

Comment Letter 0049 Continued

Principles for Making Transit Compete

- To succeed, passenger transport must emulate the qualities associated with the auto:
 - Frequency
 - Reliability
 - Speed
 - Convenience
 - Ease of Use



A note about modes

- Much time is wasted in the debate about bus or rail: both are needed, and it depends on setting.
- If goal is development impact, developers want competitive travel time, identifiable station, high quality design.

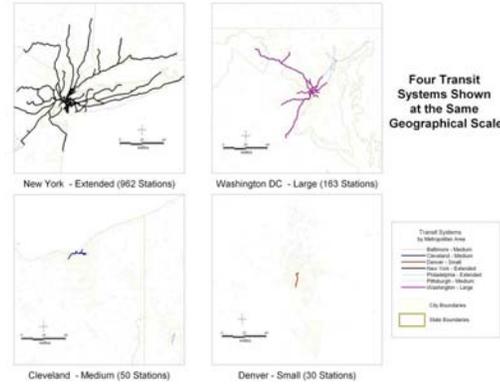


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Transit Modes and Applications

Mode	Application & Setting	Station Spacing	Technology	Examples
Rail Rapid Transit: Fully grade separated up to 80 mph	High density corridors	1/2 mile 1 mile	Electric	MARTA in Atlanta, BART in Bay Area, CTA, Washington Metro
Ferry Overwater transit 25-40 knots	Crossing river, Bay	Usually two stations	Diesel, wave jet	Golden Gate Ferry; Washington State Ferry
Commuter Rail Rail locomotive, rail ROW, up to 100 mph	Suburb to center city	Limited stations, collection & distribution downtown	Diesel, Electric, Dual Mode	SEPTA, Philadelphia METRA, Chicago Caltrain, SF Bay Area
Light Rail Self propelled rail car in both segregated right of way and street running.	Wide variety of applications: urban to suburban	Short to Long: 1 mile to 1.4 mile	Electric, DMU	Sacramento Portland Salt Lake City Boston green line
Streetcar/Tram Self-propelled car running in street, both modern and vintage	Downtown, urban circulators	Block to block	Electric	Portland Streetcar F Line San Francisco Memphis
Bus Rapid Transit Rubber-tired vehicles on fixed routes with exclusive land or separated roadway (busway)	Less dense environments, urban to suburban, may be a building block to rail	Limited stations, short to long	Diesel, Natural Gas	Brisbane Pittsburgh Silverline, Boston
Bus Transit Rubber tired vehicles operating on fixed routes in mixed traffic	All settings, as workhorse of transit : connection to rail or BRT, local transportation	Frequent	Diesel, Natural Gas Buses	Most cities
Paratransit Small vans operating on a demand responsive basis, often for specialized services	Suburban or rural environments, or for specialized transportation	On-demand	Vans	Most cities

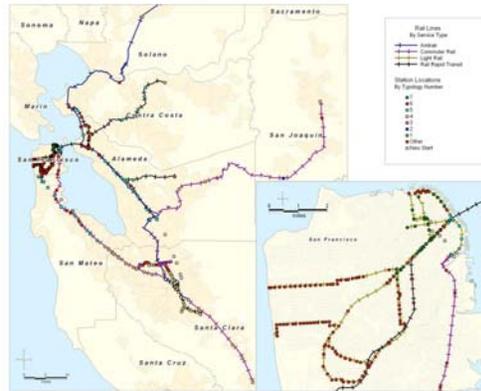
Network Coverage is Key



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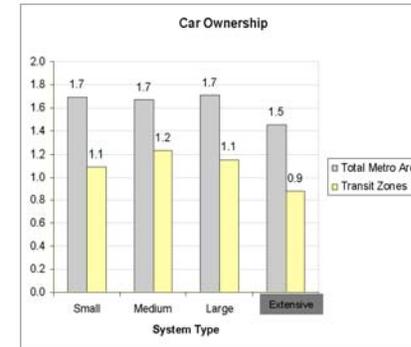
The Bay Area Exceeds the National Average in Clustering Population Near Transit

- Nation: 12 % of the Population in Metro regions live in Transit Zones
- Nation: 14 million persons; 6 million households
- Bay Area: 17% of the population, or close to 1 million people; over 422,000 households.



Car Ownership Rates are Lower in Transit Zones in regions with more extensive transit networks

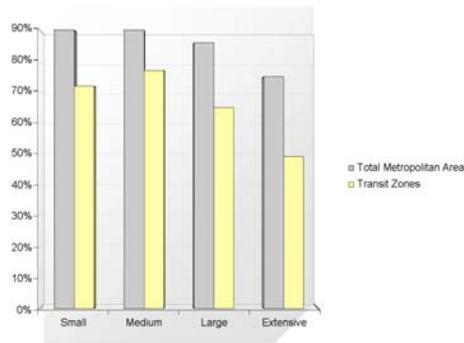
- Nationally: Residents within a 1/2 mile of fixed guideway transit own an average of 0.9 cars, compared to 1.6 cars/household for Metro regions
- Bay Area: Comparable to national standards: 1.3 vs. 1.7 cars/household for region as a whole.



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Transit Zones Have Fewer Residents Commuting by Car, particularly in regions with extensive transit networks

- Nationally: 54 percent of Transit Zone residents commute to work by car, as compared to 83 percent in the metro-regions as a whole.
- Bay Area: 62 percent of Transit Zone residents commute by car to work, compared with 82 for the region as a whole.



