22 Local Agency Comments

Part 1 of 4
June 11, 2019

California High-Speed Rail Authority
770 L Street, Suite 620 MS-1
Sacramento, CA 95814

Subject: Central Valley Wye Draft Supplemental EIR/EIS Comment Period – Request for Time Extension

Dear High-Speed Rail Authority:

The City of Chowchilla looks forward to working with the California High-Speed Rail Authority (CHSRA) for the benefit of both the HSR and the people of Chowchilla. However, we will need additional time to review the Draft Supplemental EIR/EIS.

For large projects, many jurisdictions provide review periods longer than the state-required minimum of 45 days. The SEIR is a very large document, which addresses the effects of a project that is of a scale that Chowchilla has never experienced. Particularly for those citizens of Chowchilla who do not ordinarily follow the progress of State-sponsored projects and are unable to easily access media that might inform some, we need additional time. Many people became aware of the project and the preferred alignment, and its potential implications only following the HSR open house last week, which leaves a much smaller window of opportunity to find and read the SEIR.

A thorough review of the SEIR cannot be compromised. After we have had informed dialogue with CHSRA officials, only then will we be able to communicate the relevant comments of concern that CHSRA's preferred alternative will have on the City. Additional information and time are required for a proper review of a project of this size and complexity.

Therefore, I am asking for an additional 30 days to review and comment on the Draft SEIR.

Sincerely,

Rod Pruett, CPA
Interim City Administrator & Director of Finance
City of Chowchilla

130 S Second Street, Chowchilla, CA 93610
Telephone: (559) 665-8615 Fax: (559) 665-7418 www.cityofchowchilla.org
Response to Submission 229 (Rod Pruett, City of Chowchilla, June 11, 2019)

229-25
The comment pertains to the initial circulation of the document pursuant to the California Environmental Quality Act (CEQA). The public review period extended for 48 days, from May 3, 2019, until June 20, 2019. The California High-Speed Rail Authority (Authority) declined to extend the comment period but engaged in an ongoing dialogue with the City of Chowchilla subsequent to the close of the CEQA comment period to review in depth the City’s concerns.

In addition, the document was circulated for National Environmental Policy Act (NEPA) review on September 13, 2019, for a 45-day comment period ending on October 28, 2019.
June 11, 2019

Attn: Draft Supplemental EIR/EIS for the Merced to Fresno Project Section
California High-Speed Rail Authority
770 L Street, Suite 620 MS-1
Sacramento, CA 95814

Via Email to: CentralValley.Wye@hsr.ca.gov

Subject: Request for Extension of Time to Comment and for Cooperative Discussions regarding the Central Valley Wye Draft Supplemental EIR/EIS

Dear High-Speed Rail Authority,

The County of Madera is reviewing the California High-Speed Rail Authority (CHSRA) “Merced to Fresno Section: Central Valley Wye Draft Supplemental Environmental Impact Report/Environmental Impact Statement” (dated September 2018) and the April 2019 “EIR Clarifications and Errata,” collectively referenced herein as the “DSEIR.” CHSRA published the DSEIR on May 3, 2019, with a requirement that comments be submitted by June 20, 2019. By way of this letter, the County is requesting an extension of time to comment on the DSEIR and is requesting to meet with CHSRA representatives to discuss matters associated with the Central Valley Wye that are of substantial importance to the County.

The County appreciates CHSRA’s efforts and we recognize that environmental review of the HSR components is a complex undertaking. While we have concerns regarding certain aspects of the DSEIR, we are confident that our concerns can be addressed through cooperation with CHSRA in advance of the close of the DSEIR comment period. Therefore, we request that CHSRA extend the comment period for a sufficient duration to allow for cooperative discussions. It is not our intent to cause unnecessary delays in the environmental review process; instead, our request is made with interest in ensuring that the concerns and interests of stakeholders in Madera County are considered and addressed.

Thank you for your consideration of this request. Please feel free to contact Matthew Treber at 559-675-7821 or matthew.treber@maderaCounty.com with any questions and to schedule a meeting to discuss our concerns.

Respectfully,

Brett Frasier, Chairman
Madera County Board of Supervisors

Max Rodriguez, Supervisor District 4
Madera County Board of Supervisors
Response to Submission 230 (Matthew Treber, Madera County Board of Supervisors, June 12, 2019)

230-26
The comment pertains to the initial circulation of the document pursuant to CEQA. The public review period extended for 48 days, from May 3, 2019, until June 20, 2019. The Authority declined to extend the comment period but engaged in an ongoing dialogue with Madera County subsequent to the close of the CEQA comment period to review in depth the County’s concerns.

In addition, the document was circulated for NEPA review on September 13, 2019, for a 45-day comment period ending on October 28, 2019.
Submission 234 (Matthew Treber, Madera County (on behalf of Wye Madera County Taskforce), June 17, 2019)

June 14, 2019

Attn: Draft Supplemental EIR/EIS for the Merced to Fresno Project Section
California High-Speed Rail Authority
770 L Street, Suite 620 MS-1
Sacramento, CA 95814

Via Email to: CentralValley.Wye@hsr.ca.gov

Subject: Request for Extension of Time to Comment and for Cooperative Discussions regarding the Central Valley Wye Draft Supplemental EIR/EIS

Dear High-Speed Rail Authority,

The Wye Madera County Task Force (Task Force) is reviewing the California High-Speed Rail Authority (CHSRA) “Merced to Fresno Section: Central Valley Wye Draft Supplemental Environmental Impact Report/Environmental Impact Statement” (dated September 2018) and the April 2019 “EIR Clarifications and Errata,” collectively reference herein as the “DSEIR.” CHSRA published the DSEIR on May 3, 2019, with a requirement that comments be submitted by June 20, 2019. By way of this letter, the Wye Madera County Task Force is requesting an extension of time to comment on the DSEIR and is requesting to meet with CHSRA representatives to discuss matters associated with the Central Valley Wye that are of substantial importance to Task Force member agencies and the communities we represent.

The Task Force is a collaborative of agencies in Madera County with common interests pertaining to the California High-Speed Rail (HSR). Task Force agency members are:

- County of Madera
- City of Chowchilla
- City of Madera
- Madera Unified School District
- Madera County Transportation Commission
- Workforce Development Board of Madera County
- Madera County Economic Development Commission

The Task Force appreciates CHSRA’s efforts and we recognize that environmental review of the HSR components is a complex undertaking. While we have concerns regarding certain aspects of the DSEIR, we are confident that our concerns can be addressed through cooperation with CHSRA in advance of the close of the DSEIR comment period. Therefore, we request that CHSRA extend the comment period for a sufficient duration to allow for cooperative discussions. It is not our intent to cause unnecessary delays in the environmental review process; instead, our request is made with interest in ensuring that the concerns and interests of stakeholders in Madera County are considered and addressed.

Thank you for your consideration of this request. Please feel free to contact Matthew Treber at 559-675-7821 or matthew.treber@madera county.com, with any questions and to schedule a meeting to discuss Task Force concerns.

Sincerely,

Arnoldo Rodriguez, City Manager
City of Madera

Patricia Taylor, Executive Director
Madera County Economic Development Commission

Eric Fleming, County Executive Officer
County of Madera

Rodrigo Peralta, City Administrator
City of Chowchilla

Tracie Smith-Gonzalez, Executive Director
Workforce Development Board of Madera County

Todd Lutz, Superintendent
Madera Unified School District
Response to Submission 234 (Matthew Treber, Madera County (on behalf of Wye Madera County Taskforce), June 17, 2019)

234-38
The comment requested to meet with the Authority. The Authority conducted informal meetings with the Task Force over the summer of 2019.

234-39
The comment pertains to the initial circulation of the document pursuant to CEQA. The public review period extended for 48 days, from May 3, 2019, until June 20, 2019. The Authority declined to extend the comment period but engaged in an ongoing dialogue with the Wye Madera County Task Force subsequent to the close of the CEQA comment period to review in depth the Task Force’s concerns.

In addition, the document was circulated for NEPA review on September 13, 2019, for a 45-day comment period ending on October 28, 2019.
Good afternoon,
Please see the attached letter we received from a constituent.
Feel free to follow up with me with any questions.
Thank you!

Nick Salinas | District Chief of Staff
MADERA COUNTY BOARD OF SUPERVISORS
200 W. 4th Street, Suite 4100, Madera, CA 93637
Office: (559) 662-6030

###
June 3, 2019

Robert Poythress
Madera County Supervisor, District 3
205 W. 4th St.
Madera CA 93637

RE: HSR Draft Supplemental Environmental Impact Report:
Merced to Fresno Section: Central Valley WYE/Gordon Shaw Properties Site

Dear Supervisor Poythress,

I’m writing this letter to comment on the above referenced Draft Supplemental Environmental Impact Report. The Supplemental Report will direct the CHSRA in choosing the last piece of the alignment that will connect Madera to San Jose. Specifically, I want to voice my support for the Ave. 21/Gordon Shaw alignment (see drawing enclosed) and ask that you and the County take a position in support of this alignment.

The Gordon Shaw HMF site was studied extensively for over two years and certified by the CHSRA. It was stated in the report that the site was the least expensive to develop and had the minimal impacts on the environment. In addition, the site, submitted by the County of Madera contained a letter by the owner of the property wherein the owner offered the site on any terms deemed acceptable by the CHSRA. The site was one of over 20 sites submitted from Atwater to Bakersfield and after environmental clearance, became one of 4 sites left of the original sites submitted. It is a preferred site.

The Ave. 21 alignment is less expensive than the Ave. 23 alignment. It is a faster alignment than the Ave. 23 alignment. It will be easier to construct. However, if the Ave. 23 alignment is chosen, there is a route that serves the Gordon Shaw Site [see enclosed]. The drawings attached were done by Precision Engineering, who has done extensive work for the CHSRA.

I ask that the County pass a resolution in support of the Ave. 21 and Ave. 23 alignments that serve the Gordon Shaw Properties HMF site. This resolution would not in any way threaten any other HMF sites under consideration in Madera County and would keep a high quality site chosen as a finalist by the CHSRA in contention for selection.

Thank you for your consideration.

Sincerely,

Edward J. McIntyre
Gordon Shaw Properties Representative
Response to Submission 236 (Nicholas Salinas, Madera County Board of Supervisors (On behalf of McIntyre), June 18, 2019)

236-41
The comment submission from Madera County forwarded a letter from Edward J. McIntyre, Gordon Shaw Properties Representative, to the Madera County Board of Supervisors asking the County to pass a resolution regarding the Gordon Shaw Properties heavy maintenance facility site. The letter does not address the content of the Draft Supplemental Environmental Impact Report (EIR)/Environmental Impact Statement (EIS). Please refer to Standard Response: CVY-Response-GENERAL-4: Heavy Maintenance Facility.
Submission 244 (Ellen Wehr, Grassland Water District, June 21, 2019)

Dear California High-Speed Rail Authority,

The Grassland Water District and Grassland Resources Conservation District (collectively, GWD) submit these comments regarding the California High-Speed Rail Authority’s (Authority) Draft Supplemental Environmental Impact Report/Environmental Impact Statement (SEIR/SEIS) for the Merced to Fresno Section of the California High-Speed Rail Project (Project). The SEIR/SEIS addresses the Central Valley “Wye” feature of the Project, which would serve as a junction for the proposed east-west connection from the Fresno to Merced Project section to San Jose. The Authority is only issuing the SEIR/SEIS pursuant to state law, the California Environmental Quality Act (CEQA).

GWD, its landowners, non-governmental organizations, and wildlife agencies have long advocated for the Project to follow a route that does not bisect the Grasslands Ecological Area (GEA). The GEA is an internationally recognized natural wetland ecosystem that comprises the largest remaining intact contiguous freshwater wetland in California. The environmental impacts of routing high-speed trains through the GEA are not fully understood but will undoubtedly be significant. Despite extensive efforts by a coalition of organizations working with the Authority to develop mitigation and avoidance measures, the Authority has not yet shared its environmental analysis or committed to mitigation measures, and the potential impacts to the GEA remain significant and unavoidable.

1. A 2018 mitigation request letter from Audubon California, California Waterfowl Association, Ducks Unlimited, and Point Blue Conservation Science is attached hereto.
All of the proposed alternatives for the Central Valley Wye east-west connection would route the Project along Henry Miller Road, which equates to a premature selection of a high-speed rail route through the GEA. When the Authority previously approved its Final EIR/EIS for the Fresno to Merced Project section, it purposely declined to select an east-west Wye connection. In light of Project changes, changed circumstances, and new information, it appears that this decision was the correct one. The Authority should not approve an east-west Wye connection at this time. The SEIR/SEIS also omits highly relevant information that CEQA requires to be included.

I. STATEMENT OF INTEREST
Grassland Water District is a California Water District that delivers water to the 75,000-acre Grassland Resource Conservation District, including water supplies for delivery to private, state, and federally managed wetlands and wildlife refuges. The Grassland Water District and Grassland Resource Conservation District (collectively, GWD) intensively manage wetlands to produce standing crops of moist-soil food plants and invertebrates with high value to wildlife, particularly waterfowl and shorebirds in the Grasslands Ecological Area, located in Merced County in the San Joaquin Valley. 90% of the GRCD is preserved under permanent wetland conservation easements or as public lands. GWD has a strong interest in preserving the habitat value of the GEA.

II. CEQA REQUIREMENTS
When changes occur after an EIR is certified, a subsequent or supplemental EIR must be prepared and circulated to the public if there are substantial changes to the project, its surrounding circumstances, or there is pertinent new information:

(1) Substantial changes are proposed in the project which will require major revisions of the environmental impact report.

(2) Substantial changes occur with respect to the circumstances under which the project is being undertaken which will require major revisions in the environmental impact report.

(3) New information, which was not known and could not have been known at the time the environmental impact report was certified as complete, becomes available. The regulatory CEQA Guidelines elaborate on the meaning of this law. First, the CEQA Guidelines require the preparation of a subsequent EIR if there are substantial changes to the project, its surrounding circumstances, or there is new information requiring "major revisions" to a previous EIR "due to the involvement of new significant environmental effects or a substantial increase in the severity of previously identified significant effects." A subsequent EIR is also required if new information shows that feasible mitigation measures or project alternatives would substantially reduce the project's significant effects on the environment, but are rejected by the lead agency. The CEQA Guidelines authorize the preparation of a supplemental EIR rather than a subsequent EIR if any of these events occurs but "only minor additions or changes" to the EIR are necessary. New information is "significant" when it "deprives the public of a meaningful opportunity to comment on a substantial adverse environmental effect of the project or a feasible way to mitigate or avoid such an effect (including a feasible project alternative) that the project's proponents have declined to implement." For example, the discovery that a project may have an greater adverse effect on wetlands than previously believed is a substantial change in circumstances requiring revision and recirculation of an EIR. Failure to do so "deprive[s] the public, who relied upon the EIR's representations, of meaningful participation regarding the issue of wetlands degradation," a significant adverse effect.

III. SIGNIFICANT CHANGES AND NEW INFORMATION
The Draft SEIR/SEIS neglects to describe substantial changes with respect to the Project and the circumstances under which the Project is being undertaken:

(1) On February 11, 2019, Governor Newsom gave a State of the State address declaring support for a scaled-back Project between Merced and Bakersfield, which does not require a determination regarding an east-west connection;

(2) On February 19, 2019, the Federal Railroad Administration (FRA) notified the Authority that it would not participate in federal environmental review and would rescind federal grants for the Project, grants that contained a requirement to complete CEQA review for future Project sections; and

(3) On May 1, 2019, the Authority issued a Project Update Report, stating that it did not have funding to complete the entire Project and would focus on constructing a scaled-back Project from Merced to Bakersfield by 2028.

3 Id.
4 Id., § 15163.
5 Laurel Heights Improvement Assn. v. Regents of the Univ. of Cal. (1993) 6 Cal.4th 1112, 1129-1130.
Not only does the Draft SEIR/SEIS omit this new information, it fails to provide any sufficient purpose or need for the Authority to adopt a SEIR/SEIS that approves an east-west connection for the Central Valley Wye at this time.\(^8\) The Authority has already approved a Final EIR/EIS for the Merced to Fresno section. It must now select only a final north-south route for the high-speed rail from Merced to Fresno and then to Bakersfield, in order to proceed with the scaled-back Project.

Moreover, because this portion of the Project will not be completed until 2028 at the earliest, any future construction of an east-west connection will be long into the future and will likely face further significant changes to the Project, its surrounding circumstances, and available information. The proposed approval of an east-west Central Valley Wye connection is premature and unwise.

Finally, through regular meetings with the Authority, a working group of stakeholders has provided significant information regarding the potential impacts that an east-west connection along Henry Miller Road would have on wildlife in the GEA. There remains substantial debate about the nature and extent of disturbances that the Project would cause due to noise, lighting, vibration, glare, connectivity of wildlife corridors, placement of accessory facilities, and Project-induced growth. The Authority’s ability and willingness to deploy stringent avoidance and mitigation measures also remains unclear. The Authority should seriously consider the potential costs, delays, and impacts of making a too-early decision regarding the proposed east-west Project connection in the Central Valley.

CEQA requires the inclusion of the new information described above in a revised SEIR/SEIS. GWD urges the Authority to reframe its environmental review on those north-south features that are necessary to complete a scaled-back Project in the Central Valley. The premature selection of an east-west connection in the Central Valley at this time is controversial and unnecessary. Thank you for your consideration of these comments.

Sincerely,

Ricardo Ortega
General Manager
Grassland Water District and
Grassland Resource Conservation District

\(^8\) The SEIR/SEIS at pages 1-2 to 1-3 refers vaguely to "updated data for existing conditions, and new and updated policies and regulations," but provides little to no additional explanation.
Chapter 22 Local Agency Comments

Submission 244 (Ellen Wehr, Grassland Water District, June 21, 2019) - Continued

December 5, 2018

VIA U.S. MAIL AND E-MAIL

Mark McLoughlin
Director of Environmental Services
California High-Speed Rail Authority
770 L Street, Suite 620
Sacramento, CA 95814
E-Mail: Mark.McLoughlin@hsr.ca.gov

Re: Request for Wildlife Mitigation in the Grasslands Ecological Area

Dear Mr. McLoughlin,

Our organizations have met with you, your staff and consultants over the past year to discuss environmental design, impacts, and mitigation for the High-Speed Rail (HSR) project in that portion of the San Jose to Merced segment known as the Grasslands Ecological Area (GEA). This area of the San Joaquin Valley contains abundant wildlife and birds, wetlands, and green space that is vital to local communities, the regional economy, and the international migration of birds. The GEA is recognized under our international treaties and by national and international environmental organizations as one of the last remaining undeveloped wetland complexes in the West.

We have expressed our strong desire that the HSR be rerouted to avoid the GEA, or that the trains be routed underground. If HSR trains are to pass through this precious place without doing irreversible environmental harm, we must use modern mitigation techniques that are on par with other nations. Countries like China and Spain are employing new and promising technologies in environmental design and monitoring for HSR trains. We write you to request that California embrace these same opportunities for the “Valley to Valley” segment of the HSR project.

It is widely acknowledged that “HSR planning faces a key environmental challenge: practically nothing is known regarding the potential environmental effects of HSRs beyond pollution and climate change.” However, an extensive body of research shows that transportation corridors cause significant disturbance and mortality of birds and other wildlife. Recent observations in Spain estimated 80 direct bird strikes/deaths per HSR kilometer per year (daytime only). It is our informed belief that HSR trains travelling through the wildlife-rich GEA will have even greater disturbances of wildlife, resulting in long-term behavioral changes and frequent bird collisions.

The recently opened Shenzhen-Maoming Railway in China’s Guangdong Province was constructed with sensitivity to a nearby wetland habitat used by 30,000 herons. To avoid disturbing this habitat, China constructed a vaulted tube/shield on a 2,056-meter section of HSR line, using sound absorption and insulation materials. Tests showed that when a HSR train passed at a speed of 200 km per hour, the sound monitored at the core area of the birds’ habitat was barely audible.

In Spain, shields are also being deployed to reduce the effects of HSR operations on birds. Spain has allowed on-board monitoring of bird presence and bird strikes to better understand the environmental costs of its HSR projects. We believe that the potential for damage to wildlife in the GEA is larger in magnitude than the existing HSR projects studied in Europe and Asia. In addition to a number of smaller mitigation measures to reduce and avoid these impacts, we request that the California High-Speed Rail Authority fully vet the following environmental design, mitigation, and monitoring techniques as a serious option for the HSR project, similar to China and Spain:

1. Design and construct a vaulted tube/shield through the GEA similar to the Shenzhen-Maoming Railway. Using modern sound- and vibration-absorption techniques, this mitigation measure will greatly reduce noise, vibration, and visual disturbances to wildlife, and avoid bird strikes.

2. Commit to pre-construction and post-operational monitoring of bird presence and bird responses around the HSR project where it passes through the GEA. Employ modern GPS and camera-based technologies to observe bird behavior and record bird strikes along the HSR corridor. If there are unpredicted or unreasonable impacts to wildlife from HSR operations, adaptive mitigation measures may need to be implemented in response.

Millions of birds use the GEA each year for nesting, feeding, and resting during long migratory journeys, and other wildlife species make abundant use of this peaceful and productive wetland habitat. A significant amount of private, local, state, and federal investment has been made in the GEA habitat for many decades. We encourage the HSRA to lead the world in protecting and preserving our wetland environment.

Sincerely,

Michael Lynes
Policy Director
Audubon California

Ricardo Ortega
General Manager
Grassland Water District

Jeffrey Volberg
Director of Water Law & Policy
California Waterfowl Association

Catherine Hickey
Conservation Director
Point Blue Conservation Science

Mark Biddlecomb
Director of Operations, Western Region
Ducks Unlimited
Response to Submission 244 (Ellen Wehr, Grassland Water District, June 21, 2019)

244-95
The Authority acknowledges the Grasslands Water District’s (GWD) participation and comments in the planning and environmental review processes for the HSR to date. The Authority has recognized the potential for and evaluated the impacts of the HSR on the Grasslands Ecological Area (GEA) as part of its Tier 1 Bay Area to Central Valley programmatic environmental documents. In its Tier 1 decision, selecting the Pacheco Pass via the Henry Miller Road corridor for further Tier 2 study, the Authority committed to continuing to seek and evaluate ways to minimize or avoid resources in the GEA (Resolution HSR #12-17, Exhibit A). That Tier 2 study is occurring as part of the San Jose to Merced Project Section. Figure 2-1 in the Draft Supplemental EIR/EIS depicts the Tier 1 corridors that advanced for further study and illustrates that the study area limits for this Draft Supplemental EIR/EIS do not include areas that cross or are proximate to the GEA.

