

## 1.0 Merced to Fresno Section Draft EIR/EIS Comments Summary

This chapter summarizes comments received on the Merced to Fresno Section Draft EIR/EIS. It is intended to serve as a summary only; it does not reflect every individual comment received during the Draft EIR/EIS comment period. All comments received and responses to those comments are included in Appendix 8-A of this Final EIR/EIS.

The Authority and FRA published the Merced to Fresno Section Draft Project EIR/EIS on August 15, 2011. The 45-day extended comment period was extended 15 days to allow the public additional time to review and submit comments and ended on October 13, 2011. This summary reflects those comments received by the close of the comment period.

At the beginning of the comment period, the Authority held a series of informal open houses to review materials available in the Draft EIR/EIS and to answer any questions from interested parties. These open houses were held between August 23 through August 30, 2011, in the communities of Fairmead and Le Grand and in the cities of Chowchilla and Fresno. Materials available included exhibit boards, hard copies of the EIR/EIS and supporting documents, DVDs, and online viewing of the Draft EIR/EIS. English and Spanish versions of information about the property acquisition process, project brochure, fact sheet, and notice of availability were available. During these open houses, people offered comments using comment cards or by submitting online comments at available computer stations at the meetings. Others submitted comments via the Authority website after the meetings. During these four open houses, 223 persons signed in attendance.

Once the Draft EIR/EIS had been in circulation for approximately 30 days, the Authority and FRA held a series of formal public hearings. Meeting materials were the same as for the open houses held earlier; however, methods to submit public comments, in addition to comment cards and computer stations, included a court reporter present to record verbal comments. The following is a list of the hearing locations, dates, times, and number of attendees that signed in:

### **Merced**

September 14, 2011, 3 – 8 p.m.  
Merced Community Senior Center  
755 W 15th Street  
Merced, CA 95340  
Number of persons signed in: **164**

### **Madera**

September 15, 2011, 3 – 8 p.m.  
Madera City Council Chambers  
205 W 4th Street  
Madera, CA 93637  
Number of persons signed in: **76**

### **Fresno** (joint meeting with Fresno to Bakersfield section)

September 20, 2011, 3 – 8 p.m.  
Fresno Convention Center  
848 M Street  
Fresno, CA 93721  
Number of persons signed in: **94**

Occasionally, comments received overlapped with comments intended for the Fresno to Bakersfield Section and vice versa. These comments have been directed to the appropriate HST section for inclusion in the environmental document, and those that cover both are included in both. This summary provides an overview of the comments received from public agencies and from other organizations.

## 1.1 Overview of Comments Received

### 1.1.1 Draft EIR/EIS Overview

During the comment period, there were 857 comment submittals on the Merced to Fresno Section Draft EIR/EIS. The comments covered a wide range of issues and represented viewpoints from government agencies, organizations, business groups, businesses, residents, and property owners.

Most expressed support or opposition opinions about the project or its alternatives. Of the 875 submittals, approximately 103 generally supported and 127 were generally opposed to the project. Most comments came from individuals living, working, or with property interests in the project study area. About a fourth of the comments submitted were regarding the UPRR/SR 99 Alternative. Few preferred the BNSF Alternative; most comments on the BNSF Alternative expressed opposition to this alternative. Only a few comments mentioned the Hybrid Alternative by name. (Some comments referred to the UPRR/SR 99 Alternative and BNSF Alternative by their earlier titles of Alternative A2 and Alternative A1, respectively. This chapter refers to the HST alternatives by their existing titles.)

Overwhelmingly, effects on agricultural and private property were the top concerns about the project. Many comments did not mention the content of the Draft EIR/EIS but rather strongly urged that the comment period be extended 60 to 90 days or even 6 months. Also, comments expressed concern over the project cost estimates, funding availability (including whether any money should be spent on this type of project in light of state and federal budget deficits), and questions regarding the accuracy of the ridership projections. Common issues also covered safety at stations, station access limitations for vehicles and pedestrians, and connectivity to ultimate destinations upon arriving at HST stations. Other common environmental concerns included noise and vibration, ecosystem effects, neighborhoods, and construction effects.

Approximately 41 submittals included suggestions to change the Merced to Fresno Section HST alternatives. Most common among these comments was that the alternatives do not strictly remain within or along existing transportation corridors. These comments most often referenced the east-west wye connections from San Jose and the BNSF Alternative. The primary suggestion was to consider an alignment adjacent to I-5 that would bypass this Merced to Fresno corridor and the HST stations in Merced and Fresno altogether. In addition, other comments suggested a preference for the State of California to invest in the development of the Amtrak system instead of HST or use funding for other infrastructure improvements.

The following sections list how many comment submittals referenced each alternative, summarize the general comments received from individuals on particular alternatives, and highlight which alternatives received the most support from organizations and agencies.

#### 1.1.1.1 UPRR/SR 99 Alternative

More than 100 comment submittals mentioned the UPRR/SR 99 Alternative. Of those, most expressed a preference for this alternative and identified that it more closely adheres to the transportation corridor compared to the other alternatives, that it reduces agricultural impacts, and that it best consolidates infrastructure. One particular grassroots effort, named Madera Friends of High-Speed Rail, sent in 1,113 submittals generally grouped in 9 standardized letters, each supporting the UPRR/SR 99 Alternative. Themes express support for this alternative from their letters include that it would protect farmlands; provide connectivity, economic opportunities, and jobs in Madera; grade-separate the existing track through Madera; eliminate blight along the "E" Street corridor through the city; and, with mitigation could, improve the City of Madera. Those that did not support this alternative expressed that it would have severe adverse impacts on the City of Madera and further divide the community. Others opposing this alternative were concerned about business and economic impacts.

### **1.1.1.2 BNSF Alternative**

Approximately 90 submittals were received that mentioned the BNSF Alternative. Most of the comments expressed opposition to this alternative arguing that it would result in negative effects to their community and the agricultural economy. Since most of these were received during or directly following the open house at Le Grand, they are addressing the potential impacts to Le Grand and the surrounding agricultural communities. Fewer, but still a notable number of, comments expressed concern about the potential effects of the BNSF Alternative on the wildlife in the areas surrounding the BNSF Alternative.

No comments mentioned the various wye options connecting to the BNSF Alternative. A few mentioned their displeasure with the Ave 24 Wye due to impacts on farmlands and that it did not follow existing transportation corridors. Commenters did not note a preference or difference in the East of Le Grand design options. Two commenters mentioned how the Mariposa Ave design option would affect their dairy business and agricultural operations.

### **1.1.1.3 Hybrid Alternative**

Relatively few comments mentioned the Hybrid Alternative. A few expressed support for this alternative because it avoids both Madera and Le Grand community impacts. Two businesses expressed a concern that this alternative would remove property and thus limit their future expansion plans.

### **1.1.1.4 Stations**

Comments on stations ranged from requesting a station in Madera to pedestrian safety and traffic issues around the proposed stations. Transit connectivity, safety for school access routes, parking availability, and traffic congestion getting to and from SR 99 were also mentioned. Fresno proposed potential changes to the design to help facilitate traffic circulation and meet future land use plans objectives.

### **1.1.1.5 Heavy Maintenance Facilities**

Only about 25 comments mentioned the heavy maintenance facility alternatives. One stated that the Harris-DeJager HMF site was no longer available for an HMF. The Fagundes HMF site property owner commented that either their business would have to be purchased entirely or their property and dairy operations would be adversely affected. A few persons from the Merced area commented that the access tracks for the Castle Commerce Center HMF should be considered as part of the tracks northbound for future sections. A few comments from Madera residents urged that the HMF be placed in Madera County noting that because no HST station is proposed in the county, the HMF site would create much needed job opportunities.

### **1.1.1.6 Suggestions for Modified and New Project Alternatives**

Some individuals opposed the Merced to Fresno Section HST alternatives as defined in the Draft EIR/EIS and suggested changes to the alternatives. Some questioned the project's use of HST technology, wondering whether or not the high speeds could actually be achieved. In addition, some commenters questioned whether the ridership projections were realistic. Approximately five submittals, including from EPA and the USACE, referenced the Western Madera alternative from the preliminary alternatives analysis process. The Authority and FRA determined that this alternative was not a reasonable alternative and was dismissed during the preliminary alternatives screening phase of the project. Several members of the public suggested that Madera should have a station, and without one there would be less ridership from this area. One commenter wondered why the BNSF Alternative design options that crossed the San Joaquin River further east than at the UPRR/SR 99 were eliminated from further consideration, because they felt that these would not impact residential land uses.

Only a few commenters submitted suggestions for minor modifications to existing alternatives. These modifications were suggested mainly in order to reduce property acquisitions, business impacts, agricultural impacts, and biological impacts, or to serve specific areas. Several commenters requested that additional design options between the BNSF and UPRR railways south of Madera Acres continue to

be considered, which were options previously eliminated from further analysis due to high property impacts in Fresno. Businesses along Golden State Boulevard in Fresno felt that by changing the location of this roadway, their business would have limited accessibility and cause a hardship in this area; therefore, they felt the alignment would be best along SR 99. Several commenters, including Preserve our Heritage, Planning and Conservation League, and a manufacturing business, felt that the I-5 route should be considered in the EIR/EIS. Several commenters in the City of Fresno noted that they would prefer the alignment to go around Fresno to avoid impacts on their properties. The mayor of Fresno requested a trench alignment through Downtown Fresno. A dairy farm that would be affected by the project, requested that the UPRR/SR 99 alternative be designed with a smaller loop around Madera to minimize agricultural impacts in the surrounding rural areas. California Legislators

State Senator Michael Rubi and Assembly Member David Valadao, as well as House of Representative members, Congressman Kevin McCarthy (majority whip) and Congressman Jim Costa, submitted a request to extend the public review period to a minimum of 60 days total due to the magnitude of the project and material to review. In addition, State Senator Anthony Cannella submitted similar concerns for inadequate review time, due to the importance of fully considering agricultural impacts and effects on the agricultural operations, such as fertilizing and other spraying requirements.

