Comment Letter I118

I118

August 24, 2004

California High-Speed Rail Authority
925 L Street Suite 1425
Sacramento, CA 95814-1908

Re: Comments on the Draft Program EIR/EIS for the Proposed California High-Speed Train System (January, 2004)

I am enclosing a copy of the report I prepared this month as a part of the University of California Transportation Centers Undergraduate Fellowship Program at the University of California Davis. This report aims to summarize and explore the debate over whether or not the Altamont Pass should have received more analysis in the Draft EIR/EIS as a possible alternative to the Diablo and Pacheco Passes. I have compiled arguments from various organizations and have examined a range of sources in order to analyze how these groups position themselves in this controversy. The goal of this document is to outline the arguments in support of the Altamont Pass or Pacheco Pass with respect to the reasons that the Altamont Pass was disregarded as a possible alternative – including accessibility/connectivity, ridership/revenue, and the environment.

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While the EIR/EIS asserts that the Altamont Pass does not meet the criteria for connectivity / accessibility, ridership / revenue, and the environment, this report has demonstrated that these assertions will remain refutable until further study is done on this corridor. Additionally, that the public has become so vocal about making sure the Altamont Pass is included in the Final EIR/EIS may be reason alone for the High-Speed Rail Authority to reconsider their decision. It makes sense for the Authority to conduct further analysis of the Altamont Pass option before supporting the Pacheco Pass option; the public might then more readily accept the Authority's argument as to why the Altamont Pass would not serve the high-speed train's purpose.

Thank you for considering these comments during the public review period. I appreciate your time and ask that you do not hesitate to contact me over any questions you may have.

Sincerely,

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Lauren Hilliard

i. "The more communities that receive service in the first phase of the project, the greater the number of people who will support the project and vote for the bond. The great the total rout miles, the greater the total system capital cost, the greater the travel times, the greater the operating costs, and the greater the overall cost."[30]

n. Ken Gosling, Executive Director, Transportation Involves Everyone

i. This transportation planning advocacy group has urged federal regulators to halt the advancement of this high-speed rail project until the Altamont route has been fully studied.[31]

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o. Mehdi Morshed, Executive Director, California High Speed Rail Authority

i. Morshed believes the objective is to serve the inter-city transportation needs of California in 2020 and beyond. It's not to serve commute trips. It (Altamont Pass) won't serve commute trips. It's for trips that are too far to drive and too near to fly.[32]

p. The Metropolitan Transportation Commission (MTC)

i. The MTC is the transportation planning, coordinating and financing agency for the nine-county San Francisco Bay Area. On May 28, 2003, its Board of Directors voted to maintain its preference for the Pacheco Pass alternative despite hearing arguments for the Altamont Pass, emphasizing the importance of serving San Jose and the Silicon Valley.[3]

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Analysis of Controversial California High-Speed Train Debate:
The Removal of the Altamont Pass Alternative

by

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1. INTRODUCTION

It seems that it often takes depressing statistics to justify the building of new infrastructure projects in the State of California; however, there is such a variety of astonishing numbers that the general public often does not make the connections between them. For instance, the number of persons fatally injured in U.S. motor vehicle crashes in the year 2000 was **41,821.**[1] Of that number, California is responsible for **9%** of those fatalities.[1] There is a projected **63%** increase in the number passengers traveling intercity in California by the year 2020.[2] Of California's 58 counties, **34** failed one or more of three clean air tests in 2004.[3] The top **three** cities in the United States that are most polluted by short-term particle pollution are all located in California.[3] Automobiles are responsible for **70%** of ozone and particulate pollution.[3] It is when all of these statistics are combined and understood that people can begin to see the correlation between vehicle fatalities, increased congestion, and deteriorating air quality.

In conjunction with California's extreme highway congestion, these statistics offer additional reasons as to why California has taken steps toward planning a state-wide, high-speed train system. In1994, the California Intercity High-Speed Ground Transportation Commission was formed and in 1996 they issued a set of baseline recommendations for the rail network. The Commission envisioned the first phase connecting Los Angeles with the San Francisco Bay Area, and a later phase extending south to San Diego and north to Sacramento.[4] The California High-speed Rail Authority (CHSRA) was created by the state Legislature in 1996 to develop a plan for the construction, operation and financing of a statewide, intercity high-speed passenger rail system. The Authority consists of nine members – five appointed by the Governor, two by the Senate Rules Committee, and two by the Speaker of the Assembly. All environmental, planning, and engineering work is performed by private firms under contract with the Authority.[5]

