

Comment Letter O070

AUG-31-2004 23:40

P. 01/06

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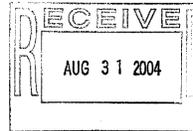
O070

TRANSPORTATION INVOLVES EVERYONE (TIE)

Central Valley/Sierra Office
P.O. Box 3111
Merced, CA 95340

August 31, 2004

Mehdi Morshed, Executive Director
California High Speed Rail Authority
C/O 925 L Street, Suite 1425
Sacramento CA 95814



Comment Letter Re: California High-Speed Train Draft Program Environmental Impact Report (EIR)/Environmental Impact Statement (EIS) SCH 2001042045

Dear Mr. Morshed:

The draft EIR/EIS is noteworthy as much for what it is lacking as for what it contains.

By design, within the hundreds upon hundreds of pages in the document, decision-makers are craftily steered toward reaching unfounded conclusions. With aplomb and indifference for California, the High Speed Rail Authority asks elected officials and the funding public to finance a rolling debacle.

First recommendation of Transportation Involves Everyone (TIE), is that the draft environmental document be re-labeled, Alice in Wonderland.

By using in vain the icon of the environment, combined with slick promotional material showing speed shiny trains, followed up by a purposefully misleading environmental impact report, the Authority has developed a sizeable contingent of "groupies." When combined with land speculation interests that stand to make billions of dollars in profits from Authority-induced sprawl, all sense of purpose is lost. California's future is cast aside.

In changing a chapter of "Wonderland" to "Wanderland," the people of California in the document are being told, for instance, that they will love taking mysterious circuitous routes to go from destination to destination. Case in point: even at buildout of the "system," under the plan presented in the document, passengers from Sacramento would need to travel on the trains to a point south of Merced, then to San Jose as part of an excursion around the South Bay Area and the Peninsula to reach the intended destination of San Francisco. What is now an auto trip of about 90 miles from Sacramento to San Francisco, turns into an arduous journey covering 302 miles under the plan. In turn, decision-makers and the funding public are asked to believe that fares coming from this adventure in travel will produce revenue that helps bring financial viability and re-pays the state bond financing.

As part of Wonderland, with "things getting curioiser and curioiser," in the name of improving the environment, under the plan an estimated 168 trains a day would travel at 200 mph through one of the world's most biologically important wildlife preserves. Or as an alternate, the high-speed trains would zip through a state-designated currently roadless wilderness area--larger than some national parks and with more wildlife.

Pg. 2/Comment Letter to Mehdi Morshed
Re: HSRA Draft Program EIR/EIS
August 31, 2004

In initial phases of service and extending out a probable 15 years, three counties totaling some 35 million vehicle miles traveled daily (source: California Air Resources Board and California Information Almanac) are denied primary service under the preferred alignment in the Draft EIR/EIS.

Meanwhile, the San Joaquin Valley's primary conduit for smog from the Bay Area--Altamont Pass, which produces up to 2.5 tons of vehicular pollutants daily--also is kept from high-speed train service. (Source: Estimates based on per-vehicle emissions data provided by San Joaquin Valley Air Pollution Control District and Metropolitan Transportation Commission report, "Commuter Forecasts for the San Francisco Bay Area, 1990-2030: Data Summary" May 2004)

However, under the Authority's preferred option, trains entering Pacheco Pass, after disrupting the state and federal wildlife preserve's flocks of rare migratory birds from as far away as the Arctic Circle are speeding around the periphery of a veterans' cemetery. It's as if to show arrogance that no tranquil area--even a veterans' graveyard in the foothills of Santa Nella--is left untouched while areas critically needing high-speed rail are bypassed.

Price tag for this carnival of blunders--a comedy except that the economic, environmental and transportation future of California is very much at stake--is \$37 billion to \$38 billion and growing. (When the Authority some seven years ago took on what to have been fine-tuning of the High-Speed Rail Commission's mission, the total projected buildout cost was slightly less than \$15 billion).

