rail Authority

Gavin Newsom
GOVERNOR

Ian Choudri
CHIEF EXECUTIVE OFFICER

April 22, 2026

Mr. Michael A. Cacciotti, Chair
South Coast Air Quality Management District
21865 Copley Drive
Diamond Bar, CA 91765

Re: General Conformity for the Los Angeles to Anaheim Project Section of the California High-Speed Rail System

Dear Mr. Cacciotti:

Thank you for your active participation with the California High-Speed Rail Authority (Authority) to address the General Conformity requirements of the Los Angeles to Anaheim Project Section of the California High-Speed Rail (HSR) System, which is primarily within the jurisdiction of the South Coast Air Quality Management District (SCAQMD).[1] The HSR system will provide intercity, high-speed train service on more than 800 miles of guideway throughout California, connecting the major population centers of Sacramento, the San Francisco Bay Area, the Central Valley, Los Angeles, the Inland Empire, Orange County, and San Diego. The approximately 30-mile-long Los Angeles to Anaheim Project Section (also referred to as the Project) would connect Los Angeles Union Station (LAUS) in Los Angeles and Anaheim Regional Transportation Intermodal Center (ARTIC) in Anaheim (LAUS was previously approved by the Authority as part of the Burbank to Los Angeles Project Section).

Air Quality and Public Health Benefits of the High-Speed Rail System

The HSR system will use 100 percent renewable, electrically powered, zero-emission (ZE) high-speed trains and is identified in the California Air Resources Board's 2017 Scoping Plan as part of a sustainable statewide transportation system necessary to achieve the state's climate goals. The HSR system is predicted to help achieve that goal by reducing 2040 greenhouse gas (GHG) emissions by approximately 1.5 million metric tons. The HSR system would also result in a net reduction of criteria pollutant emissions.

The Los Angeles to Anaheim Project Section is a critical link in Phase 1 of the HSR system, bringing the HSR system to Anaheim. Operation of the Project and the HSR system within the

[1] Construction activities for the Los Angeles to Anaheim Project Section would occur within the jurisdictions of SCAQMD, Mojave Desert Air Quality Management District (MDAQMD), and San Joaquin Valley Air Pollution Control District (SJVAPCD). However, the construction emissions in MDAQMD's and SJVAPCD's jurisdictions are solely related to locomotives hauling ballast and haul trucks transporting hazardous waste, respectively, as discussed in Section 1.1, Regulatory Status of the Study Area, in the Draft General Conformity Determination. Project construction emissions within MDAQMD's and SJVAPCD's jurisdictions would not result in an exceedance of the *de minimis* levels for any applicable criteria pollutant.

South Coast region would result in a net decrease in regional emissions of criteria pollutants and associated public health impacts, and emissions levels during Project operations would be less than the general conformity *de minimis* levels. This overall net decrease in emissions during Project operations would help the South Coast Air Basin meet its attainment goals of federal ambient air quality standards for ozone (O_3) by reducing precursor emissions of nitrogen oxides (NO_X), reactive organic gases (ROG), and particulate matter (PM) and will result in long-term air quality and public health benefits. However, the Authority currently estimates that construction of the Project is expected to result in a temporary net increase in criteria pollutant emissions of NO_X in the South Coast Air Basin in excess of general conformity *de minimis* levels during some of the construction years. As such, the Authority and SCAQMD have agreed to the commitments in this letter to track and mitigate construction emissions from the Project to meet General Conformity requirements.

General Conformity Rule

The General Conformity Rule, as codified in Title 40 Code of Federal Regulations Part 93, Subpart B, establishes the process by which federal agencies determine conformance of proposed projects that are federally funded or require federal approval with applicable air quality standards. This determination must demonstrate that a proposed project would not cause or contribute to new violations of air quality standards, exacerbate existing violations, or interfere with timely attainment or required interim emissions reductions toward attainment. The Authority, as the Project proponent, is receiving federal grant funds through the Federal Railroad Administration's (FRA) High-Speed Intercity Passenger Rail program. The Project may also receive FRA safety approvals. Because of the federal funding and potential safety approvals, the Project is subject to the General Conformity Rule; and because construction-phase emissions (without mitigation) would exceed General Conformity *de minimis* levels, the Project is not exempt and must demonstrate conformity.