Congressman Dennis Cardoza supports the project; more specifically, he supports the UPRR/SR 99 Alternative because it best follows existing transportation corridors. His comment notes that this project represents job and economic opportunities. However, he noted that it is premature to decide on the HMF at this time, requesting that the evaluation and discussion of HMF options be removed from the Final EIR/EIS and evaluated at a more appropriate time.

State Assembly member Cathleen Galgiani expressed support for the project, its purpose and economic benefit connecting over 5 million persons in the San Joaquin Valley and potential improvements on traffic along SR 99 and I-5, as well as subsequent improvements to air quality. She believes that linking to UC-Merced will be valuable, but, most important, she believes the project may support additional jobs and economic recovery.

## 1.2 Comments Received from Public Agencies

Public agencies are categorized into project area jurisdictions (local cities, counties, and related organizations), federal agencies, state agencies, regional public agencies, and other public agencies, such as public utility districts. These categories also include several agencies that support the jurisdictions in the project area or those outside the project area, but that choose to comment on this Draft EIR/EIS. Some agencies that are involved in project development and that continuing to participate chose not to comment on the Draft EIR/EIS, including Native American Tribes, Advisory Council of Historic Preservation, and California State Department of Fish and Game. Comments from these organizations will continue to be considered in the development of the Final EIR/EIS as coordination with them continues.

### 1.2.1 Project Area Jurisdictions

Each jurisdiction within the study area submitted comments, which are summarized herein. Comments from the unincorporated communities and from conservation, school, and water districts within the study area are summarized under Section 8.3.5, Other Public Agencies.

#### 1.2.1.1 City of Merced

The City of Merced, represented by John Bramble, the City Manager, noted support for the project, and specifically for the UPRR/SR 99 Alternative, which they consider to be the most environmentally friendly. The City indicated that the project will provide benefits to both Merced and Fresno and will allow for economic diversification within the Central Valley. The City also noted that the track between the Downtown Merced Station and the BNSF Alternative track should be evaluated in terms of the future extension to Sacramento and not just as an HMF track, which penalizes the Castle Commerce Center HMF for track which will eventually be used for the mainline.

### 1.2.1.2 City of Chowchilla

David Alexander, the Mayor of City of Chowchilla, provided comments stating the City's support for the BNSF Alternative and Ave 21 Wye, and believes that the UPRR/SR 99 Alternative, Ave 24 Wye connection, and Hybrid Alternative with the Ave 21 Wye would disrupt their community and conflict with planned transportation improvements in the project area. They noted that there are inconsistencies between the San Jose to Merced Section and the Merced to Fresno Section Draft EIR/EIS documents, and between the program-level documents completed earlier for these segments and the later project-level documents. They commented that the UPRR/SR 99 Alternative was selected as the preferred alternative prior to the project-level EIR/EIS process was complete, and in conflict with what was identified in the 2005 Program EIR/EIS, which "approved the alignment of the BNSF (A-1) alignment in Madera County." The City of Chowchilla noted that the mitigation proposed is inadequate and does not meet CEQA guidelines, and that the San Jose to Merced Section EIR/EIS must also be considered when determining a location for the HMF. They state that the impact evaluation criteria used are inadequate, and that the analyses do not thoroughly analyze the impacts on rural communities such as Chowchilla. Specific resource analysis the City believes are deficient include land use, use of natural resources, noise and vibration, traffic and circulation, social impacts, and air quality.

The City states that no request was made for traffic studies that have been completed in the Chowchilla area and that this information is not reflected in the Draft EIR/EIS. The City states that traffic counts should have been conducted during the fall harvest season when traffic is highest rather than in the winter. The City of Chowchilla believes it would suffer economic impacts not identified due to changes in land use, traffic impacts and the division of the City, and the UPRR/SR 99 Alternative and the Ave 24 Wye would prevent the City from growing as planned.

### 1.2.1.3 City of Madera

Robert Pothyress, Mayor of the City of Madera, expressed a preference for the BNSF and Hybrid alternatives and does not support the UPRR/SR 99 Alternative, which it believes would result in detrimental impacts to the community that cannot be fully mitigated. The City also believes that not all feasible mitigation measures that would lessen the severity of impacts to the Madera communities were identified in the Draft EIR/EIS. In addition, specific comments on the following topics were provided:

General: The city commented that the review period is inadequate for the size of document and because many local governments are understaffed. In addition, the City indicated that the mitigation measures identified were too general and did not provide enough detail. The comment letter also suggests that the justification supporting the determination that the impacts from the UPRR/SR 99 Alternative are less than significant was not accurate.

Alternatives: The City requests consideration of at-grade or below-grade alternatives for the UPRR/SR 99 Alternative in Madera. They also had detailed questions about the BNSF and Hybrid alternatives, the use of Amtrak facilities, overall system design and capabilities, communications towers, stations, traction power substation locations, power lines, road modifications, maintenance train noise, changes in land use patterns and economic impacts related to statements in Draft EIR/EIS Chapter 2, Alternatives.

Transportation: The City was concerned that not all applicable goals and policies from their General Plan are included in the Draft EIR/EIS. Other concerns included the analysis of construction period impacts, changes in passenger rail service, pedestrian and bicycle impacts, and changes in freight rail transportation. They also felt the following issues should have been discussed in this chapter: the increased cost and future property acquisition required for future grade separated crossings, spacing of columns related to future road widening, reconstruction of the interchange at Gateway and Cleveland, interaction and possible conflicts with future capital improvements projects, impacts from roadway modifications on individual properties, potential changes in standards for SR 99, and permit requirements for work in public right-of-way.

Noise: The City asked how city and county plans were incorporated into the noise analysis and about the sufficiency of the proposed mitigation. There were a number of questions concerning the assumptions used to determine the methodology, as well as questions about noise levels within 100 feet of the track and beneath the elevated guideway, the impacts to pedestrians, the change in noise due to demolition of acquired buildings, SEL noise levels, and the lack of detail for mitigation.

Utilities and Energy: The City noted that the document references the 1992 General Plan instead of the 2009 General Plan. They also had questions concerning the discussion of solid waste, the need to conform with the City's undergrounding policy for new utilities, conflicts with existing utilities, and reduced access to utilities in the HST right-of-way.

Hydrology: The City noted that the document references the 1992 General Plan instead of the 2009 General Plan and the current requirements for the project to pay a development impact fee where stormwater may be conveyed to a city facility.

Safety and Security: The City noted that it believes an alternative in a rural area is inherently safer than one in an urban area. They noted their inability to be first responders where there is elevated guideway. They disagree with the assessment of the risks of accidents or acts of violence being insignificant. They also requested additional information in the high risk facility analysis and a clearer comparison of alternatives related to public safety hazards.

Socioeconomics, Communities and Environmental Justice: The City believes that insufficient efforts were made to solicit participation of minority and low-income populations. They question some of the data used in this analysis and the conclusions drawn. The City believes the project would have disproportionate and adverse effect on populations of concern and that the project would create an increased barrier between communities than currently exists. They also question the economic impacts, both adverse and beneficial, as described in the document and are concerned about effects on property values.

Land Use: The City believes the UPRR/SR 99 Alternative will discourage infill and that this should be discussed in the EIR/EIS. They disagree with some of the land use impact conclusions and with the conclusion regarding no significant impacts to land use in Madera. The City requests additional mitigation measures, including funding an update of its General Plan, to develop design and development guidelines for the project, and to set up a development fund.

Parks, Recreation and Open Space: The City's letter included comments relating to the lack of detailed mitigation, connectivity under elevated guideways, construction period impacts, and how some conclusions were drawn. They also would like additional information about a few of the parks included in the Affected Environment section of the EIR/EIS.

Aesthetics and Visual Resources: The City disagrees with some of the conclusions based on the analysis included in the Draft EIR/EIS, and believes that mitigation does not contain enough detail. They also list several policies from their General Plan that should be considered in this analysis.

#### **1.2.1.4 City of Fresno**

Mark Scott, City Manager for the City of Fresno, submitted comments focused on the following categories:

- Need for underpasses versus overpasses,
- Construction impacts,
- Adequacy and timing of certain traffic mitigations,
- Economic impacts,
- Need to trench profile through downtown Fresno,
- Protection of existing and planned utilities,
- Noise and vibration,

- Historic resources, and
- Impacts to Roeding Park.

Generally, the City believes the Draft EIR/EIS did not adequately analyze all potentially significant impacts to the City of Fresno. They commented that one alternative through Fresno is inadequate, and that a trench option should also be evaluated. The City is concerned that project construction has the potential for adverse effects to emergency response, public safety, traffic congestion, and short-term air quality. The City disagrees with many of the mitigation measures included and suggests several specific mitigation measures to be incorporated during construction. Regarding noise and vibration, the City is particularly concerned with potential vibration impacts at the Fresno Zoo located within Roeding Park and request additional analysis at this location.

The City provides a number of comments related to requirements for reconstruction of water and sewer utilities and proposes additional mitigation. Additional information about safety and security is provided and suggestions for additional analysis on this topic are made.

Regarding socioeconomic, communities and environmental justice, the City provides additional information about the affected environment and requests that 2010 U.S. Census data be used. The City requests additional analysis for the complete Fresno "corridor" (rather than splitting between two documents) concerning the effects of the loss of property tax revenue for the entire City, the potential for urban decay, and a more detailed analysis of relocation opportunities. The City requests that updated economic condition and employment data be used. They believe the mitigation proposed for displacements and economic impacts is inadequate and propose several additional mitigation measures. They also note that the Fresno City Council adopted a motion on October 13, 2011, that the EIR/EIS is legally inadequate.

