

Comment Letter AL065

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Printed on Recycled Paper 559 5/2004

August 31, 2004

Mr. Mehdi Morshed, Executive Director
California High Speed Rail Authority
925 L Street, Suite 1425
Sacramento, CA 95815



Re: Comments on the Draft Environmental Impact Report / Environmental
Impact Statement for the Proposed California High-Speed Train System – SCAG
No. I 20040087

Dear Mr. Morshed:

Thank you for submitting the Draft Environmental Impact Report / Environmental
Impact Statement for the Proposed California High-Speed Train System to SCAG
for review and comment. As areawide clearinghouse for regionally significant projects,
SCAG reviews the consistency of local plans, projects and programs with regional
plans. This activity is based on SCAG's responsibilities as a regional planning
organization pursuant to state and federal laws and regulations. Guidance provided by
these reviews is intended to assist local agencies and project sponsors to take actions
that contribute to the attainment of regional goals and policies.

SCAG is a Joint Powers Agency established under California Government Code Section
6502. SCAG is designated as the Metropolitan Planning Organization (MPO) for the
greater Los Angeles region including the Los Angeles International Airport service area.
SCAG is also the designated Regional Transportation Planning Agency, and as such is
responsible for both preparation of the Regional Transportation Plan (RTP) and Regional
Transportation Improvement Plan (RTIP) under California Government Code Sections
65080 and 65082 respectively. In terms of project review, SCAG's mandated roles and
responsibilities include, but are not limited to, the following:

SCAG is the authorized regional agency for Inter-Governmental Review of
projects and programs proposed for federal financial assistance and direct
development activities, pursuant to Presidential Executive Order 12,372
(replacing A-95 Review).

Pursuant to Public Resources Code Section 21083, SCAG reviews
Environmental Impact Reports of projects of regional significance for
consistency with regional plans (California Environmental Quality Act
Guidelines Sections 15206 and 15125(b)).

The Proposed California High-Speed Train System meets SCAG's criteria for
classification of a project that is regionally significant. The focus of our review is on
the consistency of the project with SCAG's adopted Regional Transportation Plan.

The California High Speed Train System was not included in the 2004 Regional
Transportation Plan (RTP) and, therefore, was not modeled or included in the
quantitative GIS analysis in the 2004 RTP Program Environmental Impact Report
(PEIR). Furthermore, this Draft Program EIR/EIS does not address how the proposed
high-speed train system relates to SCAG's adopted Maglev system. Future site-specific
EIR/EIS documents must resolve these outstanding issues in our region. Importantly,

AL065-1

August 31, 2004
Mr. Mehdi Morshed
Page 2

coordination between SCAG and the California High Speed Rail Authority is imperative
for success on both a regional and state level. More detailed comments and concerns on
the Draft EIR/EIS are attached.

AL065-1
cont.

The project title and SCAG Clearinghouse number should be used in all correspondence
with SCAG concerning this project. If you should have any questions, please contact
Jeffrey Smith, Senior Regional Planner, at (213) 236-1867. Thank you.

Sincerely,

Handwritten signature of Mark Pisano
Mark Pisano
Executive Director



**Comment Letter AL065 Continued**

August 31, 2004  
Mr. Mehdi Morshed  
Page 3

COMMENTS ON THE  
DRAFT ENVIRONMENTAL IMPACT REPORT / ENVIRONMENTAL IMPACT STATEMENT  
FOR THE  
CALIFORNIA HIGH-SPEED TRAIN SYSTEM  
SCAG NO 1 20040087

**CRITICAL AND URGENT ISSUES**

In order to proceed in the Southern California region, the proposed California High Speed Train System (HST) must be part of SCAG's long range Regional Transportation Plans and must be included in the Regional Transportation Improvement Program (RTIP) in order to receive funding. A program-level EIR has been certified for all elements of the 2004 Regional Transportation Plan (RTP). Our comments are based on this level of analysis in our region.

**Funding**

Several critical issues must be resolved in order to maintain existing conformity in the region. Such conformity includes the maintenance of financial constraint in the RTP with the inclusion of the proposed California High-Speed Train System. Several issues in the Draft EIR/EIS may affect financial constraint in Southern California and must be addressed.

- *State and Local Funding.* As noted, construction costs of the HST alternative are estimated at \$33-37 billion, a portion of which is proposed to be financed through "existing airport user fees and passenger facility charges...local funds (from existing sources), and existing state transportation revenue sources (e.g., gas tax, sales tax on gasoline)." SCAG is concerned about the use of such existing local funds and state transportation revenue sources. In most cases, these funding sources are already obligated for state and regional projects in the RTP and would not be able to sustain the financial demands of implementing this system.
- *Federal Funding.* A majority of the \$33-37 billion cost of implementing the high-speed rail system would be financed through general obligation bonds and federal grants or loans. However, the potential impact this could have on future state and local funding needs for existing or planned infrastructure is not discussed; nor is the impact on federal, state and local funding sources addressed. The potential effects on availability of federal funds for other projects in the state or regions of the state requesting financial support must be addressed.
- *Operations and Maintenance.* On page 1-1, it is stated that the California High-Speed Rail system would have revenues in excess of operations and maintenance costs. However, in Chapter 4, annual operation and maintenance costs per train mile are given as approximately \$153 million, and it is stated that "(Operation and Maintenance) Costs do not include the costs from train operations, maintenance of fleet of train sets, propulsion fuel (electricity), or

August 31, 2004  
Mr. Mehdi Morshed  
Page 4

marketing and reservations for the service." Following this statement, in table 4.3-3, additional O&M costs are given as:

Train Operations	178.2 million
Equipment Maintenance	208.9 million
Marketing and Reservations	37.5 million
Power	126.1 million
<b>Total</b>	<b>550.7 million</b>

With these additional estimates, it is not clear which numbers are being used in the conclusion in Chapter 1 that the system will produce revenues above O&M costs. This must be specified in the final document.