Emissions for the Los Angeles to Anaheim Project Section

The Authority has not yet secured construction funding for the Los Angeles to Anaheim Project Section and has not yet set a final construction schedule for this project section. The Authority explains that the emission numbers provided in the Environmental Impact Report/Environmental Impact Statement (EIR/EIS) are reasonable estimates based on the available information to date. The methodology used in creating these estimates is similar to what was used for estimating the emissions for the EIR/EISs for the Merced to Fresno, Fresno to Bakersfield, Palmdale to Burbank, and Burbank to Los Angeles Project Sections of the HSR system. After 10 years of construction of the HSR system in the Central Valley, it has become clear that the estimates in the EIR/EISs for the HSR system are conservative and actual emissions from construction are currently lower than estimates in the EIR/EISs for the Merced to Fresno and Fresno to Bakersfield Project Sections by 50 to 70 percent.

The Authority has not yet secured funding for final design or construction of the Project, and the Authority cannot reasonably anticipate when Project construction may actually occur. It is therefore difficult for the Authority to completely engage with SCAQMD on implementing available or future mechanisms for the reduction of construction emissions. Although the construction schedule has not been firmly established for this section, the Authority agrees with SCAQMD's encouragement to reduce emissions locally by avoiding and minimizing emissions from Project

construction prior to funding incentive programs or offsets to fully mitigate remaining construction emissions.

The Authority has a long history of being proactive toward reducing construction emissions. As shown in Figure 1, the Authority has continually updated its policies and procedures to ensure that the HSR system embraces and pushes the boundaries toward reducing emissions.

2008	• Board adopts 100 percent renewable energy for operations
2011	• Incorporated in California Air Resources Board (ARB) Scoping Plan for Assembly Bill (AB) 32
2012	• Net-zero direct GHG emissions for construction • Net-zero air quality emission for construction • Proactive construction requirement, including Tier 4 vehicles and 100 percent recycling requirements
2013	• Chief Executive Officer signs Sustainability Policy • Incorporated in California ARB Scoping Plan Update
2014	• First infrastructure project to require disclosure on major materials, informed AB 262 Buy Clean California Act • Environmental Mitigation Management Application (EMMA) developed to track and monitor program and contractor progress
2016	• Board adopts Sustainability Policy
2017	• Incorporated in California ARB Scoping Plan Update
2019	• Required performance targets for embodied energy (concrete and steel) • ZE fleet vehicles (25 percent of on-road fleet) for contractors • Required use of renewable diesel • Direct GHG emissions target set for construction tied to bonus/penalty
2020	• Board adopts Sustainability Policy Updates • Achieving net-zero tailpipe GHG emissions in construction through carbon sequestration projects
2021	• Required future construction contracts to use only ZE vehicles for on-road project fleets (100% by 2035)

Figure 1. History of Environmental Commitments Designed to Reduce Emissions

Impact Avoidance and Minimization Features

Avoiding and minimizing emissions is a strategy that is consistent with the net-zero GHG objectives of the Authority's Sustainability Policy. As such, the Authority has incorporated the following impact avoidance and minimization features (IAMF) into the Los Angeles to Anaheim Project Section (full text of these IAMFs is in Appendix 2-A of the Los Angeles to Anaheim Project Section EIR/EIS):[2]

- AQ-IAMF#1: Fugitive Dust Emissions: During construction, the Authority-designated contractor will employ measures to minimize and control fugitive dust emissions. The contractor will prepare a fugitive dust control plan for each distinct construction segment. At a minimum, the plan will describe how each measure would be employed and identify an individual responsible for ensuring implementation.

- AQ-IAMF#2: Selection of Coatings: During construction, the Authority-designated contractor will use low-volatile organic compound (VOC) paint that has VOC content consistent with SCAQMD Rule 1113, as applicable.

- AQ-IAMF#3: Renewable Diesel: During construction, the Authority-designated contractor will use renewable diesel fuel to minimize and control exhaust emissions from all heavy-duty diesel-fueled construction diesel equipment and on-road diesel trucks.

