



Californians for High Speed Rail

A Statewide Coalition of High Speed Rail Supporters | 337 Green St. San Francisco, CA 94133 | 510.931.0384

October 30, 2009

Ms. Carrie Bowen, Regional Director
Attn: Merced to Fresno HST Project EIR/EIS
California High Speed Rail Authority
925 L Street, Suite 1425
Sacramento, CA 95814

RE: Merced to Fresno Section Scoping Comments

Californians for High-Speed Rail is a grassroots group of California residents dedicated to ensuring that the California High Speed Rail (CA HSR) network is sufficiently funded and supported. Additionally, Californians for High-Speed Rail is working to ensure that the development of high speed rail (HSR) in California is done in a way that best serves all citizens, and in particular, the future riders of the CA HSR network.

We are submitting this letter to provide our scoping comments regarding the Merced-to-Fresno section of the environmental review process being undertaken by the California High Speed Rail Authority (Authority). This letter covers four subject areas. First, the critical importance of Merced being an end-point transfer station between the HSR line and Amtrak's San Joaquin line when the first phase of the high speed rail (HSR) service commences is discussed. Second, high priority criteria and mitigation measures are proposed for inclusion in the project-level EIR/EIS planning process for stations. Third, several station sites and track alignments are proposed for inclusion in the alternative analysis. Fourth, this letter briefly discusses the potential impacts of choosing either the UPRR or BNSF corridors for the track alignments of the CA HSR network.

Merced as a Transfer Station

The most critical element of a successful Merced station, and increasing overall network ridership and revenue in the first phase of CA HSR system, is the creation of a seamless transfer between Amtrak's San Joaquin line and the CA HSR line in Merced. A fast and convenient transfer station located in Merced will allow riders originating in Sacramento (and utilizing Amtrak service) to connect to/from the CA HSR system and to save approximately 40 minutes as compared to locating such a transfer point in Fresno. Locating this critical connection in Merced will allow for a Sacramento to Los Angeles travel time of approximately four hours. We believe this time savings will significantly increase ridership on the CA HSR network over an almost five-hour trip time for a Fresno transfer point. Additionally, given the uncertainty of when phase 2 of the CA HSR system will commence, it is all the more important to establish Amtrak as a high quality feeder service from areas north of Merced when phase one service of the CA HSR system commences.

Any evaluation of station locations in and around Merced needs to determine the constructability and cost of bringing CA HSR and Amtrak San Joaquin trains together at one intermodal station that makes quick transfers possible. The Authority should plan for five-minute transfer times between Amtrak and

the CA HSR network, as well as joint through-service ticketing. The eventual selection of preferred alternatives needs to include the plans for, and a commitment to build any needed connecting track for either the CA HSR line or Amtrak's San Joaquin line so that the creation of single intermodal station is possible in Merced.

Other Criteria and Mitigation Measures

The land use impacts, growth inducement potential, and transportation impacts of a HSR station in or near Merced can be very environmentally beneficial or negative, depending on the station location, mitigation measures chosen, and land use and transportation policies undertaken by the host localities. The following criteria and mitigation measure should be included in the process of selecting station and alignment alternatives.

Land Use and Growth Inducement:

- Amount of transit-oriented development (TOD) the locality has committed to planning for within a half mile radius of the station site.
- Growth management policies the locality has adopted or is committed to adopting that would direct growth into the half-mile radius of the station site.

Transportation:

- Transportation demand management measures to be adopted by the station operator to mitigate automobile trips generated (ATG).
- Use of the Natural Resources Agency 2009 Proposed Rulemaking to evaluate transportation impacts in a broader more multi-modal approach, rather than the conventional intersection automobile level-of-service (LOS) analysis.¹ This includes use of ATG rather than LOS as the measure to mitigate.
- Transportation demand management measures adopted or committed to by the locality to mitigation traffic generation.
- Availability of current and planned local transit access to HSR stations to mitigate traffic generation.

Station Alternatives

Californians for High Speed Rail asks that the following alternatives be included in the alternatives analysis for the Merced station location.

