

Comment Letter AL061

AL061



Member Agencies:
 Los Angeles County
 Metropolitan Transportation
 Authority
 Orange County
 Transportation Authority
 Riverside County
 Transportation Commission
 San Bernardino
 Associated Governments
 Ventura County
 Transportation Commission
 Ex-Officio Members:
 Southern California
 Association of Governments,
 San Diego Association
 of Governments,
 State of California

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Mr. Mehdi Morshed, Executive Director
 California High-Speed Rail Authority (CHSRA)
 Draft Program EIR/EIS Comments
 925 L Street, Suite 1425
 Sacramento, CA 95814

RE: Southern California Regional Rail Authority (SCRRA) Comments on the Draft Program EIR/EIS (PEIR/EIS) for the Proposed Statewide High Speed Train System

Dear Mr. Morshed:

The SCRRA was notified of the comment period for this document and the availability of the electronic files on the Internet. Thank you for providing the opportunity to comment on this document. As background information, SCRRA is a five-county Joint Powers Authority (JPA) that operates the regional commuter rail system known as Metrolink on member agency-owned and on private freight railroad rights of way. Additionally, SCRRA provides a range of rail engineering, construction, operations and maintenance services to its five JPA member agencies. The JPA member agencies are the Orange County Transportation Authority (OCTA), Los Angeles County Metropolitan Transportation Authority (MTA), San Bernardino Associated Governments (SANBAG), Riverside County Transportation Commission (RCTC) and Ventura County Transportation Commission (VCTC).

Background

The SCRRA Board is supportive of continued development of projects like this, but with certain reservations. On April 7, 2000, the SCRRA Board authorized me to comment on the following areas of concern regarding high speed rail initiatives:

1. Proposed services which may be competitive versus complementary of Metrolink services;
2. Activities that impinge in any way on member agency owned rights of way or access agreements with freight railroads;

3. Proposed services or activities which would increase Metrolink operating costs or subsidy requirements.

It is within this context that SCRRA is responding to your document. The following recommendations are being conveyed by SCRRA after reviewing the Draft PEIR/EIS. Although the main objective of the Draft PEIR/EIS is to determine if the HST alternative is the preferred alternative, the "Final" document might include selection of alignments and stations. For this reason, SCRRA has included some very specific comments in this letter to ensure that the HST planning process (including the Final Program EIR/EIS or the subsequent project-specific EIR/EIS documents) addresses SCRRA's concerns regarding impacts to our services and facilities. The more specific design details have been included as Attachment 1, but must be addressed at a level appropriate to the Final Program EIR/EIS and incorporated or mitigated in the subsequent project development stages of the High Speed Train (HST) project.

In addition to accepting SCRRA's comments on this environmental document, the SCRRA is required to be involved in a technical review of any proposed designs that potentially impact SCRRA. Whether impacts are to right of way, stations or other facilities utilized by SCRRA, our technical review will be necessary. Right of entry into SCRRA member agency owned operating right of way will also not be allowed without our agency's approval.

Joint Stations and Responsible Agencies

Metrolink and the proposed HST system may have several joint stations. The existing Metrolink stations are not owned by SCRRA. The stations are owned by the local jurisdictions (cities or counties) or the SCRRA member agencies. Agencies that currently pay for a station proposed to be a joint Metrolink/HST station would be faced with a quantum increase in station access issues and operational costs. SCRRA is concerned about the increased operational subsidy requirements that would be forced upon the owners of these joint stations. These jurisdictions are already experiencing community and financial impacts as their stations approach design capacity. SCRRA, our member agencies, and city and county station owners will need to approve construction and operating entitlements, and are therefore responsible agencies for purposes of CEQA. SCRRA strongly suggests that the Authority communicate directly with the potentially affected jurisdictions. The Final PEIR/EIS should:

- a. Add SCRRA, our associated agencies and the local jurisdictions as Responsible Agencies in the final Program EIR/EIS and the subsequent project specific documents.
- b. Highlight the need to communicate directly with the potentially affected jurisdictions.
- c. Mitigate the additional capital cost to expand street and highway access, station parking and transit facilities and the ongoing subsidy required to operate the expanded stations, and/or the greatly increased transit and traffic access, so the affected jurisdictions are not negatively impacted.

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700 S. Flower Street 26th Floor Los Angeles CA 90017 Tel [213] 452.0200 Fax [213] 452.0425
www.metrolinktrains.com



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Service Competition

Separate analyses are required to clearly understand the potential competitive and complementary service issues between Metrolink and HST service. Differences between Metrolink and HST headways, operating hours and fares will contribute to competitive or complementary services. Complementary operating plans and common station access elements must be developed. The following general service competition issues should be addressed in the Final PEIR/EIS:

- a. Monitor the impact of Metrolink rider diversion to the HST system and provide a mitigation plan.
- b. Monitor the impact of the HST system on joint station access requirements (must consider both parking, traffic and transit feeder needs) and provide a mitigation plan.
- c. Develop a coordinated operating plan for Metrolink and HST.

Rights of Way and Freight Agreements

Metrolink operates on rights-of-way that are either owned by its member agencies or freight railroads. The rights of way owned by SCRRA member agencies are operated, maintained and dispatched by SCRRA. Shared use agreements exist between the SCRRA member agencies and the freight railroads, specifying capital improvements that are required for additional service levels on the shared use lines. SCRRA requests that the Final EIR/EIS address measures to assure:

- a. On portions of the alignments that are proposed for mixed traffic (HST and conventional rail), the addition of HST infrastructure does not hinder Metrolink operations, or future expansion of commuter or private freight infrastructure without agreed upon mitigation.
- b. Since SCRRA has plans to construct additional track and sidings, which will be negotiated in accordance with the shared use agreements, the HST does not limit SCRRA's potential growth on member agency-owned or freight rights of way, or limit SCRRA's ability to accomplish agreed upon improvements with the freight railroads without agreed upon mitigation.
- c. The proposed HST system does not negatively impact growth of goods movement by rail, due to physical and financial constraints on Metrolink without agreed upon mitigation. Federal Railroad Administration (FRA) requirements, FRA limitations and SCRRA's continuing common carrier obligations for shared use of Metrolink-dispatched lines that carry both passenger and freight services must also be addressed and mitigated, if warranted, in the Final EIR/EIS.

