



**Metro**

**METROLINK**

October 5, 2016

Mr. Jeff Morales  
Chief Executive Officer  
California High-Speed Rail Authority  
770 L Street, Suite 620  
Sacramento, CA 95814

Re: Agency Comments on 2016 Supplemental Alternative Analysis Report for the Burbank to Los Angeles Project Section

Dear Mr. Morales,

In April 2016, the California High-Speed Rail Authority (CHSRA) released to the public the report on the Burbank to Los Angeles Supplemental Alternative Analysis (SAA) (herein referred to as the "2016 SAA"). The 2016 SAA provides the current status of activities on the Burbank to Los Angeles project section and recommends carrying forward the following build alternatives and options under the guiding principle of a blended corridor by using the existing Metro-owned rail right-of-way (ROW), operated and maintained by Metrolink and shared with Amtrak Surfliner and Union Pacific Railroad as tenants, to the extent feasible:

- Carry forward two station options at Burbank Airport Station and two alternatives from Burbank Airport Station to Alameda Avenue.
- Carry forward one at-grade alternative from Alameda Avenue to Los Angeles Union Station (LAUS), with two design options from SR-2 to LAUS.
- Carry forward at-grade station platforms at LAUS.

The Los Angeles County Metropolitan Transportation Authority (Metro) and the Southern California Regional Rail Authority (SCRRA) (herein defined collectively as "the Agencies") have reviewed the 2016 SAA and have collaborated on providing comments on the 2016 SAA for your consideration. Specifically, the Agencies' comments are focused on the segment of the corridor from Alameda Avenue to LAUS and the two design options, "Dedicated" and "Shared" options.

Dedicated Option (Alameda Avenue to LAUS)

The Agencies consider the proposed Dedicated Option as presented in the 2016 SAA infeasible for the following reasons:

- 1) Under the Alameda Avenue to LAUS from Alameda Avenue to US-110 segment, the Dedicated Option proposes two dedicated tracks for High Speed Rail (HSR) service, which would require a significant portion of the Metro's ROW, reducing the existing ROW available for commuter rail (conventional passenger rail service and freight operations). The Agencies strongly believe that the proposed configuration under the Dedicated Option will not provide adequate ROW to support existing or future growth and capacity needs for passenger rail service and freight operations. Metrolink has indicated that for the Burbank to LA segment, the corridor width should comply with current Metrolink standards and be sufficient to include space for two tracks with a combined maintenance road and utility corridor, as well as a set back from the barrier or fence separating its rail operating corridor from an adjacent electrified HSR corridor.
- 2) Metro has four existing tracks with two tracks on west and east bank of the Los Angeles (LA) River that serves 120 commuter rail trains daily. The existing two tracks on the east bank of the LA River are primarily used by UPRR freight and Metrolink non-revenue equipment moves. Under the Alameda Avenue to LAUS from SR-110/Central Maintenance Facility to LAUS segment, the Dedicated Option proposes to relocate all passenger rail service (Metrolink and Amtrak) from the west bank of the LA River to the east bank. With 120 commuter trains plus at least 12 long, slow freight trains that will now be limited to the existing two tracks on the east bank, the Agencies would not be able to provide an adequate level of service to accommodate current train traffic, let alone future growth of passenger rail service and freight operations.
- 3) Furthermore, under the Dedicated Option, additional rail bridges over the LA River would need to be constructed to support the passenger rail operations in and out of LAUS to mitigate interference with UPRR freight operations. First, the existing Mission Tower Bridge over the LA River just south of Main Street, which the 2016 SAA proposes to be double-tracked to carry Metrolink and Amtrak train traffic, does not provide an acceptable route in and out of LAUS given that the existing track alignment is designed for low-speed operations. Therefore, a potential new double-track bridge over the LA River on a higher-speed alignment would be required. Secondly, a new rail bridge connecting the West Bank Line with the East Bank Line would be required just north of the Cesar Chavez roadway bridge to provide a route for non-revenue equipment movements between LAUS and Metrolink's Central Maintenance Facility (CMF) via the East Bank Line. The impacts of these two new bridges, including environmental, permitting, cost, etc. are significant and should have been addressed in the 2016 SAA.
- 4) The 2016 SAA does not adequately describe impacts to the CMF under the Dedicated Option. A high level review indicates that the CMF design would not be feasible and would require almost complete relocation at an already constrained site, including tracks, buildings, utilities and related support facilities while it is in operation. The CMF is Metrolink's primary heavy service facility and nearly all of Metrolink 50 trainsets arrive at CMF to be inspected, tested, fueled, cleaned and serviced between 7 AM and 8 PM. Please describe in detail the

proposed modifications to the CMF and how the existing CMF operations can be maintained with the proposed modifications in the final condition and during construction.