MAKE NO MISTAKE, TIE IS AN ARDENT PROPONENT OF HIGH-SPEED RAIL. MANY OF OUR CORE MEMBERS WERE STRIDENT ADVOCATES BEFORE THE CALIFORNIA LEGISLATURE IN ESTABLISHING GOALS FOR HIGH-SPEED RAIL DEVELOPMENT IN CALIFORNIA THAT WOULD REDUCE AIR POLLUTION, INCREASE MOBILITY, REDUCE URBAN SPRAWL, PRESERVE HABITAT FROM SPRAWL, ENHANCE THE ECONOMY AND BRING A BETTER QUALITY OF LIFE IN THE STATE. NOW, INSTEAD OF DEDICATION IN EXTOLLING HIGH-SPEED RAIL PRINCIPLES, BECAUSE OF INEXCUSABLE STANCES TAKEN BY THE AUTHORITY, INORDINATE AMOUNTS OF TIME MUST BE DEVOTED TO CORRECTING MISINFORMATION AND DISINFORMATION.

By purposely eliminating from the Authority's Draft EIR/EIS the carefully reasoned analysis that in the December 13, 1996 "High-Speed Rail Summary Report and Action Plan" selected Altamont Pass as the preferred trans-Diablo crossing, the entire high-speed rail concept became mired. (See Exhibit A--a copy of the summary report, provided under separate cover).

Even without any other of the disabling flaws in the Draft EIR/EIS, the denial of information to decision-makers and the financing public by excluding critical analyses within the aforementioned High-Speed Rail Commission report dictates revision and recirculation. Lacking full disclosure to decision-makers of the presentations and analyses contained in the Commission report, decision-makers are unable to evaluate relative of various options. Reality that a state

O070-2

O070-3

O070-4

O070-5

O070-1



U.S. Department of Transportation
Federal Railroad Administration

**Comment Letter 0070 Continued**

AUG-31-2004 23:41

P. 03/06

AUG-31-2004 23:41

P. 04/06

Pg. 3/Comment Letter to Mehdi Morshed

Re: HSRA Draft Program EIR/EIS

August 31, 2004

Commission, created by the Legislature, in an exhaustive three-year study, selected Altamont as the favored option of itself warrants inclusion of Altamont in the Draft EIR/EIS full evaluations of possible alignments, rather than just passing reference.

"An EIR is an informational document which will inform public decision makers and the public generally of the significant environmental effect of a project, identify possible ways to minimize the significant effect, and describe reasonable alternatives to the project. The public agency shall consider the information in the EIR along with other information which may be presented to the agency." (Section 15121 (a) of "Guidelines for California Environmental Quality Act.")

Furthermore, Section 15126 of the "Guidelines for California Environmental Quality Act" requires in sub-section (f) that "Alternatives to the Proposed Project " be fully discussed and evaluated.

Moreover, in public outreach, the Commission, selected on the basis of expertise in disciplines pertinent to high-speed rail, also relied on public participation that included some 3,500 people in its stakeholder data base. "Twenty-seven workshops were held on the High Speed Rail (high-speed rail feasibility studies throughout the State from October 10, to November 9, 1995." Workshops were conducted in 13 cities, including Bakersfield, Fresno, Stockton and Sacramento. (Commission Summary Report, Appendix D, Pg. D-2.) In addition, more than 70 stakeholder meetings were conducted by the Commission, "many of which involved multiple organizations," according to the report.

Five substantive changes in recommendations of the Commission, none of them relating of Altamont, were made as a result of public input at the sessions, according to the report.

"A broad cross-section of stakeholders attended the workshops, including elected officials, their staff, government officials, representatives from small and large businesses, rail enthusiasts, and the general public." (Ibid.)

Contrast the diligence of the Commission in public outreach with criticism of the High Speed Rail Authority by Mr. Larry Miller, chair of the San Joaquin Valley Rail Committee's sub-panels on marketing and operations, that the Authority is inattentive to Central Valley needs and representatives. Mr. Miller, a self-described advocate for the Authority, assailed the Authority in remarks delivered at the Authority's January 28, 2004 meeting in Fresno for what he described as indifference to Central Valley people and public policy recommendations brought by civic leaders. (Source: Minutes of the HSRA January 28, 2004 meeting).

**POWER OF AUTHORITY TO DELETE SELECTED ALIGNMENTS IN QUESTION**

In an Oct. 27, 2003 presentation before the City Council of Atwater in Merced County, the Authority argued that power of the Commission was restricted to feasibility studies of the potential for high-speed rail in California. The successor Authority, however, was assigned by the Legislature "to design, build and operate" the system, which obviously includes, under that

Pg. 4/Comment Letter to Mehdi Morshed

Re: HSRA Draft Program EIR/EIS

August 31, 2004

interpretation, establishing route alignments from the Central Valley to the Bay Area, even if it means obliterating the valid work of the predecessor Commission. TIE in its examination of legislation enabling the start of high-speed rail consideration for California discovered a markedly different directive by the Legislature. In Senate Concurrent Resolution 6 of 1993, the Commission is assigned to produce a plan that is "sufficiently detail to include corridors...Resolved, that the plan identify corridors to be served..."