The Authority acknowledges the 2018 letter attached to GWD’s comments, which is being considered as part of development of the San Jose to Merced Draft EIR/EIS.

244-96
As explained in Section 2.1.1 and Figure 2-1, the FRA and Authority advanced a Tier 1 corridor, extending from the Bay Area to the Central Valley, over Pacheco Pass, then along Henry Miller Road, to meet the Merced to Fresno Tier 1 corridor. Subsequent planning and environmental review, including as part of the Merced to Fresno Final EIR/EIS and as part of this document, considered several east-west connections for the HSR that refine and build upon the Tier 1 decision in the geographic area west of Chowchilla and extending to Carlucci Road (please refer to Figures 2-3 and 2-4).

All of the Central Valley Wye alternatives studied in this document converge on their western end at SR 152 and Carlucci Road, which is also the location where all alternatives under consideration for the adjacent San Jose to Merced Project Section converge. The selection of a Central Valley Wye Alternative would not predetermine the HSR alignment west of Carlucci Road. The GEA will be evaluated in the Authority’s environmental analysis of the adjacent San Jose to Merced Project Section.

244-97
The comment asserts that the 2019 remarks of the governor and FRA’s determination to cancel a certain amount of federal funding for HSR means the HSR system as a whole will be scaled back, which should have been reflected in the Draft Supplemental EIR/EIS. However, the HSR system is not being scaled back. The Authority is continuing to conduct planning and environmental reviews on each Phase 1 project section while at the same time continuing engagement with FRA concerning grant funding as well as working to find resources to fund future construction to continue and complete the Phase 1 HSR system.

The purpose of and need for the HSR system as a whole, including the Merced to Fresno Project Section, are identified in Chapter 1, Introduction and Purpose, Need, and Objectives, and remain valid and accurate.

The potential for interim service considered in the 2019 Project Update Report (Merced to Bakersfield) would include the area of the wye alternatives.

Please also refer to Standard Response CVY-Response-GENERAL-5: Interim Operating Plans and Draft 2020 Business Plans regarding considerations of interim service.

The comment’s suggestion for the Authority to approve only the north–south components for the wye and further defer the east–west connection is noted.

244-98

The Authority is proceeding with environmental review for all Phase 1 project sections and anticipates making alignment and station decisions for Phase 1 at the conclusion of those project-section EIR/EIS processes. The commenter’s suggestion that selection of an east–west wye connection is premature is noted.
Response to Submission 244 (Ellen Wehr, Grassland Water District, June 21, 2019) - Continued

244-99
The Authority acknowledges stakeholder working group efforts related to wildlife impacts from an HSR alignment along Henry Miller Road. These efforts are occurring in conjunction with the adjacent San Jose to Merced Project Section, which will include an evaluation of impacts on the GEA in the Draft EIR/EIS for that project section.

The comment urges the Authority to take cost considerations into account when making a decision regarding a proposed east–west connection through the Central Valley. The comment is noted. It does not cite or concern any specific environmental conclusion within the Draft Supplemental EIR/EIS.

244-100
The Authority appreciates the GWD comments. Please refer to prior responses to GWD’s comments regarding selection of an east–west connection in the Central Valley.

244-101
The comment is contained in an attachment to the EIR/EIS comment letter from GWD. The letter attachment is not a comment on the Draft Supplemental EIR/EIS. Rather, the letter advocates for the Authority including new technologies as mitigation for the HSR as it passes through the GEA.

As noted in prior responses to GWD, the GEA is west of the common western terminus of all of the Central Valley Wye alternatives, which converge at Carlucci Road. The Authority is considering the mitigations identified in the letter attachment to the GWD comment letter on the Draft Supplemental EIR/EIS as part of the San Jose to Merced Project Section.

244-102
Please refer to the response to submission MF2-244, comment 101.

244-103
As noted above, the Central Valley Wye does not encompass the area in and around the GEA. HSR impacts on the GEA will be evaluated in the Authority’s environmental analysis of the San Jose to Merced Project Section. The Authority appreciates the comment regarding protecting and preserving wetlands.
 Submission 245 (Matthew Treber, Madera County (on behalf of Wye Madera County Taskforce), June 21, 2019)

Please find attached the WYE Madera County Task Force formal comment letter on the Central Valley Wye Draft Supplemental EIR. We look forward to an opportunity to work through our concerns with the High Speed Rail Authority. Please contact me with any questions or concerns. We are also Oversighting this letter to the Authority via FedEx.

Thanks,

Matthew Treber | Director of Community and Economic Development
COMMUNITY AND ECONOMIC DEVELOPMENT
200 W. 4th Street, Suite 3100, Madera, CA 93637
Office: (559) 675-7621 | Cell: (559)395-5559
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https://twitter.com/maderaCounty/

June 20, 2019

Attn: Draft Supplemental EIR/EIS for the Merced to Fresno Project Section
California High Speed Rail Authority
770 L Street, Suite 620 MS-1
Sacramento, CA 95814

Via Email to: CentralValley.Wye@hsr.ca.gov

Subject: Comments on Merced to Fresno Section: Central Valley Wye Draft Supplemental Environmental Impact Report/Environmental Impact Statement

Dear High-Speed Rail Authority,

This letter provides comments from the WYE Madera County Task Force (Task Force) to the California High-Speed Rail Authority (CHSRA) regarding the “Merced to Fresno: Central Valley Wye Draft Supplemental Environmental Impact Report/Environmental Impact Statement” (dated September 2018) and the April 12, 2019 “EIR Clarifications and Errata,” collectively referenced herein as the “DSEIR.”

The Task Force is a collaborative of agencies in Madera County with common interests pertaining to the California High-Speed Rail (HSR). Task Force agency members are:

- County of Madera
- City of Chowchilla
- City of Madera
- Madera County Transportation Commission
- Madera Unified School District
- Workforce Development Board of Madera County
- Madera County Economic Development Commission

The DSEIR was published on May 3, 2019, with a requirement that comments on the document be submitted by June 20, 2019. On June 14, 2019, the Task Force submitted a letter to CHSRA requesting extension of the comment period and requesting to meet with CHSRA to discuss the Task Force’s concerns. Presently, CHSRA has not notified the Task Force of a decision to extend the comment period; therefore, we are submitting this letter to ensure our comments on the DSEIR are received by the substantial deadline. We remain interested in meeting with CHSRA to discuss and address our concerns. The Task Force supports CHSRA’s efforts in implementing the statewide HSR. However, the Task Force has concerns regarding certain elements of the Central Valley Wye and of the environmental review. We are confident these concerns can be addressed through refinements to certain aspects of the project and clarifications related to the environmental review, and we look forward to addressing these concerns in cooperation with CHSRA.

A primary interest shared by Task Force members is our support for selection of Madera County as the location for the HSR Heavy Maintenance Facility (HMF). The Central Valley Wye will result in HSR having greater and disproportionate impacts in Madera County due to the extra track miles needed to accommodate the intersection of the San Jose-Merced and Merced-Fresno segments in Madera County. Locating the HMF in Madera County would provide jobs and revenue that would contribute to offsetting...
adverse effects of the HSR and Central Valley Wye. With the sanction of the San Jose-Merced and Merced-Fresno segments in Madera County, it is reasonable to expect that the HMF should be located in Madera County. In 2015, Task Force members adopted resolutions (enclosed with this letter) expressing support for establishing the HMF in Madera County. Three proposals identifying specific sites in Madera County and demonstrating each site’s ability to meet CHSRA’s HMF selection criteria have also been submitted to CHSRA and are also included with this letter. The Task Force’s strong support and interest in siting the HMF in Madera County continues, and we urge CHSRA to coordinate with the Task Force and other stakeholders for the selection of an HMF site in Madera County.

245-106

The Task Force is interested in cooperating with CHSRA to ensure HSR facilities in Madera County are designed, constructed, and operated to achieve the intended statewide benefit while minimizing the adverse effects on our communities, productive lands, and businesses. Part II of this letter outlines our specific requests for consideration by CHSRA. The Task Force looks forward to discussing our requests with CHSRA staff and developing a program for achieving the Task Force objectives while providing for successful development and operation of a community-sensitive HSR system.

We encourage CHSRA to consider the issues and recommendations in this letter in the weight they carry from our perspective as agencies with land use and regulatory responsibilities, directly related to protecting the health and welfare of the citizens of Madera County and the County’s economic and environmental values. We invite and look forward to additional discussions with CHSRA in the decision-making process for HSR facilities developed and operated in Madera County.

PART I. TASK FORCE PRIMARY REQUESTS

Construction of HSR components in Madera County began in 2015. Since that time, Madera County residents, business, and local agencies have gained important insight to the effects and challenges of this substantial public infrastructure construction project. We have worked cooperatively with CHSRA and its contractors to assist in accommodating construction activities while seeking to minimize the effects on our community. We are confident that our insights and our interest in continued cooperation with CHSRA can result in successful development of the HSR system, including the Central Valley Wye and other important components of the system in Madera County.

The Task Force has identified issues of concern pertaining to the proposed project presented in the DNEIR. These relate to temporary effects during construction of HSR facilities and permanent effects resulting from the changes to our communities and our public infrastructure resulting from the permanent presence and operation of HSR facilities in the County. Our concerns with regard to construction-related impacts could largely be addressed through more clearly defined local agency involvement and approval processes, greater attention to impacts on existing transportation infrastructure, and improved construction planning and planning. The current road closure situation at the Road 27 grade-separation project for HSR Construction Package 1 (CP-1) Extension north of Madera is illustrative. Road 27 is a north-south road that serves as one of the primary access routes to the Madera Acres community, including Berenda Elementary School that serves approximately 850 students. Road 27 was permitted by the County to be closed for one year for HSR construction at the HSR crossing in September 2016 resulting in all traffic being routed to the remaining primary access route (Road 26). The detour essentially doubled the traffic using Road 26 to the area, which led to significant congestion at the single access point and doubled traffic loading on these roads, thereby accelerating the depletion of the service life of this transportation infrastructure. Additionally, a significant portion of the traffic that would otherwise take access from Road 27 was rerouted through local neighborhood streets to access Road 26. This increased the volume of traffic in neighborhoods and the concern for the safety of children and pets playing in these neighborhoods. Three years after construction at this location has not been completed and Road 27 remains closed. Compressing this situation, Burlington Northern Santa Fe (BNSF) initiated work on its existing rail line south of the Road 27 location, resulting in a closure that forced even more traffic onto the already heavily impacted Road 26. This traffic would have been detoured onto Road 27 were it not for the ongoing closure due to HSR construction. These overlapping closures have resulted in extending the travel distance between Madera Acres and the City of Madera by an additional two to four miles for each trip.

With improved planning and coordination and more clearly established construction contract requirements and commitments, we believe situations like the one described above can be avoided. Our key requests listed in this section (and specific modifications to IANPs suggested in Part III of this letter) outline improved mechanisms to avoid construction delays and related effects on Madera County communities.

The Task Force also requests that CHSRA provide assistance and funding for the planning efforts our land use agencies will need to undertake to update general plans, transportation plans, zoning, and other related planning activities necessary as a result of the substantial permanent changes to land use, circulation, and other conditions caused by the development and operation of HSR facilities in the County. Our most populated areas and our most traveled roads are substantially affected by HSR. With HSR facilities becoming a permanent fixture in the County, our land use and planning agencies must update our general plans, zoning codes, land use and zoning designations, and infrastructure and circulation plans to accommodate the HSR. The HSR is planned as a state-wide and nationally important transportation resource. Our communities are being required to absorb the effects and, therefore, must be provided with the tools and funding to allow us to adjust. Key Task Force requests listed below would help achieve that.

The HSR will eventually result in millions of passengers passing through Madera County each year. Thus, in our requests, the Task Force urges CHSRA to provide for visibility and promotion of our communities through signage along the HSR corridor and access to our community with a permanent Madera Station.

As discussed, the location of the Central Valley Wye in Madera County will result in the HSR having greater and disproportionate impacts in the County. Locating the HMF in Madera County would provide economic benefits that would substantially aid in alleviating the adverse economic and community effects of the HSR and Central Valley Wye. Locating the HMF in Madera County would provide jobs and revenue that would contribute to offsetting adverse effects of the Central Valley Wye. With the sanction of the San Jose-Merced and Merced-Fresno segments in Madera County, it is reasonable to expect that the HMF facility should be located in Madera County. Thus, a key Task Force request is for CHSRA to establish the HMF in Madera County. As discussed further in Part II of this letter, the Task Force also suggests that HMF sites be evaluated as a component of the Central Valley Wye so as not to prematurely eliminate and preclude feasible HMF sites from consideration.
### Chapter 22 Local Agency Comments

**Submission 245 (Matthew Treber, Madera County (on behalf of Wye Madera County Taskforce), June 21, 2019) - Continued**

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<td>Provide compensation to local agencies and to communities for reduced jobs and income associated with permanent loss of agricultural land and productivity as a result of the HSR;</td>
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<td>Provide compensation to local agencies and to communities for reduced jobs and income associated with permanent loss of agricultural land and productivity as a result of the HSR;</td>
<td>Provide enhanced aesthetic features, with Task Force involvement in the design, of HSR structures and other infrastructure to be developed or reconstructed as a result of the HSR, including but not limited to, low fences, overpasses, and elevated road structures;</td>
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<td>Provide financial assurances sufficient to fund local agency completion/cleanup of work initiated at various HSR construction sites if necessary due to HSR finding delays or shut down;</td>
<td>Provide a mechanism to design with Task Force involvement, fund, install, and maintain a minimum of eight (8) &quot;Welcome to Madera County,&quot; &quot;Welcome to the City of Chowchilla,&quot; and &quot;Welcome to the City of Madera&quot; high-quality, lighted signs along HSR facilities to promote Madera County and its cities to HSR users;</td>
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<td>Provide for developing and permanently retaining an HSR Madera Station in Madera County to ensure continued value of infrastructure and access provisions developed for the proposed temporary station and to enable HSR to serve residents and businesses in Madera County;</td>
<td>Provide a mechanism to ensure that groundwater rights associated with acquired or otherwise affected properties are sufficient for retaining local access to groundwater and aquifer for regional water supply and groundwater recharge needs;</td>
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<td>Provide funding for upgrades to local emergency service equipment and personnel training as needed to provide emergency response associated with HSR operations and facilities;</td>
<td>Provide opportunities for shared utility use of the HSR corridor and fund and install utility connections when available and feasible for communities adversely affected by HSR (e.g., installation of conveyance facilities for water and sewer services to the affected community of Farmland).</td>
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<td>Establish a mechanism for HSR construction practices that will minimize construction-related traffic impacts (e.g., detours, closures, increased vehicle miles traveled (VMT) with specific requirements for construction scheduling and planning, and include defined processes for review and approval of construction traffic management plans by affected local agencies in Madera County);</td>
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<td>Provide a mechanism to aid in funding the extension and connection of Avenue 17 westward to SR 145 to compensate for east-west road closures and the loss of connectivity resulting from HSR and ensure emergency access and acceptable response times between areas east and west of HSR facilities;</td>
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<td>Provide for the design, permitting, and reconstruction of the State Route (SR) 99/SR 152 interchange with a design that includes on- and off-ramps to both northbound and southbound SR 99;</td>
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<td>Provide specific measures that will ensure permanent closures of local roads and road crossings are minimized;</td>
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<td>Provide specific measures to reconstruct and improve existing local roads and intersections sufficient to mitigate construction impacts and to accommodate increased use due to closure of other roads and future traffic;</td>
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<td>Provide analysis and measures sufficient to ensure the phased development of the HSR system, in consideration of initial components in Madera County and the Central Valley, does not adversely affect the region's ability to comply with Federal Clean Air Act Transportation Conformity requirements;</td>
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<td>Provide compensation to local agencies and community groups for the economic and community impacts of the HSR in Madera County;</td>
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<td>Provide compensation to local agencies for losses of property tax revenue from properties acquired for HSR facilities or otherwise decreased in value as a result of the HSR (e.g., payments in lieu of taxes);</td>
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<td>PART II. COMMENTS ON THE DRAFT SUPPLEMENTAL EIR/EIS</td>
<td><strong>Clarifications and Errata</strong>, &quot;The Authority presently is uncertain regarding future NEPA steps related to the Merced to Fresno Section Central Valley Wye. The Authority will pursue collaboration with FRA to issue a draft supplemental EIS for public comment pursuant to NEPA in the future.&quot; (EIR Clarifications and Errata, pg 1)</td>
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<td>This section provides Task Force comments on the DSIEIR in consideration of requirements of the California Environmental Quality Act (CEQA). Our comments reflect the Task Force's consideration of the &quot;proposed project&quot; and the associated environmental and community impact conclusions in the DSIEIR. Although the DSIEIR contains information and analysis pertaining to the National Environmental Policy Act (NEPA), neither the Federal Railroad Administration (FRA) nor any other federal agency has authorized circulation of the Environmental Impact Statement (EIS) component. Therefore, the Task Force reserves the right to provide additional comments on the NEPA environmental document when it is circulated.</td>
<td>Thus, the NEPA components of the document are not ripe for public review. The 2012 Merced-Fresno EIR/EIS was a joint CEQA/NEPA and the Central Valley Wye will require federal agency discretionary decisions subject to NEPA. If CHSRA has determined that circulation of a CEQA-only</td>
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**August 2020**

California High-Speed Rail Authority

**Merced to Fresno Section: Central Valley Wye Final Supplemental EIR/EIS**
document is the proper approach, the document should be limited to the issues and environmental analysis required by CEQA and should not constitute NEPA issues and analysis that are not authorized for publication. The Task Force suggests that public review and comment on the environmental analysis in the DSER should be postponed until such time as either: 1) CHSRA establishes its authority to proceed with the development of HSR without federal participation and subsequently issues a CEQA-only environmental document, or 2) the federal agency(ies) with discretionary decision-making authority for HSR concur with and authorize release of a joint CEQA/NEPA document.

2. CHSRA did not issue a notice of preparation for the “proposed project,” inviting local agencies and other stakeholders the ability to provide input on the scope of issues to be considered in the EIR.

The Task Force recognizes that CEQA does not require issuance of a notice of preparation or scoping in advance of the publication of a subsequent or supplemental EIR. However, although the DSER is described as a “supplemental” EIR, the DSER evaluates the Central Valley Wye. Alternative 4, as a stand-alone “project” and not as a modification to the Merced-Fresno segment “project” evaluated in the 2012 EIR/EIS. Although the document is described as a supplement to the 2012 EIR/EIS, the DSER does not supplement the 2013 EIR and, instead, evaluates the Central Valley Wye as a stand-alone project component of the HSR. To evaluate the Central Valley Wye as a stand-alone project component of the HSR consistent with CHSRA’s approach to other HSR components, the HSR Central Valley Wye/EIS would need to be treated as a second tier EIR/EIS. As a second tier EIR/EIS, the CEQA-required public notice and opportunity for input on the scope of issues to address in the environmental analysis scoping process would have been provided. CHSRA’s decision to not issue an NOP and to not conduct EIR scoping for the Central Valley Wye did not give local agencies and other stakeholders the ability to consider the proposed project and provide comments on the scope of issues to address in the EIR. As a result, the DSER does not fully consider environmental and other issues important to the Task Force and relevant for consideration in preparing the draft environmental document.

3. The DSER defines the “project” as the Central Valley Wye instead of describing and evaluating the Wye as a change to the project evaluated in the 2012 Merced-Fresno EIR/EIS.

The DSER defines the “project” as the Central Valley Wye. When preparing a “supplement” to a previously certified CEQA document, CEQA requires that the lead agency disclose and evaluate the potential for new significant effects and the potential for increases in the severity of impacts identified in the previous EIR, for which the supplement is prepared. Such evaluation requires disclosure of the proposed changes to the project and changes in the circumstances in which the project would be implemented (discussed further in the section below). As discussed previously in this letter, while the DSER is described as a supplement to the 2012 Merced-Fresno EIR/EIS, the DSER treats the Central Valley Wye as a stand-alone “project” component of HSR. The DSER evaluates the impacts of the Central Valley Wye in isolation instead of updating the analysis of the 2012 Merced-Fresno EIR/EIS. This approach does not provide a full and meaningful understanding of the impacts of the Merced-Fresno segment of HSR with incorporation of the proposed Central Valley Wye portion of the Merced-Fresno segment. Instead, the analysis is limited to the Central Valley Wye and the impact analysis is thus limited.

CEQA Guidelines 15163(e): “When the agency decides whether to approve the project, the decision-making body shall consider the previous EIR as revised by the supplemental EIR. A finding under Section 15001 shall be made for each significant effect shown in the previous EIR or revised.” Because the DSER does not identify the changes to impacts identified in the Merced-Fresno EIR/EIS that would result from the proposed Wye component, the DSER does not provide the evidence that will be necessary for a finding “for each significant effect... as revised,” as required by CEQA and does not provide an opportunity for agencies and other stakeholders to comment on such analysis.

4. The DSER does not address “changed circumstances” as required by CEQA and is speculative with regard to implementation of other components of the HSR system.

Many of the conclusions in the DSER are based on the assumption that the HSR system will be fully developed. Given uncertainties with regard to funding, final design, planning, timing, and other factors, the DSER does not sufficiently disclose impacts of the Central Valley Wye, or the full Merced-Fresno segment in consideration of these uncertainties. As a supplement, the DSER should provide updated information regarding assumptions pertaining to the HSR system and should evaluate and disclose impacts based on reasonably foreseeable outcomes for the HSR. Impact analyses and conclusions in the DSER that presuppose development of subsequent phases of the HSR and future benefits (e.g., improved statewide mobility, reduced vehicle miles traveled [VMT], reduced traffic, reduced air pollutant and greenhouse gas [GHG] emissions) are speculative and overly optimistic based on current circumstances and available information (e.g., see item 6 regarding the 2018 Business Plan, below). The DSER should provide an impact evaluation and conclusions that reflect only those components of the HSR that are reasonably foreseeable given the current status of federal participation, funding, and other circumstances.

5. The DSER does not disclose and account for the current status of the San Jose-Merced segment of HSR.

The DSER analysis appears to be based on the premise that the San Jose-Merced segment of HSR has received final approval. For the DSER analysis to be accurate and meaningful, the DSER should include the status and phasing for interconnection of the San Jose-Merced segment to the proposed Central Valley Wye and the DSER should disclose the implications of selecting/evaluating a Wye configuration prior to completion of environmental review of the San Jose-Merced segment.

6. The DSER does not incorporate information from the current HSR business plan adopted nearly one year prior to circulation of the DSER.