**Alignments**

- Several alignments proposed by the California High Speed Rail Authority are similar to proposed alignments of SCAG's Inter-Regional Maglev system. These alignment similarities include Los Angeles International Airport (LAX) to March Inland Port in Riverside County which includes the Initial Operating Segment (IOS) from West LA to Ontario, the Antelope Valley alignment through Palmdale, LAX to Irvine in Orange County and Union Station to Anaheim (see attached Map 1). The similarities in these two systems necessitate a high level of coordination and partnership during any further planning and/or implementation. Issues such as alignments, station locations, environmental costs/benefits, community impacts, regional needs, commuter services and interaction with existing modes of transit must be thoroughly analyzed before implementation of a regional rail system to ensure the greatest degree of efficiency and service in the SCAG region. These issues are brought forward in SCAG's 2004 RTP Program Environmental Impact Report (PEIR) for projects in our region.
- SCAG has adopted an Interregional Maglev System in its long range RTP since 1998. Given the scope of this system, which would cover most of Southern California, the Final EIR/EIS should consider how Maglev relates to the proposed HST in this region. Most issues are not yet resolved. Future EIS work will have to resolve these issues. As SCAG continues to develop the IOS on the Maglev Deployment Program, the California High Speed Train System segments will be included and analyzed on a project specific EIS/EIR level.
- SCAG's Regional Council has supported the Antelope Valley corridor of the California High Speed Rail Proposal (Resolution #96-357-1-B). Currently, the High Speed Rail DEIR/EIS provides two alternatives from Bakersfield to Sylmar: one along I-5, one through the Antelope Valley. SCAG would like to reiterate its support for the Antelope Valley alignment in this corridor.

AL065-3  
cont.

AL065-4

AL065-5

AL065-2

AL065-3



**Comment Letter AL065 Continued**

August 31, 2004  
 Mr. Mehdi Morshed  
 Page 5

**Coordination**

- Effective coordination (as detailed below) could be beneficial to both Maglev and California High Speed Rail. Such coordination will lead to enhancement of the state and enhancement of the region.
- The California High Speed Rail Authority should coordinate all planning and implementation activities with SCAG and other regional stakeholders, specifically with regard to Maglev, aviation, environment, growth, access, finance and community development. This coordination should entail consideration of the goals, policies, and technical information in the adopted RTP and working with SCAG Committees and Task Forces to help ensure that Southern California's priorities are fully considered. SCAG can provide an important forum to help the Authority reach out to cities and counties in Southern California to collaboratively finalize alignments, design, and mitigation. Also, the Authority should work with SCAG's Growth Visioning effort to help implement Transit-Oriented-Development around proposed stations. This coordination will help support their subsequent project-level environmental reviews for segments in the SCAG region.
- Coordination of PEIR and site-specific EIR/EIS for the proposed California High Speed Train System is essential to maintain constraint and air quality conformity in the Southern California region. Conformity in long range transportation plans requires both emissions constraint as well as financial constraints. The region must remain within the boundaries of available resources to ensure both constraints are met to ensure regional conformity. Please note that SCAG will be conducting independent air quality conformity analysis on high-speed rail segments in our region.

**FINDINGS AND RECOMMENDATIONS**

SCAG has reviewed the Draft Program Environmental Impact Report/Environmental Impact Statement for the proposed California High-Speed Train System. The following list outlines major concerns that should be addressed and incorporated into environmental documents. As specified, each issue should be part of either the Final Program EIR/EIS or subsequent site-specific EIR/EIS documents.

**Issues to be addressed in the Final Program EIR/EIS**

**General**

- The proposed High Speed Train (HST) System was not included as a construction project in SCAG's 2004 RTP and was not modeled or included in the quantitative GIS analysis in the 2004 RTP Program EIR.

August 31, 2004  
 Mr. Mehdi Morshed  
 Page 6

- Since the High Speed Train System Draft EIR/EIS analysis began, SCAG adopted the 2004 Regional Transportation Plan, which includes the most recent data on population, housing, employment, urban densities and environmental considerations. These latest data should be included in the Final EIR/EIS (see attached Table 1).
- For a majority of the proposed high-speed rail system, electric train technology has been proposed; however, a non-electric high-speed rail technology is planned for service from Los Angeles south to San Diego along I-5 in the LOSSAN corridor. If this corridor is selected for continued service to San Diego, this could seriously affect ridership and convenience of the system as passengers would have to disembark in Los Angeles to board a non-electric train to continue to San Diego. The logistical impacts of this transition as well as the speed differences of non-electric train technology should be clearly identified and discussed. (See attached map, Figure S.4-2)