The City commented that Roeding Park will experience construction impacts because some of the park would be needed for construction. They note that the project conflicts with the Zoo Master Plan. The City suggests changes to some of the proposed mitigation measures. The City disagrees with some of the visual assessment, specifically related to overpasses and retaining walls, and also believes this mitigation is inadequate.

Regarding historic resources, the City requests that the Belmont Circle, the Belmont Underpass and Railroad Bridge be evaluated for potential historic significance, additional mitigation be incorporated for the Forestiere Underground Gardens, and that additional properties be identified for the Fresno Register of Historic Places. They would also like the downtown rail station analysis from the Fresno to Bakersfield EIR/EIS be included in the Merced to Fresno document.

The City also provided a number of detailed comments on the 15% conceptual design plans. The City supports a Mariposa alignment for an east-facing station over the Kern St. west-facing station.

Oliver Baines III, Councilmember for the City of Fresno, submitted comments at the hearing, as well as in a comment letter. He stated his support for the project and the economic benefits it will have in the Central Valley. He noted that he has received comments from constituents concerned that the document is inadequate, and therefore is concerned about the public involvement process. He suggests creation of an ombudsman office in Fresno to help facilitate public interaction. He also is concerned about ensuring that the project will create jobs in the Fresno area.

#### **1.2.1.5 Merced County and County Planning Department**

Chairman and Rail Representative John Pedrozo for Merced County offered the County's support for the UPRR/SR 99 Alternative because of the lower impact on the community, the farmland, and the environment. Also, Chairman Pedrozo submitted several comment cards developed by his office and filled out by residents stating their preference for the UPRR/SR 99 Alternative and in opposition of the BNSF Alternative. Additionally, the County seeks cooperation to prevent any inconsistencies from arising with respect to land use, agricultural, and natural resources.

Bill Nicholson, the Assistant Planning Director for Merced County, noted that there are three segments of the HST project intersecting their county that are being reviewed by separate environmental documents, and this affects the ability for impacts to Merced County to be fully evaluated, particularly for the HMF. He also expressed preference for alternatives in the UPRR right-of-way, following SR 99, over alternatives in the BNSF right-of-way, which have greater impacts to farmlands and the natural environment. Use of the UPRR corridor also supports the county's current planning efforts.

#### **1.2.1.6 Madera County, County Planning Department and County Department of Agriculture**

The Board of Supervisors, as represented by Chair Frank Bigelow, requested a 90-day review period justifying that a project this large and with significant material for review requires additional time. Chairman Bigelow also submitted comments acknowledging they did not receive an extension but thanking the Authority for the extension provided to the State Department of Conservation for the Williamson Act review.

Norman Allinder, Planning Director for the Madera County Planning Department, submitted comments stating that the DEIR/DEIS is inadequate in its description of the affected environment as well as in several qualitative and quantitative analyses. The Planning Department requests that the document be amended and re-circulated for further comments. They also believe the San Jose to Merced EIR/EIS should be included in any decisions regarding alternatives. Specific comments on the following topics were included:

Interactive Community Involvement: The Department commented that detailed mitigation measures for noise and vibration impacts be developed through interactive community workshops prior to finalizing the EIR/EIS.

Impacts to Schools: The Department expressed concern that not all schools near the alternatives were identified as noise sensitive receivers, and that school transportation activity could be disrupted by project construction.

Transportation: The Department does not believe that the mitigation measures provided were detailed enough to address potential impacts in Merced and Fresno, and that that the traffic analysis in rural areas was insufficient, especially during construction. They requested an analysis of impacts to the Madera Amtrak station and also were concerned about deviations in existing rural road alignments due to overcrossings.

Safety and Security: The Department suggested the HST project be put on hold until safety and security standards are adopted for a high speed rail system within the U.S. They stated that there is a safety concern regarding children crossing the UPRR tracks in transit to schools.

Socioeconomics: The Department believes the County will not see any economic benefit from the project because no station is located within the County. They commented that that Madera County is an ideal location for a HMF and support the HMF alternatives within the County. Other concerns include a loss in property values in affected communities, and the potential impacts to local employment as a result of impacts to affected businesses.

Public Utilities and Energy: The Department is requesting a mitigation measure to require the recycling of construction and demolition waste to reduce impacts to the Fairmead Landfill. They are also concerned about potential impacts to rural energy supplies as a result of the project.

Biological Resources and Wetlands: The Department is concerned about the possibility of introducing invasive species through the use of non-native soil as fill.

Station Planning, Land Use, and Development: The Department disagrees that the impact to land use is less than significant and no mitigation is required. They believe that local land use plans were not

sufficiently analyzed and that funding will be required to amend these plans to accommodate the HST project. Induced growth along SR 152 from remnant parcels is also a concern.

Aesthetics and Visual Quality: The Department commented that all alternatives would have significant visual impacts after mitigation, that impacts to Sierra Nevada views from Madera County are overlooked, and requests more detailed mitigation measures. Also of concern is graffiti abatement and that impacts to all communities could be reduced by lowering the train height from 50 to 25 feet.

Regional Growth: The Department disagrees that the project will not induce growth in their county, as the commute times between Fresno and Merced and Bay Area cities will be reduced.

Air Quality and Global Climate Change: The Department suggests that quarries within the three-county area be used for ballast material to reduce emissions and promote economic activity. They also request more detail on how the decrease in vehicle miles traveled (VMT) was calculated, and are concerned that VMT within their county may increase. They also request analysis of particulate matter and fugitive pollutants dispersed by the trains.

Noise and Vibration: The Department requests that the Madera County noise and vibration standards be addressed in the EIR/EIS, and does not believe that the day-night sound level ( $L_{dn}$ ) is an adequate measure of noise impacts to receivers. They also request that impacts to rural areas be analyzed separately from urban areas and that noise impacts to poultry and dairy operations be assessed.

Agriculture: The Department believes the impacts to agricultural operations were not fully analyzed, including the loss of sales tax from agricultural conversions, the impacts to agricultural infrastructure, division of farms, impacts to farm buildings and capital improvements, potential impacts to financing, and impacts to Williamson Act lands.

Hydrology and Water Resources: The Department is concerned about potential flooding in agricultural lands from at-grade crossings of irrigation channels.

Independent Utility: The Department states that a discussion of the independent utility of the track needs to be included.

Alternatives: The Department requests that an alternative be included that utilizes the existing Amtrak system.

The County Planning Department provided comments on mitigation measures relating to noise and vibration, socioeconomics, safety and security, agricultural lands, and aesthetics and visual resources. The County Department of Agriculture submitted comments relating to potential impacts to aerial spraying of agricultural fields not disclosed in the Draft EIR/EIS were the project to shift either vertically or horizontally. They also note that the footprint of the Castle Commerce Center HMF would overlap with an interchange that is part of this project and request that the design be refined to allow for both projects.

## 1.2.2 Federal Agencies and Tribes

### 1.2.2.1 U.S. Environmental Protection Agency

Enrique Manzallia, Director of Communities and Ecosystems Division, submitted comments suggesting that the Draft EIR/EIS has insufficient information, but EPA also recognizes the potential benefits of the project. Despite coordination efforts under the NEPA and Clean Water Act (CWA) Sections 404 and 408 integration process, EPA expressed concerns over aquatic resource impacts and refinements on measures to maintain wildlife connectivity and movement. Additionally, EPA outlines its concern about reducing the project's construction period impact to communities and farms, specifically the potential to exceed National Ambient Air Quality Standards, and farming and community impacts along the corridor. EPA commends the September 2011 Authority- and FRA-signed *Memorandum of Understanding for Achieving an Environmentally Sustainable High-Speed Train System in California*.

EPA notes that the Final EIR/EIS should clearly and consistently identifying impacts in the NEPA impact summaries using the term “significant” where appropriate, as defined by CEQ 40 CFR Part 1508.27. EPA finds that the Draft EIR/EIS is not detailed enough to fulfill the CWA 404 requirements, and therefore they offer direction on the Alternatives Analysis, Protecting Water Quality and Sensitive Species, including storm water discharge regulations, and mitigation. EPA request that the Western Madera Alternative be studied. Additional studies on impacts on aquatic resources including quantifying indirect impacts, clarifying the permanent and temporary impacts, and providing a functional assessment of aquatic resource impacts. EPA is concerned that the project may result in erosion and other construction related impacts on water resources, and therefore EPA requests additional detail. Regarding special status and wildlife movement corridors, EPA would like the San Joaquin River Crossing to be expanded to include more detail on crossing designs and best available methods to maintain and enhance wildlife habitat.

To address exceedances in ambient air emissions during construction, EPA requests confirmation of direct and indirect emissions, the identification of additional mitigation measures, and completion of the interagency consultation process for determinations in the San Joaquin Valley. EPA also requests that the effects of air emissions on health of children be explained and addressed with additional mitigation measures. EPA requests that the agricultural resource section include information on increased operational expenses on farming around the HST project and other effects from property acquisition valuation on agricultural practices, such as road closures and access changes.

EPA requests that the induced growth and land consumption analysis fully acknowledge historic patterns and review the potential for commuters to be using HST to live in the Valley and work elsewhere in the state. EPA would like there to be stronger commitments to protect rural lands from development by supporting agricultural land conservation easements and similar programs. Likewise, EPA would like to have additional information about cooperation with cities to densify land use around station locations and similar coordination with transit agencies to enhance connectivity. EPA suggests that station planning incorporate brownfield use and reuse, safety in access planning at stations, and programs that promote equitable development practices.

EPA requests that additional outreach be performed to receive input for the areas under the elevated guideway. EPA notes that Executive Order 13045 on Protection of Children from Environmental Health Risks and Safety Risks needs to be addressed in the Draft EIR/EIS both for construction and operation, assessing direct, indirect, and cumulative impacts.