A Typology of TOD Places



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A Typology for TOD: Density and Service Levels



TOD Type	Land Use Mix	Minimum Housing Density	Regional Connectivity	Frequencies
Urban Downtown	Office Center Urban Entertainment Multifamily Housing Retail	>60 units/acre	High Hub of Radial System	<10 minutes
Urban Neighborhood	Retail Class B Commercial	>20 units per acre	Medium Access to Downtown Subregional Circulation	10 minutes peak 20 minutes offpeak
Suburban Center	Primary Office Center Urban Entertainment Multifamily Housing Retail	>50 units/per acre	High Access to Downtown Subregional Hub	10 minutes peak 10-15 offpeak
Suburban Neighborhood	Residential Neighborhood Retail Local Office	>12 units/acre	Medium Access to Suburban Centers and Access to Downtown	20 minutes peak 30 minutes offpeak
Neighborhood Transit Zone	Residential Neighborhood Retail	>7 units/acre	Low Access to a Center	25-30 minutes Demand Responsive

Creating a policy for conditioning transit funding on transit-supportive land uses

- Task 1: Project Start-Up
- Task 2: Literature Review (CTOD and GB Arrington of PB)
- Task 3: Regional Analysis of the Potential for TOD
- Task 4: Bay Area TOD Opportunities
- Task 5: Develop Regional TOD Policy
- Task 6: Case Studies
- Task 7: Final Report

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Findings from the Literature Review

- The Question: What is the State of the Practice in linking land use to transportation investment decisions?
- Three Types of Approaches:
 - Leveraging Land Use for Transportation Investments
 - Gradually Re-Shaping Land Use for Transportation
 - Conditioning Project Funding on Land Use Activities



Leveraging Land Use for Transportation Investments

- Examples:
 - Federal New Starts Land Use Criteria (Existing and Proposed)
 - Portland's Westside Light Rail
 - BART System Expansion Policy (Val Menotti to present)
 - Bypass and Interchange Management



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Example: Federal New Starts Land Use Criteria (Existing)

- Land use is one of three factors (user benefit and strength of local financial commitment are others)
- For a project to advance it needs a combined rating of "medium"
- Land use = concentrations of population and employment + supportive local and regional policies.
- Given strong competition for FTA \$\$, communities seek to maximize strategies that concentrate development around transit stations to "seek an edge in the rating program"

Example: Federal New Starts Land Use Criteria (Proposed Revision – ULI)

- Raise the bar, encourage "high" ratings
- Get land use considerations incorporated into the process earlier
- Develop a threshold or pass/fail criteria, as with User Benefit and strength of local financial plan.

FTA / ULI New Starts Panel

Recommendations for Weighting Land Use

- 20 points: Existing Land Use (max 33 points)
- 65 points: Plans & Policies (max 33 points)
 - Regional 10 points
 - Corridor 15 points
 - Zoning 20 points
 - Incentives 20 points
- 15 points: Performance (max 33 points)

ULI Panel Recommended Land Use Thresholds

- Late P.E.
 - Jurisdictional IGAs / MOUs covering 50% corridor population
 - PASS/FAIL 1st/2nd
- Final Design
 - Adopt interim or final codes
 - PASS/FAIL 1st/2nd
- Full Funding Grant Agreement (FFGA)
 - Adopt final codes before FFGA approval
 - PASS/FAIL 1st/2nd

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Gradually Re-Shaping Land Use for Transportation

■ Examples:

- Atlanta Livable Communities Initiative
- Chicago RTA's Regional Technical Assistance Program
- State of Maryland's Priority Funding Areas Act

■ Findings:

- Atlanta and Chicago are like MTC's TLC Program
- State of Maryland is different than either the State of California or the Bay Area



Conditioning Project Funding on Land Use Activities

■ Examples:

- VTA Community Design and Transportation Program
 - Chris Augustine to present
- Portland METRO TOD Implementation Program
 - Federal Transportation Funds are directly invested in TOD projects
- New York Number 7 Line
 - Linking rezoning to transit project construction
- Portland Airport MAX
 - Public/Private Partnership to Build Airport LRT extension
- Portland Streetcar

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Example: Portland Streetcar to the Pearl District

- Streetcar investment used to catalyze redevelopment of 90 block abandoned warehouse district/brownfield
- Streetcar began service in 2001 and runs 2.4 miles through Downtown and into the Pearl District
- Ridership is over 5,000 daily
- Allocation of public funds linked to "upzoning" (from 15 du/ac to 131 du/ac)
- 1,300 new housing units in 2000 and up to 5,500 units (10,000 residents), 21,000 jobs and 1m. S.F. retail
- Affordable housing, urban parks, and streetscape/utility improvements exacted from developer.



Conclusions: Implications for the Bay Area

- **Flexibility and Local Control is Important:** How can the agency set performance criteria in a manner that meets its own ridership, livability, and cost effectiveness goals, yet allow local jurisdictions the flexibility to address land use issues in their one way?
- **Don't Create a Burdensome System:** Nest the effort local jurisdictions must undertake inside current MTC processes and link with existing programs by local transit agencies (e.g. BART and VTA)
- **Tie Expectations to Reality:** Set benchmarks for performance (planning, regulation and development) to what local governments (and the market) can realistically provide at different stages in the process.
- **Threshold or Rating System:** Simply setting a pass/fail requirement tends to deliver the lowest common denominator. A performance-based system rewards excellence.
- **Think About the Long Term:** Politics and markets change over time. While the policy needs to be sensitive to change, expectations for performance ought to be evaluated once the transportation investment is made.
- **What is a Sufficient Measure?:** How to include both the density/ridership expectations and the place-making elements that allow TOD to work.

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Palmdale On Board With High-Speed Rail Plan

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Los Angeles Times - latimes.com

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Hi, eddymoore August 9, 2004

Palmdale On Board With High-Speed Rail Plan
The pro-development city has spent \$500,000 on efforts to be part of the 700-m

By Jia-Rui Chong, Times Staff Writer

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- Steve Lopez

Up and down the state, people have complained that they don't want the planned bullet train from San Diego to Sacramento thundering through their communities.

But not in Palmdale.



The Antelope Valley city has spent more than half a million dollars on lawyers, public relations specialists, and economic and geological studies to persuade state officials to bring the high-speed trains its way.

"Quite frankly, we're prepared to go further to win the alignment," said Palmdale Mayor James C. Ledford Jr.

Residents near other stretches of the proposed 700-mile route — in Silicon Valley and near Stockton, for example — have complained to the California High-Speed Rail Authority that they don't want 220-mph trains with horns blaring barreling through their neighborhoods.

No one voiced any such concerns about the proposed Antelope Valley

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Palmdale On Board With High-Speed Rail Plan

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route — one of two paths being considered in the region — at the most recent public hearing in Los Angeles in June.

Officials in pro-growth Palmdale believe the train would bring an influx of business people to work in new office complexes and would thrill commuters who could zip home to Palmdale from downtown Los Angeles in 20 minutes.

Violet Talavera's story is typical of many Palmdale residents. Talavera, an accountant, moved to the city 10 years ago to escape city life but hated the 1 1/2 -hour drive to Los Angeles.