The California High-Speed Train Program Draft Environmental Impact Report / Environmental Impact Statement (EIR/EIS) lays out plans for a high-speed railway network for intercity travel through the area from the San Francisco Bay Area and Sacramento, the Central Valley, Los Angeles, and San Diego. The California High-Speed Rail Authority is the lead agency for the California Environmental Quality Act (CEQA) requirements, and the U.S. Department of Transportation's Federal Railroad Administration is the federal lead agency for NEPA requirements.[6] The purpose of and need for a high-speed train system in California, as laid out in the Draft EIR/EIS, is to alleviate the pressures that an increasing population's intercity travel will put on highways, airports, buses, and conventional passenger rail infrastructure. The EIR/EIS details how the proposed high-speed train system would improve intercity transportation problems with predictable, consistent, and shorter travel times, an alternative to highway congestion, and lower emissions.[2]

The Draft EIR/EIS describes three alternatives including a No Project Alternative, a Modal Alternative, and a High-Speed Train Alternative. The No Project Alternative depicts the State's transportation system – highway, air, and conventional rail – as it existed in 1999-2000 and as it would be in 2020 with the implementation of transportation projects already in

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planning. The Modal Alternative includes a proposal for improvements to meet the increased intercity travel demand in 2020 that would not be met in the No Project Alternative. The High-Speed Train Alternative examines various high-speed train technologies, corridors, and alignment and station options within the corridors.[7]

The June 2000 Final Business Plan was prepared for Governor Grey Davis and the California Legislature, and includes plans for the construction of a state-wide high-speed rail system.The Business Plan explains that in the year 2020, a total of 86 weekday trains in each direction could be provided to serve the statewide intercity travel market. Sixty-four of the trains would run between northern and southern California, and the remaining 22 trains would serve shorter distance markets. There would be a total of 20 express, 12 semi-express, 20 suburban-express, 12 local, and 22 regional trains in operation.[11] Its timetables demonstrate that on an express train one could travel from San Francisco to Los Angeles in 2 ½ hours, and from Sacramento to Los Angeles in just over 2 hours.

While the Authority has laid out alternatives for various corridors within the rail system, they have stated a preferred alternative in the Draft EIR/EIS that would connect the Bay Area to the Central Valley via a route parallel to Highway 152. This choice, known as the Pacheco Pass, would include proposed station stops in Los Banos, Gilroy, and Morgan Hill. Many agencies are opposed to this route because of the growth the rail line might induce in the low-density areas. However, the California High-Speed Rail Authority claims that a rail line would instead control growth by supporting transit-oriented development. North of the planned Pacheco Pass lies the proposed Diablo Pass – an alternative that environmental groups are adamantly against because it would go through Henry Coe State Park. While the Draft EIR/EIS only outlines these two corridor alternatives, the Authority's predecessor Commission believed a different route paralleling Interstate 580 and going through the cities of Tracy, Livermore, and Pleasanton would be the best connection from the Central Valley to the Bay Area. Several organizations believe that this route, the Altamont Pass, was not given proper consideration in the Authority's Draft EIR/EIS as an alternative to the Pacheco Pass or Diablo Pass.

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The reasons for the elimination of the Altamont Pass as an alternative for a Northern Mountain Crossing are based on its supposed poor connectivity/accessibility, low ridership/revenue potential, significant environmental impacts, and lack of owning the right-of-way. However, each of these arguments has been countered by many Northern San Joaquin cities, rail advocacy organizations, and environmental groups. These groups and many other individuals claim that the Altamont Pass would reach more riders living in higher density cities, have less environmental impacts than the other two alternatives, and be much more cost effective than either the Pacheco Pass running through Gilroy and Los Banos, or the Diablo Pass running through Henry Coe State Park. This controversy has prompted the California High-Speed Rail Authority to extend its public review time on the Draft EIR/EIS to August 31, 2004.[8]

This report aims to summarize and explore the debate over whether or not the Altamont Pass should have received more analysis in the Draft EIR/EIS as a possible alternative to the Diablo and Pacheco Passes. I will be compiling arguments from various environmental and

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transit advocacy groups, city and county politicians, special districts, and commissions. An examination of newspaper articles, periodicals, letters, websites, and interviews has led to an analysis of how these organizations position themselves in this controversy. My goal is to provide a document which conveys the arguments for supporting each of the Altamont and Pacheco Passes in retrospect to the reasons that the Altamont Pass was disregarded as a possible alternative – including accessibility/connectivity, ridership/revenue, and the environment.

I118-1 cont.

2. THE REASONS

While there are still those who contend that a high-speed rail line should not even run between the Bay Area and Merced, there are many in support of the train serving this quickly growing region. This area includes the 13 counties of Madera, Merced, San Benito, Stanislaus, Santa Clara, Alameda, San Mateo, San Francisco, Contra Costa, Solano, Yolo, Sacramento, and San Joaquin. The population in this region grew by 14%, from 7.6 million people in 1990 to 8.7 million in 2000. By the year 2020, population in the region is expected to reach 10.8 million, increasing 23% over 2000 levels.[12] There remains yet another debate within the train-supporting community as to which high-speed rail corridor would best meet this increasing travel demand in this region.