1. **Downtown Merced** (Refer to Figure 1 for a illustration of what is described below)
This alternative would be located at the same location as the preferred station alternative in the program-level environmental impact report. Californians for High Speed Rail envisions that this station would become the primary transfer station to/from Northern San Joaquin Valley to the HSR network. To accommodate Amtrak at this site, the station site would need to include a four-track HSR elevated station above the at-grade UPRR right-of-way (ROW). The UPRR ROW would include additional at-grade tracks (three to four) to accommodate existing freight and the re-aligned Amtrak San Joaquin line. Crossover tracks would need to be constructed north and south of Merced to allow San Joaquin trains to be re-routed from the BNSF ROW onto the UPRR ROW through central Merced. A possible location for crossover tracks north of Merced could be along Snelling Highway, and to the south of Merced along East Mission Avenue or McHenry Road.

1 California Natural Resources Agency. "Proposed Guideline Amendments" ("to the "Guidelines for Implementation of the California Environmental Quality Act"). <http://ceres.ca.gov/ceqa/docs/Text_of_Proposed_Changes.pdf>

A variation of what is described above would require only a two-track elevated station for local HSR trains with express HSR trains using an elevated bypass around downtown that would be located immediately west of the Highway 99 ROW through central Merced.

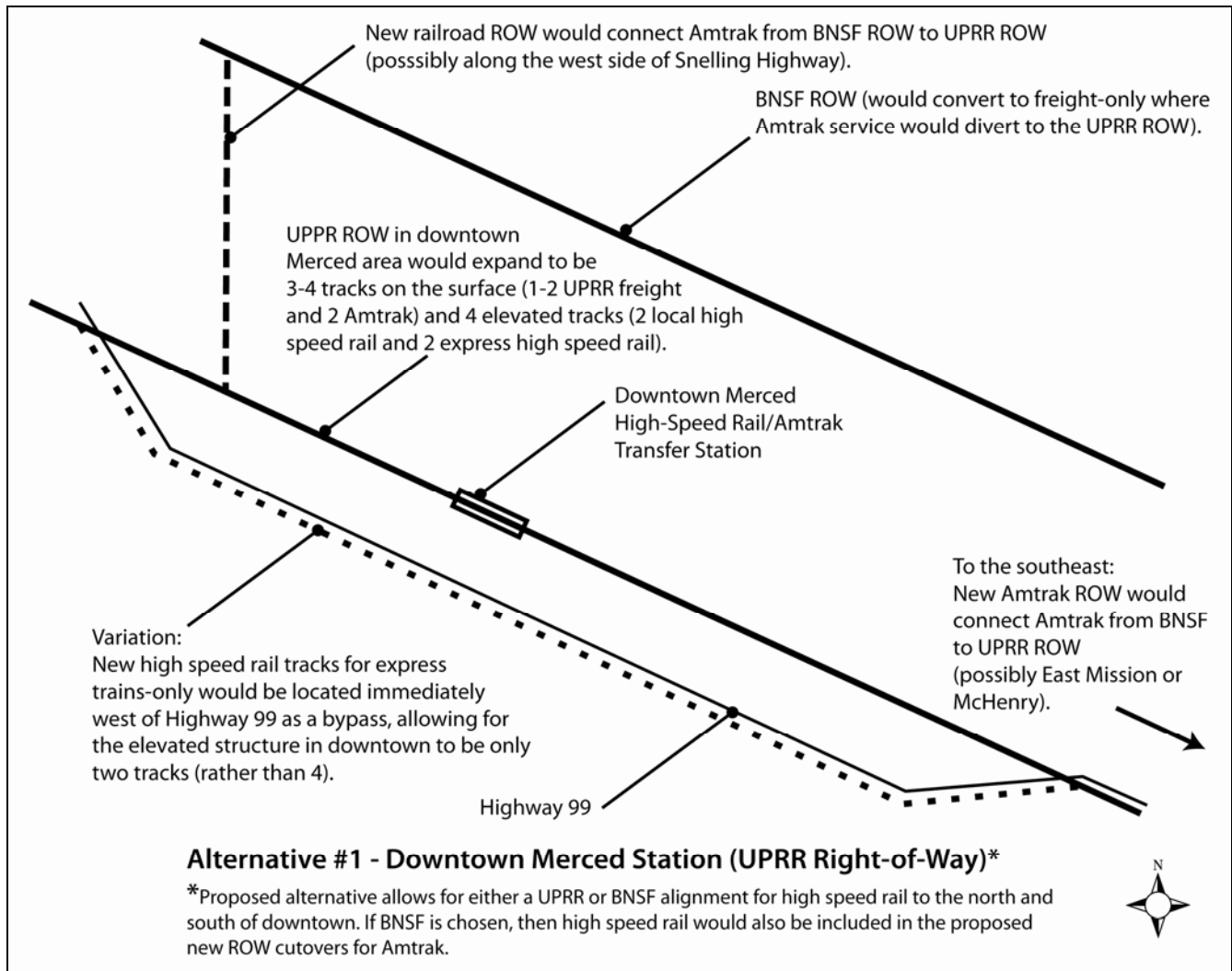


Figure 1.

2. **UC Merced** (Refer to Figure 2 for a illustration of what is described below)

This alternative would place a dual HSR/Amtrak station in the vicinity of the UC Merced campus (possibly near the intersection of East Bellevue Road and Lake Road). To reach this proposed station location, a new HSR/Amtrak ROW would need to be created and include one or two new tracks for Amtrak along side the HSR tracks. This new railroad ROW would turn east just south of the Castle Air Force Base site, and possibly run along Bellevue Avenue. After the UC Merced station, the alignment would run approximately seven miles to the intersection of the BNSF line and S.R. 140 (near Planada).

Under this alternative, UC Merced would become the main transfer station to/from Northern San Joaquin Valley to the HSR network

CA4HSR believes there is merit in examining a station in the vicinity of UC Merced because of

the high ridership potential presented by the student body (which will continue to expand), faculty, and other visitors to the campus. Additionally, this alternative could significantly reduce costs because it would avoid existing urban areas.