The DSER references and relies on information in the 2016 California High-Speed Rail Business Plan. However, a revised Business Plan was published in June of 2018, nearly one year prior to circulation of the DSER. The 2018 Business Plan contains updated projections (e.g., ridership, phasing, and timing) that directly pertain to impact analyses and other conclusions in the DSER. The 2018 Business Plan was completed nearly a year prior to publication of the DSER. As discussed above, an essential component of a supplemental EIR is to provide updated evaluations in consideration of factors including changes in circumstances under which a project would be implemented. The 2018 Business Plan should be used to establish changed circumstances associated with ridership, construction phasing, construction timing, and the currently predicted factors of HSR development and operation. Without such an update, the DSER evaluation does not properly disclose the impacts of the modified project and relies on unrealistic and overly optimistic projections of future HSR benefits. Such benefits directly contribute to impact significance determinations in the DSER and those conclusions should, therefore, be updated.
Chapter 22 Local Agency Comments

Submission 245 (Matthew Treber, Madera County (on behalf of Wye Madera County Taskforce), June 21, 2019) - Continued

7. The DSIR eliminates the 2010 implementation date from the objectives without explanation of the effects of this change on the impact analyses and conclusions.

An objective in the 2012 Merced-Fresno EIR/EIS states, “Develop a practical and economically viable transportation system that can be implemented in phases by 2020 and generate revenues in excess of operations and maintenance (O&M) costs.” (Emphasis added.) The DSIR eliminates the reference to, “by 2020,” but does not explain the implications of this modified objective. As noted above, as a supplemental EIR, the DSIR should describe relevant changes in circumstances and should update the impact analyses in the previous EIR to current circumstances (including adjustments to predicted planning/timings of HSR development) for the Wye and the rest of the Merced-Fresno segment.

8. CHSRA should identify and evaluate a Heavy Maintenance Facility (HMF) in Madera County.

The DSIR discusses that it “does not contain any new information about HMF sites or impacts” (Background, pg. 201) and discusses that “selection of the HMF location would occur after completion of the Draft Supplemental EIR/EIS.” (HMF Appendix, pg A-33) The DSIR further states, “[t]he selected north-south and alternative alignments are the drivers for establishing the HSR system, and a decision on these alignments would greatly influence the process for determining which HMF alternatives continue to be viable.” (DSIR HMF Appendix, pg A-33). The Task Force is concerned that this piecemeal approach to defining and evaluating the project is not in compliance with CEQA and could prematurely eliminate and preclude consideration of feasible HMF sites in the County.

Because neither the Central Valley Wye nor the HSF facilities currently under construction will have functional value unless an HMF is developed, the Task Force urges CHSRA to identify and evaluate one or more HMF sites in Madera County and to select a site in Madera County to develop the HMF. The Central Valley Wye will result in the HSF, having greater and disproportionate impacts in Madera County due to the extra track miles needed to accommodate the Wye section of the San Joaquin Merced and Merced-Fresno segments. Locating the HMF in Madera County would provide jobs and revenue, and would help offset adverse effects of the Wye.

The purpose of a supplemental EIR is to update information and analyses from the previous EIR based on project changes and changed circumstances. Thus, since HMF sites were included in the 2012 EIR/EIS, we disagree with CHSRA’s approach of not addressing the HMF in the DSIR and deferring consideration of the HMF to a separate and subsequent environmental review process. We encourage CHSRA to coordinate with the Task Force for selection of an HMF site in Madera County and complete environmental review for the HMF site in Madera County.

9. The DSIR does not comply with CEQA requirement to consider alternatives that would reduce impacts of the proposed project.

CEQA requires an alternatives evaluation to identify and evaluate alternatives to the proposed project that would avoid or reduce significant environmental effects of a proposed project. The DSIR identifies that the proposed project would result in significant environmental effects, but fails to consider alternatives to the proposed project that would avoid or lessen those significant effects. The alternatives evaluation process described in the DSIR discusses the method used to select the preferred alternative/propose project among the other alternatives, but is not a CEQA alternatives analysis. Such analyses must be conducted to consider whether alternatives are available to avoid or reduce significant effects of the proposed project.

10. The DSIR does not fully evaluate the effects of the proposed project on transportation and circulation.

The DSIR identifies that the proposed project would result in 37 road crossings and 33 permanent public road closures. Additional temporary road closures will be necessary during construction. The DSIR does not provide the level of detailed evaluation on traffic operations and vehicle miles traveled (VMT) associated with the road closures to enable DSIR reviewers or decision makers to fully understand the impacts on traffic operations levels of service or VMT that will occur as a result of the proposed Central Valley Wye. Furthermore, the DSIR does not consider CEQA alternatives (as discussed above) that would avoid or lessen the significant environmental, and in this case, transportation impacts, of the proposed project. Without detailed analyses of specific locations, the DSIR does not properly evaluate and disclose the potential need for additional design measures, mitigation, and/or investigation of alternatives to reduce significant transportation impacts. It can be reasonably anticipated that the substantial number of road/crossings closures and detour routes could result in significant traffic operations impacts and increased VMT. Additional analysis of traffic impacts associated with the temporary and permanent road closures should be conducted by CHSRA.

Furthermore, the substantial amount of road closures (over 50 percent of the roads crossed by HSR facilities) will result in significant modifications to the exiting and planned future road network in Madera County, and will create the need for local land use planning agencies and the Madera County Transportation Commission to update their transportation plans to account for these significant changes in future road volumes and travel patterns. As discussed in Part I of this comment letter, the Task Force is requesting that CHSRA provide funding to support the updates required due to HSR.

11. The DSIR does not evaluate and mitigate for potential failure of the region to achieve federal air quality conformity.

Madera County Transportation Commission (MCTC) is the designated Metropolitan Planning Organization (MPO) in Madera County, and is responsible for regional transportation planning including analysis indicating the impacts of roadway transportation projects conform to Federal air quality standards. The Federal transportation conformity regulations (40 Code of Federal Regulations Parts 51 and 93) specify criteria and procedures for conformity determinations for transportation plans, programs, and projects and their respective amendments. The conformity regulation applies nationwide to “all nonattainment and maintenance areas for transportation-related criteria pollutants for which a nonattainment plan has been determined as nonattainment or has a maintenance plan” (40 CFR 93.100). Currently, the San Joaquin Valley (including all of the Madera County region and the area within which the HSR Merced-Fresno segment and Central Valley Wye are located) is designated as nonattainment with respect to Federal air quality standards for ozone and particulate matter under 2.5 microns in diameter (PM0.25) and has a maintenance plan for particulate matter under 10 microns in diameter (PM10). Therefore, transportation plans and programs for the nonattainment areas for Madera County area must satisfy the requirements of the Federal transportation conformity regulation.

Under the transportation conformity regulation, the principal criteria for a determination of conformity for transportation plans and programs are:

1. the federal Transportation Improvement Program (TIP) and Regional Transportation Plan (RTP) must pass an emissions budget test using a budget that has been found to be adequate by the U.S. Environmental Protection Agency (U.S. EPA) for transportation conformity purposes, or an interim emission test;
Submission 245 (Matthew Treber, Madera County (on behalf of Wye Madera County Taskforce), June 21, 2019) - Continued

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2. the latest planning assumptions and emission models specified for use in conformity determinations must be employed;
3. the TIP and RTP must provide for the timely implementation of transportation control measures (TCMs) specified in the applicable air quality implementation plans; and
4. interagency and public consultation.

On-going interagency consultation is conducted through the San Joaquin Valley Interagency Committee Group to ensure Valley-wide coordination, communication and compliance with Federal and California Clean Air Act requirements. Each of the eight Valley MPOs and the San Joaquin Valley Unified Air Pollution Control District (SVAPCD) are represented. The Federal Highway Administration (FHWA), Federal Transit Administration (FTA), the U.S. EPA, the California Air Resources Board (CARB) and the California Department of Transportation (Caltrans) are also represented on the committee. The final determination of conformity for the TIP and RTP is the responsibility of FHWA and FTA within the U.S. Department of Transportation (U.S. DOT).

MCTC has demonstrated the air quality impacts associated with the project and the applicable Federal criteria pollutant standards:
- For 2008 and 2015 8-hour ozone, the total regional on-road vehicle-related emissions (ROG and NOx)
- For PM_{10}, the total regional vehicle-related emissions (PM_{10} and NOx)
- For the 1997 annual and 24-hour and 2012 annual PM_{2.5} standards, the total regional on-road vehicle-related emissions
- For the 2006 24-hour PM_{10} standard, the total regional on-road vehicle-related emissions

The entirety of the Madera County region shares a single air district with seven other San Joaquin Valley counties (Fresno, Kern, Kings, Merced, Stanislaus, San Joaquin, and Tulare). Each must demonstrate an ability to conform to Federal air quality standards individually for the SVAPCD to demonstrate conformity. If one region fails to conform, the entire SVAPCD as a whole is out of conformity. A funding freeze for the SVAPCD would trigger a freeze of all Federal funding for non-exempt transportation projects for each MPO region within the SVAPCD.

A funding freeze due to not being in conformity would result in hundreds of millions of dollars programmed for capital projects to address safety, congestion and goods movement being inaccessible and unspent across the eight San Joaquin Valley MPO regions until such a time that a demonstration of conformity could be achieved. Such a freeze would have a significant adverse impact on Madera County, the cities of Chowchilla and Madera, and other Task Force members. Planned road construction projects would not proceed, resulting in significant adverse effects on the economy from restrictions to development, communities, mobility and movements of goods and services, traffic congestion, and increased air pollutant and greenhouse gas emissions.

The proposed project, as well as the three alternatives, in the DSIEIR includes numerous road closures and road alternations. Individually and collectively, these road closures/alternations would change the Madera Region’s Significant Roadway Network. The Significant Roadway Network represents the vehicle facilities in the Madera Traffic Model upon which vehicular travel activities is projected and analyzed for the Federal air quality conformity process. Additionally, many of the facilities represented in the Madera Traffic Model as centroid connectors (i.e., facilities that load traffic onto but are not part of the Significant Roadway Network) would also be subject to closure or alteration as a result of the Central Valley Wye.

The road closures and alterations that change the Significant Roadway Network and the centroid connectors access points onto the Significant Roadway Network within the Madera Traffic Model must be well understood in detail related to the dates of closures (permanent and temporary), dates of opening, addition and subtraction of lanes/capacity (permanent and temporary), alterations to speed limits (permanent and temporary), and any reclassification of facility type (permanent and temporary) to be adequately incorporated into the Madera Traffic Models framework. The general project information related to these road closures/projects must also be reflected in the region’s RTP/TIP.

The Madera Traffic Model must be adjusted to accurately depict the road closures/alternations associated with the Central Valley Wye proposed project to analyze whether or not the Madera Region, and SVAPCD, will continue to be able to demonstrate conformity to Federal Air Quality standards. The Central Valley Wye Draft Supplemental EIR/EIS does not present adequate detail upon which to conduct analysis confirming that the Madera Region would be able to meet this requirement under future conditions with the road closures/alternations associated with the Central Valley Wye.

Appropriate and required assessment of the impacts of the proposed project and its associated road closures/alternations as they relate to the existing Federal requirements the Madera Region must adhere to are not assessed in the DSIEIR. Because an evaluation of Federal air quality conformity of the region and SVAPCD with implementation of the Central Valley Wye has not been conducted, the adverse environmental and adverse impacts associated with potential non-conformity are not addressed. Therefore, the need for mitigation to ensure the region and SVAPCD will remain federally complaint has not been determined, no provisions are identified with the project to ensure that conformity will be achieved, and no mitigation is identified to alleviate or offset the impacts should the results of the proposed project yield a situation in which the Madera Region and SVAPCD will not be able to demonstrate conformity to Federal standards as a result of the proposed project.

To address concerns associated with the potential for non-conformity resulting from the proposed project and prior to completion of the environmental review process, CHSRA must:
- work closely with MCTC staff to define the proposed project details needed to perform a regional conformity analysis tailored for the Madera Region under current Federal regulations;
- perform all the evaluations needed to assess conformity under various project scenarios;
- identify and commit to the implementation of mitigation measures that will ensure the Madera Region will meet Federal conformity requirements.

The CHSRA will provide a demonstration of conformity with Federal requirements that sufficiently alleviate or offset impacts of the proposed project sufficient for the Madera Region to meet Federal conformity requirements should the proposed project trigger a failure of the Madera Region to conform to Federal regulation.
Mitigation Measures in the DEIR do not provide sufficient detail regarding implementation requirements or performance standards, and the DEIR is unclear with regard to the applicability of mitigation measures adopted with the 2011 EIR/EIS.

The impact analyses in the DEIR assume implementation of IAMFs and the DEIR does not disclose environmental impacts that would occur if the IAMFs are not implemented. Many of the IAMFs do not provide sufficient commitments, detail, or performance standards to ensure they would adequately reduce potential impacts, yet the DEIR assumes the IAMFs would be adequate to avoid or reduce many impacts that would otherwise occur. This unsupported assumption results in a failure of the DEIR to evaluate and disclose impacts that would occur if the IAMFs are not more clearly defined and fully implemented. Part III of this comment letter provides recommendations for specific revisions and clarifications needed to ensure that certain IAMFs are effective. Although our specific suggestions in Part III are limited to IAMFs associated with Agriculture, Agricultural and Farmland, Transportation, we suggest similar detail is necessary and must be added to all IAMFs.

PART III: COMMENTS ON DEIR ANALYSIS, MITIGATION MEASURES, AND IAMFS

As discussed in Part II of this letter, the Task Force has significant concerns regarding the lack of accountability and specific requirements/performance standards in IAMFs and mitigation measures in the DEIR. Below we have provided specific requested revisions (in underline/strike-through text) to IAMFs pertaining to Aesthetics, Agriculture, and Transportation that need to be incorporated to ensure the IAMFs sufficiently define implementation responsibilities, provide opportunities for local agency input and approval, and establish clear requirements and performance standards. Without this additional specificity, the efficacy of the IAMFs assumed in the DEIR analysis is insufficient and must be revised to provide analysis of impacts without the unreasonable assumption that the IAMFs would serve as effective mitigation. Although our specific suggestions below are limited to IAMFs associated with Aesthetics, Agricultural and Farmland, Transportation, we suggest similar detail is necessary for all IAMFs.

AVR-IAMF#: Design Standards

Prior to construction the contractor would document, through issuance of a technical memorandum, how the Authority’s adopted design standards and guidelines, such as the Authority Technical Memorandum Aesthetic Guidelines for Non-Station Structures (Authority 2011a; TM 200.06), have been employed to mitigate visual impacts. TM 200.06 provides guidance regarding a minimum aesthetic quality of long-lasting infrastructure. More specifically, the authority’s adoption of the design measures as identified in the contractor technical memorandum, the Authority shall provide an opportunity for the local land use authority to review the contractor’s technical memorandum(s) and the proposed design therein, and the Authority shall consider and incorporate specific design recommendations provided by the local land use authority sufficient to ensure aesthetic quality and acceptability of design. The contractor shall be required to implement and adhere to the accepted aesthetic design provisions.

AVR-IAMF#: Context-Sensitive Solutions

Prior to construction the contractor would document, through issuance of a technical memorandum, how the Authority’s Urban Design Guidelines for the California High Speed Train Project (Authority 2011b), which discusses the principles of context-sensitive solutions to guide the design of stations, have been employed to evaluate visual impacts through context-sensitive designs. The Authority shall be required to implement and adhere to context-sensitive solutions. This approach is equally applicable to elevated guideways.

Requested Revisions to Agricultural and Farmland IAMFs

Prior to construction the contractor would document, through issuance of a technical memorandum, how the Authority’s Urban Design Guidelines for the California High Speed Train Project (Authority 2011b), which discusses the principles of context-sensitive solutions to guide the design of stations, have been employed to evaluate visual impacts through context-sensitive designs. The Authority shall be required to implement and adhere to context-sensitive solutions. This approach is equally applicable to elevated guideways.
any related access, irrigation, and other facilities shall be restored equivalent to or
to prevent disturbance to the top 18 inches. of as may be necessary, for soil
restoration plan as a part of restoration activities and/or hazard mitigation
properties, the contractor shall submit the restoration plan to the Authority and
shall provide a method for verifying through monitoring and comparison to
standards that farmland has been sufficiently restored. The Authority
shall review the restoration plan until providing an opportunity to the land owner
and Local Farm Program to review and provide comments on the proposed
restoration plan. The restoration plan shall include
time-stamped photographic documentation of the pre-construction conditions of all temporary staging areas and any other location where temporary disturbance will occur.

All construction access, stabilization, material placement, and staging areas on important farmlands
shall be designed to avoid the pre-construction staging/staging area. This requirement is
in the design-build construction contract requirements.

Prior to disturbance causing activities affecting any
facilities or a confined animal facility, the Authority shall
assign a representative to act as a single point of contact to assist each confined
animal facility owner during the process of obtaining new or amended permits or other regulatory
compliance necessary to the continued operation or relocation of the facility. The Authority shall
consider and provide compensation for relocation and acquisition of any
necessary new or amended regulatory permits when the acquisition of a confined animal site would
require either relocation of the facility or amendment of its existing regulatory permits. The Authority
shall create a permit assistance center for landowners and operators whose operations would be
out of compliance with permits because of the HSR. This permit center assistance
focus on helping the permit holders modify or extend operating permits are able to obtain any new permits that are or permit
modifications required because of a result of the HSR impacts.

The Authority shall establish and administer a farmland consolidation program to sell remnant
divide for continued agricultural use on the maximum feasible amount of remnant parcels
otherwise may not be economic to farm. The program shall be
available to all surface remnant parcels, including those that were under Williamson Act or
operating expenses associated with the condition of the public roadways along truck
landowners in obtaining lot line adjustments where appropriate to incorporate remnant parcels into
a larger parcel that is consistent with size requirements under the local government regulations.

The program, shall operate for a minimum of 5 years after construction of the section is
completed, and longer as may be necessary to accomplish the requirements specified herein. The Authority shall
document implementation of this measure through issuance of a compliance memorandum, after the minimum operation period and until all requirements of Section 8.1.2 have ceased
this measure are satisfied for all affected parcels. The document shall be complete
compliance memorandum shall demonstrate that the requirements of this measure being satisfied and shall be

Filed annually with Environmental Mitigation Management and Assessment system (EMMA) and
opies shall be submitted to the local land use authority and farm bureau.

Requested Revisions to Transportation IAMEs:

TR-IAFM# : Obtain and Comply with Local Agency Encroachment Permits for All
Construction Activities Affecting Local Roads

All Authority contractors shall obtain encroachment permits from the applicable local land use agency (city or
county) for any and all work or other activities within or affecting local roads and the contractor shall comply with all conditions established through the encroachment permit process. The Authority shall include this requirement in its contracts with construction contracts, and the Authority shall be responsible for ensuring its contractors comply with this requirement. The local agency
encroachment permit process shall include the local agencies review and approval acceptance of CTPs and the requirements and provisions specified therein.

TR-IAFM# : Protection/Restoration of Public Roadways Damaged During Construction
Sufficient to Accommodate Future Traffic Volumes

The Authority shall ensure that any roads damaged during construction of the HSR, including roads within or near the area affected by the project has been restored sufficient to accommodate future traffic volumes. The Authority shall ensure that the roads restored are of sufficient width to accommodate future traffic volumes for the expected Future Traffic Volumes. The contractor shall survey the condition of the public roadways along truck routes providing access to the project site after construction is complete. The contractor would complete a before- and after-survey report and submit it to the Authority for review, indicating the location and extent of any damage.

TR-IAFM# : Construction Transportation Plan

The contractor shall prepare a detailed construction transportation plan (CTP) for minimizing the impact of construction and construction traffic on adjacent properties and other activities. The plan shall be submitted for approval prior to beginning any construction activities. The plan shall be responsible for ensuring implementation and compliance with the provisions of the CTPs shall address, in detail, the activities to be carried out at each construction phase, with the requirement of minimizing impacts on adjacent properties and other activities. The plan shall be responsible for ensuring implementation and compliance with the provisions of the CTPs shall address, in detail, the activities to be carried out at each construction phase, with the requirement of minimizing impacts on adjacent properties and other activities.
Chapter 22 Local Agency Comments

Submission 245 (Matthew Treber, Madera County (on behalf of Wye Madera County Taskforce), June 21, 2019) - Continued

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- Review existing or planned safe routes to schools with school districts and emergency responders to incorporate roadway modifications that maintain existing traffic patterns and fulfill response route and access needs during project construction and HSRR operations. [Comment to CHSRA: It is unclear how a CTP could effectively provide for conditions during HSRR operations following the completion of construction. A separate requirement/plan element should be identified to ensure safe school routes and emergency vehicles remain available during HSRR operations.]

- Identification: Provisions to avoid or minimize potential safety risks to children associated with project construction. Development of these provisions shall involve identification and assessment of the potential safety risks of project construction to children, especially in areas where the project's construction-related activities will be located near homes, schools, day care centers, and parks, or other locations where children reasonably be anticipated to be present.

- Promotion: Provisions to promote child safety within and near the project area. Examples: Such provisions shall include, but shall not be limited to: providing crossing guards, temporary sidewalks, and other measures in areas where construction activities are located near schools, day care centers, and parks, or other locations where children can reasonably be anticipated to be present.

CTPs would consider account for the potential for overlapping construction projects.

CTPs shall consider and account for the potential for overlapping or adjacent construction activities associated with ISR. Such overlapping or adjacent construction activities shall be minimized through scheduling to avoid cumulative effects of construction. Contractors and the Authority shall coordinate with local jurisdiction and road departments to develop construction schedules and commitments (1) minimize the duration of construction and related effects on traffic for any given portion of ISR construction, and 2) avoid to the maximum extent feasible adjacent construction that would have cumulative effects of increased travel times and/or decreased safety for motorists, bicyclists, pedestrians, and transit.

TR RAMP 53: Off-Street Parking for Construction-Related Vehicles

The contractor would provide off-street parking for construction-related vehicles, including worker vehicles, throughout the construction period to minimize impacts on public parking. A 24-hour access-by-emergency vehicles would be provided to accommodate construction-related activities and minimize impacts on public parking. The contractor would secure temporary parking permits for public parking facilities to accommodate construction-related activities.

TR RAMP 54: Maintenance of Pedestrian Access

The contractor would provide adequate pedestrian access during construction and restore pedestrian access in contact with temporary roads. The contractor would also coordinate with public road authorities to ensure pedestrian access during construction and provide temporary pedestrian access during construction.

