

APPENDIX 3.12-D

Summary of Issues/Concerns Affecting Schools

Summary of Issues/Concerns Affecting Schools – Merced to Fresno Section of the California High-Speed Train Project

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This technical memorandum (TM) summarizes the issues and concerns raised in public comments on the EIR/EIS for the High-Speed Train (HST) Merced to Fresno (M-F) Section and the approach for addressing them. Most of the relevant public comment letters raising questions or concerns about school-related matters were written by school districts that would be affected by the Project. The comment letter received from the Kings County Office of Education on the draft EIR/EIS for the HST Fresno to Bakersfield section was also reviewed. Specific issues and concerns that could directly or indirectly affect schools and school children are listed below within four specific categories: procedural, safety, socioeconomic, and changes to community. This TM summarizes the school-related information from the M-F EIR/EIS chapters, technical reports, and other supplemental information.

1. Procedural

1.1 Claim that there was a lack of coordination with school districts during scoping and preparation of the Draft EIR/EIS.

Pursuant to the requirements of NEPA and CEQA, the California High Speed Rail Authority (Authority) and the Federal Railroad Administration (FRA) conducted a public and agency involvement program as part of the environmental review process. Public involvement and outreach activities included development of informational materials including fact sheets; informational and scoping meetings, including town hall meetings, public and agency scoping meetings, meetings with individuals and groups, as well as presentations; and briefings. Agency involvement included agency scoping meetings, formation of an interagency working group, meetings with agency representatives, and other agency consultation. The Authority met with numerous organizations, businesses, and community groups as part of the public and agency involvement process and will continue to do so throughout this environmental process.

In response to requests from school districts for coordination, the Authority held meetings with three school districts and has meetings scheduled with two more:

- Merced City School District on September 2, 2011
- Alview-Dairyland School District on November 29, 2011
- Chowchilla Union High School District on November 29, 2011
- Le Grand Union High School District and on February 22, 2012
- Plainsburg Elementary School District on February 22, 2012

Coordination is ongoing and additional meetings may be held.

1.2 Claim that the comment period for the Draft EIR/EIS was inadequate.

The 60-day period of review exceeds the time required under CEQA and under FRA’s Procedures for Considering Environmental Impacts. The Authority and FRA believe this was sufficient time for the public to review and provide comments on the M-F Draft EIR/EIS based on CEQA Guidelines (14 CCR 15105) and Section 13(c)(9) of the FRA Procedures for Considering Environmental Impacts (64 FR 101, page 28545, May 26, 1999).

Recognizing that the Draft EIR/EIS is a lengthy document, the Authority and FRA provided extraordinary outreach to the community. The Authority and consultant staff held several advertised public workshops and public hearings in the project area during the review period to present the Draft EIR/EIS and give the public an opportunity to ask questions and collect information about the project prior to the more formal public hearings. Dates and locations of the meetings were:

<u>Meeting</u>	<u>Location</u>	<u>Date</u>
Fairmead Public Information Meeting	Galilee Missionary Baptist Church	August 23, 2011
Le Grand Public Information Meeting	Le Grand Legion Hall	August 24, 2011
Chowchilla Public Information Meeting	Madera County Fairgrounds	August 25, 2011
Fresno Public Information Meeting	Harvest of Harmony Church	August 30, 2011
Merced Public Hearing	Merced Community Senior Center	September 14, 2011
Madera Public Hearing	Madera City Council Chambers	September 15, 2011
Fresno Public Hearing	Fresno Convention Center	September 20, 2011

Table 8-1 in Chapter 8 of the Final EIR/EIS contains a complete list of public and agency meetings. The Authority and FRA also provided multiple means of submitting comments on the document.

The Authority and FRA will assess and consider all comments on the Draft EIR/EIS that were received by the close of the comment period and will include a response, where necessary, in the Final EIR/EIS. However, the formal review period does not limit the consideration of comments received from agencies, organizations, and the public after the end of the comment period. The Authority and FRA will consider comments received after October 13, 2011 and will reproduce them in the Final EIR/EIS. The primary difference between comments received before October 13, 2011 and those received afterward is that the latter may not be responded to in writing in the Final EIR/EIS if they were received after that document had been drafted.