In Senate Bill 1420, which established the High Speed Rail Authority as successor to the High Speed Rail Commission, which had completed its duties on schedule, nowhere in the legislation is there to found any prohibition against the Authority adding routes to those endorsed by the Commission. However, SB 1420 unwaveringly and persistently mandates full consideration of "all feasible" proposed routes. In turn, the Authority arbitrarily and capriciously—with little notice in contrast to the public outreach by the Commission that had endorsed the Altamont decision—yanked meaningful Altamont consideration. Over subsequent months, all references to Altamont on the Authority's website began to disappear and by April of this year it was as if Altamont never ever had existed, much less as the preferred option of a duly constituted body.

**AUTHORITATIVE FEDERAL AGENCIES TAKE NOTICE OF AUTHORITY WIPING ALTAMONT OFF THE MAP**

Obliteration of Altamont by the Authority cuts off most of Merced County and all of Stanislaus and San Joaquin counties from primary high-speed rail service. Instead, a Pacheco Pass alignment with little fanfare became the favored option of the Authority.

The action caught the notice of the U.S. Environmental Protection Agency (EPA) and the U.S. Army Corps of Engineers, both with statutory power under federal law and regulations in evaluating substantial transportation projects. EPA and Corps curiosity heightened after the Authority and the Federal Railroad Administration (FRA) steadfastly refused a written recommendation by TIE in late 2003 to include Altamont for analytic EIR/EIS consideration.

Consequently, the EPA in a letter on Jan. 13, 2004 and the Corps on January 21, 2004 in separate letters addressed to the FRA hinted at displeasure over the dismissal of Altamont consideration.. Disagreement intensified with a letter on February 27, 2004 from Mr. Enrique Manzanilla, director of the EPA's Cross Media Division, to Mr. Mark Yachmetz, the FRA's associate administrator of railroad development. "Based on our review, the Altamont Pass (Altamont) alternative appears to have been prematurely eliminated, and, because of the severity of their environmental impacts, the Diablo Range Direct (Diablo) alternatives and the Pacheco Pass Pacheco) alternatives face significant permitting obstacles and would need to be substantially modified to avoid anticipated environmental impacts." (To be provided under separate cover as Exhibit B).

TIE submits that even if it is solely on the basis of the findings in the aforementioned EPA letter that under Section 15126.6 Subsection C of the "Guidelines for Environmental Quality Act," full consideration of Altamont is required in the Draft EIR/EIS. "Selection of a range of reasonable alternatives. The range of potential alternatives to the proposed project shall include those that could feasibly accomplish most of the basic objectives of the project and could avoid or substantially lessen one or more of the significant effects."

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Comment Letter 0070 Continued

AUG-31-2004 23:42

P. 06/06

AUG-31-2004 23:42

P. 06/06

Pg. 5/Comment Letter to Mehdi Morshed  
Re: HSRA Draft Program EIR/EIS  
August 31, 2004

**GOALS FOR HIGH SPEED RAIL SET BY LEGISLATURE**

The HSRA repeatedly is intent on establishing what it believes should be the goals for the high-speed rail program for California. Unilateral goal-setting carries over from presentations before elected officials, to its Business Plan, to the Draft EIR/EIS. Among the goals set by the Legislature when it adopted SCR 6 on July 16, 1993 were: coordination of high-speed rail service with existing intercity and commuter rail service, reduction in air pollution caused by vehicular traffic and aircraft, reduction in traffic and confinement of sprawl.

Not only because of legislative mandate, but because of the correlation between motorized vehicular traffic and air pollution, traffic volumes under the California Environmental Quality Act (CEQA) are a key component of consideration in projects. There were no relevant traffic counts of analysis apparent in the HSRA's decisions on eliminating Altamont or for that matter in consideration of the Direct Diablo or Pacheco Routes.

The only traffic counts that could be found (which may be where the baseline data came from for the Tables used in Chapter 3 of the Draft EIR/EIS are actually part of the Environmental Screening documents compiled by Parsons Brinckerhoff et al in 2001).