With regard to Environmental Justice, EPA includes suggestions about evaluating effects on the localized communities due to access, noise, and economics and note any outreach efforts identifying these communities’ concerns. EPA also would like to see the impacts on commercial and residential displacement and economic impacts, such as the changes to the job market.

EPA notes inconsistencies in the Noise and Vibration analyses between the Merced to Fresno and the Fresno to Bakersfield sections, particularly around the proposed HMFs and in the cumulative impacts assessment. EPA would also like a summary table noting details of noise barriers and more understanding for the potential of changes relating to traffic noise. EPA would like a better understanding about change in potential noise and vibration impacts due to the potential slab track design and has concerns about the vibration mitigation proposed.

EPA references the Memorandum of Understanding on Sustainability practices in the High Speed Rail Project. They would like the Final EIR/EIS to reference this document and associated commitments. Similarly, they would like commitments to identify, minimize, track, and control hazardous materials use in construction and operations of the HST Project. Finally, EPA requests that medical laboratories and research/technical parks be added to the list of facilities reviewed and mitigated for impacts from EMF.

### 1.2.2.2 U.S. Army Corp of Engineers

Michael Jewell, Chief of the Regulatory Division for the U.S. Army Corps of Engineers (USACE), submitted comments expressing that the Draft EIR/EIS may not be sufficient to meet its requirements under NEPA

and the 404(b)(1) guidelines. USACE does not agree with the elimination of the Western Madera Alternative (originally referred to as Alternative A3) and SR 152 Wye Connection alternatives and without a formal explanation for this elimination, cannot close Checkpoint B of the NEPA/404/408 integration process. They would like to see more progress on the draft compensatory mitigation plan, which USACE believes is necessary in order to make a preliminary determination of the Least Environmentally Damaging Practicable Alternative (LEDPA). They provide a number of specific comments on the text related to aquatic habitats and waters of the U.S., costs and funding, construction impacts and BMPs, and cumulative impacts. The USACE also commented that some construction impacts are more than temporary and cannot be adequately restored to pre-construction conditions.

#### **1.2.2.3 U.S. Department of Commerce, National Oceanic and Atmospheric Administration, National Marine Fisheries Service**

Maria Rea, Sacramento Area Office Supervisor for National Marine Fisheries Service (NMFS), submitted comments stating that they needed to be added to discussions of agencies consulted, both generally and under the Endangered Species Act (ESA). The project needs to include California Central Valley steelhead on lists of aquatic species present, and additional detail regarding direct and indirect impacts needs to be included. Also, Essential Fish Habitat needs to be included as a habitat of concern. They included questions and suggestions relating to aquatic mitigation measures. NMFS clarified that informal consultation has not been initiated as stated in the document and requested that this statement be corrected in the document.

#### **1.2.2.4 U.S. Department of Homeland Security, U.S. Coast Guard**

D. H. Sulouff, Chief of the Bridge Section for the U.S. Coast Guard, has reviewed the project area and determined that neither the Merced to Fresno nor the Fresno to Bakersfield sections require Coast Guard involvement for bridge permit purposes.

#### **1.2.2.5 U.S. Department of the Interior, Office of Environmental Policy and Compliance**

Patricia Sanderson, Regional Environmental Officer, submitted a statement that they had reviewed the environmental documents and had no comments to offer.

#### **1.2.2.6 Amtrak**

Wendy Wenner, High-Speed Rail Coordinator for Amtrak, submitted detailed comments on a number of aspects of the document, including purpose and need, project description, transportation, air quality, and project costs. Most comments were specific to document text or suggested additional analyses.

### **1.2.3 State Agencies**

#### **1.2.3.1 California State Department of Conservation, Division of Land Resource Protection**

Jacquelyn Ramsay, an Environmental Planner for the California State Department of Conservation, requested a 30-day extension for their review of both the Merced to Fresno and Fresno to Bakersfield environmental documents. Between the two segments there are 148 properties to be evaluated under the Williamson Act.

#### **1.2.3.2 California State Department of Conservation, Division of Oil, Gas, and Geothermal Resources**

Yuko Sakano, Ph.D., Environmental Scientist for the Division of Oil, Gas, and Geothermal Resources submitted comments that focused on the presence of oil wells in the project proximity, with a total of 60 wells identified in the Merced to Fresno Section. The comment letter outlines safety requirements for rail within 100 feet of wells, along with protocols for dealing with abandoned or unrecorded wells.

### **1.2.3.3 California State Water Resources Control Board, Division of Water Quality**

Catherine Woody, Environmental Scientist for the State Water Resources Control Board provided a letter stating they will be providing comments regarding stormwater, but they will be late.

### **1.2.3.4 California State Department of Conservation, Williamson Act Program**

John Lowrie, Williamson Act Program Manager, submitted comments regarding impacts to farmland within the Williamson Act and the process required for acquiring lands within this program. The Williamson Act Division is also preparing a response to the public acquisition notice process. They provide information on Williamson Act Cancellation Findings and provide suggested revisions to mitigation measures Ag-MM#1 and Ag-MM#2. These comments were submitted after the comment deadline.

### **1.2.3.5 California State Department of Corrections and Rehabilitation**

Deborah Hysen, Deputy Director of Facility Planning, Construction and Management for the California State Department of Corrections and Rehabilitation, commented on impacts to the Valley State Prison for Women (VSPW) from the BNSF Alternative with the Ave 24 Wye and to the Central California Women's Facility (CCWF) from both the BNSF Alternative with the Ave 24 Wye and the Hybrid Alternative with Ave 24 Wye. Each alternative would encroach on one or both of these facilities and would remove land within the prison from agricultural production, resulting in an economic impact. Both alternatives would be incompatible with security standards. Safety related to train derailment was also listed as a concern. The BNSF Alternative would also have impacts to Road 21 outside the VSPW that could compromise security of the facility. The Department states that the S&S Mitigation Measure 1 is not sufficient and that only an alternative that completely avoids the facilities is acceptable.

In addition, the Department emphasized that maintaining access on Ave 24 and Road 22 is important regardless of the alternative selected.

### **1.2.3.6 California State Department of Transportation, Caltrans**

Christine Inouye, High-Speed Rail Coordinator for Caltrans, provided comments that stated that additional detail regarding mitigation is needed for completion of a Project Report for work within the State Highway System (SHS). Other issues of concern are compatibility with future expansions of the SHS, especially SR 99, additional right-of way needs for drainage, jacking of the reinforced concrete box under SR 180, and the impacts from closure of part of Golden State Boulevard. Detailed comments were submitted regarding hazardous waste, landscape, stormwater, and noise and vibration impacts, along with comments on the detailed plans and the transportation report.

### **1.2.3.7 Governor's Office of Planning and Research**

The Governor's Office of Planning and Research, State Clearinghouse and Planning Unit, sent a memorandum to all relevant state agencies regarding the extension of the comment period from 45 to 60 days.

### **1.2.3.8 California State Department of Resources Recycling and Recovery**

Lynn Smith, Integrated Waste Management Specialist for the Department of Resources Recycling and Recovery, submitted comments focused on closed solid waste facilities within 1,000 feet of project. Concern about these facilities in proximity to the project is related to the presence of landfill gas, which includes methane, and could be a health and safety concern for the project. Recommendations for work in these areas are included in the comment letter.

### **1.2.3.9 Native American Heritage Commission (NAHC)**

Dave Singleton, Program Analyst for the NAHC, did not offer comments on the content or the project description, but rather advised that the project coordinator use their submitted list of Native American

Tribes to engage input and consultation from affected Native American tribes in support of Section 106 and 4(f) of the Federal National Historic Preservation Act.

#### **1.2.3.10 University of California, Merced**

Ms. Janet Young submitted comments on behalf of the UC-Merced campus supporting the UPRR/SR 99 Alternative referencing least impact on farmlands and most environmentally sensitive. She also suggested that the Merced Station and rail be at-grade in Merced. Finally, she requested that the connections north of Merced be considered part of the Merced to Sacramento Section, thereby attributing the cost to that section rather than attributing the cost as part of the Castle Commerce Center HMF site.

#### **1.2.3.11 California State Lands Commission**

Cy Oggins, Chief of the Environmental Planning and Management Division of the California State Lands Commission, submitted comments stating that a lease will be needed from their agency for use of sovereign lands in the San Joaquin River. The Commission requests more information on the use of piles for the river crossing, including timing and construction methods. If these methods will be described in a future, more detailed CEQA document, they request that this be disclosed in the EIR/EIS. In their general comments on the document, they state that more information is needed on how the mitigation measures do or do not reduce impacts below the threshold of significance. Regarding biological resources, they feel that mitigation has been deferred and more detail is needed regarding mitigation, and if this is not possible, then performance standards need to be included. They feel that by not including the specific mitigation measures, agencies and the public do not have an opportunity to comment on the adequacy of these measures. The Commission also requests additional analysis on the impact of underwater noise on the fish in the river. The Commission notes that all cultural resources, including shipwrecks, on sovereign land are under the jurisdiction of the state and provides information for coordinating with their agency on this resource.

#### **1.2.3.12 California Public Utilities Commission**

Daren Gilbert, Program Manager for the Consumer Protection and Safety Division of the California Public Utilities Commission, submitted comments encouraging the Authority to involve their agency early on in planning to help identify impacts and appropriate mitigation. The Commission will need to approve any modifications of tracks or new tracks across roadways and should be identified as a permitting authority. They state that unless absolutely necessary due to engineering factors, all tracks should be grade separated when adjacent HST tracks are grade separated, and where existing at-grade crossings are modified, pedestrian facilities should be incorporated into these crossings. They note that accident statistics in Technical Appendix 3.11-A (Safety & Security Data) do not match their accident records and that several underpasses shown in Volume III (Alignments and Other Plans) barely meet the 15-foot vertical clearance requirement. They provide additional California Public Utility Codes (CPUC) that should be referenced in the EIR/EIS and request that all CPUC requirements be included in the Mitigation Measures sections of the Final EIR/EIS.