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Submission 245 (Matthew Treber, Madera County (on behalf of Wye Madera County Taskforce), June 21, 2019) - Continued

245-160
pedestrian access which shall be avoided or minimized to the maximum extent feasible include, but are not limited to, sidewalk closures, bridge closures, crosswalk closures, or pedestrian rerouting at intersections, placement of construction-related material within pedestrian pathways or sidewalks, and other actions that may affect the mobility or safety of pedestrians during the construction period. If sidewalks are maintained along the construction site frontage, the plan shall identify and the contractor shall provide covered walkways and fencing between construction areas and the walkways. If sidewalks are maintained along roads that will be used by construction vehicles, the plan shall identify and the contractor shall provide barriers between walkways and adjacent roads. The plan objective would be to maintain pedestrian access at the maximum extent feasible (i.e., while meeting design, safety, and Americans with Disabilities Act requirements). This measure would address the pedestrian access requirements in the CTP and the Authority shall be responsible for ensuring contractor compliance.

245-163
The contractor would prepare specific construction-period bicycle access management plans to address maintenance of bicycle access during the construction period. Actions that limit bicycle access would include, but are not limited to, bike lane closures or narrowing, bike path closures or narrowing, closure or narrowing of streets that are designated bike routes, bridge closures or narrowing or closure a bike lane or shoulder on a bridge or to remain open, placement of construction-related materials within designated bike lanes or along bike routes, and other actions that may affect the mobility or safety of bicyclists during the construction period. The plan would maintain bicycle access at the maximum extent feasible (i.e., while meeting design, safety, and Americans with Disabilities Act requirements). This measure would address these requirements in the CTP and the Authority shall be responsible for ensuring contractor compliance.

245-166
The contractor would limit construction material deliveries between 7 a.m. and 9 a.m. and between 4 p.m. and 6 p.m. on weekdays to minimize impacts on traffic on roadways, during morning and evening peak traffic hours. The contractor would limit the number of construction employees arriving or departing the site between the hours of 7 a.m. and 9 a.m. and 4 p.m. and 6 p.m. Actions for these periods would be addressed in the CTP and the Authority shall be responsible for ensuring contractor compliance.

245-169
The contractor would ensure that all construction-related equipment and materials are delivered to the site on the appropriate truck routes as specified in the CTP. The contractor would prohibit heavy construction vehicles from using alternative routes to get to the site without prior approval from the local land use authority. Truck routes would be established away from schools, day care centers, and residences along routes with the least impact, determined by the Authority. These measures would address the CTP and the Authority shall be responsible for ensuring contractor compliance.

245-172
The contractor would provide a mechanism to prevent roadway construction activities from reducing roadway capacity during major athletic events or other special events that substantially (10 percent or more) increase traffic on roadways affected by project construction. Mechanisms may include arranging for the presence of police officers deploying direct traffic provisions for establishing special-event parking, use of within-the-curb parking, or shoulder lanes for through traffic and traffic zones. This measure would be addressed in all CTPs. Action CTP 10.1. The requirements and effectiveness of this IAFM should be reviewed by a more clear discussion of how special events will be identified and how measures to accommodate them will be determined by the contractor and approved by the local land use agency.
PART IV. CONCLUSION

The Wye Madera County Task Force is interested in cooperating with CHSRA to ensure HSR facilities in Madera County are designed, constructed, and operated with statewide benefit while minimizing adverse effects on our communities, productive lands, and businesses. Part II of this letter outlines our specific requests for consideration by CHSRA, and seeks to achieve siting of the HMF in Madera County, clarification of road construction requirements, methods to ensure assistance with updating local plans to account for HSR, and other items important to the Task Force.

The Task Force and our individual member agencies look forward to discussing our concerns and requests with you and developing a program for addressing our concerns while providing for successful development and operation of a community-sensitive HSR system.

Thank you for your consideration of our comments. Please feel free to contact Matthew Treber at 559-675-7821 or matthew.treber@maderaounty.com with any questions and to schedule a meeting to discuss these issues with the Task Force.

Sincerely,

[Signatures of task force members]

Enclosures:

1. Madera County Board of Supervisors Resolution No. 2015-128, “A Resolution in Support of Locating the California High Speed Rail Heavy Maintenance Facility in Madera County”

2. City Council of the City of Madera Resolution No. 15-219, “A Resolution of the City Council of the City of Madera, California, in Support of Locating the California High Speed Rail Heavy Maintenance Facility in Madera County”

3. City Council of the City of Chowchilla Resolution # 25-16, “A Resolution of the City Council of the City of Chowchilla, California, in Support of Locating the California High Speed Rail Heavy Maintenance Facility in Madera County”

4. Madera Unified School District Resolution No. 61-2015/16, “A Resolution in Support of Locating the California High Speed Rail Heavy Maintenance Facility in Madera County”

5. Commissioners of the Madera County Transportation Commission, County of Madera, State of California, Resolution No. 15-10, “Support of Locating the California High Speed Rail Heavy Maintenance Facility in Madera County”

6. Wye Madera County Proposal for Center Point Heavy Maintenance Facility (March 2017)

7. Request for Expression of Interest California High Speed Rail Heavy Maintenance Facility (Fagundes Property; January 2010)

8. Expression of Interest: Heavy Maintenance Facility, Madera County, A-2 Alignment, Gordon Shaw Properties Site (January 2010)
Enclosures

Enclosure 1

Madera County Board of Supervisors Resolution No. 2015-128, “A Resolution in Support of Locating the California High Speed Rail Heavy Maintenance Facility in Madera County”
Chapter 22 Local Agency Comments

Submission 245 (Matthew Treber, Madera County (on behalf of Wye Madera County Taskforce), June 21, 2019) - Continued

BEFORE

THE BOARD OF SUPERVISORS
ON THE COUNTY OF MADERA
STATE OF CALIFORNIA

In the Matter of

Resolution No. 2015-128

BOARD OF SUPERVISORS
ON THE COUNTY OF MADERA
STATE OF CALIFORNIA

WHEREAS, the County of Madera is in the center of the State and represents the backbone of the California High-Speed Rail Project, bearing the brunt of the eye and the most significant miles of any county in the initial operating segment, and,

WHEREAS, the role of the California High-Speed Rail Authority (CHSRA) is to provide benefits to these communities who are accommodating the system and Madera County is the only County that has yet to be designated any facility in this region, and,

WHEREAS, locating the Heavy Maintenance Facility (HMF) in Madera County would serve as a much-needed stimulus to the struggling local economy and create an estimated 24,000 jobs for the next five years, create approximately 1,000 permanent jobs when the facility is completed, generate additional property taxes for the County, and provide the most measurable economic benefit to offset the loss of important agricultural land and employment opportunities; and,

WHEREAS, a HMF placed in Madera County would serve as a major hub within the largest labor force in the San Joaquin Valley including Fresno, Madera, Merced, and Stanislaus Counties, making Madera County the only county under consideration and providing the CHSRA with the largest number of local employees to staff the HMF,

NOW, THEREFORE, THE BOARD OF SUPERVISORS OF THE COUNTY OF MADERA RESOLVES AS FOLLOWS:

1. The Board of Supervisors for the County of Madera supports the location of the HMF for the California High-Speed Rail System within the County of Madera.

2. The Board of Supervisors of the County of Madera respectfully request that the CHSRA mandate that any site in Madera County, whether existing or an alternative, that meets the criteria as described in the technical requirements developed by the CHSRA, the delivery schedule, and is cost competitive, be given priority when evaluating the alternatives for the HMF.

3. This copy of this resolution be forwarded to the CHSRA for consideration when evaluating the site alternatives for the HMF.

* * * * * * * * *

The foregoing Resolution was adopted this __________ day of __________, 2015, by the following vote:

Supervisor Freiler voted: 

Supervisor Regan voted: NO

Supervisor Fournier voted: YES

Supervisor Rodriguez voted: YES

Supervisor Wheeler voted: YES

Chairman, Board of Supervisors

ATTEST:

[Signature]

Clerk, Board of Supervisors

Approved as to Legal Form:

COUNTY COUNCIL

By: [Signature]

August 2020

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California High-Speed Rail Authority

Merced to Fresno Section: Central Valley Wye Final Supplemental EIR/EIS
Submission 245 (Matthew Treber, Madera County (on behalf of Wye Madera County Taskforce), June 21, 2019) - Continued

Enclosure 2

City Council of the City of Madera Resolution No. 15-219, "A Resolution of the City Council of the City of Madera, California, in Support of Locating the California High Speed Rail Heavy Maintenance Facility in Madera County"

RESOLUTION NO. 15-219

A RESOLUTION OF THE CITY COUNCIL OF THE CITY OF MADERA, CALIFORNIA, IN SUPPORT OF LOCATING THE CALIFORNIA HIGH SPEED RAIL HEAVY MAINTENANCE FACILITY IN MADERA COUNTY

WHEREAS, the City of Madera joins the County of Madera in support of locating the California High Speed Rail Maintenance Facility in Madera County; and,

WHEREAS, the County of Madera is in the center of the State and represents the backbone of the California High Speed Rail project, bearing the placement of the Wye and the most track miles of any county in the initial operating segment; and,

WHEREAS, the stated policy goal of the California High Speed Rail Authority (CHSRA) is to provide benefit to those communities who are accommodating the system and Madera County is the only County who has yet to be designated any facility in the system; and,

WHEREAS, locating the Heavy Maintenance Facility (HMF) in Madera County would serve as a much needed stimulus to the struggling local economy and create an estimated 20,000 jobs for the next five years, create approximately 1,500 permanent jobs when the facility is completed, generate additional property taxes for the County, and would provide the most measurable economic benefit to offset the loss of important agricultural land and employment opportunities; and,

WHEREAS, a HMF placed in Madera County would serve the labor markets of the largest labor forces in the San Joaquin Valley including Fresno, Madera, Merced, and Stanislaus Counties, making Madera County the only regional site under consideration and providing the CHSRA with the largest number of local employees to staff the HMF.

NOW THEREFORE, THE CITY COUNCIL OF THE CITY OF MADERA HEREBY finds, orders and resolves as follows:

1. The City Council of the City of Madera joins Madera County in support of the location of the HMF for the California High Speed Rail System within the County of Madera.

2. The City Council of the City of Madera respectfully request the CHSRA mandate that a site in Madera County, whether existing or an alternative, that meets the criteria as described in the technical memoranda developed by the CHSRA, meets the delivery schedule, and is cost competitive, be given priority and placed in Madera County.

3. The City Council directs that a copy of this resolution shall be forwarded to the CHSRA for consideration when evaluating the alternatives for the HMF.

* * * * * * *
PASSED AND ADOPTED by the City Council of the City of Madera this 21st day of October, 2015 by the following vote:

AYES: Council Members Poythress, Oliver, Rigby, Bomprezzi, Medellin, Holley, Robinson.

NOES: None.

ABSTENTIONS: None.

ABSENT: None.

APPROVED:

ROBERT L. POYTHREES, Mayor

ATTEST:

SONIA ALVAREZ, City Clerk

APPROVED AS TO LEGAL FORM:

BRENT RICHARDSON, City Attorney

City Council of the City of Chowchilla Resolution # 25-16, “A Resolution of the City Council of the City of Chowchilla, California, in Support of Locating the California High Speed Rail Heavy Maintenance Facility in Madera County”
COUNCIL RESOLUTION # 25-16

A RESOLUTION OF THE CITY COUNCIL OF THE CITY OF CHOWCHILLA, CALIFORNIA, IN SUPPORT OF LOCATING THE CALIFORNIA HIGH SPEED RAIL HEAVY MAINTENANCE FACILITY IN MADERA COUNTY

WHEREAS, the City of Chowchilla joins the County of Madera and the City of Madera in support of locating the California High Speed Rail Maintenance facility in Madera County; and,

WHEREAS, the County of Madera is in the center of the State and represents the backbone of the California High Speed Rail project, bearing the placement of the Y and the most track miles of any county in the initial operating segment; and,

WHEREAS, the stated policy goal of the California High Speed Rail Authority (CHSRA) is to provide benefit to those communities who are accommodating the system and Madera County is the only County who has yet to be designated any facility in the system; and,

WHEREAS, locating the Heavy Maintenance Facility (HMF) in Madera County would serve as a much needed stimulus to the struggling local economy and create an estimated 20,000 jobs for the next five years, create approximately 1,500 permanent jobs when the facility is completed, generate additional property taxes for the County, and would provide the most measurable economic benefit to offset the loss of important agricultural land and employment opportunities; and,

WHEREAS, a HMF placed in Madera County would serve the labor markets of the largest labor forces in the San Joaquin Valley including Fresno, Madera, Merced, and Stanislaus Counties, making Madera County the only regional site under consideration and providing the CHSRA with the largest number of local employees to staff the HMF; and,

WHEREAS, The City remains consistent with Chowchilla City Council Resolution # 81-15.

NOW, THEREFORE, BE IT RESOLVED that the City Council of the City of Chowchilla hereby finds and determines the following:

1. The City Council of the City of Chowchilla joins Madera County and the City of Madera in support of the location of the HMF for the California High Speed Rail System within the County of Madera.
2. The City Council of the City of Chowchilla respectfully request the CHSRA mandate that a site in Madera County, whether existing or an alternative, that meets the criteria as described in the technical memorandum developed by the CHSRA, meets the delivery schedule, and is cost competitive, be given priority and placed in Madera County.
3. The City Council directs that a copy of this resolution shall be forwarded to the CHSRA for consideration when evaluating the alternatives for the HMF.

PASSED AND ADOPTED by the City Council of the City of Chowchilla this 23rd day of February, 2016 by the following vote to wit:

AYES: 5 – Walker, Chavez, Gaunmitz, Haworth, Ahmed
NOES: 0
ABSENT: 0
ABSTAIN: 0

APPROVED: Wasaem Ahmed, Mayor

ATTEST: Joann McClendon, CMC
City Clerk
Madera Unified School District Resolution No. 61-2015/16, “A Resolution in Support of Locating the California High Speed Rail Heavy Maintenance Facility in Madera County”

WHEREAS, both the County of Madera and City of Madera have adopted resolutions in support of locating the California High Speed Rail Heavy Maintenance Facility in Madera County:

WHEREAS, locating the Heavy Maintenance Facility (HMF) in Madera County would serve as a much-needed stimulus to the struggling local economy, and create an estimated 30,000 jobs for the next five years, create approximately 1,500 permanent jobs when the facility is completed, generate additional property taxes for the County, and would provide the most measurable economic benefit to offset the loss of important agricultural land and employment opportunities:

WHEREAS, supporting the creation of new jobs within Madera County benefits the students of Madera Unified, including students participating in the District’s Career Technical Education program, who graduate and remain in the Madera area.

NOW, THEREFORE, BE IT RESOLVED by the Board of Education of the Madera Unified School District as follows:

1. The foregoing resolutions are approved and adopted.
2. The Board of Education joins the County of Madera and City of Madera in support of the location of the HMF of the California High Speed Rail System within the County of Madera.
3. The Board of Education respectfully requests that the California High Speed Rail System mandate that the HMF site be placed in Madera County.
4. The Board of Education directs that a copy of this resolution shall be forwarded to the California High Speed Rail Authority for their consideration.

The foregoing Resolution was passed and adopted at a meeting of the Board of Trustees of the Madera Unified School District on the 28th day of June, 2016, by the following vote:

AYES: 5
NOES: 0
Commissioners of the Madera County Transportation Commission, County of Madera, State of California, Resolution No. 15-10, “Support of Locating the California High Speed Rail Heavy Maintenance Facility in Madera County”
WHEREAS, the County of Madera is in the center of the State and represents the backbone of the California High Speed Rail project, housing the placement of the way and the most rail miles of any county in the initial operating segment; and

WHEREAS, the state policy goal of the California High Speed Rail Authority (CHSRA) is to provide benefit to those communities who are accommodating the system and Madera County is the only County who has yet to be designated a facility in the system; and

WHEREAS, locating the Heavy Maintenance Facility (HMF) in Madera County would serve as a much needed stimulus to the struggling local economy and create an annual 20,000 jobs for the next five years, create approximately 1500 permanent jobs when the facility is completed, generate additional property taxes for the County, and would provide the most measurable economic benefit to affect the 70’s of important agricultural land and employment opportunities; and

WHEREAS, a HMF placed in Madera County would serve the labor markets of the largest labor force in the San Joaquin Valley including Fresno, Madera, Merced and Stanislaus Counties, making Madera County the only regional labor market in the San Joaquin Valley. Madera County also possesses the lowest number of local employees to staff the HMF.

NOW, THEREFORE, BE IT RESOLVED, that the MCTC supports the location of the HMF for the California High Speed Rail system within the County of Madera and respectfully requests the CHSRA identify this site for Madera County, the only existing site alternative that meets the criteria as described in the technical criterium developed by the CHSRA. The facility schedule is not competitive to be given priority and placed in Madera County.

The foregoing resolution was adopted this 21st day of October, 2015 by the following vote:

Commissioner Rodriguez voted: Yes
Commissioner Rogers voted: Yes
Commissioner Wheeler voted: Yes
Commissioner Pacheco voted: No
Commissioner Medellin voted: Yes
Commissioner Ahmad voted: Yes
Submission 245 (Matthew Treber, Madera County (on behalf of Wye Madera County Taskforce), June 21, 2019) - Continued

Enclosure 6

Wye Madera County Proposal for Center Point Heavy Maintenance Facility (March 2017)
March 7, 2017

Jeff Morales, CEO
California High Speed Rail Authority
770 L. Street, Suite 1160
Sacramento, CA 95814

Dear Mr. Morales:

On behalf of Wye Madera County, we are pleased to formally submit the Center Point Heavy Maintenance Facility Expression of Interest to the California High Speed Rail Authority. Wye Madera County includes individuals from the County of Madera, City of Madera, City of Chowchilla, Madera Unified School District, Madera County Economic Development Commission, Madera County Transportation Commission, Madera County Workforce Development Board, and the Madera Association of Realtors. We recognize Madera County is the cheaper, faster and smarter location for the heavy maintenance facility due to its cost-effective sites, existing industrial zoning, central location and regional economic benefits.

The proposal stems from a meeting held with Chairman Dan Richard on October 10, 2016, regarding an alternative site location for the heavy maintenance facility. As noted, in January 2010 the Expressions of Interest identifying potential sites for a heavy maintenance facility were submitted at a time when there was a “spaghetti bowl” of alignment options including 14 Wye options and four North/South alignment options of which the Authority selected a hybrid North/South route. Since competing counties have refined their proposals, Madera County has identified the Center Point alternative site which delivers the Authority’s maintenance facility criteria, minimal environmental impacts, and offers financial incentives and economic benefits to the State of California and the community.

The Center Point Heavy Maintenance Facility site in Madera encompasses approximately 305 acres and is situated adjacent to the initial operating segment between Avenue 11 and Avenue 12 abutting the Burlington Northern and Santa Fe (BNSF) Railway, just 2.25 miles east of State Route 99 (SR 99). The Avenue 12 and SR 99 interchange has recently been reconstructed and expanded to 6-lanes accommodating heavy truck traffic. This new interchange provides easy access to SR 99 within 3 minutes of the site which will benefit the delivery of materials and supplies as well as providing an easy commute for employees. The property owner has submitted a letter indicating his willingness to cooperate with the County and the CHSRA.

The site is zoned Industrial, Urban or Rural Heavy (II), consistent with the General Plan designation of Heavy Industrial (HI). The property was the subject of a Mitigated Negative Declaration for an industrial subdivision in 2007 that determined all impacts could be mitigated below the thresholds of significance. The site currently has no businesses that would be displaced by the development of the Center Point Heavy Maintenance Facility and has been graded previously in anticipation of heavy industrial development. The property is not subject to any Williams Act contract or other development restrictions. Surrounding uses include industrial to the east, a PG&E transmission and agriculture to the west, and agriculture to the north and south.
Jeff Manley, CEO
March 7, 2017
Page two

In addition to the recently expanded interchange at Avenue 12 and SR 99, the City of Madera has confirmed that sewer and water services will be available to the proposed Center Point Heavy Maintenance Facility site. Further, the site is adequate in size to accommodate required site storm drainage facilities and the PG&E substation currently located to the west is programmed to be updated in the near future. All utilities required for development, including sewer, water, storm drainage, and electrical are available to the site within the time necessary to deliver a fully improved site to the California High Speed Rail Authority.

Locating the region’s Heavy Maintenance Facility within short proximity to the Wye alignment will maximize maintenance, operational efficiency and cost savings, while providing access to a well-trained and job-ready regional workforce benefiting Fresno, Madera, Mariposa and Merced Counties. Madera County offers the best possible location for a heavy maintenance facility resulting in millions of dollars of savings to the project. We stand ready to work with the Authority, its staff, and consultants to bring this much needed project to Madera County.

Respectfully,

Max Rodriguez, Supervisor District 2
County of Madera

Andrey Medellin, Mayor
City of Madera

March 5, 2017

Equimax Financial Services Inc.

County of Madera
200 W 4th Street
Madera, CA 93637

RE: California High Speed Rail Heavy Maintenance Facility at Center Point Subdivision

Dear Sir/Madam,

My name is Makram Hanna and I am a managing member of the Center Point Industrial Subdivision, which is located on the south side of Avenue 12 approximately 1/2 mile east of its intersection with Road 30 3/4 in Madera. This subdivision was recorded in March of 2015 and consists of 65 lots and two (2) outlets over 305.86 acres. It is my understanding that the County of Madera (County) is highly supportive of having a heavy maintenance facility for use by the California High Speed Rail Authority located at Center Point and surrounding lands.

This letter is intended to express my willingness to cooperate with the County of Madera during the land acquisition process if the Center Point properties are ultimately chosen as the location for the California High Speed Rail Authority’s heavy maintenance facility. I am willing to be a partner with the County and will provide support wherever needed, since locating the facility on Center Point properties will not only benefit Madera County, but the surrounding region as well.

You may contact me in regard to any engineering documents that were created by my engineering and development team that you believe may be of assistance to you. If you have any further questions, please feel free to contact me.

Sincerely,

Makram Hanna
Managing Member, Center Point LLC
mjh@equimaxfinancial.com

March 5, 2017

Page 1
CITY OF MADERA
COMMUNITY DEVELOPMENT DEPARTMENT

Dave Merchén – Director of Community Development
director@cityofmadera.com • (559) 661-5430
205 W 4th Street • Madera, CA 93637

September 1, 2016

Dan Richard, Chairman
California High Speed Rail Authority
770 L Street, Suite 620
Sacramento, CA 95814

Re: Sewer and Water Services – CenterPoint Madera HMF Site

Dear Mr. Richard,

I am pleased to provide this letter confirming that City of Madera sewer and water services will become available to the proposed CenterPoint Heavy Maintenance Facility (HMF) in Madera. The information outlined below further describes the relationship between the CenterPoint site and planned infrastructure improvements.

General

The CenterPoint site is located contiguous to City of Madera General Plan Village I, the Community College Village. The Village is anchored by the existing community college campus and is planned for a range of uses, including industrial use south of Avenue 12 adjacent to the CenterPoint site. Development approvals have been granted within the Community College Village and build out of the area pursuant to the adopted plans is viewed by the City as a priority. Expansion of the full range of City services will occur in conjunction with development, with construction of primary sewer trunk and water main distribution systems being initial priorities.