"When I want to go below, I don't want to drive," she said. "That's part of the reason my own business here, so I wouldn't have to commute."

In addition to the convenience of a train, Talavera believes it would spur development here gain more clients. "The more houses are built, the more business we'll have."

Palmdale, with 130,000 residents, occupies about 65,000 sparsely developed acre Mojave Desert in northern Los Angeles County.

Since the Antelope Valley Freeway opened in the 1960s, the town has been friendly developers. Luxury homes in gated communities with names such as "Pacific Rer big-box shopping plazas with espresso cafes seem to spring up every few months. vehicles with Harry Potter stickers and shiny trucks with vanity plates dominate the pothole-free roads.

But the Antelope Valley is the fastest growing part of Los Angeles County, and it chokes freeways for hours in the morning and evening. Palmdale officials believe a train would help relieve the congestion.

California began work 11 years ago on the high-speed rail link, which would whip from Los Angeles to San Francisco in 2 1/2 hours, and has spent \$30 million on the bond to pay for the first phase of the \$37-billion project — the leg from Los Angeles to San Francisco — is slated for the ballot in fall 2006. Extensions to San Diego and Sacramento follow. It would be decades before passengers could climb on board.

For the trip between Bakersfield and Los Angeles, rail authority board members are considering two paths through the Tehachapi Mountains. The straightest route would Golden State Freeway along the Grapevine. The alternate route would hook east into Antelope Valley, adding about 40 miles and 10 minutes to the trip.

The staff hopes to recommend a route by year's end.

A Palmdale representative has attended every meeting since the high-speed rail effort in the last 12 months, the city has stepped up its campaign.

In presentations before the rail board, environmental and geological consultants here Palmdale have argued that the Golden State Freeway route would cost more and be built because the rock there is weak and the tunnels would have to be stabilized.

Su

Palmdale On Board With High-Speed Rail Plan

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Marketplace

The city also brought in a smart-growth expert who testified that without a transit railroad between Los Angeles and Bakersfield, Bakersfield would become like a suburb of Los Angeles, and suburban sprawl would replace rich agricultural land. A Palmdale spokesman argued, would encourage growth in a place that is better suited for development.

At the June public hearing in Los Angeles, rail authority Executive Director Mehner said with a laugh: "I think we've had more help from the city of Palmdale than any other city in the state."

"Whether we wanted it or not," quipped board member Ron Diridon.

The city's high-priced efforts appear to be paying off.

Palmdale has garnered support for the Antelope Valley route from the county's Metropolitan Transportation Authority, several congressmen, and cities including Los Angeles and Chowchilla.

Some rail board members have called Palmdale's presentations "very impressive."

It wasn't always that way.

"The authority had a strong bias for the Grapevine alignment," said Stephen H. W. Palmdale's assistant city manager. "I believe it was based on information that was well researched. We have provided that research and background."

The city, which has a \$40-million annual budget, has paid for its campaign with sales taxes earmarked for public transit.

"If it's a sure thing, \$500,000 will be insignificant compared to the benefit we would get from John Brooks, a transportation analyst for the city who has books on lobbying such as "Yes" on his office shelf.

Even opponents of the Palmdale route call the city's tenacity "brilliant."

Alan C. Miller, executive director of the Train Riders Assn. of California, a Sacramento group that monitors intercity train projects, said he did not agree with all of the Palmdale researchers' findings. But he said he admired the thorough and upfront approach of the city.

"They're definitely convincing a lot of people that Palmdale is the way to go," Miller said. "That's probably why they keep spending money."

Palmdale officials see high-speed rail as part of an ambitious makeover that will transform the city to other parts of Southern California.

The city has lobbied for an east-west freeway to Victorville and a magnetic levitation rail could connect the city to Los Angeles.

The city has already cleared land for a \$10-million station on the Metrolink corridor between Acton and Lancaster. Expected to open next year, it will also serve as a station for taxis, bicycles and a tram to Palmdale Airport. The bullet train, if it's routed through the station, may also pull into this station, or it may run through Palmdale Airport.

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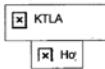
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Palmdale On Board With High-Speed Rail Plan

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- More Classifieds
- Place an Ad
- Newspaper Ads
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Palmdale officials said they have encountered little resistance to a high-speed rail city is so pro-development that it voted overwhelmingly about two years ago to allow hangar-sized Super Wal-Mart to be built even though, at that time, there was already a sized Wal-Mart.

Marta Williamson, 57, who lives near the site of the new Metrolink station, is one of few opponents.

She worries that city officials might seize homes in her neighborhood or that private might take over. In her neighborhood, once known as "Tortilla Flats" because it was an area in which people of color were allowed to live, 40% of residents have a low income, she said.

"They want to build an all new city here," Williamson said. "They want big industrial bucks, even if they have to squash people to get it and destroy an area with historical value."

Jose A. Rodriguez, a retired construction worker who was recently shopping at the Valley Mall, said he hoped the rail link would be built, but he shared Williamson's concerns about the urbanization of Palmdale.

If a high-speed rail stop brings high-rise apartments and lots of strangers coming to the area, Rodriguez said, "I'm going to move someplace else."

Mayor Ledford said that Palmdale officials, knowing many of its residents would move to escape the crowds, would do a careful job of planning.

"There's good growth and bad growth," he said. "We're not going to be another Silicon Valley."

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Published April 2, 2004, in the New York Times

Bullet Train Remakes Map of South Korea

By James Brooke

PUSAN, South Korea, April 1 -- Speeding through patchwork landscapes of rice paddies and 20-story apartment buildings, a fleet of blue and gray bullet trains made South Korea decidedly smaller on Thursday.

With sleek new French-designed trains hitting 185 miles an hour, 100 miles an hour faster than older trains here, the new service is already reworking the face of this nation, prompting airlines to cut scores of domestic flights and **sending real estate prices soaring in backwaters suddenly seen as future suburbs of Seoul**, a capital with Tokyo-level apartment prices.

On the world stage, the bullet trains herald South Korea's coming of age. The next generation of high-speed locomotives under development here is called G7, a clear nod to Korea's ambition to join the Group of Seven industrialized nations.