#### **1.2.3.13 California Department of Fish and Game**

Jeffrey Single, Ph.D, Regional Manager for the California Department of Fish and Game, submitted comments regarding their regulatory requirements, including a Lake and Stream Alteration Agreement, which they expect to be needed for at least some of the many stream crossings, and additional analysis and mitigation they would like to see in the Final EIR/EIS. They are concerned about east-west wildlife movement across the project corridor and request that elevated profiles be used instead of wildlife underpasses or overpasses to facilitate wildlife movement. If underpasses or overpasses are used, more analysis is needed before an alternative is selected. The Department feels that the scope of analysis for wildlife movement was too narrow and that other areas besides Essential Connectivity Areas be considered.

They are concerned that construction and operation of HST facilities within or near Department-managed lands may reduce the wildlife and public use values of these lands, and point out the greater impacts that

the BNSF Alternative, and specifically the Le Grand design options, would have on Department lands. The Department notes that the acquisition of property or an easement at Camp Pashayan would be Section 4(f) impact and that the EIR/EIS does not evaluate an alternative that would avoid this property. They feel that the economic impacts from lost revenue due to the HST traveling through Camp Pashayan should be evaluated. They recommend that the HST alignment be elevated where it runs adjacent to Department properties in order to facilitate wildlife movement underneath.

Regarding special-status plant species, the Department feels the one survey was not adequate and that focused, repeated surveys should be conducted prior to the Final EIR/EIS and not be deferred to the pre-construction period. The Department notes that no surveys were conducted for the California tiger salamander and that relocation is not a minimization measure in the USFWS guidance as stated in the Draft EIR/EIS. Relocation would constitute a "take" under California Fish and Game Code and no Department-approved mitigation banks or in-lieu fee programs are available to purchase credits for mitigation for the California tiger salamander, as suggested in the Draft EIR/EIS. Alternative mitigation would need to be developed during the incidental take permitting process. For special-status raptors, the Department feels that the 1,000-foot buffer for active nests is inadequate and requests a 0.5-mile buffer.

## **1.2.4 Regional Public Agencies**

### **1.2.4.1 Central Valley Flood Protection Board**

Curt Taras, Chief of Permitting and Enforcement Branch for the Central Valley Flood Protection Board, provided information on the conditions under which a permit from their agency would be approved, as well as a number of text changes and additions related to the Board's jurisdiction and the actual floodplains in the project area. Design requirements and the permitting schedule for working in a regulated floodplain were also provided.

### **1.2.4.2 San Joaquin Valley Air Pollution Control District**

Arnaud Marjollet, Permit Services Manager for the San Joaquin Valley Air Pollution Control District, commented that construction-related air quality impacts are understated in the Draft EIR/EIS and that not all feasible mitigation measures have been included. Specific concerns are related to assumptions regarding the construction equipment in modeling impacts, as well as the model itself. For mitigation, the District recommends that Voluntary Emissions Reduction Agreements be included as mitigation in addition to measures already included. They also note that the Health Risk Assessment (HRA) for the HMF may not be adequate and request to review the methodology prior to the Final HRA being completed.

## **1.2.5 Other Public Agencies**

### **1.2.5.1 Central California Irrigation District**

Chris White, General Manager for the Central California Irrigation District, provided comments regarding impacts to their irrigation facilities and requested that reasonable and inexpensive access be provided for farmers to cross the project and for the farmland, irrigation, and drainage facilities to be treated respectfully.

### **1.2.5.2 Chowchilla Water District**

Douglas Welch, General Manager of the Chowchilla Water District, submitted comments regarding impacts to the District, including closures to county roads, farm roads, and the District's irrigation distribution system roads where they would cross the HST tracks. The District also expressed concern about impacts on air quality related to additional miles driven to access the limited crossings. The District also states they submitted a Freedom of Information Act (FOIA) request to FRA in December 2010 that has not received a response. Because of these unmitigated impacts on their district, they support the No Project Alternative.

Dan Maddalena, President of the Chowchilla Water District, also submitted comments, requesting a meeting to discuss impacts to the District.

### **1.2.5.3 Fresno County**

Henry Perea, Supervisor for the County of Fresno, submitted their support for the BNSF Alternative within the Fresno to Bakersfield Section while understanding that there will be local impacts on property owners and construction disturbances to business, farms, and the transportation network.

### **1.2.5.4 Fresno Irrigation District**

William Stretch, Chief Engineer for the Fresno Irrigation District, submitted comments related to impacts on their facilities and included maps and tables indicating areas of conflict. They noted that changes to their facilities will likely increase their operations and maintenance costs, and provide information on the requirements of their review process and their design standards. They also provided markups for the 15% conceptual design drawings.

### **1.2.5.5 Fresno Metropolitan Flood Control District**

Jerry Lakeman, District Engineer for the Fresno Metropolitan Flood Control District, provided comments relating to the Drainage Fee required for projects in their district, compatibility with the District's Master Plan, design considerations, and impacts to existing district facilities. These comments also identify District planned facilities that would need to be constructed by the Authority prior to project construction. The District offers that it has fill material available within the project area that could be a material source for the project, and also discuss compliance with National Pollutant Discharge Elimination System (NPDES) permit requirements both during construction and operation.

### **1.2.5.6 City of Gilroy**

Thomas Haglund, City Administrator for the City of Gilroy, submitted comments stating that the project's approach to mitigating fire, rescue, and emergency services impacts is inadequate for the degraded response times and will place an unfair cost burden on the cities of Merced and Fresno.

### **1.2.5.7 Greater Bakersfield Separation of Grade District**

Jefferey Cutherell, President of the Greater Bakersfield Separation of Grade District, submitted comments regarding grade separations with major roadways within their jurisdiction. These locations are within the Merced to Bakersfield Section of the HST Project.

### **1.2.5.8 Kern County**

Mike Maggard, Chairman of the Kern County Board of Supervisors, requested additional extension of time for review of both the Fresno to Bakersfield Section as well as the Merced to Fresno Section Draft EIR/EIS documents. The letter acknowledged that both the effects of the alternative on over 2.2 million Central Valley residents as well as the importance of considering the location for the HMF justifies their interest, but that the level of detail requires careful review and assessment.

### **1.2.5.9 Kings County Water District**

Donald Mills, General Manager for the Kings County Water District, requested an extension of the comment period for both Merced to Fresno and Fresno to Bakersfield sections to February 2012, for a total comment period of 6 months, due to the length of the documents. The District also noted that none of the Merced to Fresno Section Draft EIR/EIS documents and the technical appendices for the Fresno to Bakersfield Section Draft EIR/EIS were not available at the public libraries in Kings County, and that the documents were only available in English.

#### **1.2.5.10 Lower San Joaquin Levee District**

Reggie Hill, Secretary-Manager for the Lower San Joaquin Levee District, submitted comments that a reduction in privately held land within its boundaries would reduce their revenues, and that the HST project will need to adhere to flood regulations. They request that the reduction in revenue be mitigated in perpetuity.

#### **1.2.5.11 Madera Irrigation District**

Lance Johnson, General Manager for the Madera Irrigation District, submitted comments stating they believe the analysis provided is programmatic in nature and insufficient, and requesting more detailed analysis once a final alignment is selected. They are concerned about impacts to water deliveries via pipes and canals that the project would cross, and impacts to their water carrying capacity. They stated that coordination with the U.S. Bureau of Reclamation will be necessary for facilities on their property. They are concerned about the loss of farmland and the impacts to air quality from vehicles having to travel longer distances to cross the HST tracks. The District provides mitigation requests.

#### **1.2.5.12 Merced Irrigation District**

Ron Price, Associate Engineer for the Merced Irrigation District, submitted comments regarding impacts to their irrigation and drainage facilities by alternative, as well as impacts to their electrical distribution system.

#### **1.2.5.13 Merced, Madera and Fresno County School Districts (6)**

The Alview-Dairyland Union, the Chowchilla High School, Plainsburg Union Elementary School, the Central Unified School District, the Madera Unified School District and the Le Grand Union High School Districts submitted their request for immediate coordination regarding concerns about disruption to school bus routes, divisions within the district and potential loss of students, impacts on safety, and impairing property values and the agricultural community, which in turn affect the school districts' budget and funding. The Plainsburg Union Elementary School District also noted that the review time was insufficient and they are concerned about their future bonding ability after a project alternative is chosen. The Madera Unified School District also list three schools they feel need to be evaluated for noise and vibration impacts and requested more detail regarding impacts to schools within their district. The Madera Unified District also voiced support for the Gordon-Shaw HMF within their district, which would provide an economic benefit for a community, which would not get the economic benefit of having a station, and requested that the Hybrid Alternative be modified to be adjacent to this HMF site.

#### **1.2.5.14 San Joaquin River Conservancy**

The San Joaquin River Conservancy submitted comments that the project will negatively affect the planned San Joaquin River Parkway, existing Parkway public uses, and Camp Pashayan, a habitat conservation/reservation area. The Conservancy provides suggestions for minimization and mitigation measures.

#### **1.2.5.15 Stanislaus County**

Raul Mendez, Senior Management Consultant for Stanislaus County, submitted comments that the County conducted a review of the Merced to Fresno Draft EIR/EIS and did not offer any comments.