**Alternatives Analysis**

- The DEIR/EIS essentially provides an assessment of three alternatives, namely, No-Project Alternative, Modal Alternative (hybrid of Highway Improvements and Airport Improvements), and the High Speed Train (HST) Alternative (and there are several variations of alignments considered through a number of urbanized areas along the corridor). Another alternative the Draft Program EIR/EIS should consider for comprehensive evaluation is the enhancement of existing rail services along the corridor, primarily Amtrak.
- The only discussion of performance criteria is on p. 2-26 in conjunction with the preliminary assessment of the HST alternative. The criteria used are System Design Criteria, System Capabilities Criteria, System Capacity Criteria, and Level of Service Criteria. These criteria are meant to serve more as screening criteria for the HST option rather than alternative evaluation criteria.
- The alternative evaluation analysis presented in the Draft EIR/EIS discusses the corridor capacity issues, relative capital as well as operation and maintenance costs, relative air quality benefits, safety benefits, etc. However, the analysis is not based on a specific set of performance measures such as mobility, accessibility, cost-effectiveness, reliability, safety, and others as proposed by SCAG as well as the state DOT (Caltrans). Such performance criteria should be used to evaluate the alternatives so that the full spectrum of systemic interactions are considered and captured in the alternative evaluation process. The Regional Performance Indicators used in SCAG's most recently adopted RTP are attached for your use (see Table 2).

AL065-6

AL065-7

AL065-8

AL065-9

AL065-10

AL065-11



**Comment Letter AL065 Continued**

August 31, 2004  
 Mr. Mehdi Morshed  
 Page 7

August 31, 2004  
 Mr. Mehdi Morshed  
 Page 8

**Environmental**

Public Utilities

- The DEIR/EIS does not address the impact on police, fire, and other emergency personnel. A system of this size certainly will require security and other emergency services. Of additional concern to our region, solid waste services should be addressed.

AL065-12

Traffic and Circulation

- Analysis on traffic impacts address most transportation projects included in the 2001 RTP and that would be completed by 2020. However, the information about congestion on certain corridors may be affected by the more recent modeling completed for the 2004 RTP. Additional projects are included in this RTP that may affect traffic and circulation modeling and mitigation efforts.
- Although mitigation measures are discussed briefly at the end of Chapter 3.1, these are only in relation to freeway capacity constraints and traffic impacts due to construction. Mitigation on impacts of current rail infrastructure due to shared track service needs to be addressed. Further, cost estimates of mitigation measures should be included in the final EIR/EIS.

AL065-13

AL065-14

Energy

- SCAG would like to emphasize that the conclusions about energy impacts should be regarded as particularly uncertain given the number of conditional scenarios relied on in the discussion. Individual alignment or segment EIR/EIS's should be more definitive in their assessment.
- As an additional mitigation measure, consider incorporating solar panels on the roofs of all station structures and any other structures built in association with the system, so as to provide a renewable source to offset the HST's demand on the state power grid.

AL065-15

AL065-16

Noise

- The Draft EIR/EIS generally uses the same buffer sizes as the 2004 RTP PEIR to determine noise impacts. Vibration is addressed similarly to the 2004 RTP PEIR.
- There is no discussion on the methodology used for the determination of ambient noise, and there is little discussion of station noise, or anything associated with ground access to the stations. In addition, construction noise is not addressed.

AL065-17

Mitigation

- In the environmental analysis, it is difficult to determine the specific significant impacts and the specific mitigation measures that are implemented for each impact. Furthermore, it is difficult to determine which impacts remain significant after mitigation. In SCAG's 2004 RTP PEIR, each impact and mitigation measure is specified and the significance after mitigation for each impact is identified. An approach similar to this would be useful in analyzing post-mitigation impacts.
- A copy of SCAG's Mitigation Monitoring Reporting Program (MMRP) from the 2004 RTP Draft Program EIR is included for your use. Our MMRP provides a useful menu of mitigation options that should be considered for the Final Program EIR/EIS, and should be used in subsequent, project level environmental reviews. Additionally, SCAG's 2004 RTP Program EIR should be used to bolster the cumulative impact analysis of future project level environmental reviews. The Program EIR can be accessed at: <http://www.scag.ca.gov/peir/index.htm>
- All feasible measures needed to mitigate any potentially negative regional impacts associated with the proposed project should be implemented and monitored, as required by CEQA.
- There are relatively few mitigation measures to deal with noise, and none that are operational (nighttime curfews, slower speeds, etc).

AL065-18

Economic/Growth

- Since the Draft EIR/EIS analysis began, new data has been developed for the SCAG region. The most recently adopted numbers should be considered for the Final EIR/EIS and should be used for the project-level analysis of segments in Southern California (see attached Table 2).
- Additional information on economic impacts expected during construction would be helpful. These impacts include road/lane closure on streets and highways, rail service delays, noise pollution and expected length of time for construction.
- Although the report addresses the potential impacts on urban land consumption due to induced growth in population and employment in Chapter 5, it does not directly address the impacts on housing and associated land use impact.

AL065-19



**Comment Letter AL065 Continued**

August 31, 2004  
Mr. Mehdi Morshed  
Page 9

**Goods Movement/Freight**

- The Draft EIR/EIS does not discuss the movement of cargo/freight and services. The movement or the potential movement of cargo/freight and the effects high-speed rail could have on existing goods movement services should be discussed in the Final EIR/EIS.

AL065-20

**Financial analysis**

- The total capital cost of the HST is estimated between \$33-37 billion and the Modal alternative is estimated at \$82 billion. Annual O&M costs are estimated for the HST alternative and the Modal alternative as \$153 million and \$201 million, respectively. Based on cursory analysis, it would appear that the Model alternative implementation would result in far greater carrying capacity in the corridor than implementing the HST alternative, so the cost advantage or cost-benefit of the HST alternative may not be as significant as portrayed in the PEIR. This is all the more reason to perform a more complete performance measures evaluation of alternatives as prescribed by SCAG as well as Caltrans.