"Following Japan, France, Germany and Spain, we have become the fifth country to run a high-speed train," the acting president, Goh Kun, said on Tuesday at an inauguration ceremony for the service at Seoul Station. This newly rebuilt terminal of soaring steel and sunlit glass is part of a five-year, \$1 billion program to build 12 bullet train stations. When the network is complete, in 2010, the 18-year project is expected to have cost about \$17 billion, the largest civil engineering undertaking in Korean history.

High-speed rail, for 40 years a Japanese preserve, is spreading in middle-class Asia as a glut of vehicles slows traffic. In October, Taiwan is to inaugurate a Japanese-built, 210-mile bullet train between Taipei and the southern port of Kaohsiung. By year's end, China is expected to choose a foreign partner to help build an 807-mile high-speed link between Beijing and Shanghai, which could cost \$12 billion by 2008. One bidder is Alstom, the French company that provided most of the technology for South Korea's new train.

The new era for South Korea began on Thursday with the start of high-speed service on the first three-quarters of the 253-mile distance from Seoul to here.

In 1970, South Korea showed its industrial ambitions with its first



U.S. Department of Transportation
Federal Railroad Administration

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limited-access highway, along the same corridor. But in South Korea, where 48 million people live in an area the size of Indiana, traffic jams now cost the economy about \$20 billion a year, largely in lost working hours. While South Korea is renowned for having nearly universal high-speed Internet access, highway speeds can be torturous.

"You can't tell how long it will take to drive -- four to six hours minimum," Lee Sook Jeong, a 24-year-old student who hopes to teach English, said of the drive from Seoul to Pusan, her hometown. Relaxing on Thursday in an airplane-style seat on the ride of 2 hours and 40 minutes, she said, "This fast train is cheaper and it's better than planes."

South Korea's goal is to become a business and logistics hub for northeastern Asia. A crucial part of this vision is the high-speed train, officially called Korea Train Express, or KTX. South Korea, the world's fourth-largest oil importer, has high gasoline prices, because all its oil is imported. For the 180-mile drive to Seoul from Taegu, the nation's third-largest city, gas and tolls run \$40, while the train is just \$35.

High-speed trains could triple passenger traffic on the nation's main line, between here and Seoul, to half a million passengers daily, according to one study. And with the old tracks freed of passenger trains, rail freight to and from this port could increase sevenfold, to three million containers a year.

Korail, the state railroad operator, charges about 25 percent less for tickets than airlines do. The one-hour air hop from Seoul to Pusan may be faster -- KTX trains promise to do it in less than two hours -- but air travelers have to factor check-in time and travel time to airports.

In a rare victory in modern times for trains over planes, airlines cut 70 percent of flights from Seoul to Taegu and 21 percent of flights between Seoul and here.

To compete, Korean Air said it would cut check-in times in half and would serve hot muffins to early-morning fliers. But the future looks bleak for domestic air travel.

In contrast, Japan's Nozomi super-express trains between Tokyo and Osaka are locked in a price war with airlines. Last fall, after the Central Japan Railway Company invested \$900 million in a new Shinkansen terminal for southwestern Tokyo, Japan Airlines representatives walked through the station, distributing leaflets that read, "Dear Nozomi, I'll arrive at the destination first."

Japanese airlines have taken some market share away from bullet trains in recent years. But South Korea's domestic airports are resigned to reinventing themselves as international conduits. Last week, Kimhae Airport in Pusan announced an ambitious plan to seek as many as 72 new international flights, largely to the United States and Europe.

High-speed rail is expected to accelerate another lifestyle change in this country, long notorious for a "develop at any price" work ethic. Starting in July, South Korean companies are to shift to a five-day workweek, from five and a half.

This city, known for its beaches and islands, is forecasting a 30 percent jump in foreign tourist arrivals this year, to two million. To cater to day-trippers, sightseeing companies are shifting tours to start at the refurbished railroad station. Mokpo, another seaport that is the terminus of the other high-speed branch, is forecasting a 60 percent jump in tourists.

"When the five-day workweek is phased in, people will have more time for leisure, for long weekends," Guy Godet, general manager of the beachfront Pusan Marriott Hotel, predicted here on Thursday. Foreseeing that South Koreans will develop a taste for weekends, Korail is scheduling 122 bullet trains between here and Seoul on weekends, and 104 on weekdays.

In another shift, the high-speed trains are pushing the range of Seoul's suburbs. In Taejon, real estate prices doubled last year in anticipation of commuting times that have been cut to 49 minutes from an hour and a half.

"The high-speed railway will ease overpopulation in the metropolitan areas across the country by encouraging businesses to move to now-provincial areas," The Korea Times said in an editorial on Thursday. "It is certain to emerge as the key means of long-distance transportation, easing chronic traffic on the two main expressways and greatly cutting transport costs for business."

As real estate prices rise, urban planners predict that new service by the fleet of 46 high-speed trains will stretch Seoul into an oval-shaped megalopolis. In Japan, bullet train service has bolstered Tokyo and provincial cities where trains stopped. Greater Tokyo has a third of Japan's population, while greater Seoul has almost half of South Korea's.

The population pressure on Seoul may be eased by cheaper real estate in

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commuting range and by the government promise to move the capital to a more centrally situated city along the bullet train route.

On Thursday, despite all the balloons and celebrations, some passengers still complained. In Car 12 of the 10 a.m. nonstop from Seoul, several seat rows were facing backward, the drop-down television monitor did not show the train's progress, and there was no hot coffee.

"The seats are quite small, and for me, with a belly, it's a little uncomfortable," said Cho Sang Yoon, an amply built 38-year-old software engineer from Seoul.

BAY AREA TRANSIT ORIENTED DEVELOPMENT (TOD) STUDY

PURPOSE, KEY QUESTIONS AND STUDY APPROACH

Study Purpose

The Transit Oriented Development (TOD) Study will assess the opportunities, benefits and barriers for increased levels of TOD in the San Francisco Bay Area, and help define MTC's policies in support of Bay Area TODs. Specifically, this study will recommend policies for conditioning regional discretionary funds under MTC's control for Resolution 3434 transit expansion projects on the demonstration of supportive land use policies by local government around transit stations and along key transit corridors. This direction was adopted in principle as part of Resolution 3434 and reaffirmed in the Commission's approval of the draft five-point transportation-land use platform in December 2003. This study will play an instrumental role in defining and implementing this policy, and will be conducted in close partnership with ABAG, transit agencies, local governments and other interested stakeholders.