- AQ-IAMF#4: Reduce Criteria Exhaust Emissions from Construction Equipment: All heavy-duty off-road construction diesel equipment used during the construction phase will meet Tier 4 Final engine requirements.

- AQ-IAMF#5: Reduce Criteria Exhaust Emissions from On-Road Construction Equipment: All on-road trucks used to haul construction materials, including fill, ballast, rail ties, and steel, will consist of an average fleet mix of equipment model year 2020 or newer, but no less than the average fleet mix for the current calendar year as set forth in the database included in the latest U.S. EPA approved EMFAC at the time of emissions inventory development.

These IAMFs have helped to reduce the construction emissions generated by the HSR project sections currently under construction, which are outside SCAQMD's jurisdiction. For example, Figure 2 highlights the substantial criteria pollutant emission reductions resulting from incorporation of AQ-IAMF#4 demonstrated by the Central Valley portions of the HSR system currently under construction.

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[2] For the purposes of this agreement, a shortened version of the IAMFs are presented here. The full IAMFs for purposes of CEQA and NEPA will be presented in the Final EIR/EIS. In addition, the Authority complies with all applicable SCAQMD Rules.

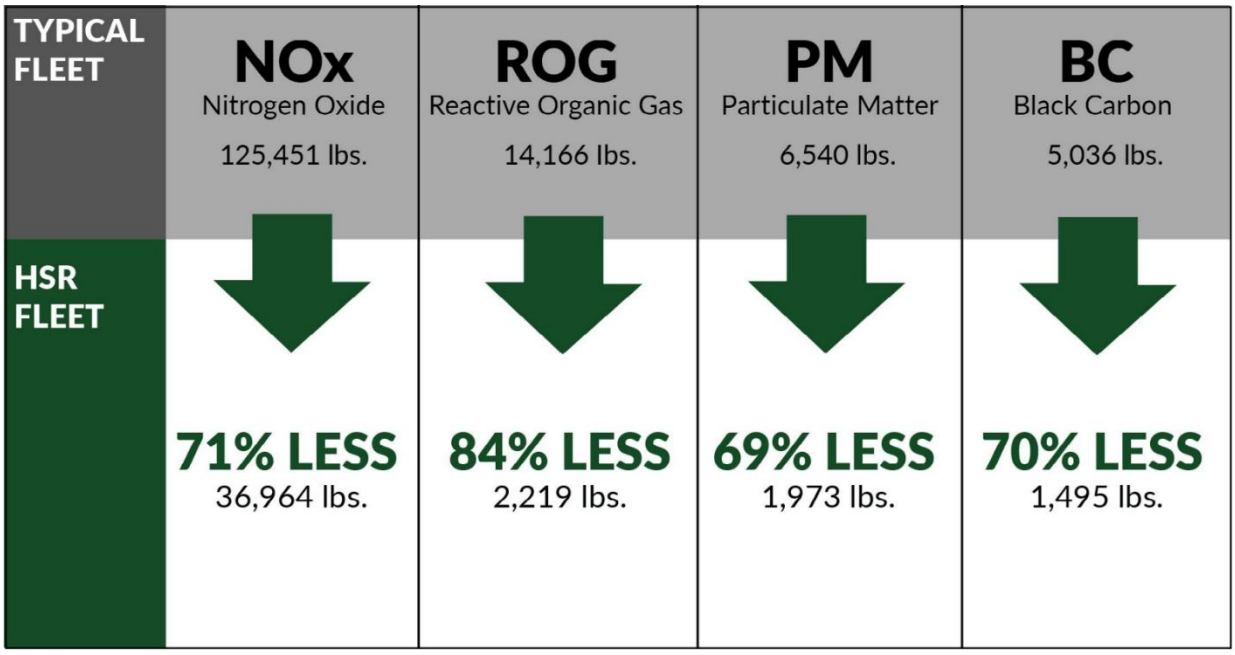


Figure 2. 2023 Criteria Air Pollutants Emitted and Avoided (Typical California Fleet Comparison)

Mitigation Measures

The Authority is continually incorporating mitigation measures that would reduce the generation of construction emissions in construction contracts and practices. For example, the Authority incorporated the following mitigation measure into the Los Angeles to Anaheim Project Section EIR/EIS and is already incorporating portions of these measures into existing contracts.