2. Safety

The Children’s Health and Safety Risk Assessment (Appendix 3.12-C to the Final EIR/EIS) addresses many of these concerns, including emergency response times; HST accidents; noise, vibration, and electromagnetic field impacts; and impacts on air and water quality. Generally, there are no safety risks to children beyond those disclosed in the EIR/EIS for the general population. Additional information can be found in the Final EIS/EIR sections as summarized below.

2.1 Concern that the project would disrupt transportation, including school bus routes and emergency response, causing a safety hazard as well as an inconvenience. Reduced vision from fog would exacerbate safety hazards during construction, and narrow overcrossings would add to safety concerns during project operation. The project could also cause the closure of the Le Grand Fire Station, affecting emergency response in Le Grand.

Section 3.2, Transportation, of the Final EIR/EIS discusses transportation issues, including increases in traffic during construction and road closures. The design features and mitigation measures listed in Section 3.2, Transportation, are intended to minimize traffic impacts, including the preparation of a detailed Construction Transportation Plan (Plan) prior to commencing any construction activities. The Plan is intended to address the activities to be carried out in each construction phase, and will be prepared in coordination with the affected school districts. The Plan will include a Traffic Control Plan that addresses temporary road closures, detour provisions, allowable routes, and provisions for emergency access, school transportation, and farm equipment. Changes to the transportation system after construction would not increase any safety hazards since all crossings would be grade-separated and designed to be safe for visibility (including during periods of fog) and farm equipment. Additionally, the effect of detours around construction sites on the number of accidents and on emergency response times would be negligible with implementation of the Construction Transportation Plan and Traffic Control Plan.

The width of roadway overpasses would accommodate farm equipment on the overpasses, and would therefore accommodate school buses (which are narrower and lighter than some farm equipment) traveling in each direction. Driving conditions in fog on modified roadways and overpasses, which would be built in accordance with current engineering standards, would be the same as existing conditions during periods of fog on existing roads and bridges. In some locations, new roadway overcrossings would deviate from the existing roadway alignment (i.e., they would be off the current centerline) so that the overcrossing could be constructed while maintaining traffic on the existing road. Offline overpasses will be designed in accordance with applicable design standards, which account for driver expectations (for example, roadway curves would not be abrupt) and safety (for example, guard rails and crash barriers would be installed on bridges). Such design features would reduce the safety hazards during fog conditions.

The project construction footprint for the BNSF alternative would be adjacent to the Le Grand Fire Station, but would not require its acquisition and would not obstruct access to and from the station. The BNSF alternative would also be grade-separated in downtown Le Grand, and therefore would not affect the station after construction.

2.2 Concern that HST accidents, including potential derailments and/or collisions, will create a safety hazard for nearby schools and students.

Section 3.11, Safety and Security, discusses the potential for train accidents, including derailments. The HST includes design features that reduce both the potential for derailment and the potential consequences of derailment. Strategies include operation and maintenance plan elements for high-quality tracks and vehicle maintenance, as well as sensors that would automatically stop trains in the event of seismic activity to minimize the possibility of a derailment. As a result of implementing these standard design practices, the potential for HST derailments would be negligible.

The HST system includes design features that protect against a collision with trains or other vehicles. When an HST track is adjacent to a highway or roadway, a barrier is typically required where the roadway is less than 30 to 40 feet from the HST access control fence. Depending on the highway facility, the barrier can range from a standard concrete barrier to a taller barrier that protects against errant commercial trucks and trailers. Additionally, there would be either (1) a minimum separation between the HST and adjacent UPRR or BNSF trackways or (2) additional protection where a railroad line is less than the minimum separation from an HST track and both are at ground level, including the use of earthen

berms, swales, or a physical barrier. The need for and type of protection are subject to the distance between tracks and the risk of a derailment.

A basic design feature of an HST system is to contain train sets within the operational corridor. Physical elements, such as containment parapets, check rails, guard rails, and derailment walls, would be used in specific areas with a high risk of or high impact from derailment. These areas include elevated guideways and approaches to conventional rail and roadway crossings. Concrete derailment walls (tall curbs that run close to the train wheels) keep the train within the right-of-way and upright.

2.3 Concern that HST operational noise may disrupt classroom instruction and outdoor activities and that the ground/walls may vibrate. Vibration could also damage buildings over time.

Section 3.4, Noise and Vibration, of the Final EIR/EIS discusses noise and vibration impacts to schools. Schools are included as sensitive receptors for noise and vibration impact analysis. Every sensitive receptor within approximately 2,300 feet of the tracks was included in the noise and vibration assessment; however, only schools that would be impacted by the project were included in the EIR/EIS.