AL065-21

**Ridership**

- The high end of total traffic projected on the entire North-South Corridor is 261 million annual trips by 2020 per the Draft PEIR/EIS. The Draft PEIR/EIS estimates that approximately 22% of these trips will be captured by the HST alternative and the air travel mode share will drop from 10% in 1997 to approximately 2% in 2020. Given the cost as well as travel time competitiveness of air travel mode as depicted in the Draft PEIR/EIS, this scenario is rather optimistic for the proposed HST.

AL065-22

**Issues to be addressed in Site-Specific EIR/EIS (for future analysis)**

**Regional Needs and Coordination**

- In order to meet regional needs, both the California High Speed Rail Authority and the Southern California Association of Governments must ensure that any high-speed transit in the region will provide improvements in each of the following:

- Connectivity
- Mobility
- Decentralized aviation system
- Environmental benefits
- Economic stimulus
- Goods/Cargo Movement
- Cost Effectiveness

AL065-23

August 31, 2004  
Mr. Mehdi Morshed  
Page 10

- More site-specific analysis, including coordination with proposed projects in the region, should be conducted on site-specific project EIR/EIS documents.

AL065-23  
cont.

**Environmental**

Air Quality/Emissions

- The high-speed train segment from Union Station to San Diego (along the LOSSAN corridor) is not expected to be powered by electricity, and may, therefore, produce direct emissions. Although the CHSRA is not the lead agency of the LOSSAN corridor, there is no evaluation of emissions impacts or mitigation measures on this segment. Therefore, the contribution of HST emissions relative to overall emissions in the region cannot be quantified based on the level of detail provided in Draft PEIR/EIS. Project-level air quality evaluation for segments in Southern California should identify and mitigate train emissions from use of non-electric train technologies.

AL065-24

Energy

- In SCAG's Regional Comprehensive Plan and Guide, peak energy consumption in 2012 is forecasted as 31,670 MW for the region. The forecasted energy consumption for statewide high-speed rail is 480 MW. Of the statewide energy consumption for high-speed rail, at most, half or 240 MW, would be consumed in the region of Southern California. Thus, at most, high-speed rail would account for 0.75% of the energy consumption in Southern California.
- The Draft PEIR/EIS does not offer any discussion of potential locations for power stations from which energy will be derived or potential impacts on energy consumption specific to the southern California region. The potential energy sources in the SCAG region that will be used by high-speed rail and potential energy consumption impacts in southern California should be identified in the Final EIR/EIS.

AL065-25

**Economic/ Growth**

- Additional data is needed on the following factors that are used in standard growth assessment modeling:

- Vehicle Hour Delay Savings
- Vehicle Hour Travel Savings
- Vehicle Miles Traveled Savings
- Air Quality Improvements
- Reduction in cost of commerce and business transactions

AL065-26



Comment Letter AL065 Continued

August 31, 2004  
Mr. Mehdi Morshed  
Page 11

- Additional information on economic impacts expected during construction would be helpful. These impacts include road/lane closure on streets and highways, rail service delays, noise pollution and expected length of time for construction.

**Goods Movement/Freight**

- In general, the costs associated with each particular segment and alignment are interpreted to reflect ROW and track capacity sufficient to assure that the introduction of high-speed rail operations would not have a negative impact on existing and forecast freight operations. As such, interface between this passenger-oriented mode and the system of goods movement in the SCAG region would be at most minimal with little if any shared or proximate facilities or land uses.
- Although SCAG assumes that High Speed Rail will be run on dedicated track and that the construction of dedicated track is included in cost estimates, there was insufficient information in the Draft PEIR/EIS to adequately address this matter. If this dedicated track is planned, there should be no impact on freight rail. However, if High Speed Rail is run on track shared with freight rail service, then this could have a major impact on freight and goods movement in the region. Assumptions regarding shared track services and dedicated high-speed rail track should be clearly identified and addressed.
- SCAG has identified the following alignments that correspond to freight service alignments in our region.
  - Bakersfield to Los Angeles Region: on existing rail ROW owned by Metrolink to Lancaster from LA, UPRR owns balance, up to 46 freight trains per day along segment.
  - Los Angeles to San Diego via Inland Empire: UP main line 30 freight trains through Colton from LA, Riverside to San Diego minimal freight activity
  - Los Angeles to San Diego via Orange County: minimal UP activity, Fullerton to LA on BNSF 50 trains, Fullerton south owned by Metrolink, four BNSF freight trains.

**Impacts on and coordination with existing Transit Infrastructure**

- The Draft PEIR/EIS discusses coordination and consultation with public transit services only as it would be needed to provide access to HST stations. However, there is no further discussion of how this would occur or how stakeholders would be identified for coordination of services with transit operators.
- In the alternative analysis, potential for offering both high-speed train service and conventional rail service on the same track were discussed. However, additional discussion

August 31, 2004  
Mr. Mehdi Morshed  
Page 12

of both the potential impacts on commuter and freight rail services and the coordination among rail lines would be helpful.

**Right of Way**

- The Draft PEIR/EIS proposes extensive tunneling in the SCAG region. Of particular concern, this has been proposed paralleling an inactive fault along I-5 in the region of the Grapevine corridor where potential long-term disturbances could be made. Additionally, tunneling has been proposed in heavily urbanized areas around LAX, along the LOSSAN corridor and in the northern portion of Los Angeles. SCAG is concerned about the potential traffic and topographical impacts of such extensive tunneling.