> **AQ-MM#2: Requirements for Use of Zero-Emission or Near-Zero-Emission Vehicles and Off-Road Equipment to Reduce Construction Emissions**
>
> This mitigation measure, as included in the EIR/EISs, will reduce the impact of construction emissions from Project-related on-road vehicles and off-road equipment. All remaining emissions after implementation of this measure would be offset to conform with 40 CFR 93.158(a) with emission credits required under AQ-MM#1.
>
> The Authority will require that all Project construction contractors use a minimum of 25 percent, with a goal of 100 percent, of all light-duty on-road vehicles (e.g., passenger cars,

light-duty trucks) associated with the Project (e.g., on-site vehicles, contractor vehicles) with ZE or near-ZE technology.[3]

The Authority and all Project construction contractors will have the goal that a minimum of 25 percent of all heavy-duty on-road vehicles (e.g., for hauling, material delivery, and soil import/export) associated with the Project use ZE or near-ZE technology.

The Authority and all Project construction contractors will have the goal that a minimum of 10 percent of off-road construction equipment use ZE or near-ZE vehicles.

If local or state regulations mandate a faster transition to using ZE or near-ZE vehicles at the time of construction, the more stringent regulations will be applied. For example, California Executive Order N-79-20, issued by California Governor Gavin Newsom on September 23, 2020, currently states the following:

- Light-duty and passenger car sales be 100 percent ZE vehicles by 2035
- Full transition to ZE short haul/drayage trucks by 2035
- Full transition to ZE heavy-duty long-haul trucks, where feasible, by 2045
- Full transition to ZE off-road equipment by 2035, where feasible

The Project will have a goal of surpassing the requirements of these or other future regulations as a mitigation measure.

Because the commercial availability of future electric equipment and vehicles is unknown, emissions reductions achieved by AQ-MM#2 cannot currently be quantified or included in the analysis.

In addition to the above AQ-MM#2, the Authority already mandates that all such equipment meet the most stringent emission standard codified by the U.S. Environmental Protection Agency: Tier 4 Final. This has had a substantial positive impact on emission reductions, because 42,651 pounds of criteria air pollutants in 2023 would have otherwise been released based on Figure 2 above. This implementation strategy will go further, mandating that 10 percent of off-road equipment be ZE, not just Tier 4 Final, at the start of construction, and sets the goal of 100 percent ZE for such equipment by 2035.

This is the most recent step the Authority is taking to ensure the California HSR System is the greenest infrastructure project in both operation and construction. The Authority has captured or avoided more than 143,000 metric tons of GHG emissions through planting more than 7,000 trees and other forest projects. The HSR system has also prevented more than 300,000 tons of

[3] According to the CA HSC § 44258 (c) "Near-zero-emission vehicle" means a vehicle that utilizes zero-emission technologies, enables technologies that provide a pathway to zero-emissions operations, or incorporates other technologies that significantly reduce criteria pollutants, toxic air contaminants, and greenhouse gas emissions, as defined by the state board in consultation with the State Energy Resources Conservation and Development Commission consistent with meeting the state's mid- and long-term air quality standards and climate goals.

construction materials from being sent to landfills with its 95 percent construction waste recycling rate.

The Authority will continue to work with contractors to encourage and mandate the use of ZE vehicles and off-road equipment. In addition, the Authority will encourage contractors to use available tools that will aid decision makers in their purchases of new equipment and include the use of ZE technologies in applicable bid documents, purchase orders, and contracts with contractors. For example, a current tool that the Authority has presented to contractors is Argonne National Laboratory's Alternative Fuel Life-Cycle Enviromnental and Economic Transportation (AFLEET) Tool (https://greet.es.anl.gov/afleet). This tool examines both the environmental and economic costs and benefits of alternative fuel and advanced vehicles and provides output to the user quantifying specific case scenarios based on user input (Figure 3).