#### **1.2.5.16 Madera County Economic Development Commission**

Bobby Kahn, the Executive Director of the Madera County Economic Development Commission, submitted comments stating their opposition to Alternative A2 (UPRR/SR 99 Alternative) and supporting Alternative A1 (BNSF Alternative), and are requesting that below grade profiles be considered for Alternative A2 (UPRR/SR 99 Alternative) within Madera County. They feel that compensation should be provided for changes in property values once the alternative is chosen and after operation begins, and that the

economic analysis of displaced businesses and associated mitigation is insufficient. They are concerned about impacts on future development along Alternative A2 (UPRR/SR 99 Alternative) and feel that more analysis of this issue is needed. The Commission also felt the comment period was insufficient.

**1.2.5.17 Bay Area Air Quality Management District**

Jean Roggenkamp, Deputy Air Pollution Control Officer for the Bay Area Air Quality Management District, submitted comments on the Merced to Fresno and Fresno to Bakersfield sections, stating that materials hauling for the project will result in exceedances of CEQA significance thresholds for nitrogen oxides (NO<sub>x</sub>) within their management district. The District disagrees with the conclusion that these impacts remain significant because the District does not have an offset program for mobile sources, and feels that there could be more analysis of potential mitigation measures, such as an off-site mitigation program. The District also provided suggested text for expanding AQ-MM#9.

**1.2.5.18 Fresno County Housing Authority**

Allison Williams, Chief Planning and Developmental Officer for the Fresno County Housing Authority, submitted comments encouraging the Authority to achieve 30% minority participation in the project and they are working to provide assistance to minority-owned small businesses in getting certified.

**1.2.5.19 Fresno City College**

Dr. Tim Woods, Dean of Business at Fresno City College and also representing the State Center Community College District, submitted comments regarding programs and initiatives they have that are helping to train the workforce needed for this project.

**1.3 Comments Received from Organizations**

Comments on the Merced to Fresno Section Draft EIR/EIS from organizations have been grouped into those representing businesses, interest groups, and organizations representing environmental protection. (Comments from individuals are summarized in Section 8.5.) Summaries for each follow.

**1.3.1 Businesses and Business Groups**

Comments were received from 73 different businesses, which are listed below. The majority of comments from businesses were concerned with how the project would affect their business including relocation, access, changes to property values, effects to farming, and economic impacts. An overview of comments from businesses is presented in this section.

- 3393 N Parkway Dr. Fresno, CA
- Abbey Transportation Company
- Agriland Farming Company
- Allied Waste Services
- Azteca Milling L.P.
- Bradford Farms
- Bright's Nursery INC.
- Buzz Oates Group of Companies
- Cavalletto Ranches
- C.A.R.S.
- CertainTeed Insulation
- Chevron Environmental Management Company
- Chowchilla District Chamber of Commerce
- Church & Dwight Company
- Conservation Resources LLC
- Del Shebelut Farms
- Diana Thomas Recycling
- Dicker, William
- Doak Development
- Doctor Kelly Brooks
- Domingos Ribiero Dairy
- Double Creek Dairy
- Durey Libby West Inc.
- Etchart Real Estate Consulting Group
- Fagundes Brothers Dairy
- Fresno Chaffee Zoo
- Fresno Motel
- George Dakovich & Son Inc
- Giersch and Associates, INC.
- Grimmway Farms
- Holiday Motel
- J.G. Boswell Company
- J. Marchini Farms

- John R. Lawson Rock & Oil INC
- Jurkovich Doak Department
- Kansas Holstein Dairy
- Kelsey Ranch
- KB Home, South Bay INC
- Kojima Development Company
- Lazy K Ranch
- Live Oak Farms
- Manning Properties
- Meders Ranch/Carleton Properties
- Miller, Amanda
- Minturn Nut Co Inc
- Mordecai Ranch
- North Machine Company
- N&W Land Co. LLC/Red Top Jerseys
- Olam Farming
- Pacific Gas & Electric Co.
- Rancho Calera LLC
- Ready Roast Nut Company
- Republic Services
- Richland Homes, INC
- Riverside Landscape and Nursery Supplies Inc
- Rosedale Ranch
- RSA Investments LLC
- Santa Fe Farms
- Shasky Farms
- Shimmich Construction Co, Inc.
- Shute, Muhaly & Weinberger
- Siroonian Properties LTD INC
- Soares Dairy
- Swanson Farms
- T-Mobile USA
- Union Pacific Railroad
- Valley Venture LLC, Delta Valley
- Vineyard Restaurant
- Wells Nut Farm Inc.
- Unidentified business owner on Santa Fe Drive
- Unidentified manufacturing facility
- Unidentified real estate company
- Zelman Development Co

A common sentiment among most businesses was that the 60-day comment period did not allow enough time for property owners to engage and become familiar with the complexity of the Draft EIR/EIS.

Almost half of the businesses (28 business) wondered how their property would be physically impacted by the project and asked for more information such as "I think my property is affected, please advise," or "The alignment of Golden State Blvd will affect so many properties, how will these changes affect access to our businesses?" Business who commented on acquisitions included Allied Waste Services, Amanda Miller, Azteca Milling L.P., Bradford Farms, Bright's Nursery Inc., an unidentified business owner on Santa Fe Drive, Cavalleto Ranches, CertainTeed Insulation, Durey Libby West Inc., Fresno Motel, Holiday Motel, Jurkovich Doak Department, KB Home, Republic Services, Richland Homes Inc., Rosedale Ranch, Santa Fe Farms, Soares Dairy, T-Mobile USA, Union Pacific Railroad, and Zelman Development Co. Businesses concerned about effects to their property also included Abbey Transportation Company, Buzz Oates Group of Companies, C.A.R.S., Double Creek Ranch, Grimmway Farms, Siroonian Properties LTD Inc., and William Dicker.

Two businesses, Etchart Real Estate Consulting Group and Rosedale Ranch, stated support for HST in general; while three other businesses, Giersch and Associates Inc., Doctor Kelly Brooks, and Amanda Miller, were against HST. Seventeen other businesses stated that they were either against a particular alignment that would affect their business or for an alignment that would have lesser effects to their businesses. Businesses that stated a position for the UPRR/SR 99 Alternative or against the BNSF Alternative included Agriland Farming Company, Cavalleto Ranches, Wells Nut Farm Inc., Olam Farming, Kelsey Ranch, Lazy K Ranch, Shasky Farms, Santa Fe Farms, and Swanson Farms. Businesses for the BNSF Alternative, or against the UPRR/SR 99 Alternative included Azteca Milling, Fagundes Brothers Dairy, George Dakovich & Son Inc., Ghosoph Real Estate, Jurkovich Doak Department, KB Home, Rancho Calera LLC, Ready Roast Nut Company, an unidentified business owner on Santa Fe Drive, an unidentified manufacturing facility, Valley Venture LLC, and the Vineyard Restaurant. Two businesses stated that they were against the Hybrid Alternative. These businesses were Cavalleto Ranches and an unidentified manufacturing facility.

Twenty-two farms or ranches expressed concern about impacts to agriculture and farmlands. These included Agriland Farming Company, Amanda Miller, Bradford Farms, Bright's Nursery Inc., Cavalleto

Ranches, Del Shebelut Farms, Domingos Ribiero Dairy, Double Creek Dairy, Fagundes Brothers Dairy, J. Marchini Farms, Kansas Holstein Dairy, Lazy K Ranch, Meders Ranch/Carleton Properties, Minturn Nut Co. Inc., Mordecai Ranch, Olam Farming, Santa Fe Farms, Red Top Jerseys, Shasky Farms, Soares Dairy, Swanson Farms, and William Dicker. Domingos Ribiero Dairy, Fagundes Dairy, and Shasky Farms were concerned about farm owners' ability to comply with district water quality board regulations and state pesticide and drift regulations as a result of the project. Several farms noted that relocating livestock away from HST would increase the costs of farm operations and/or decrease the productivity of their farms. One commenter noted that "the frightening and scaring of animals/livestock by passing train noise and vibration causing loss of production is an issue for me." Red Top Jerseys also commented that noise, vibration, dust, and stray voltage may negatively impact the health of their milking herd, while Swanson Farms mentioned that noise, dust, and light would affect their poultry operation. Cavalletto Ranches was concerned with how a passing HSTs would affect their nut tree farm and cited increased dust, which would increase mites and defoliation, potential changes in pollinator bee flight patterns, and potential spray drifts. Santa Fe Ranch and Shasky Farms were concerned with changes to irrigation systems from the BNSF Alternative and the resulting effect on farm productivity. Shasky Farms noted their role as a state-contracted social service provider of fresh produce and food services to surrounding lower income areas, local schools, and non-profit organizations, which they believe would be endangered if asked to relocate as a result of the project.

Fagundes Dairy and Amanda Miller commented on the legitimacy of the Draft EIR/EIS, voicing opposition to the segmenting of the HST System into separate geographically based EIR/EISs. Church & Dwight, N&W Land Co. LLC/Red Top Jerseys, and J.G. Boswell Company also commented on the legitimacy of the Draft EIR/IES and asked that it be revised and recirculated. It was noted that the Draft EIR/EIS did not adequately describe the transmission lines needed for the project.

Businesses also voiced concern that acquisitions and relocations could affect jobs and the economy. Live Oak Farms, Meders Ranch, Shasky Farms, Soares Dairy, and Valley Venture LLC noted that the full-time and seasonal jobs that they provided could be eliminated if their farms were relocated or acquired. One commenter stated, "You are destroying family homes and businesses which would end three full-time jobs and approximately 30 seasonal jobs." Doak Development was concerned that the HST would impact the viability of commercial business properties along Golden State Boulevard. Others expressed concern that tax revenues benefiting Madera and Merced could be reduced or eliminated if the HST project passes through these communities. Other businesses such as Etchart Real Estate Consulting Group, Rosedale Ranch, and various farms noted their support for the project in anticipation of the future employment, development, and growth they perceive the project will generate.