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Metrolink Subsidy / Operating Cost Impacts

SCRRA's member agencies contribute subsidies to cover operating expenses that exceed SCRRA's revenues. The Final PEIR/EIS should ensure the following subsidy related issues are addressed:

- a. A competitive service may result in the HST system attracting riders from Metrolink trains, requiring increased subsidies to operate Metrolink. CHSRA should monitor the impact of the HST system on Metrolink subsidies and develop a mitigation plan as necessary.
- b. If lower than expected HST ridership is experienced, and HST fares are reduced in order to attract more riders, HST fares would be more competitive with Metrolink fares and diversion from Metrolink to HST might be increased. This potential ripple effect must be acknowledged and a mitigation plan included, if warranted.
- c. The project document states that subsidies will not be needed to operate the HST beyond the issuance of bonds for initial construction. The Authority should pledge that operating subsidies would not be sought from the regional agencies in the event ridership does not meet projections.

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Metrolink Capital Cost Impacts

Capital improvements are constructed by SCRRA using a mix of state, federal and local funds. The following issues should be addressed in the Final PEIR/EIS regarding capital costs:

- a. SCRRA is concerned that construction and operation of the HST system will divert already limited state and federal funding from Metrolink projects. The HST system should not be funded in lieu of funding for expansion of the Metrolink system.
- b. Future designs will be generated based on the alignment and station selections that come out of this PEIR/EIS. SCRRA must be involved in the technical review of all designs within the territory owned by our member agencies. Our agency needs to be reimbursed for the expenses associated with these reviews. The reviews will ensure technical and regulatory compliance with the California Public Utilities Commission (CPUC) and federal track and signal standards, SCRRA engineering standards, access for maintenance, preservation of freight service obligations, preservation of SCRRA and freight expansion plans and compatibility with the existing SCRRA signal and communications system.

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SCRRA's Grade Separation Design Requirements

Expanded use of existing rail corridors to include HST should be conditioned by six general requirements:

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1. All users in such a corridor must be grade separated; this offers noise, safety and isolation benefits.
2. Construction staging must be carefully coordinated with all rail operators and mitigated to minimize impacts to operations during construction and should provide for uninterrupted operations by all present users in the corridor.
3. Design and construction of aerial, trench and tunnel options in existing corridors requires that the vertical alignment be compatible with the existing corridor operators.
4. The project must comply with the FRA specific and complex guidelines about shared use corridors and ensure that all HST equipment in these corridors be FRA compliant.
5. Existing freight delivery track access and maintenance access to railroad facilities (both the conventional system and the HST system) must be designed into the shared corridors.
6. The combined right of way must have provisions for SCRRA signal facilities and maintenance access points.

The PEIR/EIS calls for conventional rail to be grade separated with the HST, except when the HST is put on an aerial structure. In aerial structure segments, the conventional rail is left at its current grade, which is not an acceptable design solution. The importance of grade separating all modes in the corridor is that once one mode is moved to a **higher or** lower configuration it becomes all but impossible to grade separate the remaining mode at a future time. This is because the space needed for detour roads and/or shoo-fly tracks is occupied by the grade separated mode; therefore, the corridor as a whole must be grade separated. A significant benefit of the wholly grade separated corridor is that the impacts of added HST trains can be mitigated by the decreased noise, traffic disruption, and safety hazards as a whole for the corridor.

- a. Construction of a trench or aerial alignment for the HST and accompanying conventional rail lines must be staged very carefully so as to minimize impacts to existing rail passenger and freight services. Except for brief night and weekend periods of a few hours, all tracks presently in use by SCRRA (whether owned by the SCRRA member agencies or owned by UPRR or BNSF) must be available for train service.
- b. Temporary speed restrictions for construction zones should not result in more than 4 minutes of cumulative added travel time for any SCRRA route.
- c. Temporary tracks that are to be used for more than one month should have no net decrease in operating speed.

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- d. Design and construction of aerial, trench or tunnel corridor options in existing corridors require that the vertical alignment be compatible with the existing corridor operators.
- e. Freight train power and braking distance factors usually control the percent grade and length of vertical curves. In general, the grade of a new alignment must not be greater than the present maximum grade within that general corridor. For example the maximum southbound grade between Fullerton and Oceanside is 1.4% (near Irvine); therefore, a trench or tunnel option at San Clemente or Orange cannot exceed this grade.

In general, SCRRA is concerned about the extensive use of aerial structures in the Los Angeles area, when it may be preferable to have the HST and conventional tracks at grade, while grade separating the streets as part of HST implementation.

- a. In order to completely grade separate the corridor, the aerial structure must accommodate the SCRRA/freight tracks - making the structure very large (4 or 5 tracks wide).
- b. This tall structure is very challenging to design to AREMA specifications for seismic resistance - which is an absolute requirement of SCRRA.
- c. The construction phasing for the very deep foundations needed has a high potential to disrupt the operating SCRRA/freight corridor.
- d. The vertical alignment of the SCRRA/freight corridor must not make any part of the corridor a steeper grade than the steepest part of the route today.
- e. Having the HST project grade separate the SCRRA/freight line at the present grade, and then add the aerial HST line could in some instances, satisfy the requirement to have all operators grade separated. This two-stage approach results in a smaller aerial structure and permits steeper HST grades. The instances where this could be applied must be worked out in detail with SCRRA staff.