Additional information has been added Section 3.4, Noise and Vibration, based on comments received from school districts, including the potential for moderate and severe impacts to specific schools. Table 1 lists the potential impacts to schools by alternative. In places where the project is anticipated to have severe noise impacts, mitigation measures, such as installation of sound barriers and/or building sound insulation, would reduce noise and vibration impacts. The analysis concludes that with the mitigation listed in Section 3.4, Noise and Vibration, there would be no severe impacts remaining at any schools. Additionally, no moderate or severe noise impacts would occur at any schools with a Heavy Maintenance Facility (HMF) alternative and there would be no vibration effects on schools from any of the HST alternatives or the HMF sites.

It is important to note that the FRA and Federal Transit Administration (FTA) noise and vibration impact criteria are based on human annoyance. The criteria are not related to health effects, nor do separate criteria exist for children.

Table 1
 Noise Impacts on Schools

HST Alternative	Total Number of Impacts Before Mitigation for Ballast & Tie Track		Total Number of Impacts Before Mitigation for Slab Track	
	Moderate	Severe	Moderate	Severe
UPRR/SR 99	Sierra Vista Elementary School - Madera Unified School District Washington Elementary School - Madera Unified School District	None	Washington Elementary School - Madera Unified School District Addams Elementary School - Fresno Unified School District Fairmead Elementary School - Chowchilla Elementary School District (West Chowchilla Design Option Only)	Sierra Vista Elementary School - Madera Unified School District

HST Alternative	Total Number of Impacts Before Mitigation for Ballast & Tie Track		Total Number of Impacts Before Mitigation for Slab Track	
	Moderate	Severe	Moderate	Severe
BNSF	None	None	Addams Elementary School - Fresno Unified School District Le Grand Elementary School - Le Grand Union Elementary School District (Mariposa Way and Mission Avenue Design Options Only)	None
Hybrid	None	None	Addams Elementary School - Fresno Unified School District	None

Source: Authority and FRA (2012).

Parks that are used by schools for athletic programs would not be affected by noise or vibration after implementation of mitigation measures. Roeding Park is the only park identified as having severe noise impacts; however, this park is not identified as a location schools use for athletic programs. Additionally, as discussed in Section 3.15, Parks, Recreation, and Open Space, of the EIR/EIS, a sound barrier could be installed to mitigate the impacts on Roeding Park.

2.4 Concern that electromagnetic fields could affect schools and students, including interference with schools’ wireless networks and local radio frequencies.

Section 3.5, Electromagnetic Fields and Electromagnetic Interference (EMF/EMI) discusses EMF/EMI impacts. The analysis includes potential health risks as well as risks to the operation of electrical, magnetic, or electromagnetic devices. There would be negligible EMF or EMI impacts during construction of the HST alternatives because construction equipment generates low levels of EMFs and EMI. The only EMI that might be generated during construction would be occasional licensed radio transmissions between construction vehicles. Operation of the HST would generate 60-Hz electric and magnetic fields on and adjacent to trains, including in passenger station areas. EMF impacts on people in nearby schools would be expected to be below the accepted limits because, even within the HST track right-of-way, these levels are not expected to be reached.

The project would meet all federal and state regulations listed in Section 3.5, Electromagnetic Fields and Electromagnetic Interference (EMF/EMI), which includes the California Department of Education, California Code of Regulations, Title 5, Section 14010(c) which sets minimum distances for siting school facilities from the edge of power line easements.

2.5 Claim that fugitive dust and air quality degradation will negatively affect children’s health, especially children with respiratory diseases.

The statewide and regional impact on air quality from operation of the HST would be beneficial. Fugitive dust emissions due to the HST-induced airflow were evaluated in Section 3.3, Air Quality and Global Climate Change, of the Draft EIR/EIS. Particulate pollution is composed of solid particles or liquid droplets small enough to remain suspended in the air. In general, particulate pollution can include dust, soot, and smoke. These can be irritating but usually are not poisonous. Particulate pollution also can include bits of solid or liquid substances that can be highly toxic. Of particular concern are PM₁₀ and PM_{2.5}. PM_{2.5} is a

subset of PM₁₀ and refers to particulates that are 2.5 microns or less in diameter, roughly 1/28th the diameter of a human hair. PM_{2.5} emissions are a greater health concern than PM₁₀ emissions. As indicated by the emissions data, only a small portion of the fugitive dust would be PM_{2.5}. As the airflow diminishes, fugitive dust emissions beyond 10 feet from a train traveling at 220 miles per hour (mph) and the subsequent health risks would be negligible.