Sewer Service

The City’s adopted Sanitary Sewer Master Plan anticipates the installation of a system of sewer trunk lines within the Avenue 12 right of way in close proximity to the site to serve new development identified in the General Plan Village I between Freeway 99 and the BNSF Tracks. The master planned trunk alignments will be adequate to serve the HMF site. Upgraded demand calculations, to be completed prior to project level design, will determine the final size(s) of the trunk lines.

Wastewater collected by the sanitary sewer system is treated at the wastewater treatment plant that is owned and operated by the City. The existing plant capacity is adequate to accommodate probable opening day demands for the facility. Expansions to the wastewater treatment plant are planned as demand for capacity increases over time in conjunction with new development. Depending on the timing and phasing of development, the HMF site and related development may serve by existing improvements or a subsequent expansion.

Water Service

The City’s adopted Water System Master Plan anticipates the expansion of the existing water main grid system occurring to serve new development identified in General Plan Village I between Freeway 99 and the BNSF Tracks. A system of existing and new water wells and storage tanks will provide water to the system. The grid-based distribution system is designed to provide reliable and redundant water service, and it will result in capacity adequate to serve the new HMF site. Final land use plans for the project area, together with water demand calculations, will determine the precise improvements required to provide service. To the extent necessary, the water main grid is expandable south of Avenue 12 and additional well sites can also be added.

We look forward to working with the project team as the site selection process evolves. If you have any questions regarding any of the information provided in this letter please let me know.

Sincerely,

David J. Merchén
Community Development Director
Submission 245 (Matthew Treber, Madera County (on behalf of Wye Madera County Taskforce), June 21, 2019) - Continued

Centrally Located

As home to the Wye, Madera County is optimally situated to service trains on both the Sacramento and San Francisco lines more quickly, efficiently and cost effectively than other potential sites. Madera County has access to the workforce needed to successfully operate the heavy maintenance facility and has planned housing developments to accommodate the population growth that stems from the jobs created by the facility. Recently ranked No. 1 in the nation for manufacturing job growth, we also have established job training programs oriented toward the skills required for heavy maintenance facility operations. As the halfway point between Fresno State and UC Merced, a Madera County site will increase workforce development and other partnership opportunities with both institutions.
Expedited Construction

Madera County’s leadership has united to ensure the most streamlined permitting process and efficient delivery of services through a long-term partnership with the High-Speed Rail Authority. In addition, unlike other potential locations, the proposed Madera County sites (whether existing or alternative) are single parcels with existing utilities, resulting in lower land costs and an accelerated timeline for land acquisition. Our sites are already connected to needed infrastructure, including freight transportation networks, light rail, highways, utilities, and municipal water and sewer systems, limiting overhead, construction costs and opportunities for unforeseen construction delays.

Significant Cost Savings

Our central location and accessibility along the high-speed rail system will also help reduce operational costs associated with transporting trains to and from the heavy maintenance facility. In addition, locating the heavy maintenance facility closer to the Wye will reduce the need for additional infrastructure and land acquisition costs during construction.

Maximum Economic Impact

Due to Madera County’s strategic central location and connectivity provided by light rail, the heavy maintenance facility will also benefit workers from other labor markets in the region, including Fresno, Mariposa, Merced and Modesto. In addition, the estimated 1,500 jobs created by the heavy maintenance facility, and additional jobs provided by auxiliary services, have the potential to drop Madera County’s unemployment rate to the single digits, a much greater impact than other potential locations would experience. By lowering the unemployment rate and increasing the median income, the heavy maintenance facility will help draw new retail and dining options to Madera County, improving the quality of life and bolstering the local economy.

For more information contact us at (559) 662-6040
RESOLUTIONS OF SUPPORT

WHEREAS, the County of Madera is in the center of the State and represents the footprint of the California High-Speed Rail project, being the placement of the ways and the parent track miles of any county in the initial operating segment, and,:

WHEREAS, the stated policy of the California High Speed Rail Authority (CHSRA) is to provide benefits to those communities who are accommodating the system and Madera County is the only County that has yet to be designated any facility in the system any County;

WHEREAS, the Heavy Maintenance Facility (HMF) in Madera County would serve as a much needed stimulus to the struggling local economy and create an estimated 22,000 jobs for the next five years, create approximately 1,500 permanent jobs when the facility is completed, generate additional property taxes for the County, and would provide the most reasonable economic benefits to offset the loss of important agricultural land and employment opportunities and,

WHEREAS, a HMF placed in Madera County would serve the labor markets of the largest labor bases in the San Joaquin Valley including Fresno, Madera, Merced, and Stanislaus Counties, making Madera County the only viable site under consideration and providing the CHSRA with the largest number of local employees to staff the HMF.

NOW, THEREFORE, THE BOARD OF SUPERVISORS OF THE COUNTY OF MADERA RESOLVES AS FOLLOWS:

1. The Board of Supervisors for the County of Madera support the location of the HMF for the California High-Speed Rail project within the County of Madera.

2. The Board of Supervisors of the County of Madera respectfully request the CHSRA mandate that a site in Madera County, whether existing or an alternative, that meets the criteria described in the Technical Manual developed by the CHSRA, the delivery schedule, and is cost competitive, is given priority when evaluating the alternatives for the HMF.

3. That a copy of this resolution be forwarded to the CHSRA for consideration when evaluating the site alternatives for the HMF.
* * * * * * * * * * * * * * *

The foregoing Resolution was adopted this 6th day of Oct, 2015, by the following vote:

Supervisor Frazier voted:  YES
Supervisor Rogers voted:  NO
Supervisor Pastinelli voted:  YES
Supervisor Rodriguez voted:  YES
Supervisor Wheeler voted:  YES

ATTEST:

[Signature]
Chairman, Board of Supervisors

[Signature]
Clerk, Board of Supervisors

[Signature]
Approved as to Legal Form:
COUNTY COUNSEL

[Signature]

RESOLUTION NO. 15-219

A RESOLUTION OF THE CITY COUNCIL OF THE CITY OF MADERA, CALIFORNIA, IN SUPPORT OF LOCATING THE CALIFORNIA HIGH SPEED RAIL HEAVY MAINTENANCE FACILITY IN MADERA COUNTY

WHEREAS, the City of Madera joins the County of Madera in support of locating the California High Speed Rail Maintenance Facility in Madera County; and,

WHEREAS, the County of Madera is in the center of the State and represents the backbone of the California High Speed Rail project, bearing the placement of the wye and the most track miles of any county in the initial operating segment; and,

WHEREAS, the stated policy goal of the California High Speed Rail Authority (CHSRA) is to provide benefit to those communities who are accommodating the system and Madera County is the only County who has yet to be designated any facility in the system; and,

WHEREAS, locating the Heavy Maintenance Facility (HMF) in Madera County would serve as a much needed stimulus to the struggling local economy and create an estimated 20,000 jobs for the next five years, create approximately 1,500 permanent jobs when the facility is completed, generate additional property taxes for the County, and would provide the most measurable economic benefit to offset the loss of important agricultural land and employment opportunities; and,

WHEREAS, a HMF placed in Madera County would serve the labor markets of the largest labor forces in the San Joaquin Valley including Fresno, Madera, Merced, and Stanislaus Counties, making Madera County the only regional site under consideration and providing the CHSRA with the largest number of local employees to staff the HMF.

NOW THEREFORE, THE CITY COUNCIL OF THE CITY OF MADERA HEREBY finds, orders and resolves as follows:

1. The City Council of the City of Madera joins Madera County in support of the location of the HMF for the California High Speed Rail System within the County of Madera.

2. The City Council of the City of Madera respectfully request the CHSRA mandate that a site in Madera County, whether existing or an alternative, that meets the criteria as described in the technical memoranda developed by the CHSRA, meets the delivery schedule, and is cost competitive, be given priority and placed in Madera County.

3. The City Council directs that a copy of this resolution shall be forwarded to the CHSRA for consideration when evaluating the alternatives for the HMF.

* * * * * * *
COUNCIL RESOLUTION # 25-16

A RESOLUTION OF THE CITY COUNCIL OF THE CITY OF CHOWCHILLA,
CALIFORNIA, IN SUPPORT OF LOCATING THE CALIFORNIA HIGH SPEED RAIL
HEAVY MAINTENANCE FACILITY IN MADERA COUNTY

WHEREAS, the City of Chowchilla joins the County of Madera and the City of
Madera in support of locating the California High Speed Rail Maintenance Facility in
Madera County; and,

WHEREAS, the County of Madera is in the center of the State and represents
the backbone of the California High Speed Rail project, bearing the placement of the
yoe and the most track miles of any county in the initial operating segment; and,

WHEREAS, the stated policy goal of the California High Speed Rail Authority
(CHSRA) is to provide benefit to those communities who are accommodating the
system and Madera County is the only County who has yet to be designated any facility
in the system; and,

WHEREAS, locating the Heavy Maintenance Facility (HMF) in Madera County
would serve as a much needed stimulus to the struggling local economy and create an
estimated 20,000 jobs for the next five years, create approximately 1,500 permanent
jobs when the facility is completed, generate additional property taxes for the County,
and would provide the most measurable economic benefit to offset the loss of important
agricultural land and employment opportunities; and,

WHEREAS, a HMF placed in Madera County would serve the labor markets of
the largest labor forces in the San Joaquin Valley including Fresno, Madera, Merced,
and Stanislaus Counties, making Madera County the only regional site under
consideration and providing the CHSRA with the largest number of local employees to
staff the HMF; and,

WHEREAS, The City remains consistent with Chowchilla City Council Resolution
# 81-15.

NOW, THEREFORE, BE IT RESOLVED that the City Council of the City of Chowchilla
hereby finds and determines the following:

1. The City Council of the City of Chowchilla joins Madera County and the City of
Madera in support of the location of the HMF for the California High Speed Rail
System within the County of Madera.
2. The City Council of the City of Chowchilla respectfully request the CHSRA
mandate that a site in Madera County, whether existing or an alternative, that
meets the criteria as described in the technical memorandum developed by the
CHSRA, meets the delivery schedule, and is cost competitive, be given priority
and placed in Madera County.
3. The City Council directs that a copy of this resolution shall be forwarded to the
CHSRA for consideration when evaluating the alternatives for the HMF.
Submission 245 (Matthew Treber, Madera County (on behalf of Wye Madera County Taskforce), June 21, 2019) - Continued

PASSED AND ADOPTED by the City Council of the City of Chowchilla this 23rd day of February, 2016 by the following vote to wit:

AYES: 5 - Walker, Chavez, Guarnitz, Haworth, Ahmed

NOES: 0

ABSENT: 0

ABSTAIN: 0

APPROVED:

Wisdom Ahmed, Mayor

ATTEST:

Jannine McLeod, CMC
City Clerk

WHEREAS, both the County of Madera and City of Madera have adopted resolutions in support of locating the California High Speed Rail Heavy Maintenance Facility in Madera County;

WHEREAS, locating the Heavy Maintenance Facility (HMF) in Madera County would serve as a much needed stimulus to the struggling local economy and create an estimated 20,000 jobs for the next five years, create approximately 1,500 permanent jobs when the facility is completed, generate additional property taxes for the County, and would provide the most reasonable economic benefit to offset the loss of important agricultural, local and employment opportunities.

WHEREAS, supporting the creation of new jobs within Madera County benefits the students of Madera Unified, including students participating in the District’s Career Technical Education program, who graduate and remain in the Northern area.

NOW, THEREFORE, BE IT RESOLVED by the Board of Education of the Madera Unified School District as follows:

1. The foregoing resolutions are approved and adopted.

2. The Board of Education joins the County of Madera and City of Madera in support of the inclusion of the HMF of the California High Speed Rail System within the County of Madera.

3. The Board of Education respectfully requests that the California High Speed Rail System mandate that the HMF site be placed in Madera County.

4. The Board of Education directs that a copy of this resolution shall be forwarded to the California High Speed Rail System for consideration.

The foregoing Resolution was passed and adopted at a meeting of the Board of Trustees of the Madera Unified School District on the 28th day of June, 2016, by the following vote:

AYES: 5

NOES: 0
Resolution No. 15-10

WHEREAS, the County of Madera is in the center of the State and represents the backbones of the California High-Speed Rail project, hosting the placement of the ‘woy and the most ideal location of key assets in the initial operating segment; and

WHEREAS, the state policy goal of the California High-Speed Rail Authority (CHSRA) is to provide benefits to those communities who are accommodating the system and Madera County is the only County who has yet to designate any facility in the system; and

WHEREAS, locating the Heavy Maintenance Facility (HMF) in Madera County would serve as a much-needed stimulant to the struggling local economy and create an estimated 20,000 new jobs for the next five years, create approximately 1,500 permanent jobs where the facility is completed, generate additional property taxes for the County, and would provide the most reasonable economic benefits to offset the loss of important agricultural land and employment opportunities; and

WHEREAS, a HMF placed in Madera County would serve the labor markets of the largest labor forces in the San Joaquin Valley including Fresno, Madera, Merced and Stanislaus Counties, making Madera County the only region also under consideration and providing the CHSRA with the largest number of local employees to staff the HMF.

NOW, THEREFORE, BE IT RESOLVED, that the MCTC supports the location of the HMF for the California High-Speed Rail project within the County of Madera and respectfully requests the CHSRA (a) place a site in Madera County, whether existing or an alternative, that meets the criteria as described in the technical memoranda developed by the CHSRA, the delivery schedule, and is cost competitive be given priority and placed in Madera County.

The foregoing resolution was adopted this 28th day of June, 2016 by the following vote:

Commissioner Rodriguez voted:  
Commissioner Rogers voted:  
Commissioner Wheelock voted:  
Commissioner Poynter voted:  
Commissioner Madsen voted:  
Commissioner Ahmed voted: 
Submission 245 (Matthew Treber, Madera County (on behalf of Wye Madera County Taskforce), June 21, 2019) - Continued

Enclosure 7

Request for Expression of Interest California High Speed Rail Heavy Maintenance Facility (Fagundes Property; January 2010)
Request for Expression of Interest
California High Speed Rail Heavy Maintenance Facility

Mr. Mehdi Morshed, Executive Director
California High-Speed Rail Authority
925 L Street, Suite 1425
Sacramento, Ca 95814

Madera County Resource Management Agency
ATTN: Rayburn Beach, Director
2037 W. Cleveland Avenue

Madera County Economic Development Commission
ATTN: Bobby Kahn, Director
2425 West Cleveland Avenue, Suite 101
Madera CA 93637

Summary of Proposal
Local Government Participation and Property Owner Acknowledgement

The following Expression of Interest in providing the High Speed Rail Heavy Maintenance Facility (HMF) has been prepared in cooperation with local governmental entities including the City of Chowchilla and Madera County. The property owners’ expression of interest in providing land and other High Speed Rail (HSR) Alternative Route right-of-way on land they control is acknowledged in this document. The City of Chowchilla participated with the property owner in the preparation of this document and accordingly advances the agreement with the property owners to provide land to the project.

The offer of the land for the HMF is a conditional offer from the property owner based on relocating the east-west connector line west of Ash Slough in order to preserve as much agricultural land and urban land would decrease the number of persons employed in the County, particularly at a time when local governments are expending significant resources in an attempt to redevelop downtowns and diversify the employment and economic base of this small County. The larger neighboring counties are both planned and positioned by the CHSRA to have High Speed Rail Stations located within them and thus benefit substantially from an economic development perspective. Locating the HMF in Madera County would serve to balance the disproportionate loss of land and further the efforts of the County to expand jobs and diversifying its economy to reduce its reliance on agriculture.

The offer of the land for the HMF is a conditional offer from the property owner based on relocating the east-west connector line west of Ash Slough in order to preserve as much agricultural land. The offer of the land for the HMF is a conditional offer from the property owner based on relocating the east-west connector line west of Ash Slough in order to preserve as much agricultural land. The offer of the land for the HMF is a conditional offer from the property owner based on relocating the east-west connector line west of Ash Slough in order to preserve as much agricultural land. The offer of the land for the HMF is a conditional offer from the property owner based on relocating the east-west connector line west of Ash Slough in order to preserve as much agricultural land. The offer of the land for the HMF is a conditional offer from the property owner based on relocating the east-west connector line west of Ash Slough in order to preserve as much agricultural land.
Displacements: Agricultural operations will cease on approximately 155 acres with the construction of the HMF at this location. The agricultural operations that would be displaced are a dairy operation and row crops. Residential HMF will not be displaced as a result of the HMF being constructed on this location. Approximately 2,250 linear feet of irrigation lateral line operated by the Chowchilla Water District will have to be relocated around the proposed site. Land use in this area is currently designated as Agricultural by the Madera County General Plan. Approximately 155 acres of active farmland will be displaced. The 100-year FEMA flood zone is located approximately 6 miles southeast of the southerly edge of this HMF location; it will not be impacted as a result of HMF construction at this site. Ash Slough, approximately 0.5 miles to the west, is a flood channel controlled by Buchanan Dam in the lower Sierra Nevada foothills.

Traffic effects: The rural nature of the proposed site generates little traffic on local County roads. It is estimated that less than 100 trips per day use local roads near the proposed site. The County roads are typically 28 foot wide paved sections with a marginally maintained shoulder on a 50 foot right-of-way. Anticipated traffic from the proposed facility would significantly overwhelm the local roads. The Infrastructure Plan for the proposed HMF at this site includes substantial upgrades to the road system in this location to meet acceptable Level-of-service standards for the anticipated traffic from the HMF (See Attachment 4). Improving local roads and to extent State facilities is included in the off-site improvements contemplated for the HMF that would be funded as part of the public/private partnership.

The site is directly served by State Route 152 (SR 152) approximately 0.5 miles to the south at the intersection of Road 12 or the intersection of Road 13. Road 13 is a rural road connection to Highway 99 to the north in Madera County. SR 152 is classified as an expressway through Madera County and presently handles an average daily traffic (ADT) volume of 17,000 vehicles near the proposed HMF site. When SR 152 was constructed, Caltrans acquired right-of-way for a future interchange at Road 12 and Road 13. The nearest full interchange is located at Robertson Boulevard (SR 233) approximately 2.5 miles to the east of the proposed HMF site. SR 152 terminates as interchange at State Route 99 (SR 99) approximately 7 miles east of Road 12. SR 99 is a major north-south freeway in the San Joaquin Valley. SR 99 peak ADT is 57,000 on a 4-lane facility. The SR 152/99 interchange is a 6-lane facility to allow for the merging of traffic.

Improvements to SR 152 will be required to accommodate turning movements to Road 12 and or Road 13. Until such time as an interchange is constructed, significantly longer acceleration and deceleration lanes will be required at the intersection for all on and off turning movements. Substantial turning movements at the intersection of SR 152 and Road 17 ½ will lower the level-of-service of SR 152 and increase traffic safety hazards. Construction of an interchange may be required early in the development process. Currently, Robertson Boulevard functions as a major arterial street in Chowchilla as a two lane facility. Connections to the proposed HMF via Robertson Boulevard would require improvements to this facility to an additional two lanes and improvements to existing rural roads between Robertson Boulevard and the proposed...
HMF site. These improvements are included in the off-site improvements contemplated for the HMF that would be funded as part of the public/private partnership.

Environmental: According to the California Environmental Protection Agency’s (Cal/EPA) Geotracker web service, there are no known underground and/or above ground fuel tanks or any other hazardous sites or clean up areas located within the HMF alternative site. Based on the biological assessments compiled for the County of Madera General Plan, research on the US Fish and Wildlife Service (FWS) mapping, and also that the land has been highly disturbed through agricultural processes, there are no known wetland areas located within this HMF site, with the exception of two actively used small stock ponds listed by FWS as freshwater emergent wetlands.

The proposed site consists of Unique Farmland with narrow bands of Prime Farmland running diagonally across the site. This map also shows the extent of existing dairy operations on the site as dark color geometric shapes. The exhibit below shows the location on the Madera County Important Farmland Map for 2008 as prepared by the California Department of Conservation Farmland Mapping and Monitoring Program.

Availability of local labor force: The City of Chowchilla and the County of Madera along with its federal state, and local partners are prepared to provide a trained and trainable labor force for the HMF project. Attachment 5 describes the regions labor force background and programs that can be put into place to ensure a suitable labor force at the time the HMF is prepared to employ them.

Public-Private Partnership: The public-private partnership approach may include economic or financial incentives. The City of Chowchilla along with the County of Madera and the City of Madera are forming a JPA to assist in providing financing for the infrastructure improvements necessary for the proposed HMF.
Submission 245 (Matthew Treber, Madera County (on behalf of Wye Madera County Taskforce), June 21, 2019) - Continued

Attachment 1

Proposed HMF Site A-3 Route
Fagundes Daries

1. 11-10 Map is an approximation of the route alternative based on very general maps. This is not an official map of the High Speed Rail Authority the City of Chowchilla or the County of Madera.

Attachment 2

Location of Proposed HMF
Shown on HSR Alternative Route Map

Highway 152
Chapter 22 Local Agency Comments

Submission 245 (Matthew Treber, Madera County (on behalf of Wye Madera County Taskforce), June 21, 2019) - Continued
Chapter 22 Local Agency Comments

Employers in Madera County most commonly draw from a labor pool within a 50-mile radius from the cities of Madera and Chowchilla. This labor pool is abundant, affordable and efficient. The 2000 Census data about California residents and county commute patterns from the Merced, Mariposa and Fresno Counties show a combined total of over 9,250 workers commuting into Madera County. In addition, more extensive data exists depicting commuters from as far north as San Mateo and as far south as Los Angeles.

The December 2009 unemployment figures show Madera County with a county-wide rate of 16% which represents 10,200 unemployed residents. The unemployment figures for the City of Madera and the City of Chowchilla are 21% and 16.6% respectively. The data for Fresno County shows an unemployment rate of 16.5% representing 73,100 people and the County of Merced is reporting an unemployment rate of 18.3% translating to 19,200 people. The heightened unemployment levels in Madera and surrounding counties that commutes into Madera County is largely due to closures and layoffs across all industry sectors. This has changed the dynamic of the available workforce and now encompasses workers at all skill and educational levels. This presents an opportunity for the Workforce Development Systems to enhance and grow the skill level of already trained workers and a chance for Madera County employers to obtain a highly trained and seasoned employee base.