Key Questions and Study Approach

The following key questions will be addressed in the study:

Question 1 - How much opportunity for TOD exists in the Bay Area, what kinds of opportunities are there, and where are they? What does the best-case scenario for TOD look like regionally? What different types of opportunities for TOD are there in the region?

- *Work with ABAG to estimate the potential regional size and impact of TOD in the Bay Area. Summarize current, future and "best case TOD" conditions next to transit stations and in transit corridors in the Bay Area, including demographics, land use conditions, local policies, and transit ridership impacts. Identify types of TOD opportunities in the Bay Area by transit mode and other characteristics.*

Question 2 - What policies to support transit oriented development are being used in other areas of the country, as well as within the Bay Area?

- *Summarize regional policies to support TODs, including different regional policy approaches and incentive programs from outside the Bay Area, and relevant policies from within the region.*

Question 3 - What are the components of an effective regional policy to support TOD in the Bay Area?

- *Assess the lessons learned from other regions and from within the Bay Area.*
- *Assess the existing transportation and land use planning processes within our region, and the unique characteristics and diversity of the Bay Area.*
- *Propose policy planning approaches that more closely link regional transit investments with corresponding levels of local land use development policies.*

Question 4 - How do we test and evaluate the potential policy approaches as proposed?

- *Develop and review the proposed approach with technical advisors, policy advisors, and the public.*
- *Conduct case studies with local jurisdictions to analyze the effectiveness of the proposed policies in detail. Refine the policy approach based on partner feedback and further analysis.*
- *Refine the policies based on the feedback and findings from the case studies.*

Question 5 - What is the objective of the TOD Study?

- *Recommend policies for conditioning regional discretionary funds under MTC's control for Resolution 3434 transit expansion projects on the demonstration of supportive land use policies by local government around transit stations and along key transit corridors.*

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BAY AREA TRANSIT ORIENTED DEVELOPMENT (TOD) STUDY
PROJECT SCHEDULE (abbreviated)

Task #	Task Description	Completion Date
1	Refined project scope and schedule	June 1, 2004
2	Summary of policy approaches/ incentive programs from outside and within the Bay Area to support TODs. Lessons learned relevant to MTC policy development.	June 18, 2004
3	Analyses of land use and demographics (current, future and "best case TOD") conditions and plans proximate to transit stations/hubs/corridors <ul style="list-style-type: none"> • Population, household and employment information in the areas immediately proximate to current and future transit stations, hubs and corridors for existing, forecast future, and "Best Case TOD" scenarios • Planned land use from local General Plans proximate to transit 	August 30, 2004
4	Types of Bay Area TOD opportunities and relevance to development of policies <ul style="list-style-type: none"> • Types of Bay Area TOD opportunities, distribution of TOD opportunity types, and the relevance to the development of MTC policies. • Issues and opportunities relevant to each type of TOD opportunity, and implications for supportive regional policies. • Regional market conditions for development in transit corridors / stations of the regional "Best Case TOD" scenario. • Estimate of regional transit ridership impacts of the "Best Case TOD" 	July 30, 2004
5	Overall regional policy approaches to support matched development of land use and transportation <ul style="list-style-type: none"> • Potential policy approaches including incentives and performance measures. • Potential performance measures for minimum densities and intensities for the programming of transit expansion funds under MTC's Resolution 3434 on supportive land use policies by local jurisdictions. • Effective approaches for achieving supportive local land use policies. 	August 27, 2004
6	Case studies analyses. For each location: <ul style="list-style-type: none"> • Existing conditions and current plans, report on site tour and discussions with local planners and interests • Summaries of opportunities, including the market assessment and land use potential. • Summaries of the relative ridership estimates from TOD. • Recommended solutions or approaches to address any impediments to development of TOD • Recommending refinements to MTC's policy approach. 	April 30, 2005
7	Final Report, PowerPoint presentation, Briefing Book	June 1, 2005

Knepper

11/2/2004

Response to Comments Bay Area Open Space Council, et al., August 31, 2004 (Letter O049)**O049-1**

Please see standard response 3.15.2 and standard response 3.15.13 regarding the general level of detail in this Program EIR/EIS and the anticipated more detailed project-level, Tier 2 studies. Please see response to Comment O042-1 for more information on the purpose of the Program EIR/EIS and the subsequent studies. The co-lead agencies believe that the Program EIR/EIS contains sufficient information and analyses for the decisions made as part of this document. Please see response to Comment O064-08 in regards to suitable mitigation measures. In addition, further clarification and description of the design features of the proposed project and further discussion of proposed mitigation strategies have been added to the Final Program EIR/EIS in Chapter 3. Please see Chapter 6A and the Summary of the Final Program EIR/EIS in regards to the preferred HST alignment and station locations.

Please refer to standard response 3.15.13 in regards to the level of detail of the Program EIR/EIS process and Section 1.1 of the Final Program EIR/EIS document. The mitigation strategies described in the Final Program EIR/EIS represent mitigation menus for decision-makers to consider. Commitments to specific mitigation measure will come in decisions on the program document and in the future, more specifically as part the decisions on project-level documents, should the HST proposal move forward.

O049-2

The co-lead agencies believe the Final Program EIR/EIS meets the requirements of both CEQA and NEPA, including the Summary section. Conclusions regarding significance of impacts before and after mitigation are presented in Section 7, "Unavoidable Adverse Environmental Impacts". Tables describing the HST alignment and station choices are included as Section 6, "High-Speed Train Alignment Options Comparison". This section is a "summary chapter", which presents in table format a summary of the data

presented in Chapter 3 and in the supporting technical documents so that alignment and station comparisons can be made between the various HST design options. Given that the HST Alternative is over 700-miles long and that thousands of miles of alignment options have been investigated, it is not practical to place all the information suggested by your comments into a single "summary chapter". Section 6 is over 100 pages in length (not including the many pages of figures). The preferred HST alignments and potential station locations and the rationale behind their identification are presented in Chapter 6A of the Final Program EIR/EIS document.