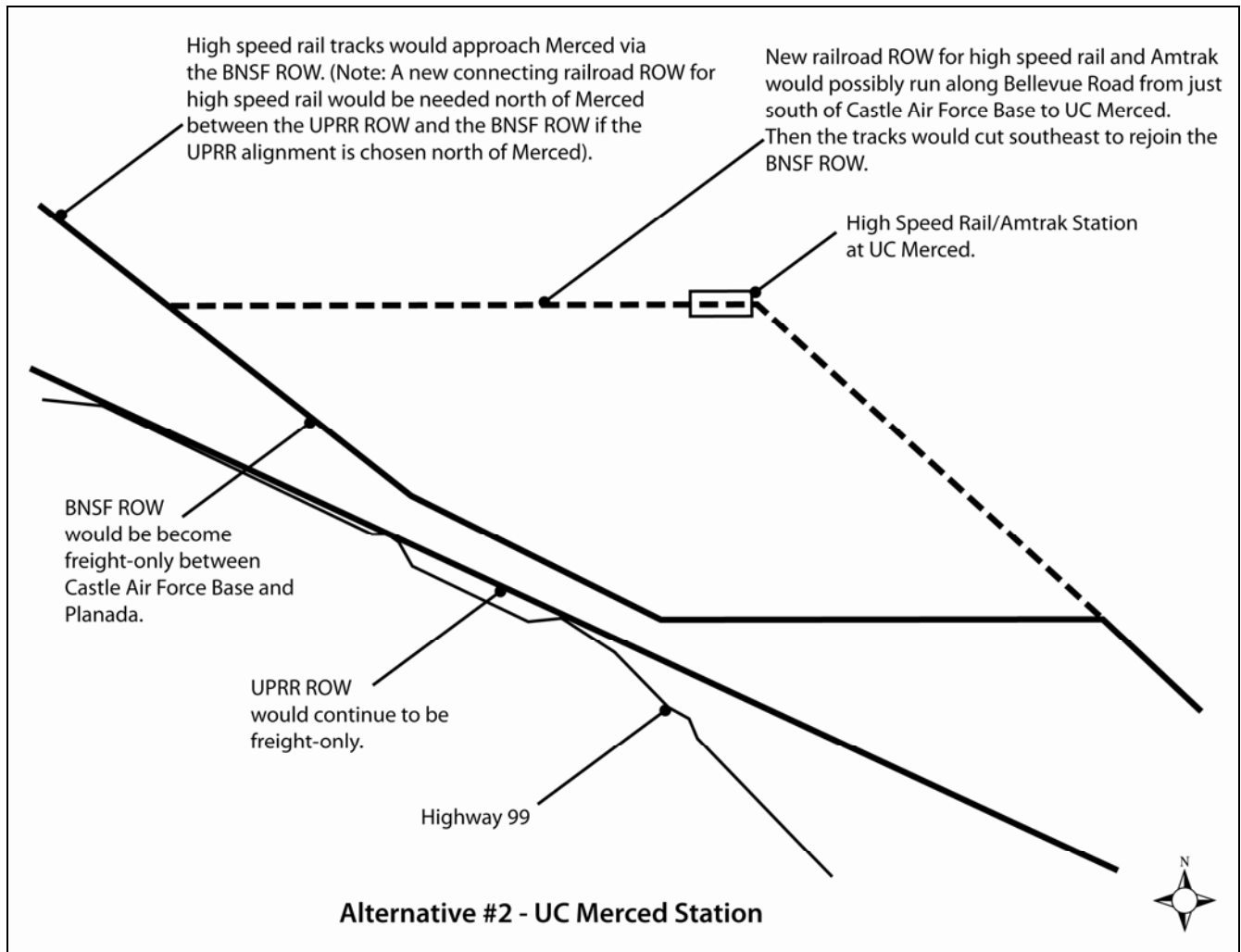


Figure 2.

3. **Castle Air Force Base Site** (Refer to Figure 3 for an illustration of what is described below)
 This alternative would locate a dual HSR/Amtrak station in the vicinity of the Castle Air Force Base site. We ask the California High Speed Rail Authority to consider a station location that is more central within the redevelopment area (possibly in the vicinity of Heritage Drive and either Thunderbird Avenue or Hardstand Avenue) to provide a more transit-oriented environment.

Given the recent development in moving the HSR project forward, there is great potential to utilize this redevelopment site much more intensely than previous redevelopment plans have contemplated. If existing redevelopment plans could be considered for revision that allows for a high-level of transit-oriented development, in addition to many of the land uses already envisioned, this station location could conceivably provide more ridership than a downtown location. More specifically, we are asking that the various parties involved in this redevelopment project consider developing a new community with tens of thousands of homes and millions of square feet of commercial and retail space around the HSR station. It may be

possible to achieve such levels of development by leveraging the HSR station rather than focusing on creating more traffic at a civilian airport.

This alternative would also locate the proposed HSR maintenance facility in a way that is buffered from the transit-oriented development.

The HSR trains and Amtrak trains would divert from the UPRR ROW and BNSF ROW as needed to reach the new intermodal station.