The Altamont Pass was eliminated from the Draft EIR/EIS because the California High-Speed Rail Authority believed the needs for connectivity/accessibility, ridership/revenue, the environment, and right-of-way could not be met with this corridor alignment option. While the Authority addressed their primary reasons for removing the Altamont Pass as a viable option to the Pacheco Pass, there was less information provided in the Draft EIR/EIS for the secondary reasons. This section of the report will summarize the Authority's primary reasons for the removal and one of the secondary reasons, as the "right-of-way" was not sufficiently discussed in the document. In addition, each of the issues raised in support of these reasons will be analyzed. The issues are defined in the Draft EIR/EIS as follows:[9]

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1. Primary Reasons for Elimination
    a. *Connectivity / Accessibility* – Limited connectivity with other transportation modes (aviation, highway and/or transit systems) that would impair the service quality and could reduce ridership of the HST system was considered a criterion for failing to satisfy the project purpose.
    b. *Ridership / Revenue* – Longer trip times and/or suboptimal operating characteristics that would result in low ridership and revenue were considered criteria for failing to satisfy the project purpose.
2. Secondary Reasons for Elimination
    a. *Environment* – A high potential for considerable impacts to natural resources including waters, streams, floodplains, wetlands, and habitat of threatened or endangered species was considered a criterion for failing to meet project objectives.
    b. *Right-of-Way* – A lack of available right-of-way or extensive right-of-way needs that would result in excessively high acquisition costs for a corridor, technology, alignment, or station were considered criteria for project impracticability.

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2.1 Connectivity / Accessibility

The Draft EIR/EIS maintains that the key reason for the removal of the Altamont Pass as an alternative lies in the infeasibility of operating the line. It argues that the Altamont corridor would lack connectivity and accessibility because the line would have to split in three different directions at Newark/ Fremont to simultaneously serve San Jose, San Francisco, and Oakland (Figure 2-1).[8] However, the use of the Pacheco Pass would only require the line to split in two directions, occurring beyond the San Jose station. Because the Altamont line would have an additional split, it is thought that it would ultimately provide less train service to each of the Bay Area major metropolitan areas. All trains via the Pacheco Pass would be able to serve San Jose regardless of whether San Francisco, Oakland, or both were served[8].

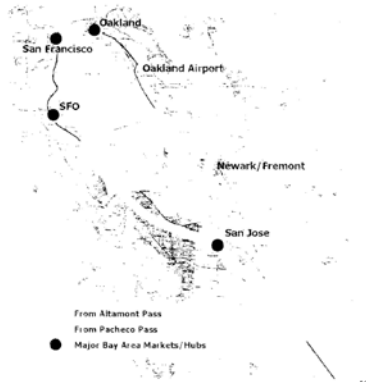

Figure 2-1: Service Branching on Alignment Option[10]

The Draft EIR/EIS also states that the Altamont Pass would be an operationally difficult line with connectivity problems because it would include a segment crossing the San Francisco Bay via a new rail bridge, which would add considerable costs to the project.[8] Between the three-way line split and the Bay crossing, the Draft EIR/EIS argues that the Altamont Pass would not be able to run the highest frequency of service to the major Bay Area markets and that its accessibility would be more limited than for the Pacheco Pass[8].

The Metropolitan Transportation Commission (MTC) is the transportation planning, coordinating and financing agency for the nine-county San Francisco Bay Area. On May 28, 2003, its Board of Directors voted to maintain its preference for the Pacheco Pass alternative despite hearing arguments for the Altamont Pass, emphasizing the importance of serving San Jose and the Silicon Valley.[8] HSRA Executive Director, Mehdi Morshed, has noted that the

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MTC's regional plans for transportation investments in the future, and how well they coordinate with the intercity system, is very important because the Authority hopes to complement their plans with the proposed high-speed rail system.[4]

The HSRA feels that the removal of the Altamont Pass alignment from the Draft EIR/EIS is consistent with the project's purpose and need because of its ineffectiveness to meet current and future intercity travel demand. Furthermore, they do not see this corridor option increasing the efficiency of intercity transportation[8].

Analysis

While the High-Speed Rail Authority believes the issue of connectivity / accessibility presents to difficult a problem, it is important to consider an analysis and response to this argument. The lack of feasibility for splitting the Altamont line in three directions toward Oakland, San Jose, and over the Bay toward San Francisco may be considered significant enough to exclude it as an option; however, sufficient studying of the Altamont corridor is the only way to confirm this. While there is the possibility of avoiding a Bay crossing by going into San Jose and up the Peninsula, the Authority notes that this concept would require trains to reverse direction at a stub end station in San Jose (minimum 10 minute additional travel times) to proceed north along the Peninsula.[8] This would add at least 22 minutes to the overall travel time versus using a Pacheco Pass option and would not meet the project purpose and objectives. However, there is no detailed explanation in the Draft EIR/EIS of this alignment option. A more thorough analysis of the Altamont Pass might reveal other ways to provide service via this route.