However, Caltrans traffic data collected during 2003 again point to the need for consideration of Altamont in following the legislative mandate and the dictates of the California Environmental Quality Act. In the 2003 measurements of AADT, the proposed Pacheco Pass alignment registered a maximum of 38,000 daily trips, whereas Altamont Pass experienced a maximum of 196,000 AADT. (To be provided under separate cover as Exhibit C).

Full consideration of Altamont is warranted also from the standpoint of evaluating significant effects. "Direct and indirect significant effects of the project on the environment shall be clearly identified and described, giving due consideration to both the short-term and long-term effects." (Section 15126.2 (a) of "Guidelines for California Environmental Quality Act.")

Studies by the California Air Resources Board and the San Joaquin Valley Air Pollution Control District in 1990 and most recently in an updated report published in April 2001 clearly demonstrate that emissions from automobiles on Altamont Pass become air pollution in the San Joaquin Valley. The diagram of "Ozone Transport, 2001 Review" depicts transport of pollutants from Altamont Pass south and east through the San Joaquin Valley. (From "Ozone Transport: 2001 Review, April 2001 Staff Report" Prepared by Planning and Technical Support Division of the California Air Resources Board. (See Exhibit D to be sent under separate cover).

O070-5  
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Pg. 6/Comment Letter to Mehdi Morshed  
Re: HSRA Draft Program EIR/EIS  
August 31, 2004

Correspondingly, traffic in the three counties most directly affected by the ouster of Altamont from consideration produce on a daily average a total of about 531 tons of pollutants. (Source: "2003 Estimated Annual Average Emissions; San Joaquin Valley Air Basin. California Air Resources Board). The San Joaquin Valley Air Pollution Control District has identified Interstate 5 and Highway 99—two arteries that would be dramatically affected by selection of Altamont—as primary culprits. (Source: Interview with David Crow, air pollution control officer for the San Joaquin Valley Air Pollution Control District).

Air pollution is a significant factor that mandates full consideration of Altamont under National Environmental Policy (NEPA) and California Environmental Quality Act (CEQA) provisions.

For all the reasons outlined above, TIE recommends that the Draft EIR/EIS be withdrawn and a new study and document be produced that provides full consideration to Altamont.

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Sincerely,

KENNETH A. GOSTING, Executive Director  
Transportation Involves Everyone (TIE)

**Transportation Involves Everyone (TIE) is a non-profit public education and policy analysis organization active statewide and nationally on rail and other transportation issues.**

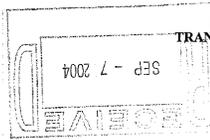
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U.S. Department  
of Transportation  
**Federal Railroad  
Administration**

Comment Letter 0070 Continued

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TRANSPORTATION INVOLVES EVERYONE (TIE)
Central Valley/Sierra Office
P.O. Box 3111
Merced, CA 95340

September 1, 2004

Sent by Certified Mail: 7003 2260 0002 8322 7385

Mehdi Morshed, Executive Director
California High Speed Rail Authority
925 L Street, Suite 1425
Sacramento CA 95814

EXHIBITS A, B, C, & D TO ACCOMPANY TIE's COMMENT LETTER OF 8/31/2004

Re: California High-Speed Train Draft Program Environmental Impact Report (EIR)/Environmental Impact Statement (EIS) SCH 2001042045

Dear Mr. Morshed,

The enclosed exhibits accompany the Comment Letter sent to you by FAX and by email on August 31, 2004 in compliance with the comment deadline of August 31, 2004, as extended by the CHSRA. A copy of the previously submitted Comment Letter is also enclosed for the convenience of your staff.

Sincerely,

Handwritten signature: Marsh Pitman

Marsh Pitman, Special Representative
TRANSPORTATION INVOLVES EVERYONE (TIE)
Phone: (209) 722-4558
Email: marshpitman@sbcglobal.net

Transportation Involves Everyone (TIE) is a non-profit public education and policy analysis organization active statewide and nationally on rail and other transportation issues.