Comments Noting a Specific Page (Engineering comments noting specific pages are in Attachment 1)

Table S.6-1:

- a. This table needs to differentiate which alternative is in which column.

Page S-9, Item S.6 System-Wide Environmental Impact Comparison - Traffic and Circulation:

- a. SCRRA requests that the Final EIR/EIS identify any potentially adverse impacts on feeder service and fund specific mitigation measures to address changes in feeder service demand

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AL061-10



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due to HST implementation. SCRRRA's existing travel markets and patterns may be significantly altered in the post-HST market; therefore, planners for HST and SCRRRA (through its five member agencies) should examine how the new travel markets can be served and what capacity enhancements are needed to support this new role as a feeder rail system. For example, a HST destination station at Los Angeles Union Station becomes much more viable if SCRRRA offers expanded services away from Los Angeles at all times of the day with relatively short headways, but this is a new service market for SCRRRA, since our services would have to respond to the HST's diverse and scattered nature of trip origins and destinations in southern California.

- b. SCRRRA requests that the selected alignments support an intermodal system, which includes appropriate interfaces with the existing and future Metrolink system.

3.10.2 Public Utilities – Affected Environment

- a. The Final PEIR/EIS mitigation plan needs to address the loss of revenue opportunity to the SCRRRA and its member agencies in the areas of fiber optic, freight dispatch, billboard and other commercial uses of SCRRRA member agency owned property resulting from HST service sharing the rights of way.

Once again, thank you for requesting SCRRRA's input on this Draft PEIR/EIS. If you have any questions regarding these comments please contact Deadra Knox, Strategic Development Planner, at (213) 452-0359 or by e-mail at knoxd@scrra.net.

Sincerely,



David Solow
Chief Executive Officer

cc: SCRRRA Board of Directors
David Valenstein, FRA
Warren Weber, Caltrans
James McCarthy, Caltrans
Patricia Chen, MTA
Eric Carlson, MTA
Shohreh Dupuis, OCTA
Christopher Wright, OCTA
Stephanie Wiggins, RCTC
Gustavo Quintero, RCTC

Michael Bair, SANBAG
Mary Travis, VCTC
Steve DeGeorge, VCTC
Richard Gonzales, UPRR
Walt Smith, BNSF
John Shurson, BNSF
SCRRRA Files

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Attachment 1

Specific Design and Alignment Comments

Comments about specific segments of SCRRRA right of way proposed for HST use are listed below by page number. The maps and descriptions included in the Draft Program EIR/EIS were too general for SCRRRA to determine specific construction or maintenance impacts. The following are some general comments to be considered in planning and designing this corridor. Although these design specific comments have been separated into an attachment, the Final Program EIR/EIS should also respond in appropriate detail to these items.

Sec 3.6.4 Electromagnetic Fields – Mitigation Measures

- a. When designing for electric propulsion in a corridor shared with conventional rail, the effort must include design review for electromagnetic effects on the existing signal circuits and devices. AL061-12
- b. The project costs should include the mitigation, redesign and reconfiguration of existing conventional rail signal systems if necessary. AL061-13

Page 6-54 Sylmar to LAUS Alignment:

The following should be noted on the plans for this segment of right of way:

- a. The text and map refer to the "Metrolink/UPRR" alignment through this segment, but the UPRR has no ownership on this route, just user rights, so it should be referred to as "MTA/SCRRRA" or "MTA/Metrolink" right of way. AL061-14
- b. The at-grade, aerial and trench portions of this segment must include the MTA/SCRRRA tracks so that all modes are separated from at-grade crossings, as mentioned under "SCRRRA's Grade Separation Design Requirements" in the body of the attached letter. AL061-15
- c. Mitigation should be incorporated so that the combined corridor can be adequately secure against terrorism, trespassing, vandalism and trash dumping. AL061-16
- d. The reconfigured right of way must leave space for a future SCRRRA second main track for the entire distance represented by this map and for the "Brighton" siding (approximately Buena Vista Street to Magnolia Street). AL061-17
- e. The shared use of this corridor by HST and conventional railroad operations (Metrolink commuter trains and UPRR freight trains) will be governed by FRA regulations. Absent any AL061-18

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specific FRA guidelines, SCRRA recommends that a substantial, reinforced concrete barrier be installed between the two rail modes to help contain any derailed equipment.

Page 6-57 and Figure 6.4-2 Sylmar/Los Angeles:

Figure 6.4-2 shows the Sylmar Metrolink station as an aerial station, which would require the MTA/SCRRA tracks and existing station to be converted to an aerial structure as part of the proposed project. This map also shows the "Burbank Metrolink/Media City" station to be near Buena Vista Street. The existing station is southeast of Magnolia Avenue.

- a. If the HST station is to be where the Metrolink station is now, the map should be corrected.
- b. Figure 6.4-2 and page 6-57 indicate an aerial alignment south of the Burbank Metrolink/Media City station. This conflicts with the overpasses of I-5 and Western Avenue (Alameda Street is grade separated in this area).
- c. This map has an aerial segment between the Glendale Station and Taylor Yard. This conflicts with the overpass for the SR-2 freeway, while the aerial segment is probably not needed since it only has two road crossings - Glendale Blvd. and Fletcher Drive, which are both currently grade separated. If the aerial segment is to fly over only the Glendale Metrolink station, the map should be corrected (see "Sylmar to Los Angeles Sheets 1A, 2A and 3A" below).

Page 6-58 & 6-59 Los Angeles Station and Screening Report Figure 3-5:

The description on Page 6-58 is difficult to follow without a map to describe the alignment for each station option. For this reason, we referred to Figure 3-5 in the Screening Report, which outlines the three general areas being considered for HST platforms near Los Angeles Union Station (LAUS).