I118-1 cont.

The Draft EIR/EIS also attempts to demonstrate the connectivity / accessibility problem of a rail line splitting three ways versus one splitting only in two directions by showing the frequency of train service to stations in San Jose, Oakland, and San Francisco. In an example, it points out that if 18 trains were to enter the Bay Area via the Pacheco Pass, then all 18 would enter through San Jose and Oakland and San Francisco would each receive 9 trains. It also conveys that if 18 trains were to enter the Bay Area via the Altamont Pass, then San Jose, Oakland and San Francisco would each only receive 6 trains. These numbers of service frequency are used to prove that a two-way split may offer more trains to Bay Area stations than a three-way split (Table 2-1).

Table 2-1: Service Comparison Example for Sacramento to Bay Area (Altamont vs. Pacheco)[8]

Alignment Option	Trains Entering Bay Area	Trains per Station		
		San Jose	*Oakland*	*San Francisco*
Altamont Pass	18	6	6	6
Pacheco Pass	18	18	9	9

This example, however, fails to address why there are only 18 trains entering the Bay Area. With the omission of units it is unclear to understand at what service frequency eighteen trains would enter the Bay Area. While the timetables of the June 2000 Final Business Plan show that there are 18 trains entering the Bay Area in each direction every day, this table is somewhat confusing

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to a reader who is only aware that there are 66 trains entering the Bay Area in each direction every day, as stated in the Draft EIR/EIS. Perhaps it would make more sense to convey the figure of 66 trains, as this is the number referred to in the Draft EIR/EIS (Table 2-2).

Table 2-2: Service Comparison Example for Trains Entering Bay Area (Altamont vs. Pacheco)

Alignment Option	Trains Entering Bay Area	Trains per Station		
		San Jose	*Oakland*	*San Francisco*
Altamont Pass	66	22	22	22
Pacheco Pass	66	66	33	33

It is also interesting that such an emphasis is placed on the importance of serving the three metropolitan areas of San Francisco, San Jose, and Oakland when the initial phase of the project would only include service to San Francisco and San Jose – not Oakland. The timetable example for 2020 in the Final Business Plan includes the lines for San Francisco to San Diego, Sacramento to San Diego, and Sacramento to San Francisco. Since there is no intention of even serving Oakland by the year 2020, it seems more logical to place a line that enters at Newark/Freemont instead of avoiding the East Bay altogether by going to San Jose.

Furthermore, the BART system could be utilized in the East Bay to increase connectivity with a high-speed rail line. For example, one could take the BART from the 12th St. Oakland City Center Station and connect to the high-speed Altamont Pass 36 minutes later at the Fremont station, or 38 minutes later at the Dublin/Pleasanton station (Figure 2-2). Oakland could still have relatively quick access to the high-speed train system without having to commute via automobile to the nearest station. On the contrary, the people of the Sacramento region would have to drive to Merced to reach the Pacheco Pass, versus Modesto if the Altamont Pass was used.

I118-1 cont.

Figure 2-2: Map of the BART system[25]

Connectivity / Accessibility	
Draft EIR/EIS Argument for the Removal of Altamont Pass Option	**Analysis and Response to Draft EIR/EIS Argument**
Altamont line would have to split in three different directions and cross the San Francisco Bay in order to serve the major Bay Area markets	A more thorough analysis of the Altamont Pass might reveal other ways to provide service without a three-way line split and a Bay crossing
Using the Pacheco Pass would only require the line to split in two directions, occurring beyond the San Jose station	While a two-way split may offer more trains to Bay Area stations than a three-way split, the Draft EIR/EIS fails to demonstrate this in a clear, consistent manner

I118-1 cont.

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Altamont route would not be able to run the highest frequency of service to San Jose, San Francisco, and Oakland	Since Oakland is not included in Phase I plans for 2020, the Altamont line through Newark/Freemont could provide service to the East Bay when the Pacheco could not
The HSRA does not see the Altamont Pass option increasing the efficiency of intercity transportation	The existing BART system could be used in conjunction with a high-speed rail network, connecting in several East Bay cities
The HSRA hopes to complement their plans with the Metropolitan Transportation Commission, who believe the Pacheco would better serve San Jose and the Silicon Valley	The HSRA should take the preferences of other Metropolitan Planning Organizations into account, as much Bay Area congestion results from Central Valley commuters

I118-1 cont.