Payback Output Sheet – Annual Energy Use and Emissions Summary Table

	Gasoline	Diesel	Gasoline HEV	Gasoline PHEV	Gasoline EREV	EV	G.H2 FCV	Diesel HEV	Diesel HHV	B20	B100	E85	LPG	CNG	LNG / Diesel LNG Pilot Ignition
Annual Life-Cycle Petroleum Use (barrels)															
LD Petroleum Use	449.4		321.0		93.6	6.1	2.9				17.1		150.5	2.4	
HD Petroleum Use		16,928.0				266.7			13,119.2		742.1			97.5	
Annual Life-Cycle Greenhouse Gas Emissions (short tons)															
LD GHG Emissions	253.3		181.0		144.5	145.0	170.2				56.2		222.9	225.4	
HD GHG Emissions		9,278.7				6,303.0			7,191.0		2,442.0			9,128.4	
Vehicle Operation Air Pollutant Emissions (lb)															
LD Passenger Car Fleet															
CO	2,424.6		1,816.3		518.0	0.0	0.0				3,248.1		2,532.4	1,754.8	
NOx	101.0		65.0		18.5	0.0	0.0				200.3		104.6	84.4	
PM10	33.3		33.3		28.3	26.2	26.2				30.5		33.3	33.3	
PM2.5	12.1		12.1		8.4	6.9	6.9				11.3		12.1	12.1	
VOC	129.8		99.4		28.3	0.0	0.0				62.3		145.0	73.0	
HD Refuse Truck Fleet															
CO		1,640.9				0.0			1,640.9		1,640.9			21,331.7	
NOx		4,232.0				0.0			4,232.0		4,232.0			2,962.4	
PM10		394.4				309.5			394.4		394.4			394.4	
PM2.5		161.1				80.0			161.1		161.1			161.1	
VOC		259.2				0.0			259.2		259.2			880.9	

Figure 3. AFLEET Sample Output

Future Steps

The Authority will continue to pursue construction methods, materials, and equipment that will reduce the generation of air pollutants. Even with these measures, however, some pollution will be emitted during the construction phase. To ensure that the Los Angeles to Anaheim Project Section of the HSR system meets all the General Conformity requirements, the following steps will be taken once construction funding is established.

- A construction schedule will be developed. The analysis in the EIR/EIS for the Project assumed that Project construction would take place from the first quarter of 2031 to the fourth quarter of 2037. Based on the new schedule, a construction plan will be developed and analyzed to determine the emission burdens generated by construction.

- At the time of the analysis, the IAMFs and mitigation measures will be revisited and updated as discussed above, and in consultation with SCAQMD, to include technologies and methodologies that were not considered in the earlier analysis. This review and implementation of updated measures will aid the Project in reducing the generation of emissions from construction.

- Once emission estimates are calculated using the revised IAMFs and mitigation measures, it will be determined if the estimates are above the applicable General Conformity *de minimis* levels. If emissions estimates determine that emissions will be reduced to below the General Conformity *de minimis* levels, those estimates will be provided to SCAQMD for review and approval.

- SCAQMD will be notified via email or letter of the emission levels and consulted to determine if emission-reduction programs could be applied as needed prior to the start of construction activities for the Project.

If emission reduction programs are required, the Authority will present a detailed plan, developed with SCAQMD, to ensure that the program has in place a procedure to adequately account for and reduce emissions generated by the Project. The emission accounting program that the Authority currently uses to track emissions for the project sections of the HSR system currently being built will be presented as a possible mechanism to quantify the construction emissions generated by the Los Angeles to Anaheim Project Section.