- a. If either the "LA River East" or the "Union Station South (Through)" location is selected, then the CHSRA will need to work with SCRRA and other LAUS stakeholders to address the pedestrian flow issues. Please also see the LAUS comments in "Attachment 1" referring to the Plans and Profiles generated by DMJM Harris.
- b. If the "Existing Union Station" location is selected, then the CHSRA will need to intensively pre-plan with SCRRA and other LAUS stakeholders to address issues surrounding significantly increased pedestrian flow, including vertical pedestrian flow. In order to handle thousands of HST passengers, LAUS will also need mitigating improvements to the baggage and transit connection services.

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- c. In addition to the pedestrian access issues, there are several station access issues to be considered. Additional right of way is required for HST to come into LAUS from the north, since this area is already constrained.
- d. It is also recommended that the HST not be designed with a stub-end station at LAUS, as this appears to be a poor use of this valuable space. Also a stub end station with reversals of trains to continue east, west or south of Los Angeles severely compromises the HST concept of rapid service due to the additional time necessary to reverse the train. SCRRA's experience has shown that a significant number of travelers to the Los Angeles area are not destined for Los Angeles proper, but are instead passing through. These travelers should not be inconvenienced by a stub-end and reversal operation. Using LAUS as an intermediate station should control station dwell time, so that the station tracks would not be held by trains awaiting servicing and turning for return trips.

Page 6-60 and Figure 6.5-1 Los Angeles/March ARB:

- a. The comments above in "SCRRA's Grade Separation Design Requirements" apply to this segment.
- b. Figure 6.5-1 is not specific, but implies that the San Bernardino alignment could use the SANBAG/SCRRA corridor from Fontana to San Bernardino. The map shows at-grade construction which may not be practical through the Kaiser Yard area (roughly Etiwanda Avenue to Beech Avenue), due to heavy BNSF freight use on both sides of the track in this location.
- c. The map describes an aerial alignment through Downtown Pomona. At present there are three underpasses of the UPRR corridor (White, Garey, and Towne) and a pedestrian overpass at the Metrolink Downtown Pomona station. Due to the impacts to the station overpass and due to construction impacts caused by an aerial alignment, it may be best to consider this segment to be at grade and to place the remaining cross streets in underpasses. The only other safe design is to raise all tracks to an aerial configuration. It is crucial to not "lock in" the grade crossings by constructing the HST line as an aerial and leaving the existing freight and commuter rail tracks at grade.
- d. The DEIR is considering the two UPRR alignments in their present configuration. Within the period of this planning process, the SCRRA and UPRR are exploring revisions to the designation of UPRR routes for SCRRA passenger service. The HST planners must be able to accommodate these changes, both as to the altered use of each corridor and the Metrolink modal transfer at proposed stations. One potential revision of track configuration is to operate Metrolink trains between Pomona and Los Angeles on the Colton (or Alhambra) line instead of the Riverside line. The goal of this shift is to remove passenger trains from the Riverside line in order to open up track capacity for freight traffic to/from the Alameda

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Corridor. As of this writing, there is neither agreement to accomplish this shift, nor any funds to construct alterations to the tracks and stations.

- c. Another track reconfiguration of interest to the SCRRA, if the above swap of passenger routes occurs, is the Temple Avenue grade separation project proposed by the CHSRA in western Pomona as shown in Figure 6.5-1, since it would sever the Alhambra line. Instead of building a grade separation, the Alameda Corridor East planners have designed a detour of the Alhambra line tracks onto the Riverside line. While this may be acceptable for freight train speeds, it is probably not compatible with the speeds needed for HST or with the footprint of HST tracks added to the Riverside line right of way. The HST would probably revert to the original horizontal alignment and pass over Temple Avenue on an aerial segment.
- f. Between El Monte and Bassett, MTA/SCRRA and the UPRR operate in adjacent rights of way, in an area that is at-grade as shown in Figure 6.5-1. HST at-grade operation would be acceptable, provided that Temple Avenue, Cogswell and Tyler Streets are grade separated by the HST project. Ramona Blvd. is being designed for grade separation in 2004 by the Alameda Corridor East agency. If this crossing is not grade separated beforehand, this would be an additional grade separation required for the HST.

Page 6-79 and Figure 6.6-1 Los Angeles to LAX:

The text descriptions and Figure 6.6-1 are not specific enough to enable an engineering review of the impact/interface between the MTA/SCRRA tracks along the Los Angeles River and the proposed HST line.

- a. This is a very complex and congested area, leaving SCRRA concerned about impacts to existing operations and maintenance access for this area. When more detailed designs are available, please provide SCRRA with a set to review.

Page 6-81 and Figure 6.6-2 Los Angeles to Orange County:

- a. The LOSSAN corridor is severely constrained by freight capacity issues from Los Angeles to Fullerton. It should be avoided as a route for new modes unless additional right of way width is purchased for any added HST tracks.
- b. Using any of the existing LOSSAN right of way width for the HST would hinder SCRRA's ability to expand service in the future, requiring mitigation in order to not limit growth of Metrolink or freight service.
- c. The fully grade separated version ("Highest level of improvement to Irvine") is being strongly advocated for by the SCRRA in order to secure separation/closure of all crossings.

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This results in higher quality service and minimizes impacts to the community from continuing operations.

- d. Figure 6.6-2 depicts a "LOSSAN Trench Option" between Orange and Santa Ana. At the scale of this map it is not possible to determine if this trench misses Santiago Creek (just south of the SR-22 Freeway). It is not practicable to trench beneath this creek. Also, construction along Lincoln Avenue would more than likely require the complete closure of Lincoln Avenue to accommodate the existing rail services during construction of the HST/conventional infrastructure. Due to narrow right of way width in Orange and Santa Ana, temporary tracks to detour around the trench would probably require private property takes. Refer to "SCRRA's Grade Separation Design Requirements" for concerns about construction of trench alignments.