2.2 Ridership / Revenue

The High-Speed Rail Authority also claims that the Altamont Pass would generate significantly lower ridership / revenue than the Pacheco Pass would; therefore, they feel this is justification for the corridor's elimination as an alternative. Although the Altamont Pass would provide a more direct link between San Joaquin County and the Bay Area, the Authority argues that this area represents a relatively short distance market. Because short distance markets equate to less revenue potential than for longer distance travel, they feel that improvements to the existing commuter rail service, the Altamont Commuter Express (ACE), would be a better way to serve Central Valley / Bay Area commuters.[8]

As Table 2-1 demonstrates, the Pacheco Pass would provide more frequent and efficient service to the major Bay Area markets than the Altamont Pass. With San Jose receiving three times as many trains via the Pacheco Pass than it would with the Altamont Pass, the Draft EIR/EIS emphasizes the importance of serving the Silicon Valley and projects that this higher train frequency will result in higher ridership and revenue. Additionally, the HSRA argues that the greater ridership / revenue market is for long-distance travel. As a result, they prefer the Pacheco Pass as it would attract more riders because it has a 10 minute shorter travel time than the Altamont Pass using express trains. The faster travel times between San Jose and southern California would also result in the Pacheco Pass having higher ridership and revenue potential. For the 2015 forecasts, the Pacheco Pass is estimated to have 1.1 million more riders annually (5.5%) and $56 million more revenue annually (8.0%) for service to San Francisco than that of the Altamont Pass.[8]

I118-1 cont.

Analysis

There is more to analyze and respond to over the Draft EIR/EIS argument in support of the Pacheco Pass offering greater ridership / revenue than the Altamont Pass. For instance, the trip between Sacramento and San Francisco via the Altamont Pass on an express train would take 59 minutes, whereas the same trip via the Pacheco Pass would take 1 hour and 40 minutes.[8] However, according to the June 2000 Final Business Plan's Timetables, a trip from Sacramento to San Francisco would take 1 hour and 45 minutes on the 9 daily semi-express service level and 2 hours and 20 minutes on the other 9 daily trains running at local service level. The timetables do not even include an express train. This is just one example of a discrepancy between these two documents, making the reader question which time they should believe.

That the Pacheco Pass would offer more frequent train service to San Jose does not necessarily qualify the corridor for attracting the greatest ridership / revenue, as the Draft EIR/EIS argument does not consider all aspects of this topic. For instance, a person traveling from Los Angeles to San Francisco via a high-speed rail line would be choosing between an airplane and automobile as his/her mode of transportation. The additional 10 minutes that the Altamont Pass would take on an express train becomes almost irrelevant when comparing the time it would take one to travel this distance in a car or aircraft. However, the fact that the Pacheco Pass would take 40 minutes longer on an express train to arrive in San Francisco from Sacramento than the Altamont would have significant impacts on whether a person chooses to travel by automobile or high-speed rail. While Amtrak's Capital Corridor from the Sacramento region to the East Bay is

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seeing a rise in ridership, the conventional train is still not competitive enough with the automobile because of schedule irregularity and fare prices. This increased interest in finding an alternative mode of transit, however, is evidence that there is a growing community of rail commuters, and possibly a strong potential ridership for a high-speed train.

The June 2000 Final Business Plan states that 14% of the current intercity travel by geographic market in California consists of trips between Sacramento and San Francisco. However, only 12% of the current intercity travel by geographic market is made up of trips from Los Angeles to San Francisco in the State. According to Mapquest.com, it should take 1 hour and 26 minutes to travel in an automobile from Sacramento to San Francisco; however, I-80's typical traffic conditions usually make this trip closer to 2 hours. A high-speed rail line via the Altamont Pass would make this trip significantly shorter at 59 minutes, while a 1 hour and 40 minute trip via the Pacheco Pass would have more difficulties competing with the automobile. With the proposal of the Pacheco Pass, the people of the Sacramento region would continue to face severe delays on Interstates 80, 580, and 680 as a result. Interstate 580 between the Bay Area and Stockton is projected to increase its average daily volume of vehicles by 60% between the years of 2000 and 2020.[26]

I118-1 cont.

Table 2-3: Traffic Volumes in 2000 and 2020 at Pacheco Pass and Altamont Pass

Major Highways	Average Daily Volume 2000	Average Daily Volume 2020	% Change 2000-2020
US 101 just south of San Jose	232,000	320,000	38%
I-580 between Bay Area & Stockton (at Pleasanton)	188,000	300,000	60%

The population density in each of the areas that the rail corridors pass through is an aspect of ridership / revenue that the Draft EIR/EIS seems to ignore. The region containing the Altamont Pass maintains a much greater population than the Pacheco Pass does. The populations of Tracy and Pleasanton, the two cities where the proposed stations are located on the Altamont Pass, total about 120,000 (Table 2-4).[27]

Table 2-4: Population Densities for Proposed Stations on Pacheco Pass[27]

HSR Proposed Stations	Population
Gilroy	41,464
Los Banos	< 25,000
Morgan Hill	33,556
Total	**< 100,020**

The populations of Gilroy, Los Banos, and Morgan Hill – the three cities where the proposed stations are located for the Pacheco Pass, total under 100,000 (Table 2-5).[27] These figures do not

reflect the other cities along the Altamont Pass whose populations far outnumber those near the Los Banos segment of the Pacheco Pass.