Employers in Madera County also have a large pool of highly skilled individuals from strong network of post secondary education facilities some of which are listed below:

UC MERCED, Merced, CA - Offers include Bachelors Degree, Masters Degree and doctorate programs.
California State University, Fresno, Fresno, CA - Offers include Bachelors programs in 65 fields of study, Masters Degree programs in 40 areas and a joint Doctorate in educational leadership with the University of California. Enrollment is approximately 20,000 with over 3,000 graduate students.
Fresno Pacific University, Fresno, CA - This private university offers Bachelors and Masters Degrees in a variety of subjects.
National University, Fresno, CA - The University offers a variety of degrees at Bachelors and Masters levels.
University of Phoenix, Fresno, CA - Over 100 degree programs are offered at this University specializing in accessible education for the working student. Degree programs include Associates, Bachelor’s, Masters, and Doctoral degrees.
San Joaquin College of Law, Fresno, CA - An accredited law school specializing in legal education.
State Center Community College District - More than 100 fields of study are offered in day and evening classes. Comprehensive Community College campuses are Fresno City College in Fresno, CA and Reedley Community College in Reedley, CA. College Centers are also located in Madera, Oakhurst and Clovis.

Chapter 22 Local Agency Comments

Submission 245 (Matthew Treber, Madera County (on behalf of Wye Madera County Taskforce), June 21, 2019) - Continued
Merced Community College, Merced, CA - Merced College is a comprehensive community college offering innovative instructional programs. They also have a community college center in Los Banos, CA.

Leadership in both the education and business sectors realize the importance of developing a future workforce that is well educated and highly trained to transition from the classroom to the world of work. Several years ago they jointly formed the Madera Compact which is comprised of the top leadership from education, business and local government. They meet regularly to discuss how to continually improve the local educational systems by developing innovative programs and forming business education partnerships.

In addition, the Madera Community College Center, in partnership with the local business community, just opened the Center for Advanced Manufacturing. This center is especially designed to train students in high demand, skilled manufacturing jobs.

The Madera County Workforce Development Office (MCWDO) is another vital partner in preparing the local workforce to meet the business needs of Madera County through partnerships with employers and community organizations resulting in a quality employment and training system. MCWDO has also pioneered relationships with the Workforce offices in the Central San Joaquin Valley and have developed a long history of collaboration. The Central California Workforce Collaborative (CCWC) is a group comprised of the Executive Directors of the local Workforce Investment areas from Kern County on the south to San Joaquin County on the north. Through a joint effort the CCWC was successful in obtaining a grant to institute a regionally recognized assessment and work readiness certificate centered on the Health Care, Agriculture and Ag Business, Manufacturing, Renewable Energy, Transportation and Logistics clusters.

The leadership in Madera County remains committed to building a highly educated and well trained workforce and can proudly say we continue to meet the demands of all of our local businesses.

Enclosure 8

Expression of Interest: Heavy Maintenance Facility, Madera County, A-2 Alignment, Gordon Shaw Properties Site (January 2010)
Expression of Interest: Heavy Maintenance Facility
Madera County, A-2 Alignment
Gordon Shaw Properties Site

Attached Documents
1. Regional Location Map with A-2 Alignment
2. Conceptual Site Map
3. Conceptual Site Design Diagram
4. Utility Map
5. Access & Circulation Map
6. Grant Deed
7. Legal description
8. Assessor’s parcel map
9. County Loop Road Cost Estimate
10. Owner’s Commitment Letter with Authority for HMF

Submission 245 (Matthew Treber, Madera County (on behalf of Wye Madera County Taskforce), June 21, 2019) - Continued
Site Description

The site lies within one parcel totaling 451 acres (see attached Grant Deed, legal description and assessor's parcel map). The parcel is situated adjacent to State Route 99 and the Union Pacific Railroad (UPRR) main line (both form the western boundary). The Ave. 20½/23½ and the Ave. 19½ State Route 99 interchanges lie immediately to the north and south of the site (respectively). Both interchanges provide easy access to the site within 3½ minutes via Ave. 19 and Road 24. The subject parcel is currently planted in wine grapes. The land adjacent is vacant or planted with crops. Within a one mile radius, there are restaurants, motels, a Pilot Truck Center, trucking companies, food processing and other industrial plants.

All utilities required for development, including sewer, water, storm drainage, roads, electrical and natural gas are either on site or available to bring to the site within the time necessary to deliver a fully improved site to the California High Speed Rail Authority.

The majority of the subject site is currently designated in the County General Plan as Agricultural Exclusive and is zoned Agricultural. County staff is currently preparing documentation to bring before the Board of Supervisors initiating both General Plan updates and zoning changes necessary (heavy industrial) to accommodate the proposed facility.
Local Labor Force

Central Location
The proposed HMF site is located in a central location considering regional labor force centers. The site is located within the Madera Metro area and approximately 1½ hours away from the Fresno Metro and the Merced Metro areas. Due to the site’s location, commute times are relatively reasonable, from 5 to 10 minutes in the local metro area to 30 to 45 minutes regionally. The Fresno Metro area represents the largest labor market with the largest labor force numbers in all labor force categories.

<table>
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<tr>
<th>Labor Force Oriented Towards HMF Services</th>
<th>Madera-Chowchilla Metro Area</th>
<th>Fresno Metro Area</th>
<th>Merced Metro Area</th>
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<td>Civilian Labor Force</td>
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<td>5,600</td>
<td>Not Identified</td>
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<td>Not Identified</td>
</tr>
<tr>
<td>Manufacturing: Durable Goods</td>
<td>2,400</td>
<td>8,600</td>
<td>Not Identified</td>
</tr>
<tr>
<td>Professional, Scientific &amp; Technical Services</td>
<td>2,800</td>
<td>11,000</td>
<td>Not Identified</td>
</tr>
</tbody>
</table>

*Data from California Employment Development Department

Labor force categories identified as potentially important to the HMF include construction, durable goods manufacturing, and professional, scientific and technical services.
Local Economic Benefits

Not unlike many other San Joaquin Valley communities impacted by the recession, the Madera-Chowchilla Metro area faces an unemployment rate of 15%. The proposed HMF site is located near several disadvantaged, low income communities in the metro area. These include Fairmead (four miles to the north of the site), Parksdale (7 miles to the south), Parkwood (7 miles to the south), and Chukchansi (8 miles to the west). All four communities face staggering unemployment and poverty rates.

The economic benefits resulting from the HMF would have exponential effects, including potential industrial spin-off businesses. Both Fairmead and Chukchansi have been specially identified as “Lowest Target Income Group” communities (Lowest Targeted Income Group households have incomes that are at 50 percent or less of the adjusted area median family income) that would benefit the most from potential economic activity created by the HMF. Fairmead in particular has been the focus of County community revitalization efforts, involving numerous State grant projects. Additionally, the Valley floor region of Madera County offers 7,721.26 acres of vacant, industrially designated property that may provide “breathing room” for industrial spin-off businesses resulting from the HMF.
Constructability

Construction Access

The property designated for the HMF has ample right of way access for construction needs. Access may be gained from Avenue 19, Road 23, and an abandoned rail spur to the northeast (UPRR Raymond Spur). No utilities exist on the portion of the site designated for the HMF. Electrical and gas lines do exist along the UPRR right of way on the western boundary of the parcel, but these lines will not interfere with the proposed site of the facility.
Displacements

Properties Displaced

The Heavy Maintenance Facility and Right of Way Maintenance facility together will impact (1) property, totaling 451 acres. The property is currently in agricultural production for wine grapes. No residential, commercial, or industrial structures currently exist on the parcel. The parcel is designated in the Madera County General Plan as Agricultural Exclusive. The parcel includes valuable farmland, including both Prime and Unique farmland as designated by the State Department of Conservation. The map on the following page highlights acres of farmland potentially affected.
Existing Level of Service (LOS)

The project site will be served by two separate Interchanges, including Avenue 20 ½ and SR 99 to the north and Avenue 18 ½ and SR 99 to the south. Avenue 20 ½, Avenue 18 ½ and Road 22 are the main County roads serving the site in route to SR 99. Both the Interchanges and the road segments currently operate at acceptable LOS. The poorest LOS was recorded in July of 2007 at the Avenue 18 ½ and SR 99 interchange, with a LOS “C” (LOS D is the lowest LOS allowed by the General Plan).

The HMF has the potential to generate as many as 3,000 trips (2 trips per each job, 1,500 jobs) per day. It is expected that most employees will utilize both Interchanges for those traveling north to Chowchilla and Merced and south to Madera and Fresno. Trips are expected to be distributed roughly 60% through Avenue 18 ½ and SR 99 to the south (Fresno and Madera represent the largest population and labor force areas) and 40% to the north.

Circulation Improvements

Road system improvements will be targeted to accommodate an acceptable LOS for the project (LOS D or better). Both Interchanges (SR 99 and Avenue 18 ½, SR99 and Avenue 20 ½) will need capacity improvements. Additionally, County road Improvements will be necessary to provide ample access to the site (see the attached cost estimate). The table below highlights the improvements necessary. The attached access and circulation map shows the improvements noted below. Please note that the County loop road will only need to be a two lane facility for the HMF. Additional development in the area may require capacity improvements as noted on the map.

<table>
<thead>
<tr>
<th>Item</th>
<th>Improvements needed</th>
<th>Cost</th>
</tr>
</thead>
<tbody>
<tr>
<td>Avenue 18 ½ and SR 99 interchange</td>
<td>Right turn lanes for northbound and southbound ramps, two traffic signals</td>
<td>3-5 million</td>
</tr>
<tr>
<td>Avenue 20 ½ and SR 99 interchange</td>
<td>Left turn and right turn lanes for northbound and southbound ramps, two traffic signals</td>
<td>3-5 million</td>
</tr>
<tr>
<td>County Loop Road</td>
<td>4.5 miles of two lane road with paved shoulders, four traffic signals</td>
<td>8.7 million</td>
</tr>
</tbody>
</table>

Total cost: 14.7-18.7 million
Wetland Avoidance

No wetlands exist on the potential HMF site. A riparian area exists along Berenda Creek along the northern boundary of the site. The riparian habitat, along with the creek itself will have to be bridged by the A-2 alignment, should it be the final route chosen by the Authority. The proposed site itself will not impact this riparian area.

Phase 1 Environmental Site Assessment

A phase 1 environmental analysis has been conducted on the potential site. The analysis did not reveal any underground storage tanks and/or hazardous materials onsite. The phase 1 analysis is available upon request of the property owner.

Economic Incentives
Submission 245 (Matthew Treber, Madera County (on behalf of Wye Madera County Taskforce), June 21, 2019) - Continued

Expression of Interest: Heavy Maintenance Facility
Madera County, A-2 Alignment Gordon Shaw Properties Site

Letter of Intent
The California High Speed Rail Authority (CHSRA) and the Property owner will enter into the following agreement as a way of facilitating a private/public partnership to construct the Heavy Maintenance Facility and all necessary infrastructure. The letter is attached.

County Efforts
A Joint Powers Agreement is currently being drafted by staff that will enable all three jurisdictions to work collaboratively in the development and on-going support of the HMF, should the Authority choose a site within Madera County.
Submission 245 (Matthew Treber, Madera County (on behalf of Wye Madera County Taskforce), June 21, 2019) - Continued
Submission 245 (Matthew Treber, Madera County (on behalf of Wye Madera County Taskforce), June 21, 2019) - Continued

Conceptual Site Design Diagram
Submission 245 (Matthew Treber, Madera County (on behalf of Wye Madera County Taskforce), June 21, 2019) - Continued
Submission 245 (Matthew Treber, Madera County (on behalf of Wye Madera County Taskforce), June 21, 2019) - Continued
Submission 245 (Matthew Treber, Madera County (on behalf of Wye Madera County Taskforce), June 21, 2019) - Continued

Grant Deed
Legal Description
Submission 245 (Matthew Treber, Madera County (on behalf of Wye Madera County Taskforce), June 21, 2019) - Continued

EXHIBIT A

The land referred to in this Report is described as follows:

All the contained property situated in the City of Bakersfield, County of Kern, State of California, is described as follows:

PARCEL 1:

Beginning at the Northeast corner of Section 29, Township 10 South, Range 17 East, Meridian Blanco Base and Meridian Boro, thence along the North line of said Section 29, North 89°21'00" West 1098.60 feet, thence along the Southern right of way line of the Southern Pacific Railroad Company’s Raymond Branch, South 87°42'30" West 537.20 feet to the beginning of a curve to the right of radius 2135.68 feet, which curve is tangent to the aforementioned curve, thence along the arc of said curve North 89°21'00" West; thence leaving said right of way line, South 87°42'30" West 72.05 feet to a point on the West line of said Section 29; thence continuing South 47°45'51" West 308.11 feet; thence along the Northwest right of way line of the Southern Pacific Railroad, South 64°15'19" West 309.30 feet to a point on the West line of said Section 29, which point is Boun 0'00'00" West 1410.30 feet from the Northeast corner of said Section 29; thence continuing South 64°15'39" East 4705.30 feet; thence along the South line of said Section 29, South 89°31'01" East 5099.85 feet to the Southeast corner of said Section 29; thence along the Southeast line of said Section 29 and the center line of a forty foot road easement, North 69°18' West 5213.30 feet to the point of beginning.

PARCEL 2:

Beginning at point which bears North 69°20'00" West 1098.60 feet from the Northeast corner of Section 29, Township 10 South, Range 17 East, Meridian Blanco Base and Meridian Boro, thence along the North line of said Section 29, North 89°21'00" West 1098.60 feet, thence along the Northeastern line of Bakersfield Township, North 64°1'30" West 952.90 feet; thence along the North line of said Section 29, South 89°21'00" East 1408.50 feet to the point of beginning.

PARCEL 3:

All three portions lying South of the center line of Bermuda Creek of Blocks C, D, E and F in the area of Bakersfield, according to map thereof filed in the office of the County Recorder of Kern County, on January 16, 1918 in Book 3 of Maps, page 60.

Together with the abandoned streets as said portion, said streets having been abandoned by an order of the Board of Supervisors of Madera County, dated October 31, 1953 and recorded October 31, 1953 in Book 259 of Official Records, page 498, Madera County Records.

EXCEPTING THEREFROM that portion of the Southern Pacific Railroad known as Raymond Spur, as shown on Southern Map No. 29-19, Madera County, California 1953.

ALSO EXCEPTING THEREFROM as embodied in Interest in all oil, gas, crude oil, and other items of like character as are now or may hereafter be owned and under leases described property granted in Southern Pacific Company, a Corporation, by Deed recorded November 23, 1960 in Book 915, page 329, as Document No. 20009 of Official Records.

PARCEL 4:

That portion of Section 29, Township 10 South, Range 17 East, Meridian Blanco Base and Meridian Boro, according to the Official Plat thereof, lying with a width of one hundred (100) feet, lying wholly on each side of the line of the Southern Pacific and the Southern Pacific Railroad Company’s railroad, where the same is located, through Sections 26, 27, 28, 29, 30 and 31 in Township 10 South, Range 17 East, more particularly described as follows:

Comencing from the same as a point on the center line of the said railroad, thence and continuing in the West boundary line of the portion of the land of Henry Miller and John Larr, as described in said Plat recorded April 14, 1880, in Book 48 at Page 195 of Deeds, and said Sections 50 being Society of the land of Central Pacific Railroad and running thence Eastwardly and Northwardly along said centerline of said Southern Pacific and Southern Pacific Railroad Company’s railroad, where the same is located, through Sections 26, 27, 28, 29, 30 and 31 in Township 10 South, Range 17 East, more particularly described as follows:

Comencing from the same as a point on the centerline of the said railroad, thence and continuing in the West boundary line of the portion of the land of Henry Miller and John Larr, as described in said Plat recorded April 14, 1880, in Book 48 at Page 195 of Deeds, and said Sections 50 being Society of the land of Central Pacific Railroad and running thence Eastwardly and Northwardly along said centerline of said Southern Pacific and Southern Pacific Railroad Company’s railroad, where the same is located, through Sections 26, 27, 28, 29, 30 and 31 in Township 10 South, Range 17 East, more particularly described as follows:

EXCEPTING THEREFROM all right, title and interest in and to all oil, gas, crude oil, and other items of like character, mineral rights, underground resources, precious metals ores, industrial grade silicates and carbonates, vegetable minerals, sand, gravel, aggregates, and all other minerals of every kind and character, mineral or otherwise, whether or not presently known to science or industry, and known to exist or hereafter discovered upon, within or under the surface of said land, regardless of the depth below the surface in which any such substance may be found; however, its succession and mineral rights shall not have the right to any purpose whatsoever to enter upon, heirs or through the surface on the first 500 feet of the subsurface as reserved in Deed by Topka Partners, Inc., a California Corporation recorded July 21, 1973 as Document No. 5910099, Madera County Records.

APX: 895,184-021 093-198-001
ARBL: None
Submission 245 (Matthew Treber, Madera County (on behalf of Wye Madera County Taskforce), June 21, 2019) - Continued

Assessor's Parcel Map
County Loop Road Cost Estimate

<table>
<thead>
<tr>
<th>Project Name:</th>
<th>HEAVY MAINTENANCE FACILITY LOOP</th>
</tr>
</thead>
<tbody>
<tr>
<td>Project Length (Miles):</td>
<td>4.25</td>
</tr>
<tr>
<td>Cost Estimate Preparation Date:</td>
<td>12/16/2009</td>
</tr>
<tr>
<td>Program Type (RRR or TIF):</td>
<td>OTHER</td>
</tr>
</tbody>
</table>

**PROJECT DESCRIPTION:**

Limits: Ave 18 1/2 to Ave 20 1/2

Proposed Improvements: 2 lane Road with paved shoulders. Structural section based on an assumed R value of 30 with a Traffic Index of 5, which resulted in a structural section of 0.39' of Asphalt Concrete (AC) and 1.0' of Class II Aggregate Base (AB).

**SUMMARY OF PROJECT COST ESTIMATE**

<table>
<thead>
<tr>
<th>Category</th>
<th>Estimate</th>
</tr>
</thead>
<tbody>
<tr>
<td>I. CONSTRUCTION COST</td>
<td>$6,014,951</td>
</tr>
<tr>
<td>II. RIGHT OF WAY - ACQUISITION COST</td>
<td>$902,243</td>
</tr>
<tr>
<td>III. RIGHT OF WAY - UTILITY RELOCATION COST</td>
<td>$661,495</td>
</tr>
<tr>
<td>IV. RESOURCE COSTS</td>
<td>$1,082,691</td>
</tr>
<tr>
<td>V. ENVIRONMENTAL MITIGATION COSTS</td>
<td>$142,500</td>
</tr>
<tr>
<td>TOTAL PROJECT CAPITAL OUTLAY COSTS</td>
<td>$8,743,881</td>
</tr>
</tbody>
</table>

Prepared by: H. Mitch Hemadran, Development Services
Madiera County Road Department

Reviewed by: Johannes Hoven, Road Commissioner
Madiera County Road Department
# HEAVY MAINTENANCE FACILITY LOOP

## I. CONSTRUCTION COST

### Section 1 - Earthwork

<table>
<thead>
<tr>
<th>Description</th>
<th>Quantity</th>
<th>Unit</th>
<th>Unit Price</th>
<th>Item Cost</th>
<th>Section Cost</th>
</tr>
</thead>
<tbody>
<tr>
<td>Roadway Excavation</td>
<td>24,033</td>
<td>YD³</td>
<td>$15</td>
<td>$375,000</td>
<td></td>
</tr>
<tr>
<td>Imported Borrow</td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Clearing &amp; Grubbing</td>
<td>1</td>
<td>LS</td>
<td>$125,000</td>
<td>$125,000</td>
<td></td>
</tr>
<tr>
<td>Develop Water Supply</td>
<td></td>
<td>LS</td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Recycling Exc AC</td>
<td>3,500</td>
<td>YD³</td>
<td>$20</td>
<td>$70,000</td>
<td></td>
</tr>
<tr>
<td>Pavement Removal</td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
</tbody>
</table>

- **Subtotal Earthwork**: $569,000

### Section 2 - Structural Section

<table>
<thead>
<tr>
<th>Description</th>
<th>Quantity</th>
<th>Unit</th>
<th>Unit Price</th>
<th>Item Cost</th>
<th>Section Cost</th>
</tr>
</thead>
<tbody>
<tr>
<td>PCC Pavt (___ Depth)</td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>PCC Pavt (___ Depth)</td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Asphalt Concrete</td>
<td>20,166</td>
<td>Tons</td>
<td>$75</td>
<td>$1,514,700</td>
<td></td>
</tr>
<tr>
<td>Lean Concrete Base</td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Cement-Treated Base</td>
<td>63,034</td>
<td>Tons</td>
<td>$24</td>
<td>$1,486,246</td>
<td></td>
</tr>
<tr>
<td>Aggregate Base</td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Treated Pervious Base</td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Aggregate Subbase</td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Pre-Tension Fabric</td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>MIzer Con (Curb + SW)</td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
</tbody>
</table>

- **Subtotal Structural Section**: $3,001,126

### Section 3 - Drainage

<table>
<thead>
<tr>
<th>Description</th>
<th>Quantity</th>
<th>Unit</th>
<th>Unit Price</th>
<th>Item Cost</th>
<th>Section Cost</th>
</tr>
</thead>
<tbody>
<tr>
<td>Large Drainage Facilities</td>
<td>3,000</td>
<td>SF</td>
<td>$125</td>
<td>$225,000</td>
<td></td>
</tr>
<tr>
<td>Storm Drain</td>
<td>2,400</td>
<td>LF</td>
<td>$83</td>
<td>$200,000</td>
<td></td>
</tr>
<tr>
<td>Irrigation Well</td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Project Drainage</td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>(X-Drains, overside, etc.)</td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Irrigation Standpipe</td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Reliable Irrigation Canal</td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
</tbody>
</table>

- **Subtotal Drainage Section**: $579,000

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**August 2020**

California High-Speed Rail Authority

Merced to Fresno Section: Central Valley Wye Final Supplemental EIR/EIS
**HEAVY MAINTENANCE FACILITY LOOP**

<table>
<thead>
<tr>
<th>Project Name:</th>
<th>HMF Loop</th>
</tr>
</thead>
<tbody>
<tr>
<td>Project Length (Miles):</td>
<td>4.25</td>
</tr>
<tr>
<td>Program Type (RRT or TIP):</td>
<td>OTHER</td>
</tr>
</tbody>
</table>

### Section 6 - Minor Items

<table>
<thead>
<tr>
<th>Item</th>
<th>Item Cost</th>
<th>Section Cost</th>
</tr>
</thead>
<tbody>
<tr>
<td>$4,866,466 x 0.01</td>
<td>$45,994</td>
<td></td>
</tr>
</tbody>
</table>

Total Section 6 Minor Items: $45,994

### Section 7 - Mobilization

<table>
<thead>
<tr>
<th>Item</th>
<th>Item Cost</th>
<th>Section Cost</th>
</tr>
</thead>
<tbody>
<tr>
<td>$5,012,460 x 0.05</td>
<td>$250,623</td>
<td></td>
</tr>
</tbody>
</table>