Some businesses believe that environmental issues related to noise, traffic, rail travel time, air quality, visual quality, and construction could be detrimental to retaining and attracting customers. KB Home expressed concern that the project's effects on local traffic would affect their mitigation agreements with local agencies. Another commenter noted that "economic loss, loss of jobs, urban blight and degrading social change must be addressed and analyzed in the Draft EIR/EIS as they are related to, and caused by, the physical changes which are significant impacts." Doctor Kelly Brooks was concerned with access to her medical office.

A unique business in this project area is the UPRR, because all alternatives would have some adjacency with this railroad corridor. UPRR provided comments primarily related to their right-of-way and uses proposed in and adjacent to it. They state that their entire right-of-way must be preserved, and the project should not be located within that right-of-way. They state that they identified several encroachments and inconsistencies in the Draft EIR/EIS, including some UPRR right-of-way as belonging to BNSF, and that the detail provided is not adequate to evaluate these right-of-way issues fully. They state that the document failed to acknowledge acquisitions for eminent domain purposes, failed to evaluate the impacts of alignments adjacent to UPRR's right-of-way, failed to address construction encroachments, and failed to evaluate safety risks and mitigation. They also commented on the design requirements, stating that any flyover must comply with their engineering standards, that grade-

separated road crossings may not preclude future grade separation of adjacent UPRR tracks, and that areas must be accounted for to provide access to their right-of-way for improvements. They also believe that the document did not adequately address land use, displacement, environmental justice, and natural resources impacts, as well as impacts from construction, maintenance, and operation of the project. They believe that these deficiencies need to be addressed and the document re-circulated. UPRR provided their design standards as an attachment to these comments.

### 1.3.2 Interest Groups

Comments were received from 43 special interest or community organizations groups listed below. Special interest groups are generally divided among 1) those representing environmental interests such as The Nature Company, 2) those representing farming interests such as the California Farm Bureau Federation, 3) those groups organized in response to this project, such as Community Coalition on High-Speed Rail, or 4) those representing other organized stakeholder groups, such as the Center on Race, Poverty, and the Environment.

The majority of comments from each of these interest group categories requested that the Authority grant a longer comment period referencing the size of the Draft EIR/EIS, the importance of the project, and the lasting effects of the decisions that will follow the Final EIR/EIS. Comments reflecting these issues were provided by the California Farm Bureau Federation; The Nature Conservancy; Sierra Club California, American Farm Trust; The Center on Race, Poverty and the Environment; Citizens for California High-Speed Rail Accountability; Californians Advocating Responsible Rail Design; Community Coalition on High Speed Rail; Endangered Habitats League; friends of Harbors, Beaches, and Parks; Kings County Farm Bureau; Madera County Farm Bureau; Merced County Farm Bureau; Preserve Our Heritage; Planning and Conservation League; California Cotton Ginners Association; California Cotton Growers Association; Fresno County Farm Bureau; Nisei Farmers League; Western Agricultural Processors Association; and the Sierra Club Tehipite Chapter.

An overview of the submittals for each of these groupings is summarized below.

#### Organizations Representing Environmental Interests

- East Merced Resource Conservation District
- Endangered Habitats League
- The Nature Conservancy
- Planning and Conservation League
- San Joaquin River Conservancy
- Sierra Club California
- Sierra Club Tehipite Chapter

#### Organizations Representing Farming Interests

- American Farmland Trust
- California Cotton Ginners Association
- California Cotton Growers Association
- California Farm Bureau Federation
- California Agricultural Aircraft Association
- Fresno County Farm Bureau
- Kings County Farm Bureau
- Madera County Farm Bureau
- Merced County Farm Bureau
- Nisei Farmers League
- Western Agricultural Processors Association

### Groups Formed in Response to High-Speed Train Project

- Californians Advocating Responsible Rail Design
- Californians for High Speed Rail
- Citizens for High Speed Rail Accountability
- Community Coalition on High Speed Rail
- Greater Merced High Speed Rail Committee
- Madera Friends of High Speed Rail
- Preserve Our Heritage

### Other Stakeholder Groups

- Associated Professionals and Contractors of California
- Black Physicians of the Central Valley
- California Alliance for Jobs
- California State Parks Foundation
- Center on Race, Poverty and the Environment
- Central Valley Air Quality Coalition, Land Use and Transportation Committee
- Court-Appointed Special Advocates of Merced County
- Fresno City and County Historical Society
- Friends of Harbors, Beaches and Parks
- Healthy House
- Iron Workers 155
- Operating Engineers Local 3
- Professional Engineers in California Government
- San Joaquin River Parkway and Conservation Trust
- Sigma Lambda Chi, Fresno State
- Silicon Valley Leadership Group
- SMT Rail
- Commerce Aviation and Economic Development

#### **1.3.2.1 Organizations Representing Environmental Interests**

Those groups organized around protecting the natural environment, including local and national groups, were mostly concerned with farmland and biological impacts. For example, the East Merced Resource Conservation District was concerned with impacts to farmlands and biological resources. This organization expressed support for the UPRR/SR 99 Alternative East Chowchilla design option because it has fewer potential impacts. The Nature Conservancy also cited concern that the alignments would impact habitat and farmland and introduce sprawl. The Nature Conservancy also was concerned that the Draft EIR/EIS does not address cumulative impacts and asks for revisions to the document including revisions to mitigation measures. The Sierra Club was concerned about indirect growth impacts and how such impacts might affect air quality and local traffic but voiced support for the HST Project.

The Planning and Conservation League believe that the Merced to Fresno Section of the proposed HST project would lead to the removal of farm land, homes, schools, churches, and historic buildings; would not have the stated benefit of urban sprawl mitigation; and would provide no immediate benefit to the citizens of the Central Valley of California. This organization recommends that funding be used elsewhere and that the Authority revisit a HST route along I-5.

#### **1.3.2.2 Organizations Representing Farming Interests**

Most farming groups voiced concern with the amount of agricultural land that would be affected by the project and preferred the UPRR/SR 99 Alternative since it would have the fewest agricultural impacts. Such groups included the Madera County Farm Bureau and the Merced County Farm Bureau. These farm

bureaus also asked for additional public outreach and thought that the SR 152 Wye should be included in the EIR/EIS to avoid piecemealing. The American Farmland Trust was concerned that the proposed HST Project would result in growth that would convert farmland to suburban development instead of concentrating growth in downtown areas as claimed in the Draft EIR/EIS. The California Farm Bureau Federation was also concerned with the validity of the growth projections in the Draft EIR/EIS.

The California Cotton Ginners Association, California Cotton Growers Association, Fresno County Farm Bureau, Nisei Farmers League, and Western Agricultural Processors Association submitted a joint comment letter. These organizations commented that agricultural impacts are understated in the Draft EIR/EIS and that to minimize farmland impacts, the Draft EIR/EIS should have considered an alternative along I-5 or the California Aqueduct. Similar to the joint letter discussed above, the Kings County Farm Bureau also noted many areas where they believed the Draft EIR/EIS failed to adequately evaluate and mitigate impacts. They also commented that the Draft EIR/EIS failed to include an alignment that follows an existing transportation corridor that would avoid conversion of farmland.

The Merced County Farm Bureau also noted that there are additional agricultural related impacts not discussed in the report and that the No Project Alternative was overstated. The Madera County Farm Bureau and the California Farm Bureau Federation commented on many sections of the EIR/EIS and asked that additional mitigation be provided to address farmland impacts. The Madera County Farm Bureau expressed concern about the potential for relocations caused by the project and the lack of an HST business plan. The California Farm Bureau Federation was particularly concerned with the project description, the alternatives analysis, and impacts to agricultural resources and requested that their concerns be addressed with another opportunity for public comment.

The California Agricultural Aircraft Association is concerned that towers associated with the project could cause a safety concern for pilots. They were also concerned with changes in spraying patterns because of the project, and they noted that wind from the high speeds of the train could cause pesticide drift.

### **1.3.2.3 Groups Formed in Response to the High-Speed Train Project**

Some of the groups who formed in response of the HST project offered critique of the project purpose rather than observations about the Draft EIR/EIS environmental review. The Community Coalition on High Speed Rail questions using federal funds, and suggests transferring funds to the Peninsula for the electrification of Caltrain. Other organizations cited insufficiencies in the Draft EIR/EIS, and requested that these insufficiencies be addressed and the document be recirculated for public review. These organizations included Preserve Our Heritage, Citizens for California High Speed Rail Accountability, and the Community Coalition on High Speed Rail. Californians Advocating Responsible Rail Design identified failures in the EIR/EIS and inadequacies of the public outreach process. They also suggested that additional alternatives be considered because of funding concerns related to the current project.

Citizens for California High Speed Rail Accountability oppose the project and suggest that the Authority either revise or abandon the proposed project and believe that the negative impacts within the City of Fresno have been grossly underestimated and not properly analyzed.

Groups who voiced support for the HST Project because of job growth and economic benefits included the Greater Merced High-Speed Rail Committee, the California Alliance for Jobs, Madera Friends of High Speed Rail, and Californians for High-Speed Rail. Californians for High-Speed Rail noted the need for mitigation when the alignment would either go through cities or circumvents them, as different alignments would result in differing impacts to the community or farmlands. Preserve Our Heritage expressed a preference for the UPRR/SR 99 Alternative and SR 152 Wye. Madera Friends of High-Speed Rail also supported the UPRR/SR 99 Alternative.

Several groups commented on the Merced and Fresno HST stations. Californians for High-Speed Rail asked for the consideration of satellite parking facilities at the Merced and Fresno stations. The Greater Merced High-Speed Rail Committee asked for more information on the funding of the Merced Station and

requested consideration of a fee included in HST tickets that would fund security in and around the proposed station. The Committee was also interested in local business and employment opportunities around the stations. Finally, the Greater Merced High Speed Rail Committee commented that the analysis of the Castle Commerce Center HMF was inadequate.