Table 2-5: Population Densities for Proposed Stations on Altamont Pass

HSR Proposed Stations	Population
Tracy	56,929
Pleasanton	63,654
Total	**120,583**

Ridership / Revenue	
Draft EIR/EIS Argument for the Removal of Altamont Pass Option	**Analysis and Response to Draft EIR/EIS Argument**
Improvements to the existing commuter rail service, the Altamont Commuter Express (ACE), would be a better way to serve Central Valley / Bay Area commuters	An express trip between Sacramento and San Francisco via the Altamont Pass would take 59 minutes, whereas the same trip via the Pacheco Pass would take 1 hour and 40 minutes
A route via the Pacheco Pass would provide more frequent and efficient service to the major Bay Area markets than the Altamont Pass would	The additional 40 minutes that the Pacheco Pass would take to arrive in San Francisco from Sacramento might sway whether a person chooses to travel by auto or by high-speed rail
The Pacheco's higher frequency of service and faster travel times between San Jose and southern California, forecast the route to have higher ridership and revenue potential	Freeway congestion in the Sacramento region, densely populated cities in the East Bay, and increased use of Amtrak's Capital Corridor could attract large ridership for the Altamont

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2.3 Environment

The Draft EIR/EIS notes that environmental impacts of the Altamont Pass are too great to consider it an alternative corridor. The strongest of these potential environmental impacts include the building of a new Bay crossing near the existing Dumbarton rail bridge. The HSRA believes that the potential environmental and economic costs would be too great to construct a new bridge across the San Francisco Bay.[8] They also argue that a new Bay crossing would impact sensitive wetlands, saltwater marshes, and aquatic habitat within and surrounding Don Edwards San Francisco Bay National Wildlife Refuge, and would require costly mitigation measures to replace or restore wetlands potentially impacted, directly or indirectly, by a new bridge.[8] The Bay Conservation and Development Commission (BCDC) has also discouraged any new or expanded use of Bay waters or shoreline habitat important to sensitive Bay species. The potential for project delays and increased costs were considerable factors in the review of the Altamont Pass option.[8]

Analysis

But even Bay Area environmental groups that oppose any new or expanding development across the Bay are not opposed to further analysis being done on the Altamont Pass to be included in the Final EIR/EIS. The BCDC, for instance, as well as other environmental groups concerned about the potential Bay crossing, indicated at a meeting in the Authority Chair's office on April 8, 2004, that they have no objections to a study of the Altamont Pass alternative.[13] A proposed segment of the line from San Jose to Oakland would cross the same Wildlife Refuge via the Mulford line, yet this route was not eliminated as a possible line on the Pacheco Pass. The environmental impacts of the Diablo Pass through Henry Coe State Park have been of much more concern to environmental organizations, yet the Diablo Pass was still studied as the only other possible corridor option from the Bay Area to the Central Valley to the Pacheco Pass. That the Bay crossing segment of the Altamont Pass would have environmental impacts is no reason to rule it out as an alternative.

Other environmental impacts involve the operation of the Pacheco Pass. Low-density areas such as Los Banos on the Pacheco Pass could be excellent candidates for sprawl if a high-speed rail line was to be built there. Despite plans for Transit-Oriented-Development around these high-speed rail stations near the less population region lining Highway 152, there is great potential for induced growth. Additionally, the San Felipe Lake on the Pacheco Pass is an area that the Audubon Society has listed as an Important Bird Area, as it is a critical habitat for many local and migratory bird species.[28] There is concern amongst many environmental groups – including the Nature Conservancy, Planning and Conservation League Foundation, and Audubon Society of Santa Clara, over any decisions made from the current Draft EIR/EIS.[15]

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Environment

Draft EIR/EIS Argument for the Removal of Altamont Pass Option	Analysis and Response to Draft EIR/EIS Argument
The strongest environmental impact of the Altamont Pass is the building of a new Bay crossing near the existing Dumbarton rail bridge	The environmental impacts of the Diablo Pass through Henry Coe State Park have been of greater focus to environmental organizations than the potential impacts of the Altamont Pass
A new Bay crossing would impact sensitive wetlands, saltwater marshes, and aquatic habitat within and surrounding Don Edwards San Francisco Bay National Wildlife Refuge	A proposed segment of the line from San Jose to Oakland would cross the same Wildlife Refuge via the Mulford line
The Bay Conservation and Development Commission (BCDC) has discouraged any new or expanded use of Bay waters or shoreline habitat important to sensitive Bay species	The BCDC indicated at a meeting in the HSRA Chair's office on April 8, 2004, that they have no objections to a study of the Altamont Pass alternative
In defense of the Pacheco Pass, there are plans for Transit-Oriented-Development around the proposed station locations in Los Banos, Gilroy, and Morgan Hill	The low-density cities in the eastern segment of the Pacheco Pass are candidates for induced growth, and could potential harm local and migratory bird habitat

I118-1 cont.