During construction, there is a potential for significant impacts to air quality. Analyses performed by the California Air Resources Board (CARB) indicate that providing a separation of 1,000 feet from diesel sources and high traffic areas, such as concrete batch plants, would substantially reduce diesel PM concentrations, public exposure, and asthma symptoms in children (CARB, 2005). With the implementation of mitigation measures on this project, no concrete batch plants would be located within 1,000 feet of schools. This, along with additional construction mitigation measures, would reduce impacts to air quality. However, as stated in the Children's Health and Safety Risk Assessment, at the regional level there would be the potential for significant impacts related to fugitive dust and combustion pollutants, even with mitigation. Adjacent to existing transportation corridors in the urban areas, children are likely already exposed to vehicle and train emissions. The impacts would end following construction completion.

2.6 Claim that water quality will be affected by the installation of new wells.

Neither the construction nor operation of the HST Project in the M-F Section is expected to have impacts on local or statewide water supply. As described in the EIR/EIS, the project will result in an overall net reduction in water use. The primary reason is that water-intensive farmland would be replaced by a rail alignment with zero water use. Overall, project water use is estimated to be 1.5% of the existing water use within the construction footprint.

With the exception of Joe Stephani Middle School (which would be removed if the Castle Commerce HMF were constructed), the project would not require any property acquisitions from schools. Because there would be no school site acquisition, any wells that may be present on nearby school properties would not be directly affected. Additionally, most schools within 0.25 mile of HST facilities are located in urban areas and are therefore served by municipal water systems, not wells.

For private properties located near schools in rural areas, it is possible that some existing irrigation wells would need to be relocated. Placement of these new wells would likely occur very close to the existing well sites, and result in minor shifts in localized groundwater drawdown. Standard well construction practices avoid siting wells where they would cause interference with nearby existing wells. Although the need for new wells (if any) and their locations would not be known until after the right-of-way acquisition process, standard practices would avoid impacts to any existing wells at nearby schools.

3. Socioeconomic

3.1 Concern that schools will lose revenue due to loss of agricultural jobs, lower property values, and population reduction. Including the loss of ability for school districts to issue and/or pay back bonds and loss of students, leading to reduced average daily attendance (ADA) at schools.

Some of the socioeconomic issues and concerns raised by school districts would be speculative to address and are, thus, not evaluated in the EIR/EIS. For example, some school districts are concerned that if they lost funding they might not be able to continue to raise money through bond sales. This is not evaluated in the EIR/EIS because it is not assumed that the project would result in school districts losing funding. Section 3.12, Socioeconomics, Communities, and Environmental Justice, as well as Appendix 3.12-B, Effects on School District Funding and Transportation Bus Routes, address several of the school districts' concerns, including those related to tax revenue, property acquisitions, and lower property values resulting in lower school funding. The findings are summarized below.

As discussed in Section 3.12, Socioeconomics, Communities, and Environmental Justice, studies indicate that residential and commercial property values near transit stations typically increase and are valued higher than similar properties not in the vicinity of transit stations. This effect is likely to occur in both downtown Merced and Fresno. Property values may decrease in areas that are farther from the HST stations but close to the HST guideway, particularly residences close to elevated sections of the guideway. In the communities of Le Grand, Madera, and Fairmead, there is the potential for physical deterioration; however, the existing rail corridors have already resulted in areas of degraded buildings and underutilized land in those areas. The lowering of property values could result in overall lower property tax revenues; however, in most areas, the alternatives are located adjacent to either the UPRR or BNSF railway corridor, and these impacts have already occurred. Outside of the communities, the adjacent land uses are primarily associated with rural agriculture, and few residential areas or businesses are located nearby. This further minimizes the overall impact of reduced property values because those land uses would not be negatively affected by visual or noise impacts. Therefore, no significant impact to school district funding is anticipated as a result of lower property tax revenues. There is actually potential for increased economic vitality in the station areas and employment growth in all three counties that could result in beneficial effects on school districts and increases in funding.