Total Section 7 Mobilization Items: $250,623

### Section 8 - Additions

<table>
<thead>
<tr>
<th>Item</th>
<th>Item Cost</th>
<th>Section Cost</th>
</tr>
</thead>
<tbody>
<tr>
<td>$5,012,460 x 0.10</td>
<td>$501,246</td>
<td></td>
</tr>
</tbody>
</table>

Total Section 8 Additions: $751,869

### Section 9 - Structures

<table>
<thead>
<tr>
<th>STRUCTURE</th>
<th>No. 1</th>
<th>No. 2</th>
<th>No. 3</th>
</tr>
</thead>
<tbody>
<tr>
<td>Total Area (Sq. Ft.)</td>
<td>$0</td>
<td>$0</td>
<td>$0</td>
</tr>
<tr>
<td>Cost Per Sq. Ft.</td>
<td>$0</td>
<td>$0</td>
<td>$0</td>
</tr>
<tr>
<td>Subtotal Cost for Structure</td>
<td>$0</td>
<td>$0</td>
<td>$0</td>
</tr>
<tr>
<td>10% Mobilization</td>
<td>$0</td>
<td>$0</td>
<td>$0</td>
</tr>
<tr>
<td>25% Contingency</td>
<td>$0</td>
<td>$0</td>
<td>$0</td>
</tr>
<tr>
<td>Total Cost for Structure</td>
<td>$0</td>
<td>$0</td>
<td>$0</td>
</tr>
</tbody>
</table>

Total Section 9 Structures: $0

Total Construction Cost Sections 1-9: $6,014,951

---

**HEAVY MAINTENANCE FACILITY LOOP**

<table>
<thead>
<tr>
<th>Project Name:</th>
<th>HMF Loop</th>
</tr>
</thead>
<tbody>
<tr>
<td>Project Length (Miles):</td>
<td>4.25</td>
</tr>
<tr>
<td>Program Type (RRT or TIP):</td>
<td>OTHER</td>
</tr>
</tbody>
</table>

### II. RIGHT OF WAY - ACQUISITION COST

<table>
<thead>
<tr>
<th>Item</th>
<th>Item Cost</th>
<th>Section Cost</th>
</tr>
</thead>
<tbody>
<tr>
<td>Right of Way - Acquisition</td>
<td>$6,014,951 x 0.15</td>
<td>$902,243</td>
</tr>
</tbody>
</table>

Construction Cost (10 to 50%)

Total Right of Way - Acquisition Cost: $902,243

### III. RIGHT OF WAY - UTILITY COST

<table>
<thead>
<tr>
<th>Item</th>
<th>Item Cost</th>
<th>Section Cost</th>
</tr>
</thead>
<tbody>
<tr>
<td>Right of Way - Utility</td>
<td>$6,014,951 x 0.10</td>
<td>$601,495</td>
</tr>
</tbody>
</table>

Construction Cost (5 to 25%)

Total Right of Way - Utility Cost: $601,495

### V. RESOURCE COSTS

<table>
<thead>
<tr>
<th>Item</th>
<th>Item Cost</th>
<th>Section Cost</th>
</tr>
</thead>
<tbody>
<tr>
<td>Engineering Cost (PS&amp;E)</td>
<td>$6,014,951 x 0.05</td>
<td>$300,748</td>
</tr>
</tbody>
</table>

Construction Cost (5 to 25%)

Total Engineering Costs: $300,748

<table>
<thead>
<tr>
<th>Item</th>
<th>Item Cost</th>
<th>Section Cost</th>
</tr>
</thead>
<tbody>
<tr>
<td>Right of Way Support Cost</td>
<td>$6,014,951 x 0.05</td>
<td>$300,748</td>
</tr>
</tbody>
</table>

Construction Cost (5 to 25%)

Total Right of Way Support Cost: $300,748

<table>
<thead>
<tr>
<th>Item</th>
<th>Item Cost</th>
<th>Section Cost</th>
</tr>
</thead>
<tbody>
<tr>
<td>Environmental Support (PA&amp;ED)</td>
<td>$6,014,951 x 0.05</td>
<td>$300,748</td>
</tr>
</tbody>
</table>

Construction Cost (5 to 25%)

Total Environmental Support: $300,748

<table>
<thead>
<tr>
<th>Item</th>
<th>Item Cost</th>
<th>Section Cost</th>
</tr>
</thead>
<tbody>
<tr>
<td>Construction Support Cost</td>
<td>$6,014,951 x 0.03</td>
<td>$180,449</td>
</tr>
</tbody>
</table>

Construction Cost (2 to 25%)

Total Resource Costs: $1,082,691
HEAVY MAINTENANCE FACILITY LOOP

<table>
<thead>
<tr>
<th>Project Name</th>
<th>HMF Loop</th>
</tr>
</thead>
<tbody>
<tr>
<td>Project Length (Miles)</td>
<td>4.25</td>
</tr>
<tr>
<td>Program Type (RRR or TIF)</td>
<td>OTHER</td>
</tr>
</tbody>
</table>

V. ENVIRONMENTAL MITIGATION COST

| TOTAL ENVIRONMENTAL MITIGATION COSTS | $142,500 |

Owner's Commitment Letter with Authority for HMF
January 13, 2010

This Letter by Gordon Shaw Properties, Inc., a California corporation or its successors or assigns ("Gordon Shaw") is to be submitted to the California High Speed Rail Authority (the "Authority").

1. Gordon Shaw is the owner of real property in Madera composed of approximately 475 acres. A site composed of approximately 154 of those acres has been proposed as a site for a Heavy Maintenance Facility for the Authority ("Facility") with additional acreage for future expansion of the Facility as shown on the site plan attached hereto.

2. Gordon Shaw will enter into an Agreement pursuant to which Gordon Shaw will commit the 154 acre site for the Facility, will commit to enter into options to provide the additional acreage set forth in the site plan and will commit to deliver the site to the Authority if it is selected subject to the terms and conditions agreed upon for that delivery by Gordon Shaw and the Authority.

3. Gordon Shaw will commit the property for the Facility for a period of one year, from January 15, 2010 to January 14, 2011. During that period, Gordon Shaw will not seek to sell or transfer the subject property to anyone other than the Authority.

4. If the site is selected for the Facility, Gordon Shaw will deliver to the Authority a site ready for the construction of the Facility under one of the following options:
   a. Gordon Shaw will enter into a long term ground lease with the Authority for the Facility;
   b. Gordon Shaw will construct the Facility and lease the Facility to the Authority;
   c. Gordon Shaw will construct the Facility and lease it to the Authority with an option to purchase at a price and on terms agreed to by Gordon Shaw and the Authority;
   d. Gordon Shaw will construct the Facility and sell it to the Authority at completion; or
   e. Gordon Shaw will sell to the Authority the 154 acres ready for development and will enter into an option with the Authority to purchase the additional acreage identified in the site plan.

5. The option selected shall be negotiated by Gordon Shaw and the Authority with all terms to be agreeable to all three parties.

6. This letter is not a binding obligation to sell or lease the subject property. The parties will enter into an integrated written agreement that sets forth all the terms of the agreement (the "Agreement").

7. Nothing herein shall affect the current operation of the property by Gordon Shaw.

GORDON W. SHAW PROPERTIES, INC.

BY: WILLIAM BARKETT, PRESIDENT
Response to Submission 245 (Matthew Treber, Madera County (on behalf of Wye Madera County Taskforce), June 21, 2019)

245-104
The Authority acknowledges the interests of the Wye Madera County Taskforce in locating the HMF in Madera County, as reflected in the eight enclosures that accompany the Taskforce comment letter. Please refer to Standard Response: CVY-Response-GENERAL-4: Heavy Maintenance Facility.

245-105
The Authority is committed to reducing the potential for interruptions for residences, businesses, schools, and emergency vehicles during construction activities. As required by TR-IAMF#1 and TR-IAMF#2, the project contractor will protect public roadways during construction and prepare a detailed Construction Transportation Plan (CTP), which will describe construction phasing and schedules; provisions to minimize access disruptions for residents, businesses, delivery vehicles, and buses to the extent practicable; and the protection of public roadways during construction. As set forth in TR-IAMF#2, the CTP would be developed and implemented in close consultation with affected jurisdictions, offering ample opportunity for local jurisdictions’ concerns to be understood and incorporated.

As set forth in TR-IAMF#1, prior to construction, the contractor will provide a photographic survey, documenting the condition of the public roadways that would provide access to the project area for trucks. Following construction, the contractor will be responsible for repairing structural damage to the roadways to return them to pre-construction condition or better. The contractor will be required to submit a before-and-after road conditions report to the Authority for review. This will ensure that the project will not result in deterioration on local streets and rural roads from use by construction traffic.

Adherence to these measures and other impact avoidance and minimization features (IAMF) will minimize if not fully avoid the scenarios and situations described by the commenter. As set forth in TR-IAMF#2, the Authority will work with the jurisdictions associated with the commenter in developing and implementing the CTP.

245-106
The comment requests funding for updating local plans and zoning. The comment does not address the analysis in the Draft EIR/EIS. Funding for updating local plans and zoning is not necessary to mitigate project impacts. The request for funding to update local plans is noted and will be considered by the Authority outside the environmental review process.

245-107
The comment does not relate to the analysis in the Draft EIR/EIS or any specific environmental concern. The request for amenities like signage that do not relate to environmental impacts in the Draft EIR/EIS will be addressed by the Authority outside the environmental review process. The Authority will continue to engage with the Task Force. Notably, following publication of the Draft Supplemental EIS/EIR for CEQA review, the Authority conducted several meetings with the Task Force to better understand the group’s concerns and seek ways to address those concerns.

245-108

245-109

245-110
The request for funding to update local plans is noted and will be considered by the Authority outside the environmental review process.

245-112
The request for funding to update local zoning designations is noted and will be considered by the Authority outside the environmental review process.
Response to Submission 245 (Matthew Treber, Madera County (on behalf of Wye Madera County Taskforce), June 21, 2019) - Continued

**245-113**
The Authority is committed to the mission identified in its enabling legislation and in Proposition 1A (i.e., to provide California with a new high-speed passenger rail service that is capable of going from San Francisco to Los Angeles in fewer than 3 hours). The system would be delivered through a phased implementation strategy. Every construction package issued by the Authority for construction of the first phase of the system would have a commitment for full funding through completion of that package. Therefore, funding shortfalls that result in construction work stoppages and warrant third-party cleanup efforts would not occur.

**245-114**
The comment does not relate to any specific environmental concern. The Authority will continue to engage with the Task Force. Notably, following publication of the Draft Supplemental EIR/EIS for CEQA review, the Authority conducted several meetings with the Task Force to better understand the group’s concerns and seek ways to address those concerns.

**245-115**
The commenter requests that the Authority provide funding for local emergency service equipment and training so as to be able to provide service to high-speed rail (HSR) facilities.

As discussed in Impact SS#8, SS-IAMF#2: Safety and Security Management Plan, commits the Authority to prepare and implement safety, security, and emergency plans related to HSR operation. A fire and life safety program will be coordinated with local emergency response organizations to provide them with an understanding of the rail system, facilities, and operations, and to obtain their input for modifications to emergency response operations and facilities, such as evacuation routes. The preliminary emergency evacuation concept for elevated structures anticipated to be incorporated formally as part of the above Safety and Security Management Plan is to include evacuation routes. While ladders may not reach all the way to the ground from elevated structures, they will extend within the range of conventional fire trucks. Therefore, there is no need for local emergency responders to upgrade emergency service equipment or construct new facilities to house such equipment.

**245-116**
The Authority is unable to provide a commitment regarding long-term funding for operation and maintenance of the Fairmead Elementary School property. In the Draft Supplemental EIR/EIS, EJ-MM#1 had outlined a process by which the Authority would purchase Fairmead Elementary School (assuming the property became available for sale) and convert the school into a community center for Fairmead. In this Final Supplemental EIR/EIS, EJ-MM#1 has been revised to reflect that the Authority will instead provide funding to Madera County toward the purchase of a site and construction of a community center to serve Fairmead. EJ-MM#1 includes a number of performance standards to avoid or minimize any potential for secondary environmental effects. The Authority would also help community leaders, as well as Madera County, to:

- **Identify funding mechanisms for operation, maintenance, and insurance of the community center.**

**245-117**
The impacts of HSR construction on transportation are addressed in Section 3.2.6.3. As required by TR-IAMF#1 and TR-IAMF#2, the project contractor will protect public roadways during construction and prepare a detailed CTP, which will describe protection of public roadways during construction; sequencing construction operations, temporary closures, and detours; provisions for off-street parking for construction-related vehicles as well as parking during special events; maintenance of pedestrian, bicycle, and transit access; and restrictions on construction hours and truck routes. In addition, specific traffic control plans will be prepared during each phase of construction. As set forth in TR-IAMF#2, the CTP would be developed in close consultation with affected local jurisdictions.

Third party agreements are arranged with the Authority prior to construction and outline the relationship between the Authority, the selected contractor, and local jurisdiction. The third party agreements with local jurisdictions detail the submittal and review process for the local jurisdiction. These agreements also include reviewing and approving actions by the local jurisdiction for design plans, including detour routes and construction staging. Similar third party agreements with local jurisdictions would be expected for construction of the Central Valley Wye. The selected contractor for the Central Valley Wye would comply with any executed third party agreements.
Response to Submission 245 (Matthew Treber, Madera County (on behalf of Wye Madera County Taskforce), June 21, 2019) - Continued

245-118
As required by TR-IAMF#1 and TR-IAMF#2, the project contractor will protect public roadways during construction and prepare a detailed CTP, which will describe protection of public roadways during construction, sequencing construction operations, temporary closures, and detours; provisions for off-street parking for construction-related vehicles as well as parking during special events; maintenance of pedestrian, bicycle, and transit access; and restrictions on construction hours and truck routes. The CTP will be developed and implemented in close consultation with affected jurisdictions. In addition, specific traffic control plans will be prepared during each phase of construction.

245-119
The comment suggests changes to proposed roadway closures as well as compensation for closure-related issues. The commenter is referring to a prospective extension of a roadway (Avenue 17 to State Route [SR] 145) substantially south of the Central Valley Wye study area, in the area of Madera Acres. The southern limit of the Central Valley Wye Study area is Avenue 19. Avenue 17 would not be affected by any of the Central Valley Wye alternatives.

The analysis of emergency route impacts of the Central Valley Wye alternatives was informed by the Authority's policy to provide roadway overpasses approximately every 2 miles, resulting in no more than 1 mile of out-of-direction travel for vehicles to cross the HSR tracks. However, in rural areas, the distance between overcrossings or undercrossings would vary from fewer than 2 miles to approximately 5 miles where other roads are perpendicular to the proposed HSR alignment. The project design would include coordination with emergency responders to incorporate roadway modifications that maintain existing traffic patterns and fulfill response route needs, resulting in negligible effects on response times by service providers. Section 3.11.8, Environmental Consequences (Safety and Security), of the Draft Supplemental EIR/EIS provides additional detail regarding emergency response time during HSR operations.

245-120
As depicted in Chapter 2, Alternatives, Figure 2.14, the Preferred Alternative would incorporate three new roadway undercrossings/overcrossings at the immediate SR 99 and SR 152 interchange area. These new undercrossings/overcrossings will ensure adequate and redundant circulation through this area.

As demonstrated in Section 3.2, Transportation, any of the Central Valley Wye alternatives, including the Preferred Alternative, would decrease regional vehicle miles traveled (VMT) relative to no-project conditions. While there is no nexus for a mitigation measure as suggested by the commenter, the Authority remains committed to working with Madera County, the City of Chowchilla, and the California Department of Transportation (Caltrans) throughout the design phase of the project and through anticipated revisions to the Freeway Agreement referenced in Section 3.2.2.

Please also refer to the response to submission MF2-245, comment 140.

245-121
Chapter 8 of the Draft Supplemental EIR/EIS identifies the SR 152 (North) to Road 11 Wye Alternative as the Preferred Alternative. It has the second-lowest number of permanent road closure (33 roads) and the fewest number of temporary road closures (13 roads) compared with the Avenue 21 to Road 13 Wye Alternative (30 permanent road closures and 15 temporary road closures). The transportation impact analysis reviewed both the temporary and permanent proposed roadway closures and modifications, including grade separations, that would be caused by the Central Valley Wye alternatives to determine possible traffic rerouting. This analysis was completed for the current (15 percent) level of design; final design of the roadways and interchanges will occur at a later stage in the process (refer to Section 3.2.4.3, page 3.2-13).
Response to Submission 245 (Matthew Treber, Madera County (on behalf of Wye Madera County Taskforce), June 21, 2019) - Continued

245-122
As required by TR-IAMF#1 and TR-IAMF#2, the project contractor will protect public roadways during construction and prepare a detailed CTP, which will describe protection of public roadways during construction, including the need to upgrade roads to handle the construction equipment and materials. Prior to construction, the contractor will provide a photographic survey, documenting the condition of the public roadways that would provide access to the project area for trucks. Following construction, the contractor will be responsible for repairing structural damage to the roadways to return them to pre-construction condition or better. The contractor will be required to submit a before-and-after road conditions report to the Authority for review. The CTP will be developed and implemented in close consultation with affected jurisdictions. This will ensure that the project will not result in deterioration on local streets and rural roads from use by construction traffic.

Once construction is complete, traffic on several local roads will slightly increase as a result of permanent road closures. However, the amount of traffic increase would not be at levels that would substantially increase roadway deterioration or maintenance needs beyond what would be expected under future no-project conditions.

245-123
As of July 2019, the Authority has assumed federal lead agency status under NEPA Assignment. However, in granting NEPA Assignment to the Authority, the Federal Railroad Administration (FRA) has retained its authority to make air quality conformity determinations under the Clean Air Act.

The project, in this case the Merced to Fresno Project Section as a whole, must demonstrate conformity under the federal Clean Air Act General Conformity Rule (not Transportation Conformity Rule).

The Authority has entered into a Memorandum of Understanding (MOU) with the San Joaquin Valley Air Pollution Control District (SJVAPCD) to "fully offset" project construction emissions to net zero via SJVAPCD’s Voluntary Emission Reduction Agreement program. As such, project construction emissions would be offset to net zero and therefore would not adversely affect the region’s ability to demonstrate conformity under the federal Clean Air Act. A copy of this MOU has been included as an attachment to this Final Supplemental EIR/EIS.
Economic and community impacts are discussed in Chapter 3.12. Section 3.12.4.4 explains that CEQA does not treat a project's economic and social changes as significant effects on the environment. Accordingly, economic effects discussed in Impacts SO#9 through SO#18 and SO#19 through SO#22 are not described as significant under CEQA, mitigation measures are not required, and none are proposed.

As described in Impact SO#19, Permanent Impacts on Regional Employment, on page 3.12-67 of the Draft Supplemental EIR/EIS, the HSR project would improve state and regional connectivity while facilitating access to employment and educational opportunities, creating job opportunities throughout the region. The HSR project is expected to result in net employment growth, which would benefit the regional economy, including the economy of Madera County.

The Authority acknowledges that there could be some permanent impacts on the agricultural economy, as described in Impact SO#20, Permanent Impacts on Agricultural Economy, on pages 3.12-68 and 3.12-69 of the Draft Supplemental EIR/EIS. The Authority would allocate the impacts through financial compensation to individual property owners, provided during the right-of-way acquisition process, and help property owners file claims so they can receive compensation for economic losses related to farm productivity.

Community impacts are discussed in Impacts SO#1 and SO#2, which address temporary and permanent community division. The analysis proposes two mitigation measures, SO-MM#1 and SO-MM#2, which are designed to address permanent effects on the community of Fairmead and to maintain community cohesion.

As described in Impact SO#15, Permanent Impacts on County and City Property Tax Revenues from Property Acquisition, on pages 3.12-63 and 3.12-64, and in Impact SO#21, Permanent Impacts on County and City Property Tax Revenues from Changes in Property Values, on pages 3.12-69 and 3.12-70 of the Draft Supplemental EIR/EIS, the Authority acknowledges that there would be some decrease in property tax revenues as a result of construction of the Central Valley Wye alternatives. However, the loss would represent a small percentage of the total tax revenues collected by the counties. In addition, the loss in property tax revenues would be partially offset by anticipated increases in sales tax revenues (described in Impact SO#22, Permanent Impacts on Sales Tax Revenues, on page 3.12-70 of the Draft Supplemental EIR/EIS).

Furthermore, as described on page D-11 in Appendix 3.12-D, Economic Effects on School Districts, of the Draft Supplemental EIR/EIS, the regional benefits of the HSR project could increase property values in some areas of the San Joaquin Valley as a result of the region's increased connectivity to the rest of the state, partially counteracting some of the decrease in local property tax revenues.

As explained in section 3.12.4.4, CEQA does not treat a project's economic effects as significant effects on the environment.

Please refer to the response to submission MF2:245, comment 124.
Aesthetics and visual resources impacts are discussed in Chapter 3.16. IAMFs, discussed in section 3.16.1.1 provide for design standards, context-sensitive solutions, and a design review process for all of the Central Valley Wye. These IAMFs ensure community input will help define the aesthetics for the CVY. For Robertson Boulevard, further mitigation is provided, please refer to AVR-MM#3, which requires the incorporation of design criteria for elevated guideways that can adapt to local context. The measure specifically requires the design/build contractor to prepare and submit to the Authority a technical memorandum that describes how it coordinated with local jurisdictions on the design of elevated guideways so that they fit in with the visual context of the areas near them (page 3.16.51). The provisions of this measure will generally accommodate the request of the comment.

The comment does not relate to the analysis in the Draft EIR/EIS or any specific environmental concern. The request for amenities, like signage, that do not relate to environmental impacts in the Draft EIR/EIS will be addressed by the Authority outside the environmental review process. The Authority will continue to engage with the Task Force. Notably, following publication of the Draft Supplemental EIS/EIR for CEQA review, the Authority conducted several meetings with the Task Force to better understand the group’s concerns and seek ways to address those concerns.

Please refer to the discussions in Section 3.8, Hydrology and Water Resources, of the Draft Supplemental EIR/EIS regarding construction period and permanent impacts on groundwater (Impacts HYD#5 and HYD#6). Those discussions note that the constructed features proposed for the Central Valley Wye alternatives are very small relative to the size of the underlying groundwater basins. The total area of permanent disturbance for any of the four Central Valley Wye alternatives (ranging from 2,414 to 2,804 acres) would constitute less than one tenth of one percent of the total 3.5 million acres of groundwater basin area. Accordingly, the Draft Supplemental EIR/EIS concluded that the project would not have any significant effects on groundwater recharge. Similarly, the relatively small footprint would not unduly impede access to groundwater. Because no impact was identified, there is no nexus for mitigation measures such as proposed by the commenter.