2.4 Conclusions

The Draft EIR/EIS central argument for the elimination of the Altamont Pass is that this corridor would have to split in three different directions (versus the Pacheco's two) in order to serve San Jose, San Francisco, and Oakland; consequently, it would not be able to run the highest frequency of service to these major Bay Area markets. To counter this argument, the most critical fact to note is that high-speed trains would not even be in operation to Oakland by the year 2020 because it is not part of the initial Phase I construction; however, this metropolitan area might be better served with the Altamont Pass, as the BART system would connect at the Newark/Freemont and Dublin/Pleasanton stations. While the HSRA believes that a new Bay crossing would impact sensitive wetlands surrounding Don Edwards San Francisco Bay National Wildlife Refuge, there are far too many other environmental consequences on both the Pacheco and Diablo Passes to consider this a factor of elimination as a possible rail corridor. Moreover, further analysis of the Altamont Pass is the only way to accurately assess whether the Pacheco or Altamont corridors would best meet the needs of connectivity / accessibility, ridership / revenue, and the environment.

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3. THE DEBATE

This section of the report looks at nineteen various environmental groups, transit advocacy organizations, special districts , and county and state politicians in order to gain a better understanding of how these organizations have responded to the elimination of the Altamont Pass as an optional corridor from the California High-Speed Train Draft EIR/EIS. An examination of newspaper articles, periodicals, letters, websites, and interviews has led to an analysis of how these organizations position themselves in this controversy. Conveyed are publicly or privately voiced answers and explanations to the questions: "Should the Altamont Pass have further analysis in the Draft EIR/EIS?" and "Does this organization support the Altamont or Pacheco Pass?" (Table 3-1). More details about the positions of these organizations are included in the Appendix.

3.1 Position on Altamont vs. Pacheco Debate: Environmental & Transit Advocacy Groups, Special Districts, and Government Officials

Regardless of which rail corridor is preferred, every environmental organization examined believes that the Altamont Pass should have further analysis in the Draft EIR/EIS. The Bay Conservation and Development Commission, Coastal Conservancy, and Save the Bay all indicated at an April 8, 2004 meeting in the Authority Chair's office that they do not oppose further analysis of the Altamont Pass alternative, because the Diablo Pass could have even greater environmental impacts.[15] The Loma Prieta Chapter of the Sierra Club believes that the HSRA had no legal authority to eliminate the Altamont corridor option from the CEQA process, and that further analysis is necessary to make a proper alignment preference.[18] The Advocates for Coe Park believe that the High-speed Rail Authority has broken state environmental laws by not including a study of the once-favored Altamont Pass alternative in the project EIR.[13] The Planning and Conservation League Foundation note that one positive reason for fully studying the Altamont Pass is that approximately 1 million more people live along this route, so it will serve existing population and development, rather than creating new sprawl in the Los Banos/Merced County area.[19]

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Similarly to the environmental groups, transit advocacy organizations also all agreed that the Altamont Pass should be studied in more depth and included as an alternative in the Final EIR/EIS. Transportation Involves Everyone is a transportation planning advocacy group that has urged federal regulators to halt the advancement of this high-speed rail project until the Altamont route has been fully studied.[22] Architecture 21 believes that the more communities that receive service in the first phase of the project, the greater the number of people who will support the project and vote for the bond.[24] The Train Riders Association of California Organization support high-speed rail, but not the exclusion of the Altamont alignment into the Bay Area.[17] The High-Speed Rail Watch Committee is firmly opposed not only to a rail route that would go through Henry Coe State Park, but one that avoids the Altamont altogether; consequently, they recommend that the Draft EIR/EIS be revised and re-circulated for another public comment cycle prior to any bonding vote.[15]

Special districts in the State break this pattern, however, as not all of them agree that the Altamont Pass necessarily needs to be studied further. The Santa Clara Valley Transportation Authority's Chair, Don Gage, has discussed the high-speed rail project with legislators because he would like to see it come though the Pacheco Pass route.[14] The Board of Directors of the Metropolitan Transportation Committee (MTC) maintains its preference for the Pacheco Pass alternative despite hearing arguments for the Altamont Pass.[8] The Bay Area Air Quality Management District supports the decision of the MTC, their "sister agency," that the Pacheco Pass would best meet the needs of the Bay Area's transportation and air quality problems.[29] On the contrary, the Sacramento Metropolitan Air Quality Management District strongly recommends that the Final EIR/EIS includes the Altamont Pass alternative, and that it analyzes all three of the corridors more comprehensively before dismissing any of them.[21] The Sacramento Area Council of Governments (SACOG) believes that the ridership potential in the Sacramento area may have been underestimated by the HSRA consultants and the Board is urging that the ridership projections be re-evaluated; furthermore, SACOG recommends the Diablo Range Direct alternative if the HSRA does not re-consider and choose the Altamont Pass.[20]