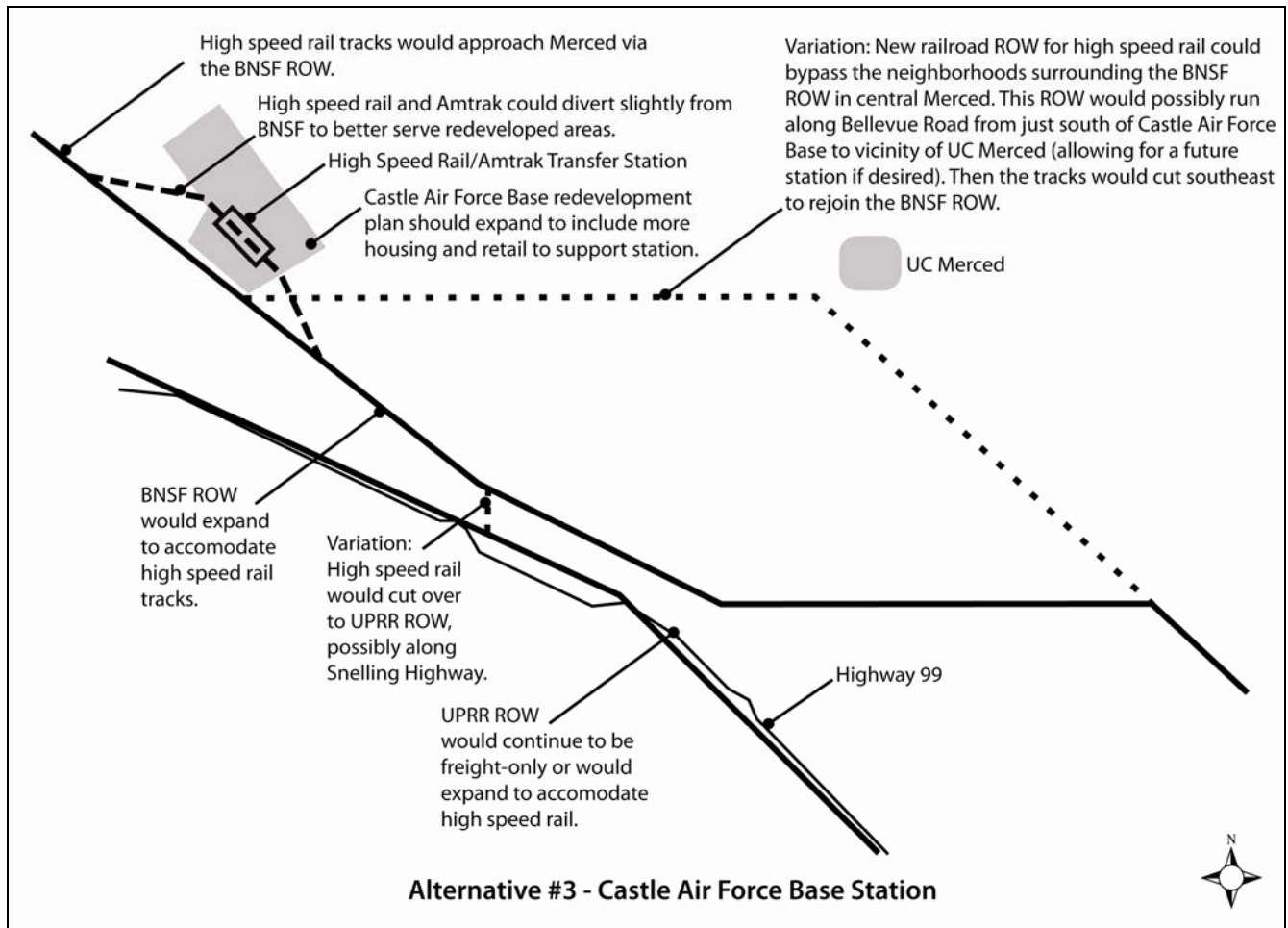


Figure 3.

Alignments

CA4HSR prefers the use of UPRR/Highway 99 alignment for HSR from points north of Merced and between Merced and Fresno because it provides the most straight forward access to the downtowns of the major cities of northern portion of the San Joaquin Valley.

The UPRR/Highway 99 alignment or the BNSF alignment are both possible and can be accommodated in the alternative station locations suggested above, though crossover tracks and other new sections of railroad ROW may need to be constructed. The UPRR/Highway 99 alignment would generally be far less complicated for accessing the various downtown locations envisioned for the CA HSR system, as trains would not need to cross over from the BNSF alignment to access the downtown station site in

Merced. This holds true for downtown station sites in Modesto and Stockton as well (as part of phase 2 of the HSR project). However, the fact Amtrak is currently located on the BNSF line seems to necessitate some sort of crossover tracks for Amtrak in the Merced area if the UPRR/Highway 99 alignment is chosen.

Thank you for your consideration,



Brian Stanke
Executive Director
Californians for High Speed Rail



Daniel Krause
Vice-Chair of the Board of Directors
Californians for High Speed Rail