O049-3

Section 2.6 of the Program EIR/EIS describes the No Project, HST, and Modal alternatives. The description of the HST Alternative includes key engineering and operations aspects and references additional technical documents. For the Final Program EIR/EIS, Section 3.18 has been added which includes a description of construction practices and discussion relating to potential construction related impacts. Potentially significant environmental impacts are addressed in Chapter 7. Chapter 3 summarizes the potential environmental impacts of the No Project, HST and Modal Alternatives. The co-lead agencies believe that the Final EIR/EIS presents sufficient information to accurately and thoroughly describe the proposed project and actions. However, it is neither necessary nor practical to include all the technical information related to the Final EIR/EIS (about 100 supporting technical reports) in the Final EIR/EIS. Please also see standard response 10.1.1 in regards to the availability of the supporting technical documents. Please also see response to Comment O043-1 and O043-2. Please see Chapter 12 of the Final Program EIR/EIS for a complete list of references including supporting technical reports.

O049-4

Please see response to Comment O043-3.

O049-5

Please see response to Comment O043-3. The co-lead agencies believe that the HST Operations description is appropriate for a program level document. Should the HST proposal move forward, more detailed operational analysis will be required as part of future project-specific studies. Please also see standard response 2.7.2 and standard response 2.7.3.

O049-6

The co-lead agencies disagree with your assessment. Please see standard response 3.15.2 and standard response 3.15.13 regarding the general level of detail in this Program EIR/EIS and the anticipated more detailed project-level, Tier 2 studies. Please see response to Comment O042-1 for more information on the purpose of the Program EIREIS and the subsequent studies. The expected scale of stations and general footprint needs are described in the "Engineering Criteria" and "Alignment Configuration and Cross Sections" technical reports (January, 2004) and are reference in Section 2.7.3 of the Final Program EIR/EIS. The analysis on public utilities (like the analysis for the resource topics) was done at a program level of detail. Further analysis of local traffic impacts and connecting transit services will be preformed in project-level environmental reviews when additional details of facilities and design and location will be known. A further evaluation of "project-related public service facilities" is beyond the scope of this program EIR/EIS process. Should the HST proposal move forward, more detailed project-level studies will be required.

O049-7

The engineering aspects of HST and the other alternatives are described at a conceptual level of detail (see Section 2.6 of the Final Program EIR/EIS). Describing "all engineering aspects of HST and the other alternatives" is beyond the scope of this program EIR/EIS process. The co-lead agencies believe that sufficient information has been provided in the Final EIR/EIS regarding to the advantages of the HST over the other alternatives (please see the Summary of the

Program EIR/EIS). A footnote has been added to the Final Program EIR/EIS documenting an appropriate source for the claim that HST would generate less runoff and has more infiltration potential than the Modal Alternative (See Section 3.15.3). Information from your comments (Attachment C) have been added to the Final Program EIR/EIS discussing the advantages of railway corridors over highways (from DeSanto and Smith 1993).

O049-8

The co-lead agencies believe that the Program EIR/EIS document fully meets the requirements of CEQA and NEPA for a program level document. The estimated costs for the HST Alternative and Modal Alternative are summarized in Section 4 of the Program EIR/EIS. Detailed cost-benefit analyses which were prepared as part of the Commission's and the Authority's feasibility studies were referenced in this program process (see Section 2.3). The preparation of a financing plan for the proposed HST system is not required for CEQA and NEPA compliance and is beyond the scope of this program EIR/EIS.

O049-9

Please see standard response 10.1.7. While the Commission discussed several phasing concepts, it made no preference or recommendation regarding the phasing of a statewide HST system. However, the Commission did determine that the links to Sacramento and San Diego were "vital to the feasibility of the project" (High-Speed Rail Summary Report and Action Plan, December 1996, page 8-28). Please also see standard response 2.13.1.

The co-lead agencies disagree with your conclusions. In the Draft Program EIR/EIS the co-lead agencies identified the HST Alternative as the preferred alternative based on a range of potential impacts derived from the various design options which were compared to the No Project and Modal alternatives. Based upon the information presented in the Draft Program EIR/EIS and comments received from agencies, organizations and the public the Authority identified a

preferred alignment and station locations which has been added to the Final Program EIR/EIS. The co-lead agencies believe that process that has been followed fully meets the requirements of CEQA and NEPA.

Please see standard response 6.3.1 in regards to the Bay Area to Central Valley portion of the HST Alternative.

0049-10

Please see response to Comment 0049-1 and response to Comment 0049-2.

0049-11

In the Final Program EIR/EIS, each environmental area (sections of Chapter 3) has been modified to include specific mitigation strategies that would be applied in general for the HST system. Each section of Chapter 3 also outlines specific design features that will be applied to the implementation of the HST system to avoid, minimize, and mitigate potential impacts. At this level of design it is premature to develop more specific mitigation measures for specific potential effects. Only once there is a more detailed analysis of the alignment and avoidance and minimization efforts have been exhausted, will specific mitigation be addressed. Also see comment 0029-4 regarding the further examination of alignment options.

Because the proposed HST system would not be operational until the year 2020, the affected environment discussions describe both the existing conditions as of 2003 and, where appropriate and not overly speculative, the anticipated 2020 conditions that would pertain when the project becomes operational. For disciplines where projections of future changes in existing conditions would be overly speculative, the existing 2003 conditions were used as a proxy for the 2020 conditions. For some disciplines—such as transportation, energy, air quality, and land use—future conditions are routinely projected in adopted regional or local planning documents or are forecast by public agencies. In these cases, the existing conditions and the projected 2020 conditions were used as the basis for impact analysis. The technical studies prepared for each region and

addressing each resource area provided key information for the preparation of the affected environment discussions.

The environmental consequences discussions describe the potential environmental impacts (both adverse and beneficial) of the Modal and HST Alternatives in comparison to the No Project Alternative and compared to each other. Each discussion begins by comparing existing conditions with 2020 No Project conditions to describe the consequences of No Project and how environmental conditions are expected to change during the timeframe required to bring the proposed HST system online. As described above, existing (2003) conditions were used as a proxy for 2020 No Project conditions where 2020 baseline information was unavailable, could not be projected, or would be overly speculative. Using 2020 No Project conditions as a basis for comparison, the analysis of impacts then addresses direct and indirect impacts for the proposed HST and Modal Alternatives, as well as potential cumulative impacts.