AL065-26  
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AL065-28  
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AL065-27

AL065-29

AL065-28



**Comment Letter AL065 Continued**

August 31, 2004  
 Mr. Mehdi Morshed  
 Page 13

**SOUTHERN CALIFORNIA ASSOCIATION OF GOVERNMENTS**

*Roles and Authorities*

**THE SOUTHERN CALIFORNIA ASSOCIATION OF GOVERNMENTS (SCAG)** is a *Joint Powers Agency* established under California Government Code Section 6502 et seq. Under federal and state law, SCAG is designated as a Council of Governments (COG), a Regional Transportation Planning Agency (RTPA), and a Metropolitan Planning Organization (MPO). SCAG's mandated roles and responsibilities include the following:

SCAG is designated by the federal government as the Region's *Metropolitan Planning Organization* and mandated to maintain a continuing, cooperative, and comprehensive transportation planning process resulting in a Regional Transportation Plan and a Regional Transportation Improvement Program pursuant to 23 U.S.C. '134, 49 U.S.C. '5301 et seq., 23 C.F.R. '450, and 49 C.F.R. '613. SCAG is also the designated *Regional Transportation Planning Agency*, and as such is responsible for both preparation of the Regional Transportation Plan (RTP) and Regional Transportation Improvement Program (RTIP) under California Government Code Section 65080 and 65082 respectively.

SCAG is responsible for developing the demographic projections and the integrated land use, housing, employment, and transportation programs, measures, and strategies portions of the *South Coast Air Quality Management Plan*, pursuant to California Health and Safety Code Section 40460(b)(c). SCAG is also designated under 42 U.S.C. '7504(a) as a *Co-Lead Agency* for air quality planning for the Central Coast and Southeast Desert Air Basin District.

SCAG is responsible under the Federal Clean Air Act for determining *Conformity* of Projects, Plans and Programs to the State Implementation Plan, pursuant to 42 U.S.C. '7506.

Pursuant to California Government Code Section 65089.2, SCAG is responsible for *reviewing all Congestion Management Plans (CMPs) for consistency with regional transportation plans* required by Section 65080 of the Government Code. SCAG must also evaluate the consistency and compatibility of such programs within the region.

SCAG is the authorized regional agency for *Inter-Governmental Review* of Programs proposed for federal financial assistance and direct development activities, pursuant to Presidential Executive Order 12,372 (replacing A-95 Review).

SCAG reviews, pursuant to Public Resources Code Sections 21083 and 21087, Environmental Impacts Reports of projects of regional significance for consistency with regional plans [California Environmental Quality Act Guidelines Sections 15206 and 15125(b)].

Pursuant to 33 U.S.C. '1288(a)(2) (Section 208 of the Federal Water Pollution Control Act), SCAG is the authorized *Areawide Waste Treatment Management Planning Agency*.

SCAG is responsible for preparation of the *Regional Housing Needs Assessment*, pursuant to California Government Code Section 65584(a).

SCAG is responsible (with the Association of Bay Area Governments, the Sacramento Area Council of Governments, and the Association of Monterey Bay Area Governments) for preparing the *Southern California Hazardous Waste Management Plan* pursuant to California Health and Safety Code Section 25135.3.

Revised July 2001

August 31, 2004  
 Mr. Mehdi Morshed  
 Page 14

**Table 1.**

<b>2004 RTP Growth Forecasts of Population, Household, and Employment</b>									
COUNTY	Pop2000	Hhold2000	Empl2000	Pop2030	Hhold2030	Empl2030	Population	Household	Employment
Imperial	147,000	39,500	55,400	269,871	83,733	111,073	84%	112%	100%
Los Angeles	9,580,100	3,137,100	4,453,500	12,221,809	4,120,261	5,660,971	28%	31%	27%
Orange	2,887,200	939,700	1,514,600	3,552,676	1,098,476	1,321,630	24%	17%	27%
Riverside	1,559,500	509,300	526,500	3,143,471	1,127,780	1,183,987	102%	121%	126%
San Bernardino	1,716,400	530,500	594,900	2,713,153	897,742	1,178,885	58%	69%	98%
Ventura	758,100	244,500	337,200	989,764	332,117	465,481	31%	36%	38%
<b>SCAG Total</b>	<b>16,630,300</b>	<b>5,400,600</b>	<b>7,482,100</b>	<b>22,890,745</b>	<b>7,660,109</b>	<b>10,527,025</b>	<b>38%</b>	<b>42%</b>	<b>41%</b>