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION IX
75 Hawthorne Street
San Francisco, CA 94105-3001

EXHIBIT B

February 27, 2004

Mark Yachmetz
Associate Administrator of Railroad Development
Federal Railroad Administration
1120 Vermont Avenue, NW, MS 20
Washington, D.C. 20590

Dear Mr. Yachmetz:

We are writing to further elaborate on concerns referenced in our letter dated 13 January 2004 and in the letter sent by the U.S. Army Corps of Engineers (Corps) dated 21 January 2004. Specifically, we wish to detail our concerns with the High Speed Train alignments between the Bay Area and Merced discussed in the Tier 1 Draft Environmental Impact Statement (DEIS) for the proposed California High Speed Rail project. As a Cooperating Agency, and in the spirit of early interagency communication, we have completed a focused evaluation of the potential environmental impacts of these alignments.

Based on our review, the Altamont Pass (Altamont) alternative appears to have been prematurely eliminated, and, because of the severity of their environmental impacts, the Diablo Range Direct (Diablo) alternatives and the Pacheco Pass (Pacheco) alternatives face significant permitting obstacles and would need to be substantially modified to avoid anticipated environmental impacts. Our conclusions are based upon the Environmental Protection Agency's (EPA) Clean Water Act responsibilities (40 CFR 230) and the federal Guidelines (Guidelines) promulgated under the Clean Water Act Section 404(b)(1).

Clean Water Act Section 404 Responsibilities and Requirements

EPA, in coordination with the Corps, is responsible for ensuring compliance with the binding and substantive Clean Water Act regulations at 40 CFR 230. While Tier 1 environmental documents represent a preliminary review of project alternatives and a conceptual consideration of potential environmental impacts, it is crucial for Cooperating Agencies to ensure that decisions made in the Tier 1 process will not need to be revisited in Tier 2 when requests for permits are made.

All of the Bay Area to Merced alternatives are expected to require discharges of fill material to waters of the United States (waters) regulated by the Corps and EPA. The Guidelines prohibit the discharge of dredged or fill material into waters if there is a practicable alternative to the proposed discharge which would have less adverse impact on the aquatic ecosystem, so long as the alternative does not have other significant adverse environmental consequences (40 CFR 230.10(a)). An alternative may be eliminated from further analysis if that alternative is not

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## Comment Letter 0070 Continued

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practicable, does not meet the project purpose, causes significant degradation of the aquatic environment, causes other significant adverse environmental consequences, or if there is another practicable alternative less damaging to the aquatic environment.

The Diablo alternatives will have significant adverse environmental consequences by impacting both waters designated by EPA as *aquatic resources of national importance* and federal and State mitigation lands, as well as bisecting the ecologically unique open space of the Diablo Mountain Range. As identified in the DEIS, the Pacheco alternatives will have significant adverse effects on aquatic resources by impacting over one thousand acres of wetlands. Because the anticipated impacts of the Diablo and Pacheco alternatives are so severe, EPA has taken a hard look at the other Bay Area to Merced alternatives considered and eliminated from detailed analysis. The objective of EPA's analysis is to ensure that other, less damaging alternatives are not prematurely eliminated from consideration. Based on the information presented in the DEIS, the Altamont alternative appears to be a practicable alternative capable of meeting the project purpose and may be potentially less environmentally damaging than the Diablo and Pacheco alternatives.

**Altamont Pass Alternative**

The stated project purpose concurred on by EPA on 27 January 2003 is: "*The purpose of the proposed action is to provide a reliable mode of travel, which links the major metropolitan areas of the state and delivers predictable and consistent travel times.*" The Altamont alternative remains the least expensive Bay Area to Merced alternative by an estimated \$600 million to \$2 billion. Furthermore, the Altamont alternative appears to have fewer adverse effects of major water crossings, and it would serve to link the same major metropolitan areas as the Diablo and Pacheco Alternatives. While EPA understands that the Altamont alternative may be less efficient from an operations perspective than other alternatives considered, it continues to meet the basic project purpose pursuant to 40 CFR 230.

In addition, the DEIS is unclear about the relative environmental impacts of the Altamont alternative compared to the Diablo and Pacheco alternatives. The DEIS states that the Pacheco alternatives may have *more* environmental impacts than the Altamont alternative in the mountain crossings. The DEIS then concludes that the Altamont alternative would not avoid or substantially reduce environmental impacts since it would require a new San Francisco Bay crossing. However, these impacts to Bay waters are not quantified or compared to the over one thousand acres of impacts to waters anticipated from the Pacheco alternatives. No comparison is made between the environmental impacts of the Diablo and Altamont alternatives.