Page 6-87 and Figure 6.6-3a Orange County to Oceanside:

- a. The long tunnels proposed for this segment will require mitigation with exhaust systems to maintain air quality suitable for passengers and railroad employees.
- b. At locations where all rail traffic is diverted from the beach, HST planners will have to develop an exit strategy for the current beachfront right of way. Presently this beach right-of-way protects the bluffs and municipal utility easements in San Clemente from wave erosion, which would also require mitigation.
- c. Refer to "SCRRA's Grade Separation Design Requirements" for concerns about construction impacts and choice of vertical alignment for existing rail operators within the corridor.

Bakersfield to Sylmar Plans and Profiles Created by DMJM Harris

SCRRA staff reviewed the segments of these plans and profiles that could impact SCRRA right of way.

Sylmar to Los Angeles

Sheet 1A

- a. North of Tujunga Wash is shown as an aerial and south of the wash as a trench. As stated above under "SCRRA's Grade Separation Design Requirements", this aerial or trench decision carries the obligation to also take the SCRRA tracks aerial or trench as we must all be grade separated.
- b. This also appears to require a very high structure over the SR 118 freeway, which is above the tracks. Perhaps a better decision would be to run at grade and grade separate the crossing

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streets. This has the added benefit of grade separating the cross streets from San Fernando Road.

Sheet 2A

- a. This shows a trench north of Hollywood Way and an aerial south of Burbank Jct. to Fletcher. There are no at-grade crossings (presuming Buena Vista St. is separated by the pending Caltrans project) through Burbank, the HST could quite easily be at grade rather than on the very tall elevated structure. In this area, the SCRRA/freight line could stay at grade (because it is grade separated). Please also refer to comments under "Page 6-57 and Figure 6.4-2 Sylmar/Los Angeles".
- b. In Glendale, there are 5 at-grade crossings to consider for grade separation if SCRRA and the HST can continue at grade and avoid needing a very high structure over the SR 134 freeway and Western Ave.

Sheet 3A

- a. This shows the line as aerial, perhaps to stay above local roads into the old Taylor Yard property; so it does not affect SCRRA as designed.
- b. The drawings do not make it clear whether the line passes over the I-5 and SR-110 freeways. If it is at grade, the HST will require another increment of right of way width since the existing SCRRA/freight tracks use all the right of way presently available.
- c. Since portions of the right of way at Taylor Yard are being converted to a park, the FEIR/EIS should address potential impacts and mitigations north of the current SCRRA Central Maintenance Facility.

Sheet 2C

- a. The tunnel entrance to LAUS will require very elaborate construction staging in order to keep the Metro Red and Gold Lines, plus the SCRRA and Amtrak lines, functional during construction.
- b. It is recommended that the designers re-plot the original ground profile, since what is shown is not credible in the area between Glendale Ave. and Fletcher Drive.

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Existing LAUS Option

Sheet 1A

- a. This proposal approaches the station from the north on the East Bank of the Los Angeles River. Since the HST alignment is drawn directly over the SCRRA/freight tracks, it needs to be confirmed in the Final EIR/EIS that the SCRRA/freight tracks would remain in service throughout the construction of the HST and thereafter.
- b. An aerial structure would presumably be on straddle bents over the existing SCRRA/freight tracks. This will make it all but impossible to grade separate Main Street, unless the separation is designed as a part of the HST project. These straddle bents need to be designed to not impede daily use of these tracks during construction and designed to resist impacts from derailed freight equipment (with crash walls or very robust columns).
- c. The vertical alignment must be very high in order to pass over North Spring Street and Broadway.
- d. The straddle bent configuration would require reconfiguration of SCRRA train control signals in order to maintain visibility along the tracks. Costs for this reconfiguration must be included as part of the HST project.

Sheet 2A

- a. This is the south approach to LAUS, primarily along the East Bank. As in 1A, it is a very tall structure, presumably on straddle bents over the existing SCRRA/freight tracks. The comments for sheet 1A on constructability, signals, crash resistance and costs also apply to this segment.

East Connection to Existing LAUS

Sheet 3B

- a. The freeway identified as "SR-60" is the I-10.

Union Station South Option South Connector

Sheet 2D

- a. This drawing shows a HST Maintenance Facility in the south portion of the Union Pacific's Transportation Center property. The track layout depicted conflicts with the SCRRA San Gabriel Subdivision (San Bernardino Line) main track and Marengo Siding, just north of Mission Road. The SCRRA must maintain operation on the San Bernardino Line since it is

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our busiest and fastest-growing line. The final EIR/EIS needs to outline a different HST alignment in this area or mitigate equal replacement of the existing SCRRA right of way.

Union Station East Bank OptionSheets 1E and 2E

- a. Please refer to aerial alignment comments under "Sheet 1A" above, regarding the SCRRA/freight tracks, which need to remain in service during construction and thereafter.

Bakersfield-Los Angeles Region Soledad Canyon Alignment Option Palmdale to SylmarGeneral

The drawings are very small scale, so it is very difficult to determine the points of interface between the HST and the existing MTA/SCRRA railroad corridor. Below are comments on some of the recognizable points of interface, which engineers must consider at the next stage of design.

- a. All overpasses of the MTA/SCRRA right of way must allow for the addition of future tracks and for maintenance access.
- b. All crossings and parallel alignments must be designed to minimize interference between the HST propulsion power and control systems and the conventional railroad signal and communications systems.
- c. The design of embankments and civil works for the HST must protect the MTA/SCRRA tracks against erosion or other geotechnical risks.