0049-12

Program EIR/EIS the traffic analysis has been completed at a regional level of detail based on regional modeling data. Should the HST program move forward detailed intersection level traffic analysis will be required as part of subsequent project specific analysis. Should the HST proposal move forward, the Authority and the FRA will work closely with the local governments (cities) and other stakeholders involved to ensure that adequate access improvements are identified to minimize and mitigate potential traffic impacts. Detailed traffic studies are not appropriate until more specificity is defined for proposed stations in terms of location and design during the subsequent project level studies.

In the Final Program EIR/EIS, each environmental area (sections of Chapter 3) has been modified to include mitigation strategies that would be applied in general for the HST system. Each section of Chapter 3 also outlines specific design features that will be applied to the implementation of the HST system to avoid, minimize, and mitigate potential impacts. Specific impacts and mitigations will be addressed during subsequent project level environmental review,

based on more precise information regarding location and design of the facilities proposed. The detail of engineering associated with the project level environmental analysis will allow the Authority to further investigate ways to avoid, minimize and mitigate potential impacts. Only after the alignment is refined and the facilities are fully defined through project level analysis, and avoidance and minimization efforts have been exhausted, will specific impacts and mitigation measures be addressed.

Please see comment O049-11, above, regarding the comparison of existing and future conditions.

O049-13

The detailed information necessary to conduct a quantitative construction phase analysis is not available at this stage of the project. Information such as the years of construction operations at each analysis site, the types of equipment and hours of equipment operating at each site, the location of this equipment relative to nearby sensitive land uses, the number of trucks entering, leaving, and idling near site, the mitigation measures that may be required or proposed for this project, etc. has not been specified with enough detail to conduct a quantitative analysis.

Section 3.18 of the Final Program EIR/EIS addresses construction methods and the potential for construction impacts in general. In addition, each section of Chapter 3 also outlines specific design features that will be applied to the implementation of the HST system to avoid, minimize, and mitigate potential impacts. However, construction impacts are highly site-specific in nature. Construction impacts will be addressed in detail during subsequent project level environmental review, based on more precise information regarding location and design of the facilities proposed and the phasing or sequencing of construction. The detail of engineering associated with the project level environmental analysis will allow the Authority to further investigate ways to avoid, minimize and mitigate potential impacts.

Section 3.3 of the Final Program EIR/EIS primarily addresses the potential impacts to air quality at a regional level. However, Section 3.3.1.D describes the methodology applied to assess localized impacts at this program level of analysis. Section 3.3.3 generally addresses impacts in each region of study. More detailed traffic analysis (see Response O049-12 above) completed at the project level of analysis will be necessary to support potential localized air quality impacts.

In the Final Program EIR/EIS, each environmental area (sections of Chapter 3) has been modified to include mitigation strategies that would be applied in general for the HST system. Each section of Chapter 3 also outlines specific design features that will be applied to the implementation of the HST system to avoid, minimize, and mitigate potential impacts. Specific impacts and mitigations will be addressed during subsequent project level environmental review, based on more precise information regarding location and design of the facilities proposed.

O049-14

The co-lead agencies disagree with your assessment. The Program EIR/EIS calculates both direct (Section 3.8) and indirect impacts to farmlands (Section 5). Severance impacts are discussed qualitatively in Section 3.8 but cannot be quantified at a program level of detail. Should the HST proposal move forward, more detailed project specific study will be required. Please see responses to Comment Letter O047 from the "American Farmland Trust". Please see response to Comment O064-08 in regards to suitable mitigation measures and additional information in Section 3.8.6 of the Final Program EIR/EIS.

O049-15

Section 3 of the PEIR/S programmatically evaluates the potential for direct and indirect impacts from the No Project, HST and Modal Alternative. Please see standard response 3.15.2 and standard response 3.15.13 regarding the level of analysis and the intended uses of the PEIR/s. Please also see responses to Comments O034

from the Defenders of Wildlife. Please see responses to Comments AS004 – 45 regarding the addition of a construction section and response to Comment AS004 – 46 regarding the addition of a discussion of HST support facilities to the PEIR/S. Please see standard response 3.15.7 and response to Comment O034 – 15 regarding the widths of the evaluation corridors – the evaluation “envelopes.” Please see standard response 3.15.10 regarding consideration of habitat conservation plans, natural community conservation plans (NCCP), and other approved local, regional, or state habitat conservation plans. Please see responses to Comments AF007 – 5, and AL072 – 8 and standard responses 3.15.7, and 3.15.11 regarding impacts to wetlands. Please see standard responses 3.15.2, 3.15.3, 3.15.4, 3.15.9, and 3.15.11 and response to Comments AS004 – 46, 47, 48, 49, & 51, AS012 – 7, 8, 9, 12, and 17, and O034 – 3 & 4 regarding impacts to wildlife and wildlife corridors and habitat fragmentation. Please see response to Comment AS004 – 50 regarding privately owned conservation lands. Please see response to Comment AS004 – 49 regarding EMF/EMI levels associated with the HST Alternative. Please see response AF009 – 26 regarding threatened vs. endangered species. Please see response to Comments AL072 regarding impacts to the Grassland Ecological Areas. Please see standard response 3.15.7 regarding the future evaluation that will be undertaken for the Corridor from the Central Valley to the Bay Area, including a review of Altamont Pass. Please note that the Authority has dropped the previously proposed Los Banos HST Station from further consideration. See also additional discussions of potential mitigation strategies in Chapter 3 of the Final Program EIR/EIS.

O049-16

Please see responses to Comments AL063 – 1 and 14 regarding consistency with local and regional plans. The HST Alternative description has been expanded – please see Section 2.6 of the Final PEIR/S. Please see response to O044 – 18 regarding environmental justice. Please see response to Comment O015 – 4 regarding the land use impact evaluation envelope. Please note that the Authority has dropped future consideration of the HST alignments through and

under Henry Coe State Park and the Orestimaba State Wilderness. Please see standard response 6.3.1. Please see standard response 3.15.2 and standard response 3.15.13 regarding the level of analysis and the intended uses of the PEIR/s.