#### **1.3.2.4 Other Stakeholder Groups**

Some groups voiced support for High Speed Rail because of job growth and economic benefits. These groups include the Silicon Valley Leadership Group, Operating Engineers Local 3, Iron Workers 155, and Professional Engineers in California Government.

The Court Appointed Special Advocates of Merced County asked that the Authority consider how the HST will affect children. Black Physicians of the Central Valley asked that there be safe walking and biking paths for children to schools.

Other stakeholders showed concern of how minority populations would be affected by the project. Healthy House and the Center on Race, Poverty and the Environment requested continued involvement of ethnically diverse communities of the Central Valley. The Center on Race, Poverty and the Environment cited visual impacts, air quality impacts, hazardous materials impacts, impacts on dividing a community, and neighborhood impacts that could affect communities of concern in the Central Valley. This group commented that the public outreach process in the communities of Le Grand and Franklin-Beachwood was insufficient and requested more targeted outreach in the unincorporated communities where the HMF sites may be located. Associated Professionals and Contractors of California were also concerned with impacts related to environmental justice. They believe that the California HST has violated the principles of environmental justice and that the most affected communities of this region (low income, minority, monolingual) were not given ample notice of the impacts of the project. The Associated Professionals and Contractors of California believe that impacts that would affect communities of concern were not fully and adequately disclosed, and they suggested additional mitigation.

The Land Use and Transportation Committee of the Central Valley Air Quality Coalition also commented on environmental justice issues. They commented that the Draft EIR/EIS did not evaluate disproportionate impacts to disadvantaged communities or issues pertaining to transportation access and access to the new HST station facilities. Furthermore, the committee commented that the Draft EIR/EIS contains no specific mitigation measures for land use or growth-inducing impacts from HST station planning.

The San Joaquin River Parkway and Conservation Trust was concerned with visual and access impacts and changes to the recreational use of Camp Pashayan in Fresno, which is operated as a public park. The San Joaquin River Parkway and Conservation Trust requested improvements to the park as mitigation. The California State Parks Foundation was concerned with impacts to Allensworth Park and how the impacts were analyzed in the Draft EIR/EIS. They noted that the Draft EIR/EIS stated that to minimize impacts to Allensworth park, the BNSF railway could be relocated adjacent to the eastern side of the Allensworth Bypass but that the impacts from this relocation were not discussed in the Draft EIR/EIS.

The Fresno City and County Historical Society recommended measures to use in the subsequent design phases of the project to minimize impacts to historical resources in the Fresno area. The Fresno City and County Historical Society requested involvement in further stages of project design because their local knowledge is important in addressing issues related to historical resources.

## **1.4 Received from Individuals**

In addition to agencies, elected officials, and those representing businesses or other organizations, there were a total of 500 submittals from California residents who do not claim affiliation with any other organization or business. The views expressed by these individuals ranged from strongly supportive to

strongly opposed to the entire statewide project. Those who were supportive expressed desires for alternative modes of transportation, reduced congestion, improved air quality, and increased accessibility to other parts of the state. Both supporters and those opposed to the project mentioned jobs in support of their position – either that the project would bring jobs or jobs would be sacrificed due to the project. Those who expressed opposition described lack of confidence in ridership projections, funding availability, and financial planning. They frequently mentioned that the project had higher than expected cost. Commenters in opposition also listed concerns over impacts to community, agricultural, wildlife, and water resources.

In addition to opinions either for or against HST or a particular alternative, the following discussion highlights the most commonly listed issues by individual commenters.

- Agricultural impacts – While agricultural impact was frequently listed as a high concern, most comments merely listed it without adding more specifics. Typically, individuals that owned large property articulated concerns about the effects on farming operations, reduced accessibility to different sides of the farm, reducing the viability of farming in this valley, and the effects on agricultural related and supporting jobs.
- Cost – Many expressed that HST Project costs are larger than expected. There were concerns regarding funding shortfalls or lack of adequate funding and concerns that funding inadequacies will cause further debt in the state of California and higher taxes.
- Property Impacts – Comments on property impacts ranged from wanting the project to avoid acquiring their property to concerns about bisecting their property, as well as generally question whether their property would be impacted. Still others expressed concerns that the noise and presence of HST would cause property devaluation.
- Division in their community – Comments concerning community division were generally addressing individual alignment alternatives. Fairmead residents addressed UPRR/SR 99 and Hybrid alignments while Le Grand residents expressed concern about the BNSF Alternative. Madera residents were generally concerned about impacts of the UPRR/SR 99 Alternative to the downtown area, but some also felt it would help redevelopment opportunities. Residents in Fairmead listed concerns about their community church and the cumulative impacts on their community since recent SR 99 construction has recently had effects on their community and their property. While many citizens in Le Grand expressed similar concerns as those in Fairmead, there were others that stated that the agriculture along the BNSF corridor was not worth protecting and that the HST project was a high value to the region. Those opposing the BNSF Alternative listed how that alternative would result in destroying their community and the agricultural economy surrounding Le Grand. Many residents in Le Grand felt that the BNSF Alternative does not adequately travel along transportation corridors. Individuals from Merced County submitted 159 comment forms distributed by County Supervisor's Pedrozo's office. The form provided four options of different combinations of either supporting the UPRR/SR 99 Alternative or opposing the BNSF Alternative or a combination of both. The form also provided an opportunity for persons to provide hand-written comments. Most continued to re-iterate their preference for or against the project or a particular alternative.

Commenters from Madera were mixed between those who felt that the UPRR/SR 99 Alternative would be detrimental to Downtown Madera and further divide the City (as SR 99 and the UPRR does) and those who felt that this alternative would help the community redevelop an area that is stagnating. Still others felt that Madera did not have anything to gain from the project unless it either had a station or the HMF.

- Safety and transportation impacts – Some comments concerned pedestrian accessibility and safety, and increased vehicular congestion around station areas. Many individuals also recognized the added access, added flexibility, and better transportation along SR 99 resulting from the HST.

The following summarizes comments received from individuals pertinent to each section of the Draft EIR/EIS. If the resource is not included below, direct comments were not provided on that particular topic.

### **Chapter 1, Purpose and Need**

There were almost no comments on the purpose and need. No one questioned the primary need statements, only the facts that the growth projections were currently reflective of the economic downturn. Two persons referenced the benefits of the project to provide support for moving the project forward.

### **Chapter 2, Alternatives Analysis**

The most frequently mentioned element of Chapter 2, Alternatives, was cost. Several commenters listed higher than expected project costs as justification for not doing the project. This comment was frequently combined with lack of trust for the availability and planning for project funding. A few wanted to know the ticket price and considerations for disability fares. Another common comment was the lack of trust for the ridership projections. Approximately 54 individuals commented on the range of alternatives considered. Several questioned whether the alternatives studied upheld the project objective to follow the transportation corridors to the extent possible. Several individuals stated that the BNSF Alternative and the UPRR/SR 99 Alternative West Chowchilla design option deviate from transportation corridors. Several wanted improvements to the Amtrak services and others wanted a Central Valley HST project to be located along I-5. About four individuals requested a stop in the City of Madera, and one person requested justification for the elimination of a design option linking BNSF to the UPRR near Fresno.

A few commenters referenced the growth trends in the Central Valley, with some listing that growth in the Valley cannot be supported and others listing a concern for lack of employment in the Central Valley.

### **Chapter 3, Environmental Resources (in order of frequency mentioned)**

There were no specific comments on Section 4f, Aesthetics, Cultural Resources, Land Use, Hydrology, Hazardous Materials, EMF/EMI, or Utilities analysis by individuals.

Transportation: Transportation issues listed included congestion around stations, safety of pedestrian access, and school walking routes. Additionally, a few mentioned increased difficulty of finding parking around the downtown areas where stations are proposed. One individual wanted to know if this project would displace bus services.

Air Quality: Most commenters that listed air quality as a justification for supporting the HST project mentioned that the operation would potentially remove automobile congestion.

Noise/Vibration: Only a few individual comments mentioned noise impacts on residential areas and no one listed concerns over vibration impacts.

Biology: Individuals listed concern for impacts on the wildlife generally without details about which species or protected areas.

Geology: One individual expressed concern regarding seismic faults lines along the BNSF Alternative alignment.

Safety: Fewer than five individuals listed safety concerns. As mentioned under transportation, a few were concerned about pedestrian safety. Two commenters listed the concern for train collision incidents between freight and HST and wanted to make sure there was a collision barrier planned.

Communities: Specific community impacts concerns were listed above concerning Le Grand, Madera or Chowchilla areas. In addition, three individuals listed their concern for the relocation of the Merced

Mobility Estates due to the access track to the Castle Commerce Center HMF. The most frequent comments were related to property acquisition, relocation procedures, and the potential for the project to devalue their property. Supporters listed the potential for jobs as a benefit of the project, and opposition related concern about project effects on agricultural-related jobs.

Agricultural: Approximately 178 individuals listed agricultural impacts, many of which listed these as the reason for opposing the project. While most were not specific about the types of agricultural impacts that concerned them, others mentioned bisecting farms, added difficulties in farming operations, and closing agricultural businesses. Also, individuals mentioned that the project would remove important economic businesses and jobs that accompany those businesses. People expressed that loss of agricultural resources was a non-renewable resource and that the project had a duty to remain adjacent to existing transportation corridors and minimize the acres of agricultural impacts. A few reiterated some specific business concerns, such as the potential to bisect dairies farm. Others also listed the heritage of multi-generational family owned farms that would be impacted.

Cumulative: A few commenters expressed concern that the project would attract residents to the area who would work outside the region.