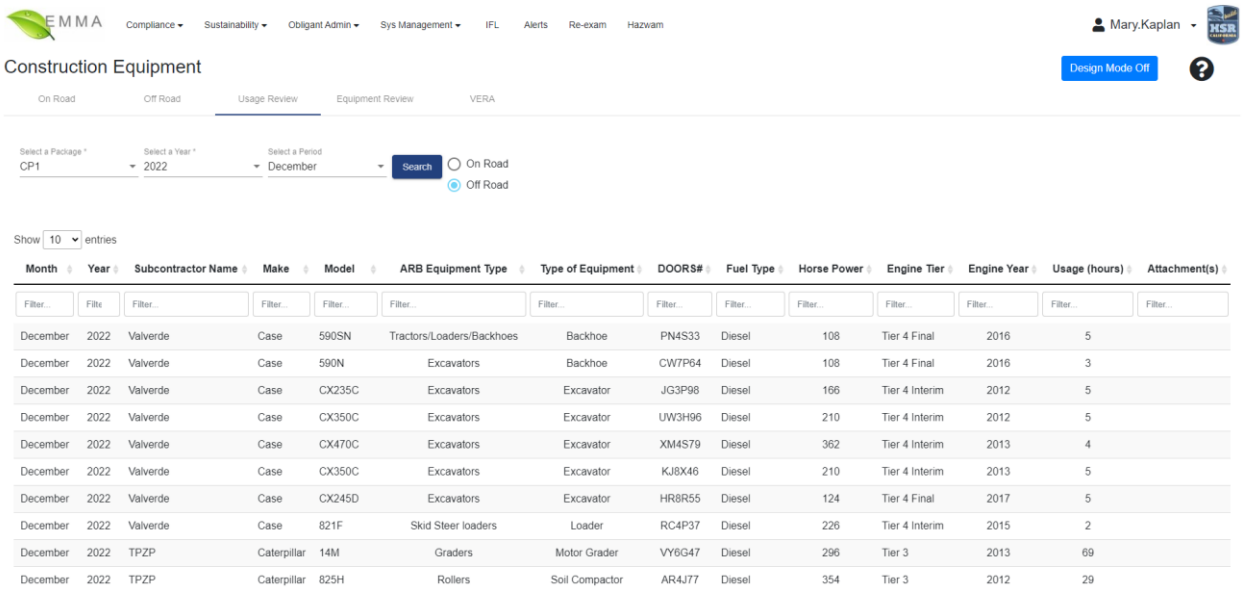
Emissions Tracking and Mitigation

In addition to AQ-MM#2, the Los Angeles to Anaheim Project Section EIR/EIS identifies the following mitigation measure to mitigate construction emissions in the South Coast Air Basin:

> **AQ-MM#1: Offset Project Construction Emissions in the South Coast Air Basin through SCAQMD Emission Offset Programs.**[4] The Project's construction emissions that cannot be reduced by IAMFs and any other mitigation measures will be offset through a SCAQMD rule or contractual agreement to fund equivalent emissions reductions that achieve reductions in the same years (to the extent same-year offsets are available) as construction emissions occur, thus offsetting Project-related air quality impacts in real time as required by the General Conformity Rule.
>
> As the Project advances toward construction, the Authority will work with SCAQMD to assess the estimated emissions, availability of offsets, and cost for achieving the Authority's Sustainability Policy goal to the extent possible.
>
> As part of these offset programs, a copy of each unit's certified tier or model year specification shall be available upon request at the time of mobilization of each applicable equipment unit. Furthermore, the Authority will require periodic reporting and provision of written construction documents by construction contractor(s) to ensure compliance and conduct regular inspections to the maximum extent feasible to ensure compliance with applicable Authority IAMFs and mitigation measures.

[4] For the purposes of this agreement, a shortened version of the mitigation measure is presented here. The full mitigation measure for purposes of CEQA and NEPA will be presented in the Final EIR/EIS.

The Authority currently mitigates emissions in the San Joaquin Valley through a Voluntary Emission Reduction Agreement with the San Joaquin Valley Air Pollution Control District (SJVAPCD). Through the use of the Environmental Mitigation Management Application (EMMA) tool, developed by the Authority, construction activity is input by the contractor and applicable emission rates are applied to calculate the emission burdens generated by off-road and on-road construction equipment and activity. Figure 4 highlights some of the data input and calculations in EMMA. As previously noted, actual emission burdens have been substantially lower than the burdens estimated in the corresponding EIR/EIS.