Private property that is acquired by the Authority for the project would be removed from the local property tax rolls. This could result in a net reduction of local property tax revenues available to school districts. However, this does not mean that the school districts' per-pupil revenue would decrease. As described in the *Public Policy Institute of California's Funding California Schools – The Revenue Limit System* (available at: http://www.ppic.org/content/pubs/report/R_310MWR.pdf), "A percentage of the property tax revenue generated by real property located within a district is assigned to the district; state aid makes up the difference between a district's entitlement and its property tax revenue."

With regard to the residential property acquisitions where children are attending public school, there is the potential for impact to revenue limits should those children move to another school district as a result of their home being acquired. However, there are enough properties available for sale in most of the school districts and in the other districts. As a result, the purchase of foreclosures or implementation of mitigation measures that move the residential building on the same parcel would likely have no significant impacts that would negatively affect the revenue limit for any of the school districts. Similarly, regarding property acquisitions resulting in reduced enrollment and ADA, no long-term effects on school district attendance and related per-pupil funding would be expected since an adequate supply of replacement sites are available.

3.2 Concern that changes to the transportation system will increase in costs to school districts from the need to hire additional bus drivers or from longer bus routes.

Changes to the transportation network during construction would be temporary and are not expected to have long-term effects on school costs. In areas where a new crossing is required, detours would be built first and traffic diverted. After construction is completed, traffic would be diverted to the new overcrossing. Prior to construction, a construction management plan will be implemented and will include information to address communications, safety controls, and traffic controls to minimize impacts and maintain access. Additionally, a Construction Transportation Plan will be prepared prior to construction and will provide information about the safety of school children and advising school districts of construction activities. With the implementation of mitigation, no significant impacts on school transportation are expected during construction.

Permanent road closures are also not expected to significantly impact schools. Nearly all of the schools are located within the city limits of Merced, Madera, Chowchilla, Le Grand, and Fresno. In the Chowchilla and Madera areas, the alignment is generally elevated; therefore, no road closures are proposed. There would be two road closures in the City of Merced, but two new crossings would be added within 1/4-mile of each closure. There would be five road closures in the City of Fresno, but eight new crossings would be added within 1/4-mile of each closure. Therefore, these closures would have minimal impact. See

Final EIR/EIS Appendix 2-A, Proposed Roadway Activities Along HST Alternatives, for additional information and for maps of road closures and new crossings.

Outside of the urban areas, all of the HST alternatives include roadways that would be closed as a result of the HST project; however, in many cases new roadway crossings would be constructed in these locations and if not, then crossings would be provided every 2 miles, resulting in no more than 1 mile of out-of-direction travel for vehicles to cross the HST tracks. The UPRR/SR 99 and Hybrid alternatives include new roadway crossings over SR 99 in unincorporated Merced County where there are currently none. These new crossings could allow for more direct transportation across the SR 99 and UPRR corridors. There are also crossings of the BNSF corridor for the BNSF and Hybrid alternatives in Merced County and Madera County. These overcrossings would remove conflicts with railroads and improve safety and access for buses. It is unlikely that school bus service is provided in these rural areas and the majority of students are likely driven by family members or themselves.

3.3 Concern that state funding to schools would be lost if HST runs at a deficit that is covered by state general fund.

The costs and revenue forecasts for the statewide HST system have been evaluated in the Draft 2012 Business Plan (Authority, 2011), which was made available to the public on November 1, 2011. As stated in the plan, according to the International Union of Railways, HST systems around the world achieve positive operating revenues. The plan concludes that the HST would be feasible under either a high fare scenario or a low fare scenario. For a detailed description of the scenarios and the risks evaluated, please see the Draft 2012 Business Plan, which is available on the California High Speed Train website at http://www.cahighspeedrail.ca.gov/Business_Plan_reports.aspx.

3.4 Concern that the bisecting of school districts would result in redistricting of school boundaries.

The Children's Health and Safety Risk Assessment (Appendix 3.12-C to the Final EIR/EIS) discusses how school district boundaries would be affected by the project. See issue 4.2 below regarding the potential bisecting of school districts and neighborhoods. Redistricting is in the purview of local school boards and is not analyzed in the EIR/EIS as the analysis would be speculative.

4. Changes to Community

4.1 Concern that the project will change the rural character of the area and remove culturally significant uses, including farms and other agricultural uses.