Government officials on the city, county, and state levels have also given their opinions on this debate. Darrell Steinberg, D-Sacramento, of the California State Assembly has urged the HSRA to consider the I-580 corridor through the Altamont Pass as a possible route for the trains between the San Francisco Bay Area and the Central Valley.[14] Scott Haggerty, Supervisor for Alameda County, failed to convince his colleagues on the Metropolitan Transportation Commission to urge a full study of the Altamont, noting that this corridor would ease congestion on I-580. [22] Roger Dickinson, District One Supervisor for Sacramento County, strongly favors the Altamont Pass alignment and notes that the Sacramento-Bay Area corridor is the third most heavily used in the United States.[23] Rudy Trevino, Mayor of Atwater, questions why the HSRA reversed findings of its predecessor agency, which concluded the Altamont route was best; moreover, he has also stated that he would be a vocal ally for the Altamont Pass, even if the results don't change. [22]

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Table 3-1: Organizations' Positions on the Altamont Pass vs. Pacheco Pass Debate

Contact & Information Source	Organization	"Should Altamont Pass have further analysis in Draft EIR/EIS?"	Supporting Reason	"Does this organization support the Altamont or Pacheco Pass?"	Why?
	Bay Conservation and Development Commission	Yes	No Comment	Pacheco	Discourage any new or expanded line over the Bay
	Coastal Conservancy	Yes	No Comment	No Formal Preference	Discourage any new or expanded line over the Bay

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	Save the Bay	Yes	No Comment	No Formal Preference	Discourage any new or expanded rail line over the Bay
Melissa Hippard, Chapter Director	Sierra Club Loma Prieta Chapter	Yes	Environmental, Ridership, Right-Of-Way; incompatible with CEQA laws	No Formal Preference	EIR Needs Further Analysis
	Advocates for Coe Park	Yes	Environmental, Ridership; incompatible with CEQA laws	Pacheco	Focus is on protecting Henry Coe State Park; do not want Diablo route
Eddy Moore, Senior Project Manger	Planning and Conservation League Foundation	Yes	Environmental; incompatible with CEQA laws	No Formal Preference	EIR Needs Further Analysis
Ken Gosting, Executive Director	Transportation Involves Everyone	Yes	Ridership, Environment	Altamont	Ease I-580 congestion
Michael Kiesling, Director	Architecture 21	Yes	Environmental, Ridership	Altamont	Ease Congestion on I-80/580/680 and won't induce sprawl near Highway 152
Alan Miller, Executive Director	Train Riders Association of California	Yes	Environmental, Ridership, Right-of-Way, Accessibility, Cost	Altamont	Ease Congestion on I-80/580/680 and won't induce sprawl near Highway 152
Patrick Moore, Chair	High-Speed Rail Watch Committee	Yes	Environmental	Altamont	Ease Congestion on I-80/580/680 and won't induce sprawl near Highway 152
Don Gage, Office of the Board Secretary	Santa Clara Valley Transportation Authority	No Comment		Pacheco	Maximize Service to San Jose

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	Metropolitan Transportation Commission	No Comment		Pacheco	Maximizes Service to San Jose
Suzanne Bourguignon, Environmental Planner	Bay Area Air Quality Management District	No Comment		Pacheco	Wants to Coincide with MTC
Larry Greene, Air Pollution Control Officer	Sacramento Metropolitan Air Quality Management District	Yes	Environmental, Ridership, incompatible with CEQA laws	No Formal Preference	EIR Needs Further Analysis
Martin Tuttle, Executive Director	Sacramento Area Council of Government	Yes	Environmental	Altamont	Most Efficient Route from Sacramento to Bay Area
Darrell Steinberg, D-Sacramento	California State Assembly	Yes	Environmental, Accessibility, Ridership, Cost	Altamont	Ease Congestion on I-80/580/680 and won't induce sprawl near Highway 152
Scott Haggerty, Supervisor	County of Alameda	Yes	Ridership, Environment	Altamont	Ease I-580 congestion
Roger Dickinson, Supervisor for District One	County of Sacramento	No Comment	Ridership	Altamont	Ease Congestion on I-80/580/680
Rudy Trevino, Mayor	City of Atwater	Yes	Ridership	Altamont	Ease Congestion on I-80/580/680

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