Sheet 1 of 4

- a. More detail is needed to show how the HST line will use the MTA/Union Pacific right of way in Palmdale, and how it will cross the MTA/SCRRA right of way near Engineering Station (ES) 2+100.
- b. More detail is also needed to represent how the HST line will pass over, relocate or otherwise affect the MTA/SCRRA right of way between ES 6+800 and 7+100, which is within the Vincent siding and set out tracks.
- c. Confirmation is needed whether the Metrolink Vincent Grade/Acton passenger station would be impacted by these proposed designs.

AL061-34
cont.

AL061-35

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- d. Consideration should be given to placing the commuter rail line in the new HST corridor from ES 0+000 to about 2+000, from the north end of these drawings in Palmdale to near Lake Palmdale. This is proposed to be a 2.06% grade, which is suitable for both freight and passenger trains. The advantages of co-locating the HST and commuter lines are:

- o the same grade separations would serve both rail lines;
- o the MTA/SCRRA would eliminate the maintenance costs and risks associated with the Avenue 'S' at-grade crossing;
- o use of the HST alignment by SCRRA trains would reduce running time and improve the quality of the commuter/regional/feeder passenger service;
- o the existing MTA/SCRRA right of way has a fiber optic easement, which could also be located in the new HST corridor; and
- o the existing commuter rail/freight right of way could be converted to a trail or other public use or, if not supporting the fiber optic line, could be considered for sale by the MTA.

Sheet 2 of 4

- a. Since the HST line will pass over the MTA/SCRRA rail line near ES 18+750, a suitable structure interface must be designed.
- b. Consideration should be given to placing a commuter rail line in the new HST corridor from ES 2+000 (Lake Palmdale) to near ES 18+700 (Ravena). This portion of the HST line is proposed to have a grade of 3.23%, which is too steep for reliable freight operation, but is acceptable for SCRRA passenger trains. The advantages of using the HST alignment for commuter service are:

- o the SCRRA trains would save several minutes running time and could therefore provide higher quality (faster) regional and feeder passenger service;
- o there are five at-grade crossings in this sector, which would still be maintained for the freight service line, but the crossings would be impacted less by rail with commuter rail operating on the grade separated alignment with HST; and
- o short of co-locating the commuter line all the way to ES 18+700 (which would require an additional tunnel near ES 15+000), the commuter rail could be co-located from ES 2+000 to ES 7+000, the Metrolink Vincent Grade/Acton station. This shorter co-location would replace the slowest segment of existing MTA/SCRRA track, enabling some timesavings and decreasing exposure to two at-grade crossings.

Sheet 3 of 4

- a. The HST line will pass over the MTA/SCRRA rail line near ES 34+750. The SCRRA has plans for improving the alignment in this area, so the HST design must be coordinated with

AL061-35
cont.

Comment Letter AL061 Continued

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SCRRA so as not impair the SCRRA's ability to reduce curvature at this location. The SCRRA can furnish concept drawings for this proposed relocation upon request.

Sheet 4 of 4

- a. The HST line joins the MTA/SCRRA rail corridor at about ES 54+650. There is no detail showing how the two rail lines will fit into the corridor. The at-grade crossing of Roxford Avenue for the existing MTA/SCRRA railroad is at about 55+150, so the HST project must grade separate all rail lines at this location.

AL061-35
cont.

Response to Comments of David Solow, Chief Executive Officer, Metrolink, Southern California Regional Rail Authority, August 30, 2004 (Letter AL061)

AL061-1

Acknowledged. The Authority appreciates Metrolink's interest and cooperation throughout this environmental process. The Authority looks forward to continuing to work with Metrolink/SCRRA as the HST program proceeds. While at a program level (which would not result in any permits), there are few, if any, agencies which would qualify as "Responsible Agencies" under CEQA (Public Resources Code Section 21069), should the HST proposal move forward, various agencies and local jurisdictions may be considered Responsible Agencies during the subsequent project specific environmental reviews. The Authority has communicated directly with potentially affected jurisdictions throughout this program EIR/EIS process, and public outreach has and continues to be an important part of the program environmental process (please see Chapters 8 and 9 of the Final Program EIR/EIS). Communicating directly with potentially affected agencies and local jurisdictions will also be an essential component of future project specific studies. Determining the appropriate mitigation for potential impacts of the HST service to street and highway access, station parking and transit facilities, and/or increased transit and traffic access would be part of future project specific studies.

The Authority has entered into an Memorandum of Understanding (MOU) with the Caltrain Joint Powers Board, and would like to enter into a similar MOU with Metrolink/SCRRA. Authority staff have suggested this to Metrolink staff and provided Metrolink with a copy of the Caltrain MOU. The MOU with the Caltrain JPB establishes a framework for the Authority and Caltrain JPB to work cooperatively on efforts to implement potential improvements in the Caltrain corridor.

AL061-2

The primary purpose of the HST is to carry intercity passengers for longer distance trips between regions. The HST and Metrolink services would primarily be complementary services. Nevertheless, the potential for long-distance commuters to use the HST is recognized in the ridership and revenue forecasts used for the program environmental process. Addressing the potential for service competition noted by the comment (monitoring the impact of Metrolink riders diversion and provide a mitigation plan, monitor the impact of the HST system on joint station requirements and provide a mitigation plan, and develop a coordinated operating plan for Metrolink and HST) calls for detailed project level study, which is beyond the scope of this program level process. Should the HST proposal move forward, these potential issues and coordination and integration with other transit providers would be addressed in detail as part of future project specific studies and operation plans. Future investigations would also look at potential benefits and impacts to the Metrolink services and could include consideration of some use of HST tracks by Metrolink/SCRRA. Please also see response to Comment AL053-8 and Comment AL053-9.

AL061-3

Acknowledged. The Authority supports continued coordination with Metrolink/SCRRA. However, except as addressed by design practices and coordination/integration policies, potential impacts on rights-of-way owned by SCRRA member agencies and on existing SCRRA shared-use agreements will primarily be addressed in future studies at the project level.