As discussed in Section 3.18, Regional Growth, the HST Project would not induce growth substantially beyond what is projected. The HST alternatives would encourage more compact, efficient land use in the region and would generate higher-density infill development around HST stations. These effects would not only be consistent with regional land use policies and growth management plans, but would assist communities in realizing the goals of these plans. The HST alternatives would only slightly raise the projected population and employment growth beyond growth planned under the No Project Alternative. Under current city and county general plans in the region, communities in the region have adequate space to accommodate both growth beyond planned growth by 2035 and HST-induced growth within their current spheres of influence. The HST-induced growth would, therefore, not require farmland conversion or the extension of public infrastructure beyond what is currently planned.

Property acquisitions for HST right-of-way, primarily in the cities of Merced and Fresno, represent a small portion of the land available in adjacent neighborhoods and would not result in changes in the existing neighborhoods' intactness or character.

The project would affect between approximately 1,000 and 1,500 acres of important farmland (depending on the alternative), converting farmland to nonagricultural use and bisecting agricultural

parcels. Bisecting parcels could create unusable remainders or non-economic remainders. The rationale is that there would be no apparent use of these remainders, and so they should be acquired by the Authority even though they would not be needed for any project use (such as HST alignments or road modifications). It is possible that these remainders may have some use during construction (e.g., material storage) and would be available for use by the construction contractors. After construction, it is possible that these remainders could be consolidated with other nearby parcels – that is the intent of the mitigation measure Ag-MM#2, described in Section 3.14.7, Mitigation Measures, of the EIR/EIS. The proposed consolidation measure is a realistic commitment for mitigating severance impacts and is consistent with programs used for other linear transportation facilities (e.g., Caltrans projects). See Section 3.14, Agricultural Lands, for more information on parcel severance and mitigation for unusable remainders and non-economic remainders.

Although these larger remainder parcels would not be at risk based on size alone, diagonal alignments could cause hardships in maintaining economic activity on otherwise viable parcels. The project would reduce these hardships by providing alignment crossings on public roads, arranging additional property transfers to consolidate ownership, arranging for additional grade-separated crossings, or offering compensation to landowners who demonstrate a hardship. Because these issues would likely be resolved during the right-of-way acquisition process, it is unlikely that parcel severance would result in the additional conversion of farmland to nonagricultural use. Following construction of the project, agriculture would remain the largest land use in the vicinity.

4.2 Concern that the project will divide school districts and neighborhoods, separating people from services (grocery stores, etc.).

Effects on community cohesion, including the potential for physically separating neighborhoods, are discussed in Section 3.12, Socioeconomics, Communities, and Environmental Justice, of the EIR/EIS and in the Community Impact Assessment. As described in Section 3.12.4, many of the communities in the study area developed around the railroad, which may have been the draw for the development originally, but has also served as a division within communities. The HST project would primarily be adjacent to the UPRR/SR 99 and BNSF corridors. Both corridors currently create boundaries between established communities and neighborhoods in the study area. The proposed north-south HST alignments would not create any new or additional barriers or disruptions that would negatively affect interactions or the quality of life in established communities and neighborhoods. Where the alternatives are at-grade in the urban areas, overpasses would be constructed to ensure that access is maintained and in areas where the overpass would also cross the existing railway, the overpass would also remove a barrier to access. In the areas of Chowchilla, Madera, and Le Grand, the trackway would be elevated and would not create an additional barrier. However, the Ave 24 Wye would construct an HST guideway west of Chowchilla that would place the city in the middle of a triangle of HST guideways. Although the majority of road crossings over the HST guideway would be maintained, the wye connection would create a barrier west of Chowchilla where none currently exists. However, the guideways would not isolate neighborhoods or activity centers.

As discussed in the Children’s Health and Safety Risk Assessment (Appendix 3.12-C to the Final EIR/EIS), in the areas of Le Grand, Chowchilla, and Madera, school districts would be intersected by the project. However, the project would be grade-separated and run parallel to existing transportation corridors. Therefore, the project would not be an additional barrier in these areas. The project would also intersect several districts in Merced and Fresno at-grade, but due to the existing transportation corridors in place (SR 99, UPRR, and BNSF) as well as the distances to many schools, the project is not expected to be an additional barrier for students walking or biking to school. The project would also include overcrossings in these areas, allowing for safer connectivity between neighborhoods.

References

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