Because EPA recognizes that impacts to the San Francisco Bay from a new Bay crossing could be significant, EPA raised the question at a 10 December 2003 interagency meeting of whether a variation of the Altamont alignment without a Bay crossing could meet the project purpose and reduce adverse effects on aquatic resources. While the agencies discussed the potential for including this variation in the DEIS, the document does not provide an analysis of an Altamont Pass variation without a Bay crossing.

2

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In summary, the Altamont Pass appears to meet the basic project purpose, and significant environmental impacts associated with this alternative are not substantiated in the DEIS. Because the impacts of the alternatives carried forward are so severe, the Altamont alternative should not have been eliminated and should be fully evaluated in the Tier 1 NEPA process.

**Diablo Range Direct Alternatives**

As mentioned above, EPA is concerned not only with the premature elimination of the Altamont alternative but also the significant environmental impacts associated with the Diablo and Pacheco alternatives. During an interagency meeting held 23 May 2003, we detailed EPA's concerns with any alignment that would adversely affect the ecosystem health of the Diablo Mountain Range. These concerns include: 1) impacts to waters designated as *aquatic resources of national importance*, 2) significant habitat fragmentation of intact ecosystems, and 3) impacts to established mitigation lands.

EPA has designated the federally regulated waters of the Diablo Range, including Orestimba Creek, as *aquatic resources of national importance* under our Memorandum of Agreement (MOA) with the Department of the Army. The MOA was prepared pursuant to CWA Section 404(q) (U.S.C. 1344(q)). Any proposed project that would result in significant adverse impacts to the waters of the Diablo Range would be classified as a candidate for elevation using procedures detailed in the MOA. On 16 December 2003, we sent to the State Attorney General representing California High Speed Rail Authority a package of eleven letters and three figures documenting the 404(q) elevation procedures exercised during the permitting dispute over the Diablo Grande Resort (attached). This information is important because the Diablo alternatives directly impact Orestimba Creek.

The Diablo Range encompasses approximately 2 million acres of relatively intact watersheds. Agencies and non-governmental organizations have recognized the immense ecological value of the Diablo Range and have collaborated toward protecting hundreds of thousands of acres in a network of public and private parks and conservation areas. As mentioned above, the Guidelines prohibit the permitting of actions that cause other significant adverse environmental consequences to non-water resources. The Diablo alternatives would bisect the Diablo Range, resulting in substantial habitat fragmentation and the disruption of important wildlife corridors. This fragmentation is considered a significant adverse environmental impact under the Guidelines.

Federal and State mitigation lands are established along Orestimba Creek. These mitigation lands were established pursuant to permitting and enforcement agreements with the Diablo Grande Resort. The Diablo alternatives would bisect several of these mitigation areas. Because of these impacts to the Orestimba Creek mitigation lands, in addition to the two reasons cited above, EPA anticipates significant permitting obstacles for these alternatives. The Diablo alternatives do not exhibit characteristics of the "least environmentally damaging practicable alternative," the only alternative that can be permitted under the federally binding regulations of Section 404 of the Clean Water Act (40 CFR 230.10 (a) and (c)). If the FRA chooses to pursue

3



**Comment Letter 0070 Continued**

05/14/04 10:08 415 744 1598 U.S.EPA/OFA 005

EXHIBIT C

the Diablo alternatives, substantial corridor alignment and conceptual design modifications would need to be made to consider them viable alternatives in the Tier 1 NEPA process.

**Pacheco Pass Alternatives**

Similarly, EPA is concerned with the significant environmental impacts related to the Pacheco alternatives. As stated in the DEIS, over one thousand acres of wetlands will be impacted by this single segment of the High Speed Train System. In a State that has already lost 90% of our wetland resources, the loss of over one thousand acres from a single segment of the project is tremendous. The loss of wetlands associated with these alternatives, as well as the impacts to wildlife corridors and habitat fragmentation, also cast doubt on the viability of the Pacheco alternatives under the federally binding regulations of Section 404 of the Clean Water Act (40 CFR 230.10 (a) and (c)). If the FRA chooses to pursue the Pacheco alternatives, substantial corridor alignment and conceptual design modifications would need to be made to consider them viable alternatives in the Tier 1 NEPA process.

