RESPONSE TO B-P GCD COMMENT ON VALLEY FEVER

Thank you for the comment and additional information regarding Coccidioides immitis (a.k.a., the Valley Fever fungus). This action for which FRA has requested comment is FRA's Draft General Conformity Determination. The General Conformity Determination documents FRA's evaluation of the potential emissions associated with the proposed Bakersfield to Palmdale Section of the California High-Speed Rail (HSR) System, consistent with relevant requirements of the Clean Air Act and implementing regulations. Fugitive dust is responsible for particulate matter pollution. However, FRA's analysis of the potential emissions from the Bakersfield to Palmdale Section found that construction period emissions would not exceed the General Conformity de minimis threshold for particulate matter pollution. Operation of the project would result in an overall reduction of regional emissions of all applicable air pollutants and would not cause a localized exceedance of an air quality standard. The general conformity analysis does not require soil testing for pathogens such as the Valley Fever fungus.

Nonetheless, in considering this comment, FRA consulted with the California High-Speed Rail Authority regarding fugitive dust that contains the Valley Fever fungus. As a part of the environmental impact report (EIR)/environmental impact statement (EIS) prepared to meet the requirements of the California Environmental Quality Act (CEQA) and the National Environmental Policy Act (NEPA), the Authority reviewed the potential of Valley Fever occurrence in the San Joaquin Valley, specifically in the area where HSR construction and operations would occur. As described in its Final EIR/EIS, the Authority, in coordination with the FRA, U.S. Environmental Protection Agency and the California Department of Public Health, has included impact avoidance and minimization features (IAMF) as part of the project to incorporate additional best practices to minimize exposure to those at risk from construction activities disturbing naturally occurring Coccidioides spores. Specifically, the Authority will prepare a Valley Fever action plan **SS-IAMF#2: Safety and Security Management Plan**, and measures that mitigate the production and exposure of fugitive dust **AQ-IAMF#1: Fugitive Dust Emissions**. These IAMFs would also reduce risk to the general public of Valley Fever spreading through fugitive dust emissions because these IAMFs would limit the amount of fugitive dust released as a result of construction.