Month	Year	Subcontractor Name	Make	Model	ARB Equipment Type	Type of Equipment	DOORS#	Fuel Type	Horse Power	Engine Tier	Engine Year	Usage (hours)	Attachment(s)
December	2022	Valverde	Case	590SN	Tractors/Loaders/Backhoes	Backhoe	PN4S33	Diesel	108	Tier 4 Final	2016	5	
December	2022	Valverde	Case	590N	Excavators	Backhoe	CW7P64	Diesel	108	Tier 4 Final	2016	3	
December	2022	Valverde	Case	CX235C	Excavators	Excavator	JG3P98	Diesel	166	Tier 4 Interim	2012	5	
December	2022	Valverde	Case	CX350C	Excavators	Excavator	UW3H96	Diesel	210	Tier 4 Interim	2012	5	
December	2022	Valverde	Case	CX470C	Excavators	Excavator	XM4S79	Diesel	362	Tier 4 Interim	2013	4	
December	2022	Valverde	Case	CX350C	Excavators	Excavator	KJ8X46	Diesel	210	Tier 4 Interim	2013	5	
December	2022	Valverde	Case	CX245D	Excavators	Excavator	HR8R55	Diesel	124	Tier 4 Final	2017	5	
December	2022	Valverde	Case	821F	Skid Steer loaders	Loader	RC4P37	Diesel	226	Tier 4 Interim	2015	2	
December	2022	TPZP	Caterpillar	14M	Graders	Motor Grader	VY6G47	Diesel	296	Tier 3	2013	69	
December	2022	TPZP	Caterpillar	825H	Rollers	Soil Compactor	AR4J77	Diesel	354	Tier 3	2012	29	

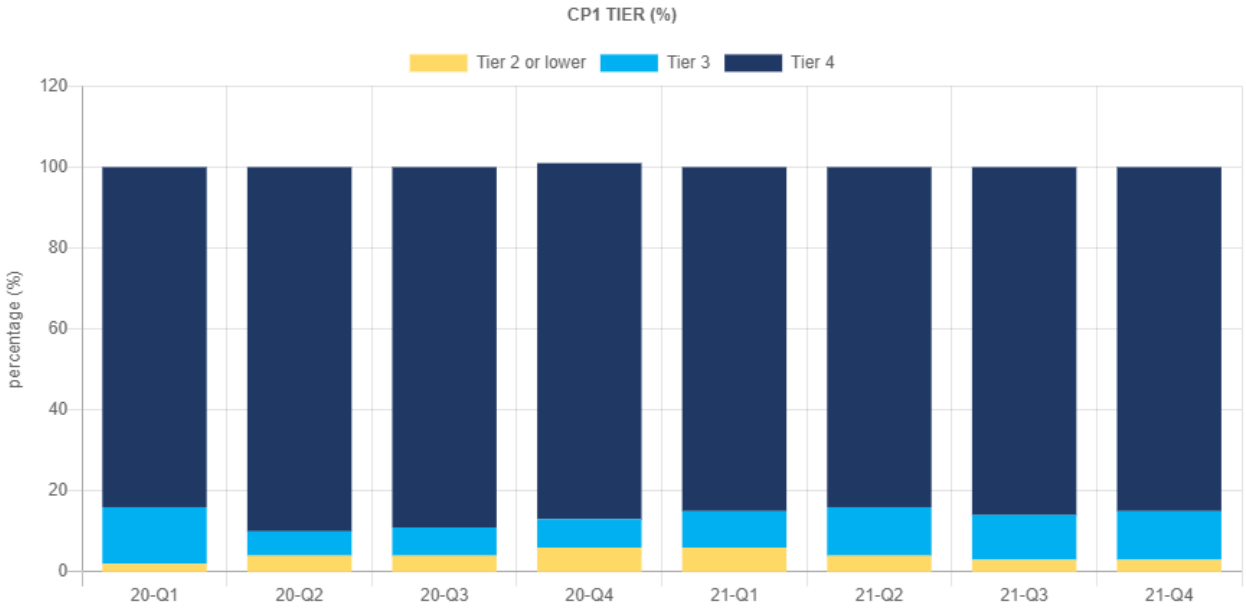


Figure 4. EMMA Tracking Tool: Sample Data and Infographics

Conclusion

The Authority is committed to serving as a model of sustainable development. The HSR system was recognized with a Platinum Envision level award in 2020 from the Institute for Sustainable Infrastructure. The Platinum Envision award achieved by the Authority and its program partners demonstrates that sustainability is achievable across large-scale and complex transportation systems.