A well planned High Speed Rail Project offers great economic and environmental benefits for California's future. We look forward to continuing our coordination with FRA and the other signatory agencies to the Cooperating Agency MOU and to discussing the issues outlined in this letter during our upcoming interagency meeting scheduled for 2 March 2004. EPA will provide formal, public comments on the entire DEIS pursuant to the National Environmental Policy Act (NEPA), the regulations promulgated by the Council on Environmental Quality at 40 CFR 1500-1508, and Section 309 of the Clean Air Act. If you have any questions regarding this letter, please feel free to call me at (415) 972-3843. You can also contact Tim Vendlinski of our Wetlands Regulatory Office at (415) 972-3464 or Nova Blazej, our Transportation Team Leader, at (415) 972-3846.

Sincerely,

*[Signature]*  
 Enrique Manzanilla, Director  
 Cross Media Division

cc: Mehdi Morshed, California High Speed Rail Authority  
 Aaron Allen, Los Angeles Army Corps of Engineers

attachment: EPA letter to State Attorney General dated 16 December 2003

**Annual Average Daily Traffic counts (ADT) comparisons:  
 Altamont Pass and I-580 vs Pacheco Pass and SR-152**

There are no quantitative traffic counts or analysis apparent in the HSRA's DEIR/S, and what analysis is there lacks an explanation or adequate description and rationale for the methodology used. The only traffic counts that could be found (which may be where the baseline data came from for the Tables used in Chapter 3 are actually part of the Environmental Screening documents completed by Parsons Brinckerhoff et al in 2001.) The following CalTrans traffic volume data collected during 2003 identifies specific segments of the I-580 and SR-152 corridors where traffic counts fluctuate the most. While this list details Back (East-West) traffic, Ahead (West-East) numbers are nearly identical (Ahead counts on SR-152 were slightly lower.) Also, unlike the 2001 documents from the HSRA, these counts are Annual Average Daily Traffic, which are more typical of traffic volume, and not the Peak counts.

**Altamont Pass and I-580 (East-West) Back AADT  
 Begin: San Joaquin County Line**

Start: Postmile 0	- JCT. Rte. 5	- AADT = 22,000	
" 4.34	- JCT. Rte. 132 East	- " = 22,000	0
" 8.15	- Corral Hollow Road	- " = 37,500	+ 14,500
" 15.34	- San Joaquin/ Alameda County Line	- " = 40,500	+ 3,000
" 0.39	- JCT. Rte. 205 East	- " = 40,500	0
" 1.48	- Grant Line Road	- " = 143,000	+ 102,500
" 5.98	- North Flynn Road	- " = 117,000	<26,000>
" 9.68	- Livermore, Vasco Rd.	- " = 142,000	+ 25,000
" 10.69	- Livermore, JCT Rte. 84/ First Street	- " = 174,000	+ 32,000
" 12.53	- North Livermore Avenue	- " = 164,000	<10,000>
" 14.98	- Livermore, Airway Blvd.	- " = 183,000	+ 19,000
" 19.86	- Pleasanton, Hopyard Rd.	- " = 196,000	+ 13,000
" 20.73	- Pleasanton, JCT Rte. 680	- " = 177,000	<19,000>
" 21.43	- Pleasanton, San Ramon Road	- " = 157,000	< 20,000>
" 28.97	- Crow Canyon Rd./ Center Street	- " = 149,000	< 8,000>
" 30.35	- Strobridge Ave	- " = 163,000	+ 14,000
" 32.84	- 150 <sup>th</sup> Avenue	- " = 130,000	< 33,000>
" 33.94	- San Leandro, Grand Ave	- " = 157,000	+ 27,000
" 38.92	- Oakland, Kuhnle Ave	- " = 185,000	+ 28,000
" 42.18	- Oakland, Beaumont Ave	- " = 195,000	+ 10,000
" 44.28	- Oakland, Oakland Ave/ Harrison Street	- " = 207,000	+ 12,000
" 47.35	- Albany, North JCT Rte. 80	- " = 94,000	<113,000>
End: " 0	- Contra Costa County Line	- " = 94,000	0