AL061-4

Acknowledged. The subsidy related issues raised are beyond the scope of the program EIR/EIS process. Should the HST proposal

move forward, coordination of services and station use, and related issues would be addressed in future project specific studies.

AL061-5

Acknowledged. Financing plans for the construction of the HST system are beyond the scope of this program level EIR/EIS process. Should the HST proposal move forward, the Authority will continue to work in cooperation with SCRRRA. Determining funding allocations for expenses associated with future reviews are beyond the scope of this program EIR/EIS process, and would be the responsibility of the Legislature and the Governor.

AL061-6

Specific grade separation design requirements should be determined as part of future project specific investigations.

AL061-7

The program EIR/EIS is based on a conceptual level of engineering. Preliminary engineering design, as a part of future project specific studies, will identify appropriate and acceptable design solutions and construction practices, and examine potential cooperative designs or solutions.

AL061-8

The program EIR/EIS is based on a conceptual level of engineering. Preliminary engineering design will be required as a part of future project specific studies. Placing the HST facilities at existing grade would be considered wherever practicable as a part of future project specific analysis.

AL061-9

The alternative title is positioned directly over the applicable column and is restated on each page of the table.

AL061-10

See response to Comment AL053 8-9. The Authority will work closely with SCRRRA during subsequent project level engineering and environmental studies to allow for the most effective interaction and coordination of SCRRRA and HST services.

AL061-11

The Authority plans to work closely with SCRRRA during subsequent project level engineering and environmental studies to allow for the most effective interaction and coordination of SCRRRA and HST services and not unduly limit other opportunities for participating agencies.

AL061-12

Acknowledged.

AL061-13

These are issues to be addressed in subsequent project-level engineering and environmental reviews, should a decision be made to move forward with the proposed HST system.

AL061-14

Acknowledged. The figures in the Final Program EIR/EIS use the label "MTA/Metrolink" for this alignment option.

AL061-15

In general, the at-grade, aerial, and trench portions of this segment (Sylmar to Los Angeles) include MTA/SCRRRA tracks so that all modes are separated from at-grade crossings as part of the conceptual HST design. The primary exception to this is the aerial structure segment between Glendale Boulevard and I-110, which did not include the MTA/SCRRRA tracks. The implementation of HST aerial structures would not preclude other entities from constructing separate adjacent structures for other services. Should the HST proposal move forward, the Authority and the FRA will continue to work with SCRRRA to define the proposed HST improvements in such a way that

maximizes the associated benefits to and efficiency of the overall transportation system.

AL061-16

Please see standard response 2.8.1.

AL061-17

Acknowledged. Should the HST proposal move forward, the Authority and the FRA will continue to work with SCRRA and other LAUS stakeholders to address specific right of way requirements in the more detailed project specific studies that would be required.

AL061-18

Acknowledged. The conceptual design assumes that a reinforced concrete barrier be installed between the two rail modes when both are operating at the same grade. Should the HST proposal move forward, project specific study and environmental documentation would include preliminary engineering design that would define safety measures.

AL061-19

The conceptual design assumes the HST tracks on aerial structure to be connected via vertical circulation with the existing Metrolink tracks at the proposed station. The HST alignment has been designed at a conceptual level of detail. Should the HST program move forward preliminary engineering design will be required as part of future project specific analysis. Additional design options (including different concepts for specific station design and location) along the preferred HST alignments would be included as part of future studies. Should the HST proposal move forward, the Authority and the FRA will continue to work with SCRRA to address issues surrounding all aspects of station design and interface with the existing facilities in the more detailed project specific studies that will be required.

Figure 6.4-2 has been revised in the Final Program EIR/EIS to reflect placement of the Burbank Metrolink/Media City station in the correct location at the existing Metrolink station.

AL061-20

The conceptual design assumes the HST tracks on aerial structure to be connected via vertical circulation with the existing Metrolink tracks at the proposed station. The HST alignment has been designed at a conceptual level of detail. Should the HST program move forward preliminary engineering design will be required as part of future project specific analysis. Additional design options (including different concepts for specific station design and location) along the preferred HST alignments would be included as part of future studies. Should the HST proposal move forward, the Authority and the FRA will continue to work with SCRRA to address issues surrounding all aspects of station design and interface with the existing facilities in the more detailed project specific studies that will be required.

Figure 6.4-2 has been revised in the Final Program EIR/EIS to reflect placement of the Burbank Metrolink/Media City station in the correct location at the existing Metrolink station.

AL061-21

Figure 6.4-2 correctly shows an alignment option for an aerial segment from through the segment containing the aerial crossings of I-5 and Western Avenue.

AL061-22

Figure 6.4-2 correctly shows an alignment option for an aerial segment from through the segment containing the Glendale Station and Taylor Yard. The aerial segment would separate the HST over both the Glendale Station and the Glendale Freeway (SR 2). See also response to Comment AL061-15.

AL061-23

The Authority has identified the existing Los Angeles Union Station as the preferred HST station site to serve the Los Angeles area. Should the HST proposal move forward, the Authority would continue to work with SCRRRA and other LAUS stakeholders to address issues surrounding pedestrian flow, station access issues and other aspects of station design in the more detailed project specific studies that will be required. The preferred LAUS alignment is designed as a through-running station above existing tracks and platforms where trains from Northern California will not need to reverse direction ("stub-end") in order to continue on to Orange County or San Diego (via the Inland Empire).

AL061-24

Acknowledged.

AL061-25

The Authority has identified the UPRR Riverside/UPRR Colton Line as the preferred HST alignment between Los Angeles and March ARB. Please see standard response 6.29.3.

AL061-26

The HST alignment, including aerial portions, has been designed at a conceptual level of detail. Should the HST program move forward, preliminary engineering design will be required as part of future project specific analysis. Review of additional design options (including different concepts to accomplish grade separations) along the preferred HST alignments would be included as part of future studies.