**Comment Letter AL065 Continued**

August 31, 2004  
 Mr. Mehdi Morshed  
 Page 15

**Table 2.**

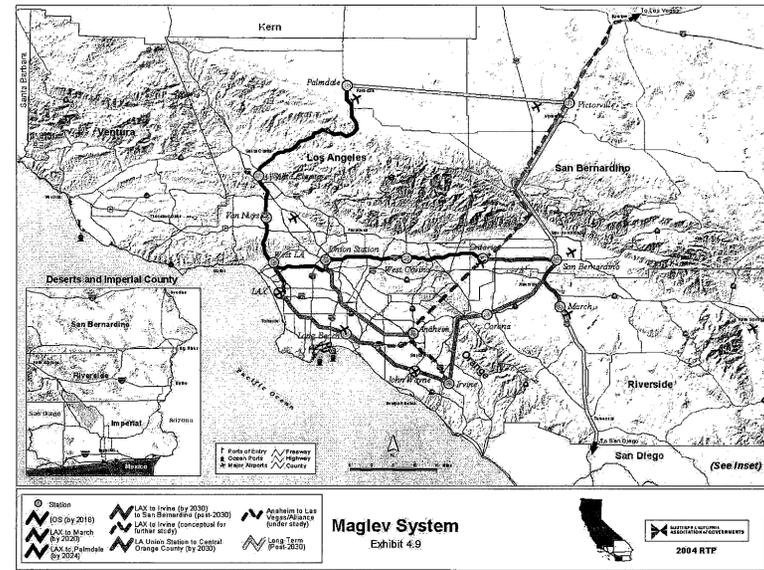
**Performance Indicators, Measures and Outcomes**

Performance Indicator	Performance Measure(s)	Definition	Performance Outcome
Mobility	Average Daily Speed	Speed - experienced by travelers regardless of mode	10% improvement
	Average Daily Delay	Delay - excess travel time resulting from the difference between a reference speed and actual speed. Total daily delay and daily delay per capita are the indicators used.	40% improvement
Reliability	Percent variation in travel time	Day-to-day change in travel times experienced by travelers. Variability results from accidents, weather, road closures, system problems and other non-incident conditions.	10% improvement
Cost-Effectiveness	Benefit-to-Cost (B/C) Ratio	Ratio of benefits of RTP investments to the associated investment costs.	\$3.08
Sustainability	Total cost per capita to sustain current system performance	Focus is on overall performance, including infrastructure condition. Preservation measure is a subset of sustainability.	\$20 per capita, primarily in preservation costs
Environmental	Emissions generated by travel	Measured/forecast emissions include CO, NOX, PM <sub>10</sub> , SOX and VOC. CO <sub>2</sub> as secondary measure to reflect greenhouse emissions.	Meets conformity requirements

*Note: Performance Outcomes are estimated for the Plan as a whole in 2030 and not on a project-by-project basis.*

August 31, 2004  
 Mr. Mehdi Morshed  
 Page 16

**Map 1.**



**Response to Comments of Mark Pisano, Executive Director, Southern California Association of Governments (SCAG), August 30, 2004 (Letter AL065)****AL065-1**

The proposed Maglev system and its relation to the proposed statewide HST system is addressed in Section 2.3.3, "Related Projects" of the Final Program EIR/EIS. As the federal lead agency for this Program EIR/EIS, the FRA will continue to provide coordination regarding studies of high-speed rail and Maglev proposals in California. In addition, the Authority will coordinate with SCAG and other project sponsors during subsequent phases of project development and implementation particularly with regard to proposed stations and alignments affecting areas in proximity to proposed HST alignments and stations. Please also see response AL061-1.

**AL065-2**

The Program EIR/EIS does not include a financing plan. The document makes no assumption of how the system will be financed. However, the Program EIR/EIS incorporates by reference the Authority's Final Business Plan which considers financing options and identifies the need for public funding to implement the HST system. Should the HST proposal move forward, financing plans and issues related to financing will be addressed through future project specific studies.

**AL065-3**

The second paragraph of Section 1.1 on Page 1-1 summarizes the findings presented in the Authority's Business Plan (2000). It states that a 700-mile (1,127 km) HST system serving the major metropolitan areas of California, as defined in the Business Plan, "would have revenues in excess of operations and maintenance costs". This finding is based on the low-end ridership forecast of 42 million annual passengers generating projected annual revenue of \$888 million (2000 dollars), and the total operations and maintenance costs (estimated at \$550 annually in 2000 dollars).

Chapter 4 describes annual costs of operating and maintaining HST infrastructure of \$152 million in 2003 dollars, not per mile. Total annual operations and maintenance costs were estimated at \$703 million (in 2004 dollars) in the Draft Program EIR/EIS (Section 4.3.2-F) for a system of alignment options most closely resembling the Business Plan System. Section 4.3.2-F describes cost assumptions and covers operation and maintenance of infrastructure (Right-of-way, track, and stations) and train operations, equipment maintenance, marketing and reservations, and propulsion power (electricity). The increase in cost from year 2000 reflects inflation, and higher costs from operating longer trains and serving more passengers based on the "high-end" ridership forecasts used for this program EIR/EIS (please note, the revenue would also be substantially higher as well). The HST system is projected to have revenues in excess of total operations and maintenance costs because revenues would also increase with inflation. Text for section 4.3.2-F has been revised to say: "For comparison with the infrastructure O&M costs for the Modal Alternative, estimates for HST infrastructure O&M costs are summarized in Table 4.3-2. HST O&M costs for train operations, maintenance of the fleet of train sets, propulsion fuel (electricity), marketing, and reservations are separately summarized in Table 4.3-3." Please also see standard response 2.1.1 and standard response 2.1.2.

**AL065-4**

See response to Comment AL065-1.

**AL065-5**

Acknowledged. Please see standard response 6.23.1.

**AL065-6**

The Authority has undertaken extensive statewide coordination since being formed in 1998. SCAG is responsible for considering and

coordinating conceptual long-range transportation improvements in Southern California, including the state's plans for a HST system. The Authority anticipates extensive inter-governmental collaboration, including SCAG, during project level engineering and environmental studies. These project level studies would address air quality conformity issues. See Chapter 6B of the Final Program EIR/EIS regarding transit oriented development around HST stations. Please also see standard response 2.1.12.