Please refer to mitigation SO-MM#2, which includes numerous measures intended to provide improvements to the community of Fairmead and help offset identified effects (e.g., installation of local stormwater management facilities).

The Authority assumed NEPA Assignment on July 23, 2019, with execution of an MOU with the FRA. Accordingly, the Authority circulated the Draft Supplemental EIR/EIS for NEPA purposes effective on September 13, 2019, through October 28, 2019.

This followed the Authority’s earlier circulation of the document for CEQA review from May 3, 2019, through June 20, 2019.

Response to Submission 245 (Matthew Treber, Madera County (on behalf of Wye Madera County Taskforce), June 21, 2019) - Continued

245-122
While the Authority did not issue a CEQA “notice of preparation” for the supplemental EIR, local agencies and stakeholders had ample opportunity to provide input into the scope of this document. The Authority disclosed its intention to conduct additional study of the Wye as part of the Merced to Fresno Draft EIR/EIS in 2011, and the Final EIR/EIS in 2012. Subsequent to 2012, the Authority conducted an extensive outreach process about the scope of the supplemental environmental review of the Central Valley Wye, as summarized in Sections 2.1.2.1 and 2.1.2.2 and Chapters 9 and 10 of the Draft EIR/EIS. Moreover, as a NEPA supplemental document, scoping is not required (refer to 40 Code of Federal Regulations (C.F.R.) 1502.9(c)(4)).

As explained in the Draft Supplemental EIR/EIS, the document is a supplement to the Merced to Fresno Final EIR/EIS focused on the Central Valley alternatives as they relate to the larger Merced to Fresno Project Section. The Central Valley Wye is not a stand-alone project, it is an integral part of the Merced to Fresno Project Section as the connector between the north/south alignment between Merced and Fresno and the east/west alignment connecting to the San Jose to Merced Project Section. Please refer to Standard Response: CVY-Response-GENERAL-7: Relationship between the Merced to Fresno Final EIR/EIS and the Central Valley Wye Final Supplemental EIR/EIS documents.

245-133
The Draft Supplemental EIR/EIS evaluates the Central Valley Wye Alternatives as a geographically limited component of the Merced to Fresno Project Section, not as a stand-alone project. Please refer to Standard Response: CVY-Response-GENERAL-7: Relationship between the Merced to Fresno Final EIR/EIS and the Central Valley Wye Final Supplemental EIR/EIS documents. Text has been added to Chapter 3.1 and Appendix 3.1-C to further clarify how this document supplements the Merced to Fresno Project Section Final EIR/EIS. Notably, all of the Central Valley Wye alternatives converge on their western end at SR 152 and Carlucci Road, which is also where all alternatives under consideration for the adjacent San Jose to Merced section converge. The selection of a Central Valley Wye Alternative would not preclude selection of any of the San Jose to Merced section alternatives west of Carlucci Road.

245-134
The Authority respectfully disagrees with the comment that changed circumstances result in the Supplemental EIR/EIS not fully disclosing environmental impacts. The Authority has consistently represented a phased approach to implementation of the HSR system, building the Phase 1 system between San Francisco and Los Angeles/Anaheim incrementally over time as funding becomes available. Construction is underway in the Central Valley utilizing funding from multiple sources. The Authority is pursuing completion of all Phase 1 project section EIR/EISs, in conformance with its federal grant requirements, to facilitate construction of all of Phase 1 as funding is secured. The Draft Supplemental EIR/EIS, in combination with the Merced to Fresno Final EIR/EIS, fully addresses the environmental impacts of the Merced to Fresno Project Section. Notably, the comment does not identify any particular environmental topic that is insufficiently analyzed.

As discussed in Section 2.3, certain environmental analysis topics utilize assumptions about HSR system operations and forecast ridership to characterize adverse impacts and benefits. These topics include reductions in vehicle miles travelled ("VMT"), reduced air pollution from automobiles due to reduced VMT, reduced levels of energy required for transportation, and levels of operational train noise. These topics consider HSR operations and ridership in 2040 assuming all of Phase 1 is implemented. If a lesser extent of the Phase 1 system is operational in 2040 and/or ridership on the HSR system is less, some project benefits of the HSR system, such as reductions in vehicle mile travelled or reduced air pollution from automobiles, will be reduced. Some adverse impacts, such as the level of operational train noise, will similarly be reduced if operations are lower in 2040 with a system that is less than the full Phase 1 system between San Francisco and Los Angeles/Anaheim.

Please also see the response to submission MF2-246, comment 169 in Chapter 23.
Response to Submission 245 (Matthew Treber, Madera County (on behalf of Wye Madera County Taskforce), June 21, 2019) - Continued

245-135
The Authority has consistently presumed that the environmental review for the Central Valley Wye would be completed prior to the completion of the environmental review for the San Jose to Merced Project Section. The selection of a Central Valley Wye alternative has no bearing on the selection of an alternative for the San Jose to Merced Project Section because all of the Central Valley Wye alternatives as well as all of the San Jose to Merced Project Section alternatives converge at a single point (at Carlucci Road).

The Authority circulated a Draft EIR/EIS for the San Jose to Merced Project Section for public review and comment on April 28, 2020.

245-136
The comment suggests the Draft Supplemental EIR/EIS was required to utilize projections of ridership, phasing, and timing of the HSR system from the 2016 Business Plan, rather than the 2016 Business Plan. The Draft Supplemental EIR/EIS, section 2.3, explains that the impacts analyses topics that require assumptions about HSR ridership utilized ridership projections from the 2016 Business Plan, updating the information from that used in the 2012 Final EIR/EIS based on the Authority’s 2012 Business Plan.

Although the Authority published a 2018 Business Plan, it did not depart markedly from the 2016 Business Plan in terms of ridership projections, HSR system phasing, or timing. Accordingly, the Authority determined it was not necessary for purposes of environmental analysis to revise the Draft Supplemental EIR/EIS prior to publication to reflect the 2018 Business Plan. Text has been added to Section 1.3 to acknowledge the 2018 Business Plan, as well as the Authority’s 2020 Business Plan. Text has been added to Section 2.3 to clarify the continued reliance on the 2016 Business Plan ridership forecasts.

The comment asserts that higher levels of ridership associated with the 2016 Business Plan (relative to those in the 2018 Business Plan) are unrealistic and may overstate the benefits of the proposed project. The differences in ridership projections between the two plans are modest. In the 2018 Business Plan, the medium ridership forecast for 2040 decreased by 6.5 percent, from 42.6 to 40 million; and the high ridership forecast decreased by 10.1 percent, from 58.8 to 51.6 million. Differences with the Authority’s 2020 Business Plan are similarly modest. The Draft 2020 Business Plan Phase 1 medium ridership forecast for 2040 is 38.6 million, and the high is 50.0 million (Authority 2020).

To the extent that the lower ridership levels projected in the 2018 Business Plan or the Draft 2020 Business Plan would result in lower trains operating in 2040, the impacts associated with train operations in 2040 (HSR operational train noise) would be somewhat less than the impacts presented in this Draft EIR/EIS, and the benefits accruing to the project (e.g., reduced VMT, reduced GHG emissions, reduced energy consumption) would also be less than the benefits presented in this Draft EIR/EIS. Like the impacts, the benefits would continue to build and accrue over time and would eventually reach the levels discussed in this Draft EIR/EIS for the Phase 1 system.
The project objective cited in the comment no longer included a 2020 implementation date as such date was no longer a realistic date. The implication of this change is simply that the planning, environmental review, and construction of the HSR is taking longer than originally anticipated when the 2020 date was included in the Merced to Fresno Project Section Draft EIR/EIS in 2011. Please also refer to the response to submission MF2-246, comment 169 in Chapter 23.


The Authority respectfully disagrees with the comment that the Draft Supplemental EIR/EIS does not comply with CEQA requirements to consider alternatives. The Draft Supplemental EIR/EIS describes four alternatives, the preferred alternative and three other alternatives. The different locations of the alternatives (SR 152 (north) versus Avenue 21, and Roads 13 and 19 versus 11, provide both avoidance and minimization of the significant impacts associated with the preferred alternative, SR 152 (North) to Road 11. As a linear transportation project, it is not possible to fashion an HSR alignment that completely avoids all adverse environmental impacts.

Response to Submission 245 (Matthew Treber, Madera County (on behalf of Wye Madera County Taskforce), June 21, 2019) - Continued

245-141
The commenter accurately describes the requirements to demonstrate Transportation Conformity 40 C.F.R. parts 51 and 93, however, the Transportation Conformity Rule applies only to projects where the Federal Highway Administration or the Federal Transit Administration is the federal lead agency under NEPA. The FRA was the federal lead agency for this project, and FRA lead agency projects must demonstrate conformity under the federal Clean Air Act General Conformity Rule. The project remains subject to the General Conformity Rule under the July 2019 NEPA Assignment MOU between FRA and the State of California.

Projects whose net construction- and operations-period criteria pollutant emissions fall below General Conformity de minimis levels are deemed to conform to the State Implementation Plan. With respect to the proposed project, the Authority has entered into an MOU with the SJVAPCD to "fully offset" project construction emissions to "net zero" via SJVAPCD's Voluntary Emission Reduction Agreement program. As such, project construction emissions would be offset to "net zero." A copy of this MOU has been included as an attachment to this Final Supplemental EIR/EIS.

With respect to long-term project operations, the proposed project would result in a net reduction in all criteria pollutant emissions, as detailed in the Draft Supplemental EIR/EIS in Table 3.3-19 on page 3.3-66. As such, the proposed project would not impede the region's ability to demonstrate conformity under the federal Clean Air Act. Additional requirements to demonstrate federal Clean Air Act conformity are not required.

Please also refer to the response to submission MF2-245, comment 143 below.

245-142
During final design, the Authority will continue to coordinate with Madera County regarding temporary and permanent road closures, reclassifications, and alterations that may change the Madera region’s Significant Roadway Network or the Regional Transportation Plan/Transportation Improvement Program. Because of the frequency of the proposed roadway overpasses along the alignment for the Central Valley Wye alternatives, the additional distance traveled by vehicles to cross the proposed HSR tracks is expected to be negligible relative to regional VMT and, therefore, would not cause additional air quality impacts (refer to discussion in Section 3.3, Air Quality and Climate Change, under Impact AQ77 [page 3.3-65]).

245-143
As of July 2019, the Authority has assumed lead federal agency status under NEPA Assignment. However, in granting NEPA Assignment to the Authority, the FRA has retained its authority to make air quality conformity determinations under the Clean Air Act. The project must demonstrate conformity under the federal Clean Air Act General Conformity Rule (not Transportation Conformity Rule).

Projects whose net construction- and operations-period criteria pollutant emissions fall below General Conformity de minimis levels are deemed to conform to the State Implementation Plan. With respect to the proposed project, the Authority has entered into an MOU with the SJVAPCD to offset project construction emissions to zero via the SJVAPCD’s Voluntary Emission Reduction Agreement program. As such, project construction emissions would be offset to zero. A copy of this MOU has been included as an attachment to this Final Supplemental EIR/EIS.

With respect to long-term project operations, the proposed project would result in a net reduction in all criteria pollutant emissions, as detailed in the Draft Supplemental EIR/EIS in Table 3.3-19 on page 3.3-66. As such, the proposed project would not impede the region’s ability to demonstrate conformity under the federal Clean Air Act.
Response to Submission 245 (Matthew Treber, Madera County (on behalf of Wye Madera County Taskforce), June 21, 2019) - Continued

245-144
As of July 2019, the Authority has assumed lead federal agency status under NEPA Assignment. However, in granting NEPA Assignment to the Authority, FRA has retained its authority to make air quality conformity determinations under the Clean Air Act. The project must demonstrate conformity under the federal Clean Air Act General Conformity Rule (not Transportation Conformity Rule).

Projects whose net construction- and operations-period criteria pollutant emissions fall below General Conformity do minimis levels are deemed to conform to the State Implementation Plan. With respect to the proposed project, the Authority has entered into an MOU with the SJVAPCD to offset project construction emissions to zero via SJVAPCD’s Voluntary Emission Reduction Agreement program. As such, project construction emissions would be offset to zero. A copy of this MOU has been included as an attachment to this Final Supplemental EIR/EIS.

With respect to long-term project operations, the proposed project would result in a net reduction in all criteria pollutant emissions, as detailed in the Draft Supplemental EIR/EIS in Table 3.3-19 on page 3.3-66. As such, the proposed project would not impede the region’s ability to demonstrate conformity under the federal Clean Air Act. Therefore, no additional mitigation would be required.

245-145
Projects whose net construction- and operations-period criteria pollutant emissions fall below General Conformity do minimis levels are deemed to conform to the State Implementation Plan. With respect to the proposed project, the Authority has entered into an MOU with the SJVAPCD to offset project construction emissions to zero via SJVAPCD’s Voluntary Emission Reduction Agreement program. As such, project construction emissions would be offset to zero. A copy of this MOU has been included as an attachment to this Final Supplemental EIR/EIS.

With respect to long-term project operations, the proposed project would result in a net reduction in all criteria pollutant emissions, as detailed in the Draft Supplemental EIR/EIS in Table 3.3-19 on page 3.3-66. As such, the proposed project would not impede the region’s ability to demonstrate conformity under the federal Clean Air Act. Additional requirements to demonstrate federal Clean Air Act conformity are not required; therefore, there is no basis for the additional mitigation proposed by the commenter.

245-146
The comment suggests the mitigation measures are insufficiently detailed and do not provide performance standards. The comment does not, however, identify any specific mitigation measure the commenter contends is inadequate. The mitigation measures discussed in the Draft Supplemental EIR/EIS are detailed, and where details are not currently known, the mitigation measures provide measurable performance standards. AQ-MM14, addressing air quality, provides an example of a detailed mitigation measure with a performance standard.

The information requested by the commenter about specifics regarding timing and responsibility for implementing and overseeing mitigation measures is normally included in a mitigation monitoring and reporting program (MMRP). Draft CEQA documents are not required to include MMRPs, nor is such inclusion typical. The Authority will include an MMRP as part of the Authority’s Board of Directors’ resolution for project approval.

The relationship between mitigation measures adopted in 2012 and the measures proposed in this document is described in Chapter 3.1 and Appendix 3.1-C of the Final Supplemental EIR/EIS.
As noted in Section 2.2.3.7, Impact Avoidance and Minimization Features, in Chapter 2, Alternatives, the Authority has developed IAMFs that are applicable to the Central Valley Wye alternatives. IAMFs are standard practices, actions, and design features that the Authority has incorporated into the Central Valley Wye alternatives.

IAMFs are distinct from mitigation measures insofar as they are considered part of the proposed project, are not considered “optional,” are applied prior to the identification of any project impact, and will be implemented by the Authority regardless of whether any impact is identified. The Authority disagrees that the IAMFs result in any failure to evaluate and disclose impacts. Volume II, Appendix 2-B, California High-Speed Rail: Impact Avoidance and Minimization Features, presents complete descriptions of all IAMFs the Authority has developed program-wide.

The Draft Supplemental EIR/EIS describes IAMFs applicable to each resource section in Chapter 3, Affected Environment, Environmental Consequences, and Mitigation Measures.

The Mitigation Monitoring and Enforcement Program would track each IAMF to document its implementation.
Response to Submission 245 (Matthew Treber, Madera County (on behalf of Wye Madera County Taskforce), June 21, 2019) - Continued

245-149
The Authority respectfully declines to incorporate the suggested revisions to AVR-IAMF#1. AVR-IAMF#1 refers to the Authority requiring the contractor to issue a technical memorandum documenting how it has used the Authority’s adopted design standards and guidelines, such as those contained in Authority Technical Memorandum 200.06. The design standards and guidelines identify the roles and responsibilities of the Authority, its contractors, and local agencies.

For Impact AVR#4, which the Draft Supplemental EIR/EIS identified as significant under CEQA, the proposed mitigation measure was AVR-MM#3, Incorporate Design Criteria for Elevated GUIDeways That Can Adapt to Local Context, which is similar to the language the commenter proposes for AVR-IAMF#1. AVR-MM#3 specifically requires the design/build contractor to prepare and submit to the Authority a technical memorandum that describes how it coordinated with local jurisdictions on the design of elevated guideways so that they fit in with the visual context of the areas near them (page 3.16-1). The provisions of this measure will generally accommodate the request of the comment as applies to the elevated guideway discussed in Impact AVR#4.

245-150
The Authority respectfully declines to incorporate the suggested revisions to AVR-IAMF#2. AVR-IAMF#2 refers to the Authority requiring the contractor to issue a technical memorandum documenting how it has used context sensitive solutions, as described in the Authority’s adopted Urban Design Guidelines, for elevated guideways generally. Please also refer to the response to submission MF2-245, comment 150 regarding AVR-MM#3, which applies to Impact AVR-IAMF#4.

245-151
The Authority notes the suggestion to delete this Impact Avoidance and Mitigation Feature, but will retain the measure as the Authority has elected to retain AVR-IAMF#1 and AVR-IAMF#2 unmodified. Please also refer to the responses to submission MF2-245, comments 149 and 150.

245-152
As stated in Section 3.14.2, the definition of “Important Farmland” is derived from federal law (the Farmland Protection Policy Act) as well as the State of California’s Farmland Mapping and Monitoring Program. “Important Farmland” is an umbrella term that includes the following categories as defined in the above regulations: “Prime Farmland,” “Farmland of Statewide Importance,” “Unique Farmland,” and “Farmland of Local Importance.” These categories encompass all types of farmland, except for grazing land, which could be encountered during construction and operations of the Central Valley Wye alternatives. Consistent with the above regulations as well as with CEQA, the analysis in Section 3.14 considers whether the project would adversely affect any of the above categories of “Important Farmland.” Accordingly, the IAMF is appropriately focused on avoiding or minimizing effects on Important Farmland. The Authority appreciates the proposed changes to this IAMF but respectfully declines to incorporate the terms of this proposed measure because the majority of the suggested revisions do not meaningfully alter the intent or requirements of the IAMF.

245-153
The Authority appreciates the proposed changes to this IAMF but respectfully declines to incorporate the terms of this proposed measure because the suggested revisions do not meaningfully alter the intent or requirements of the IAMF.

245-154
The Authority appreciates the proposed changes to this IAMF but respectfully declines to incorporate the terms of this proposed measure because the suggested revisions do not meaningfully alter the intent or requirements of the IAMF.

245-155
The commenter proposes an additional IAMF to be incorporated into the project to require the Authority to obtain encroachment permits from the applicable land use authority for actions affecting local roads. The Authority respectfully declines to incorporate the terms of this proposed measure because the Authority, as a state agency, is not required by law to obtain local government permission for work on local roads. The Authority has generally elected to require its contractors to obtain encroachment permits from local agencies, but this has occurred as a policy matter only.
Response to Submission 245 (Matthew Treber, Madera County (on behalf of Wye Madera County Taskforce), June 21, 2019) - Continued

245-156
The Authority will use all designated haul routes and will restore any roadways damaged during construction to their current configuration and re-pave them. The Authority is unable to commit to the commenter’s request to revise TR-IAMF #1 to rebuild any such damaged roadways at a larger than current configuration. Enhancing the existing capacity or condition of local roadways is not required to avoid an adverse environmental effect. The Authority will also work with local agencies, and pursuant to a cooperative agreement, will consider local agency requests in that context.

245-157
The Authority appreciates the proposed changes to this IAMF but respectfully declines to incorporate the proposed revisions because the majority of the suggested revisions do not meaningfully alter the intent or requirements of the IAMF. The majority of the suggested minor revisions would be consistent with federal and state authority. As set forth in TR-IAMF#2, the CTP would be developed in close consultation with affected local jurisdictions. Accordingly, the Authority and its contractor will engage the local agencies as a CTP is prepared and the CTP will reflect local concerns to the maximum extent feasible.

245-158
Please refer to the response to submission MF2-245, comment 157.

245-159
The Authority appreciates the proposed changes to this IAMF but respectfully declines to incorporate the proposed revisions because the majority of the suggested revisions do not meaningfully alter the intent or requirements of the IAMF. The Authority appreciates the proposed changes to this IAMF but respectfully declines to incorporate the suggested revisions because they do not meaningfully alter the intent or requirements of the IAMF, and other suggested revisions would be inconsistent with federal and state authority. As set forth in TR-IAMF#2, the CTP would be developed in close consultation with affected local jurisdictions, offering ample opportunity for local jurisdictions’ concerns to be understood and incorporated.

245-160
The Authority respectfully declines to incorporate the suggested revisions because they do not meaningfully alter the intent or requirements of the IAMF.

245-161
The Authority respectfully declines to incorporate the suggested revisions because they do not meaningfully alter the intent or requirements of the IAMF.

245-162
The Authority appreciates the proposed changes to this IAMF but respectfully declines to incorporate the suggested revisions because they do not meaningfully alter the intent or requirements of the IAMF, and other suggested revisions to seek approval from local agencies would be inconsistent with federal and state authority.

245-163
The Authority appreciates the proposed changes to this IAMF but respectfully declines to incorporate the suggested revisions because they do not meaningfully alter the intent or requirements of the IAMF, and other suggested revisions to seek approval from local agencies would be inconsistent with federal and state authority. Moreover, as set forth in TR-IAMF#2, the CTP would be developed and implemented in close consultation with affected jurisdictions, offering ample opportunity for local jurisdictions’ concerns to be understood and incorporated.

245-164
The Authority respectfully declines to incorporate the suggested revisions because they do not meaningfully alter the intent or requirements of the IAMF. Moreover, as set forth in TR-IAMF#2, the CTP would be developed and implemented in close consultation with affected jurisdictions, offering ample opportunity for local jurisdictions’ concerns to be understood and incorporated.
Response to Submission 245 (Matthew Treber, Madera County (on behalf of Wye Madera County Taskforce), June 21, 2019) - Continued

245-165
Impacts to roads associated with construction of any "shooty" tracks will be treated the same as any other construction activity associated with the Central Valley Wye alternatives and roadways damaged by such construction activity will be repaired consistent with the requirements of TR-IAMF#1. The Authority appreciates the proposed changes to this IAMF but respectfully declines to incorporate the suggested revisions because they are duplicative with other existing design features, and the suggested revision to seek approval from local agencies would be inconsistent with federal and state authority.

245-166
The Authority respectfully declines to incorporate the suggested revisions because they do not meaningfully alter the intent or requirements of the IAMF.

245-167
The attachments to the comment letter are noted and were reviewed and considered in developing responses to comments to this letter. Please refer to individual responses to submission MF2-245, comments 104 through 167.