AL061-27

Acknowledged. The Authority has identified the UPRR Riverside/Colton alignment option as preferred between Los Angeles and March ARB. Comparing the two alignments between Los Angeles and Pomona, although the UPRR Riverside/Colton option is a more heavily used freight corridor (with more freight related

constraints and future potential for freight expansion) than the UPRR Colton Line, the UPRR Riverside/Colton option would provide a much better HST connection to Los Angeles Union Station (LAUS) and to Northern California (since it connects to Union Station from the south). The UPRR Colton line enters LAUS from the north, and would likely require high-speed trains to reverse direction, turning LAUS into a stub-end station for high-speed trains traveling from the Inland Empire to northern California. This would increase travel times between these markets by at least 10 minutes with the preferred Existing LAUS HST station. Between LAUS and March ARB, the alignment options considered have similar potential for environmental impacts. The Riverside/Colton option would be less costly, about \$1.2 billion less than the Colton Line option.

For the segment between Ontario and March ARB, the UPRR Colton Line (part of both the UPRR Riverside/Colton and UPRR Colton alignment options) would provide considerably higher speeds and faster travel times (estimated at 6 minutes less between LA and San Diego) than the option that would directly serve San Bernardino. A direct link to San Bernardino is estimated to cost \$700 million more (than either the Riverside/Colton option or the Colton option) and would not avoid or substantially reduce potential environmental impacts. Should the HST proposal move forward, future studies would address planned changes to the existing UPRR alignment as necessary.

AL061-28

Acknowledged. Should the HST proposal move forward, project specific study would include preliminary engineering design and environmental documentation.

AL061-29

Acknowledged. Should the HST proposal move forward, project specific study would include preliminary engineering design and environmental documentation, and consideration of grade separation needs.

AL061-30

The Authority has identified a preferred HST system that does not include a direct link between Los Angeles and LAX.

AL061-31

Acknowledged. The Authority has identified a preferred HST system that includes direct service to Irvine in Orange County along the LOSSAN corridor alignment option. This option assumes shared operations with other passenger services and separation from freight with 4 total tracks (2 for passenger rail services and 2 for freight) between Los Angeles and Fullerton. South of Fullerton the alignment would be two tracks with additional passing tracks at intermediate stations. The electrified HST would need to share tracks (at reduced speeds) with non-electric Metrolink commuter rail, Surfliner intercity service and occasional freight trains (there are fewer freight operations south of Fullerton). Shared use improvements to the LOSSAN corridor would be considerably less costly (about \$2.25 billion less) and would have considerably fewer environmental impacts than a new dedicated alignment along the UPRR Santa Ana line.

This alignment would increase connectivity and accessibility to Orange County, California's second most populated county, and the transportation hubs of Anaheim and Irvine. Improvements to the LOSSAN corridor would provide a safer, more reliable, energy efficient intercity mode to serve Orange County and Southern Los Angeles County while improving the safety, reliability, and performance of the regional commuter, and "Surfliner" intercity service because of the fully grade separated tracks, separation from freight, and a state-of-the-art signaling and communications system. The HST service would greatly increase the capacity for intercity and commuter travel and reduce automobile traffic. Environmental impacts would be minimized since this alignment utilizes the existing LOSSAN right-of-way. Noise impacts from existing operations could be reduced due to the elimination of horn noise and gate noise from existing rail services as a result of adding grade separations at existing grade crossings (where all services are grade separated).

Further analysis at the project level could indicate somewhat greater infrastructure requirements with potentially increased costs and environmental impacts. However, the cost and potential for environmental impact associated with the LOSSAN corridor option are expected to still be considerably less than those associated with the UPRR Santa Ana option. The Authority's identification of the LOSSAN rail alignment is based on the assumption (as noted in the Final Program EIR/EIS, Chapter 6A) that the capacity and compatibility issues associated with the shared operations with existing non-electric service (Surfliners, Metrolink, and freight) can be resolved. Should the HST proposal move forward, the Authority will continue to work with SCRRRA and other agencies and the public throughout the more detailed project specific studies that will be required to ensure that the improvements to the LOSSAN corridor benefit existing rail services, the region, and local communities.

AL061-32

Please see standard response 6.41.1.

AL061-33

Acknowledged. The HST alignment has been designed at a conceptual level of detail. Should the HST program move forward preliminary engineering design will be required as part of future project specific analysis. Additional design options (including different concepts for crossing major freeways such as SR 118) along the preferred HST alignments would be included as part of future studies. Should the HST proposal move forward, the Authority and the FRA will continue to work with SCRRRA, Caltrans, and other LAUS stakeholders to address issues surrounding all aspects of freeway crossings and grade separations in the more detailed project specific studies that will be required.

AL061-34

Acknowledged. The Authority has identified the existing Los Angeles Union Station as the preferred HST station option to serve the Los

Angeles area. The HST alignment has been designed to a conceptual level of detail. Should the HST program move forward preliminary engineering design will be required as part of future project specific analysis. Additional design options (including different concepts for maintenance facility sites and connections) along selected HST corridor alignments would be included in future studies. Should the HST proposal move forward, the Authority would continue to work with SCRRA and other LAUS stakeholders to address issues surrounding all aspects of station design at Union Station in the detailed project specific studies that will be required.

AL061-35

The Program EIR/EIS has been prepared at a conceptual level of detail. Should the HST proposal move forward, the Authority looks forward to continuing to work with MTA/SCRRA, other agencies, and the public to carry out more detailed project specific studies that will include preliminary engineering design. The Authority will work with MTA/SCRRA, other agencies, and the public to identify appropriate options to be investigated as part of the scoping of future project specific studies for this area including both the co-location of the HST and commuter lines and the potential use of the HST tracks for long distance commuter services.