**AL065-7**

Planning for the proposed HST system began over 10 years ago and SCAG was familiar with the HST system concept prior to preparation of the 2004 RTP. SCAG exercises discretion as to the appropriate inclusion of future projects, taking into account the progress of project development. The Authority suggests inclusion of the HST system in subsequent RTP's. The Authority recommends that SCAG include the preferred HST system, as identified in the Final Program EIR/EIS, in the next update of the RTP and associated modeling and analyses. The Authority can provide SCAG with necessary information regarding the HST system.

**AL065-8**

The co-lead agencies thank the commenter for mentioning the availability of new population and employment forecasts in the SCAG region. The Draft EIR/EIS was initiated and completed using SCAG's forecasts that were adopted and in-place at that time. The Final Program EIR/EIS will include earlier adopted forecasts, and the updated and future forecasts will be included in the project-level analyses.

**AL065-9**

The Authority has identified the inland route through the Inland Empire for HST service to San Diego. See Chapter 2 (Alternatives) of the Final Program EIR/EIS (Section 2.6.9). The LOSSAN Conventional Rail Improvements have been removed from this Final Program EIR/EIS and are the subject of the Caltrans LOSSAN Rail

Improvements Program EIR/EIS (Draft PEIR/EIS SCH # 2002031067). Please see standard response 6.41.1.

**AL065-10**

Consideration was given to improving the conventional passenger rail system to accommodate all or part of the representative demand in the same geographic markets as the proposed HST Alternative. Improvements to conventional intercity rail were not given further consideration as a separate feasible alternative because, in order to meet the purpose and need, conventional rail improvements would be virtually the same as the HST Alternative. Nor were conventional rail improvements beyond No Project considered reasonable as part of the Modal Alternative because they would not meaningfully add to the ability of the Modal Alternative to meet the purpose and need. See Section 2.5.1-C of the Program EIR/EIS.

**AL065-11**

Section 3.2 Travel Conditions in the Program EIR/EIS includes an evaluation of performance characteristics related to each system alternative including travel time, reliability, safety, connectivity, sustainable capacity, and passenger cost. In conjunction with other information presented in the Program EIR/EIS regarding potential environmental impacts, costs, and economic growth, the Program EIR/EIS presents a comprehensive comparison of alternatives meeting both CEQA and NEPA requirements.

**AL065-12**

The impacts on and provision of public services such as emergency personnel would be addressed in subsequent project level environmental review, when more specific information is developed regarding facility placement and layout, as well as operating plans and policies.

**AL065-13**

Please see response to Comment AL065-8. The Authority will consider the updated and future forecasts for inclusion in

subsequent project-level analyses, should a decision be made to move forward with the system.

**AL065-14**

Specific mitigations for traffic impacts along shared use corridors would be addressed in subsequent project level environmental review. A general estimate of mitigation costs is included in the capital cost estimates. See Appendices 4-B and 4-C.

**AL065-15**

The Lead Agencies respectfully disagree with this comment.

**AL065-16**

Acknowledged.

**AL065-17**

The ambient noise levels are assessed according to land use typologies as specified in High speed ground transportation noise and vibration impact assessment. U.S. Department of Transportation, Federal Railroad Administration. 1998. See Section 3.4.1-B of the Program EIR/EIS.

Potential station and construction related noise impacts would be addressed in subsequent project level environmental review.

**AL065-18**

Mitigation strategies and design practices are included in each section of Chapter 3 of the Final Program EIR/EIS to be applied at the project level to address potentially significant impacts. Potentially significant impacts and specific mitigation measures for particular locations, as well as any impacts remaining after including feasible mitigation would be addressed in subsequent project level environmental review.

**AL065-19**

The co-lead agencies thank the commenter for mentioning the availability of new population and employment forecasts in the SCAG region. The Program EIR/EIS was initiated using baseline data from the Department of Finance, Department of Transportation, Woods and Poole, and REMI. Baseline data were developed using a consistent forecasting methodology across all counties in the study area, including counties inside and outside of the SCAG region. Substitution of SCAG's forecasts at this point would not be appropriate because they are not necessarily consistent with the common statewide forecasting methodology used for this document. The Final Program EIR/EIS will use the originally adopted forecasts; and the updated forecasts and future forecasts will be considered for inclusion in the project-level analyses.

Localized construction-related impacts will be considered during the project level analysis after locations are identified and more detailed design and construction staging information are available.

Please see standard response 5.2.3 for information related to housing and land use. The timeframe (year 2035) considered in the growth inducement and indirect impact analysis is well beyond the general planning horizon of typical General Plans, does not permit useful projections, and it is not possible to make non-speculative, specific conclusions about potential impacts related to housing and land use. To the extent that information was available, a generalized analysis of land use and community compatibility was presented in Section 5.4.6.

**AL065-20**

The potential movement of cargo/freight is addressed in Section 2.6.3 of the Program EIR/EIS. A scenario for provision of commercial goods movement services was not developed as part of the Program EIR/EIS as this is not a primary purpose of and is not included in the proposed HST system as described in Chapter 1: Purpose and Need. Please see standard responses 2.7.1 and 2.7.3 and response to Comment O016-8A.