#### Shared Option (SR-2 to LAUS)

The Agencies would like to offer the following comments regarding the proposed Shared Option as presented in the 2016 SAA:

- 1) The 2016 SAA does not include supporting documentation on the effects of the proposed track configuration to operational performance of passenger rail services. From SR-2 to LAUS, the Shared Option proposes that HSR and Metrolink services share two tracks and UPRR and Amtrak services share one or two tracks, depending on the location within the corridor. The Agencies are concerned that an adequate level of service cannot be maintained under the proposed track configuration in the current and future conditions.
- 2) The concepts of operations and maintenance under the proposed Shared Option need to be developed through close collaboration among all affected railroads and CHSRA. There are incompatibilities between electrified HSR and diesel-hauled conventional passenger services, including equipment, operational patterns, stations, train control and communication systems, as well as infrastructure and systems maintenance. These issues will result in significant changes to current operations and maintenance methods and will require extensive analyses, coordination, and collaboration with the Agencies to develop workable operations and maintenance plans and standards in advance of designing any alignments.
- 3) Under the Shared Option, Metro would need to modify and/or renegotiate all shared use/operating agreements with all affected railroads. The increased risks and liability to Metro, as the owner of the rail right of way, due to the introduction of CHSRA trains to the rail corridor will need to be addressed in a separate new agreement between Metro and CHSRA.
- 4) Under the Shared Option, the cost of maintaining the shared tracks and related infrastructure will need to be distributed between CHSRA and SCRRA in a manner to be determined in the future.

#### Additional Considerations

In addition to comments on the Dedicated and Shared Options listed above, the Agencies would like CHSRA to consider the following items:

- 1) The at-grade alternative from Alameda Avenue to LAUS as presented in the 2016 SAA appears to have significant impacts to current passenger rail operations and infrastructure that have yet to be resolved with stakeholders. The Agencies recommend that CHSRA reconsider the three alternatives presented in the 2014 SAA (Tunnel Alternatives LAPT1 and LAPT3, and Surface Alternative) in the alternative analysis going forward to connect to project limits of the Link Union Station Project.

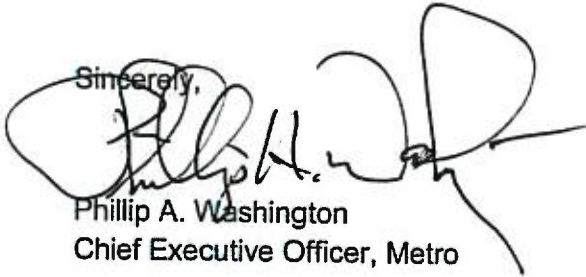


- 2) Detailed rail simulation modeling of both Shared and Dedicated Options should be performed and provided to the Agencies to demonstrate that any proposed track configuration would provide adequate capacity to accommodate current and future passenger rail and freight operations. If this cannot be demonstrated, the alternative analysis should include additional and separate dedicated HSR tracks to minimize or eliminate impacts to the Metro corridor.

Summary

The Agencies do not support the Dedicated Option of the at-grade alternative from Alameda Avenue to LAUS, but would like to work collaboratively with CHSRA to further develop and refine various other options to address our concerns. The Agencies look forward to partnering with CHSRA to bring HSR to Southern California. We greatly appreciate the partnership with CHSRA and look forward to working together to bring a high speed rail system in Southern California.

Sincerely,



Phillip A. Washington  
Chief Executive Officer, Metro

Sincerely,



Arthur T. Leahy  
Chief Executive Officer, SCRRA

Cc: Stephanie Perez, FRA  
Michelle Boehm, CHSRA  
Jeanet Owens, Metro  
Elissa Konove, SCRRA