California Rural Legal Assistance, Inc.

Rural Roots, Justice for All

September 18, 2026

Ian Choudri
Chief Executive Officer
California High-Speed Rail Authority
770 L Street, Suite 620
Sacramento, CA 95814

RE: Demand for Immediate Cessation of Activities that Violate State Law

Dear Mr. Choudri and Board Members,

California Rural Legal Assistance, Inc. (CRLA), the Community Alliance for Sustainable Economies (CASE), and leading CASE members (Faith in the Valley, Valley Voices, Lideres Campesinas, Jakara Movement, Communities for a New California, Building Healthy Communities - Kern and UNIDOS Network) and the Santa Clara Wage Theft Coalition are writing to demand the High Speed Rail Authority (HSRA) immediately cease all actions in furtherance of a high-speed rail system that does not conform to state law.

CRLA is a nonprofit legal aid organization that represents low-income clients from historically rural communities across California. Much of our work in Merced County focuses on supporting community environmental health and justice, including addressing the disproportionate lack of access and proximity to reliable public transportation options for many disadvantaged communities.

CASE is a coalition of community-based and worker organizations in the Central Valley working to ensure that development projects and public investments benefit local communities and workers.

On June 25, 2026, the High-Speed Rail Authority Board issued a Request for Qualifications for firms to provide design-build services for the Merced to Madera segment of rail, which it characterized as running from south of Mission Avenue outside the City of Merced to Madera. (High Speed Rail Authority, Request for Qualifications for Collaborative Design-Build Services for the Merced to Madera Civil Works Project.) This description of the Merced to Madera segment contradicts state law, which explicitly specifies that the Merced terminus is to be located in downtown Merced. (Cal. Health and Safety Code Sec. 39719.3; Cal. Public Utilities Code Sec. 180533.7.)

The HSRA has no authority to unilaterally re-route the high-speed rail project out of downtown Merced without prior authorization from the California legislature. The California legislature defines the Merced to Bakersfield segment of high-speed rail as "a 171-mile electrified dual-track segment that is usable for high-speed rail service in the central valley from Merced to Bakersfield, with a new combined station in downtown Merced, and connections to the Amtrak San Joaquins

and the Altamont Corridor Express." (Cal. Health and Safety Code Sec. 39719.3; Cal. Public Utilities Code Sec. 180533.7.)

The High-Speed Rail Authority relies on California Public Utilities Code, Section 185036 for its authority to issue the Request for Qualifications. Section 185036 permits the High-Speed Rail Authority to enter into design contracts, but only "upon the approval by the Legislature, by the enactment of a statute, or approval by the voters of a financial plan providing the necessary funding for the construction of a high-speed network." However, Section 185036 does not allow the HSRA to change the route or other legally required parameters of the Merced to Bakersfield segment. Since the California legislature has not authorized moving the station location from downtown Merced, nor changing this segment from double to single track, the HSRA was outside its authority in issuing the Request for Qualifications for design-build services that deviate from the statutorily mandated route and parameters.

Courts recognize that transportation authorities that deviate from law or engage in de facto amendments to mandated transit routes – even in preliminary planning processes – are subject to legal challenge. *Hayward Area Planning Assn. v. Alameda County Transportation Authority* (1999) 72 Cal.App.4th 95. Here, the High-Speed Rail Authority has demonstrated an on-going pattern of disregarding statutory language on the mandated high-speed rail route. The HSRA first proposed re-routing the high-speed rail system in its 2026 Business Plan. (High Speed Rail Authority, 2026 Business Plan.) The California Legislative Analyst's Office and the Office of California Inspector General for High Speed Rail both found that the 2026 Business Plan did not comply with statutory requirements, including its decision to base financial calculations on a new route that does not conform to state law. (Legislative Analyst's Office, Report on Draft High Speed Rail 2026 Business Plan; Office of Inspector General for High Speed Rail, Review of 2026 Business Plan.) The High Speed Rail Authority has shown a consistent disregard for California state law and the role of the California legislature by unilaterally deciding to re-route the high speed rail system, shift station locations, and downgrade the entire Central Valley segment to single-track.

The HSRA simply has no legal authority to start implementing the project in a way that deviates from the one the Legislature and the public have funded for the last decade. From approving a Business Plan to issuing a Request for Statement of Qualifications for station design services, the HSRA continues to ignore the law. We demand that HSRA immediately cease all efforts to reroute the station or move forward with any actions that advance a project that deviates from state law.

Sincerely,

California Rural Legal Assistance, Inc.

Nick Jensen
Directing Attorney /Abogado Gerente



Community Alliance for Sustainable Economies

Faith in the Valley

Valley Voices

Lideres Campesinas

Jakara Movement

Communities for a New California

Building Health Communities – Kern

UNIDOS Network

Santa Clara Wage Theft Coalition

cc: Ben Belnap, Inspector General High-Speed Rail Authority
Helen Kerstein, Legislative Analysts Office
Ernest Camacho, HSRA Board Member
Emily Cohen, HSRA Board Member
Martha M. Escutia, HSRA Board Member
Henry Perea, HSRA Board Member
Lynn Schenk, HSRA Board Member
Anthony Williams, HSRA Board Member
Jeffrey Worthe, HSRA Board Member