**AL065-21**

The Authority and FRA disagree with the conclusions of your “cursory analysis”. Annual O&M costs reflect the type of the infrastructure being maintained, not the capacity of that infrastructure. As stated on page 2-15 of the Draft Program EIR/EIS, “the representative intercity 2020 travel demand, rather than the HST capacity, is used as the basis for defining the hypothetical modal improvements because it is consistent with the project purpose and need. Because the HST Alternative has such a high capacity potential, using the HST capacity as the basis to define modal alternatives would overstate the amount of improvement needed for 2020 and the foreseeable future. While the HST system would have the capacity to carry many more passengers than those accounted for in the representative demand (e.g., the Tokaido Line in Japan carries more than 130 million passengers per year), the system alternatives are based on the 2020 forecast because it provides a reasonable estimate of the number of passengers that might be expected to be carried on the high-speed rail infrastructure in the foreseeable future. Developing a modal alternative the provided a maximum level of capacity similar to the HST system would result in extensive infrastructure improvements that would be considered unreasonable.” Please also see Section 3.2.3 of the Program EIR/EIS under “Sustainable Capacity”. The Authority’s analysis concluded that the HST Alternative would have nearly twice the amount of total capacity than the Modal Alternative that was evaluated.

**AL065-22**

The assumptions for the “High End” forecasts are documented in the Authority’s June 2000 Business Plan, and CRA’s January 2000 report which are referenced in the Draft Program EIR/EIS. The “High End” forecasts were developed to test certain assumptions, including air transportation prices that are substantially higher than current fares and resulted in a high percentage of diversion of air passengers. The “Investment Grade” forecasts represent a lower level of total demand and less diversion of air passengers.

**AL065-23**

Acknowledged.

**AL065-24**

See Standard Response 6.42.1.

**AL065-25**

Locations for power stations and potential impacts of HST energy consumption specific to southern California or any other region would be addressed in subsequent project level environmental analysis. See also response to Comment AL032-6.

**AL065-26**

Vehicle-hours of delay, vehicle-hours of travel, vehicle-miles of travel, and costs of commerce and business transactions are directly incorporated in the growth inducement analysis. For example, reduction in cost of commerce and business transactions was directly estimated through a statewide travel demand model, and then directly considered in the industry-specific policy variables within the economic modeling process. Please see Appendices A through D and F of the technical report on economic growth effects<sup>2</sup> for more detail on how these variables were calculated and considered in the analysis. Air quality is fully addressed in Section 5.4.2 of Program EIR/EIS.

Construction impacts are short-term, temporary impact issues that do not create lasting economic impacts. The 2035 timeframe for the growth inducement analysis is well beyond the projected completion of construction, and any of these short-term impacts would have already been worked out of economy. Localized short-term impacts

<sup>2</sup> *Economic Growth Effects of the System Alternatives for the Program Environmental Impact Report/Environmental Impact Statement – Final Report*; Cambridge Systematics, Inc.; July 2003. This report is available from the High-Speed Rail Authority, and has been posted on the HSRA website since March 29, 2004.

related to construction will be considered during the project level analysis after specific locations for activities are identified and more detailed design and construction staging information are available.

#### **AL065-27**

(a) Acknowledged.

(b) The Program EIR/EIS identifies two corridors where HST services are proposed to share tracks with other passenger rail services: Caltrain Corridor from San Jose to San Francisco and the LOSSAN Corridor from Los Angeles to Orange County (Irvine). The LOSSAN concept is further addressed in Chapter 2. These assumptions are clearly defined in Sections 2.6.9-A through 2.6.9-E for each alignment option carried forward. Other segments of the HST system have been identified as having dedicated tracks, including estimates of the related construction costs. While HST services are proposed to share tracks on some limited segments, minimal impacts to freight services are anticipated. The shared track concept is based on segregation of passenger and freight services along with full grade separation, which would have a positive effect on the operation of freight services. The subsequent preliminary engineering and project level environmental review will provide further opportunities to coordinate with local freight owner/operators to avoid and minimize the potential effects freight services, as more specificity is defined for proposed alignments and facilities.

(c) Acknowledged.

#### **AL065-28**

Specific impacts to other transit and rail services in shared use corridors will be addressed in subsequent project level environmental review. Should the HST program move forward, preliminary engineering design will be required as part of future project specific analysis, including physical and operational options for coordination and connection with other transportation services. Should the HST proposal move forward, the Authority will continue to work with transit and rail owner/operators and other stakeholders to address issues surrounding all aspects of system interface with existing

services as well as the complex issues associated with shared track/corridor operation with other passenger rail services.

#### **AL065-29**

Acknowledged. See standard response 3.19.1. Specific traffic and other impacts related to tunneling in heavily urbanized areas would be addressed on a case-by-case basis in subsequent project level environmental review. The Authority has identified a preferred alignment which greatly minimizes tunneling in Southern California. Between Bakersfield and Sylmar, the Antelope Valley alignment was selected as the preferred HST alignment (please see standard response 6.23.1), between Sylmar and Los Angeles, the MTA/MetroLink alignment was identified<sup>3</sup>, between Los Angeles and Irvine, the LOSSAN alignment was identified and between Los Angeles and Riverside, the UP Riverside/UP Colton was identified – each of these options minimize tunneling. Moreover, the Authority's preferred alignment does not include a direct link to LAX and does not extend further south than Irvine along the LOSSAN corridor. Both of these alignments would have required considerable amounts of tunneling.

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<sup>3</sup> Between Burbank and Los Angeles Union Station, the MTA/MetroLink alignment refers to a relatively wide corridor within which alignment variations will be studied at the project level.