**Comment Letter 0070 Continued**

Start: Postmile .31	- Watsonville, JCT Rte. 1	- AADT = 25,500	
" 2.8	- Watsonville, Main St./ Lake Street	- " = 30,000	+ 4,500
" 2.93	- Watsonville, Main St. at East Beach Street	- " = 36,000	+ 6,000
" 2.93	- <b>Couplet/ Eastbound One-way Traffic</b>		
" 2.93	- Watsonville, on East Beach St. at Main Street	- " = 7,000	< 29,000>
" 3.27	- <b>Watsonville, East Beach St. at Lincoln Street ... West &amp; Eastbound Two-way Travel</b>	- " = 7,000	0
" 0	- <b>Couplet/ Westbound ... One-way Travel</b>	- " = 8,000	+ 1,000
" .34	- <b>Couplet/ End ... Begin Two-way Travel</b>	- " = 8,600	+ 600
" .71	- Watsonville, East Lake St. at Beck Street	- " = 12,500	+ 3,900
" 2.0	- Holohan/ College Roads	- " = 13,300	+ 800
" 3.69	- Carlton/ Casserly Roads	- " = 9,000	< 4,300>
" 0	- Santa Cruz/ Santa Clara County Line	- " = 6,200	< 1,800>
" 5.03	- Watsonville Road	- " = 6,100	< 100>
" 9.43	- Gilroy, Monterey Street	- " = 17,500	+
		11,400	
" 10.28	- Gilroy, North JCT Rte. 101	- " = 22,000	+ 4,500
" 12.81	- Ferguson Road	- " = 19,600	< 1,400>
" 21. 98	- JCT Rte. 156 South	- " = 23,000	+ 3,400
" 23.41	- Casa de Fruta	- " = 32,000	+ 8,000
" 0	- Santa Clara/ Merced County Line	- " = 30,000	< 2,000>
" 13.24	- West JCT Rte.33	- " = 38,000	+ 8,000
" 13.85	- JCT Rte. 5	- " = 27,500	+ 10,500
" 19.27	- Los Banos, Ortigalita Rd.	- " = 18,700	< 8,800>
" 20.59	- Los Banos, 7 <sup>th</sup> Street	- " = 28,500	+ 9,800
" 22.25	- Los Banos, Ward Road	- " = 18,300	< 10,200>
" 40.77	- JCT Rte.59	- " = 16,800	< 1,500>
End "	40.95 - Merced/ Madera County Line	- " = 16,300	< 500>

**COMPARISON:** The highest volume of passenger vehicle traffic on SR-152 corresponding to any point on the Pacheco Pass Alignment is at Postmile 13.24, Back AADT - 38,000. The highest volume of passenger vehicle traffic on I-580 corresponding to any point on the Altamont Pass Alignment is Postmile 19.86, Back AADT - 196,000.

EXHIBIT D

# Ozone Transport: 2001 Review



California Environmental Protection Agency



April 2001

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**Comment Letter 0070 Continued**

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State of California  
California Environmental Protection Agency  
Air Resources Board

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***Ozone Transport: 2001 Review***

April 2001

Staff Report

*Prepared by*  
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This report has been reviewed by the staff of the California Air Resources Board and approved for publication. Approval does not signify that the contents necessarily reflect the views and policies of the California Environmental Protection Agency or the Air Resources Board, nor does mention of trade names or commercial products constitute endorsement or recommendation for use.

*The energy challenge facing California is real. Every Californian needs to take immediate action to reduce energy consumption. For a list of simple ways you can reduce demand and cut your energy costs, see our Web-site at [www.arb.ca.gov](http://www.arb.ca.gov).*

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**Response to Comments of Kenneth A. Gosting, Executive Director, Transportation Involves Everyone, August 31, 2004 (Letter O070 and Attachment D)**

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**O070-1**

Acknowledged.

**O070-2**

Please see standard response 6.3.1.

**O070-3**

The Draft Program EIR/EIS estimates that the HST Alternative would cost between \$33 and 37 billion in 2003 dollars (Section 4.2). The Intercity High Speed Rail Commission's Final Report estimates HST to cost \$20.7 billion in 1996 dollars (Commission, "High-Speed Rail Summary Report and Action Plan", December 1996). Key factors contributing to the cost increase between these two studies are inflation, different routes considered, and different design assumptions. Based on Engineering News Record Construction Cost Index, over 22% of the cost increase over the previous estimate in the Business Plan is due to inflation. Other cost differences result from the consideration of different alignment and station configurations (horizontal and vertical) resulting in increased length of the overall system and more costly configurations such as the use of aerial structure or tunnel to avoid constraints or environmental impacts.

The proposed alignment and station configuration options and design assumptions would be reviewed at the project level to identify cost savings through application of value engineering practices.

**O070-4**

Acknowledged.

**O070-5**

Please see standard response 2.18.1. Please also see Section 2.3.1 of the Program EIR/EIS which recognizes and references the Commission's prior studies.