Given the documented history of the HSR system's successful implementation of emission-reduction strategies that the Authority has demonstrated for sections outside SCAQMD's jurisdiction, the robust emission tracking and mitigation program, along with the Authority's vision for the California HSR System being the greenest infrastructure project in the country, it is the Authority's firm commitment to partner with SCAQMD to ensure that all General Conformity requirements specified in 40 CFR Part 93 are met.

By signing this letter, SCAQMD agrees to work with the Authority or the implementing entity, using available mechanisms as appropriate, to reduce construction emissions and satisfy General Conformity for the Los Angeles to Anaheim Project Section of the HSR system.

- The Authority or the implementing entity will work with SCAQMD to ensure that the lowest levels of construction emissions are generated through the use of IAMFs and mitigation measures outlined in its Final EIR/EIS (reproduced in this document for reference) and rolling review of best available technologies to the extent feasible, with priority given first to the use of ZE technology such as electric construction equipment and then to near-ZE technology.

- After receipt of construction funding but prior to commencing construction, the Authority or the implementing entity will review emission estimates, revise if warranted, and present a final estimate for review and use by SCAQMD for purposes of emission-reduction contributions and monitoring for the Los Angeles to Anaheim Project Section.

- If emissions exceed General Conformity *de minimis* levels, all remaining emissions after implementation of the IAMFs and on-site mitigation measures will be offset to conform with 40 CFR 93.158 through SCAQMD's emission-reduction programs. Applicable emission-reduction programs may include state or federal incentive programs that achieve emissions reductions by providing incentive funds for the incremental cost of cleaner-than-required engines and equipment. The Authority or the implementing entity agrees to provide funding at the cost-effectiveness level or amount established by the program(s) mutually selected by SCAQMD and the Authority or the implementing entity.

- After receipt of construction funding but prior to commencing construction, the Authority or the implementing entity and SCAQMD will enter into a contractual agreement to offset all remaining construction emissions for criteria air pollutant emissions that exceed General Conformity *de minimis* levels for the Los Angeles to Anaheim Project Section, to meet General Conformity regulations, by providing funds for the mutually selected emission-reduction program(s) to fund grants for projects that achieve the necessary emission reductions. At the time of preparing the General Conformity Determination, the Authority estimates[5] that the only exceedances of the General Conformity *de minimis* levels would be NO_X emissions in the South Coast Air Basin from Project construction in the years 2032 through 2034 (construction years 2 through 4).

- The Authority or the implementing entity and SCAQMD will work together to identify opportunities and mechanisms to prioritize use of Authority or implementing entity funds for emission reductions locally at construction activities sites where the Los Angeles to Anaheim Project Section takes place; to the extent local emission reductions are unavailable, the parties will work together to develop other strategies.

- The Authority or the implementing entity will contribute to SCAQMD's actual costs of administration for implementation of the necessary emissions reductions for the Los Angeles to Anaheim Project Section, and SCAQMD will seek and implement the necessary emission-reduction measures, using Authority or other funds.

- SCAQMD will serve in the role of administrator of the emission-reduction projects and verifier of the successful mitigation effort; respective Authority, implementing entity, or SCAQMD responsibilities in that effort; and related emission quantification/verification needs will be defined in a contractual agreement.

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[5] Authority estimates are based on the Los-Angeles to Anaheim Project Section Draft EIR/EIS released in December 5, 2025. As noted in the second bullet on Page 11, the Authority will review emission estimates after receipt of construction funding and present a final estimate to SCAQMD.

- The commitments in this letter are independent of any requirements related to any future SCAQMD facility-based mobile-source measure regulating freight rail yards or other, similar non-ZE rail operations.

- The contractual agreement developed pursuant to this letter will be limited to the HSR system's Los Angeles to Anaheim Project Section General Conformity Determination.

Thank you for your continuing partnership with the Authority to advance the California HSR System.

Michael Cacciotti, Chair of the Governing Board

South Coast Air Quality Management District
Date: May 5, 2026

Ian Choudri, Chief Executive Officer

California High-Speed Rail Authority
Date: April 22, 2026