Please see standard response 5.2.1 in regards to potential growth inducement. Analysis for “Land Use Planning, Communities and Neighborhoods, Property, and Environmental Justice” is summarized in Section 3.7 of the Program EIR/EIS. Section 3.7.3 “Environmental Consequences” describes the potential impacts of the HST and Modal Alternatives. Section 3.7.4 “Comparison of Alternatives by Region” provides more detailed comparisons for each region of potential land use impacts. Section 3.7.5 presents mitigation strategies for potential land use impacts. The findings of Section 3.7 are summarized in Chapter 7. The use of design practices and commitments to mitigation strategies as part of the decision on the Final Program EIR/EIS are expected to substantially mitigate most potential adverse impacts of the proposed HST system. However, demonstrating specific significant land use impacts and how mitigation measures would be applied to reduce these to less than significant is beyond the scope of this program EIR/EIS process and must be included in project-level analyses when more detailed information on specific alignment locations and design options will be available. Should the HST proposal move forward, more detailed project specific studies will be required.

O049-17

Please see standard response 5.2.1 and 5.2.5.

O049-18

Please see standard response 3.15.13. The Co-lead agencies acknowledge the importance of detailed comments regarding hydrology and water resources that are embodied in this comment. These issues will be addressed in the subsequent studies and project-level, Tier 2 studies for the selected HST alignment and station options. The Co-lead agencies believe that the level of analysis presented in the PEIR/S is sufficient to support a decision

regarding whether to advance the statewide high speed train network and to eliminate some alignment options from further consideration and identify preferred corridor alignment options. The Co-lead agencies acknowledge that information on the subjects described in this comment must be addressed in the analyses of alignment and station options that will be prepared in subsequent studies and the project-level, Tier 2 evaluations. The Co-lead agencies recognize the importance of the issues raised in this comment (and many others) requesting more detailed analysis, but believe that using the two step analysis process (outlined in standard response 3.15.13) is a reasonable, appropriate, and practical way to evaluate such a large and extensive project as a statewide high speed train network. Therefore, the Co-lead agencies acknowledge that the conceptual nature of the Alternatives makes it impossible to fully evaluate the potential for impacts on hydrology and water resources, but are satisfied that the PEIR/S provides enough information to make a decision about whether to advance the HST alternative and identification of preferred alignment and station options. While detailed environmental setting information will be necessary as part of the project-level environmental analysis, the Co-lead agencies are confident that the PEIR/S provides enough information to confirm that, all other things being equal, the proposed HST alignment would have fewer impacts on hydrology and water resources than the Modal Alternative consisting of highway and airport expansions. Mitigation measures can only be appropriately defined as part of the more detailed project-level design and environmental process.

O049-19

Please see response to Comment O064-07. Please also see response to Comment O064-08 in regards to suitable mitigation measures. Please also see Section 3.18 for a discussion of potential construction related impacts and Chapter 3 for “design practices” commitments.

O049-20

The public utilities impact analysis is programmatic and addresses only representative utilities; it does not address all utilities and does not address local details. Project-level analysis would address all utilities and local issues once the alignments and profiles, and facility designs are more defined. The detail of engineering associated with the project level environmental analysis will allow the Authority to further investigate ways to avoid, minimize and mitigate potential impacts. Should the HST proposal move forward, the Authority and the FRA will work closely with the local governments (cities) and others to avoid, minimize, and mitigate, where necessary, taking all necessary steps to ensure that there will be no disruption to service through thoughtful design and best construction practices.

Each section of Chapter 3 also outlines specific design features that will be applied to the implementation of the HST system to avoid, minimize, and mitigate potential impacts. Specific impacts and mitigations will be addressed during subsequent project level environmental review, based on more precise information regarding location and design of the facilities proposed.

Greater specificity in alignment location and profile, station designs, system access, operating plans, and control systems is also required to address the potential impacts on specific public services. These issues will be addressed during subsequent project level environmental review, based on more precise information regarding location and design of the facilities proposed (e.g., elevated, at-grade, access locations, station design features, fencing type and location, etc.). The detail of engineering associated with the project level environmental analysis will allow the Authority to identify system requirements and further investigate ways to avoid, minimize and mitigate potential affects.

O049-21

Section 3.16: Section 4(f) and 6(f) Resources has been renamed in the Final Program EIR/EIS to “Section 4(f) and 6(f) Resources (Public Parks and Recreation, Waterfowl Refuges and Historic Sites).”

It is important to note that all of the impacts associated with the HST and Modal Alternatives are potential impacts. The Authority screened a large number of different alignment options and alignment combinations throughout the state to develop the HST Alternative analyzed in the Final Program EIR/EIS. A key objective for the HST system is to avoid and/or minimize the potential impacts to cultural, park, recreational and wildlife refuges. This objective, along with others, was used to eliminate several alignment options that would have potentially affected 4(f) and 6(f) resources.

If a 4(f) or 6(f) resource is ranked as "high" that indicates that the HST or Modal centerline is within 150 feet of a 4(f) or 6(f) resource. However, given the conceptual level of engineering performed for this programmatic environmental document it is premature and would be speculative to estimate specific physical impacts based upon the location alignment options and their relationship to 4(f) and 6(f) resources in the program-level analyses. The more detailed engineering associated with the project level environmental analysis will include further investigation of ways to avoid, minimize and mitigate potential use of 4(f) and 6(f) resources, findings regarding impacts to 4(f) and 6(f) resources would be made during project-level studies when impacts from more specific alignment locations would be assessed.

A table identifying each potentially affected resource and the nature of potential impact in terms of its relative proximity to the proposed facilities for both the Modal and HST Alternatives is provided in the Final Program EIR/EIS (Appendix 3.16-A).

Please see response to Comment AS004-1 and response to Comment O051-1.

In the Final Program EIR/EIS, each environmental section of Chapter 3 has been modified to include more specific mitigation strategies that would be applied in general for the HST system and "design practices" commitments. Each section of Chapter 3 also outlines specific design features that will be applied to project level studies and the implementation of the HST system to avoid, minimize, and mitigate potential impacts. Once alignments are refined through

project-level analysis and after avoidance and minimization efforts have been exhausted, specific mitigation will be addressed.

O049-22

Please see standard response 3.17.1.

O049-23

Please see response to Comment O064-08 in regards to suitable mitigation measures. Please see Section 5, "Economic Growth and Related Impacts" in regards to potential growth inducement as a result of the HST and Modal alternatives. Please also see information added to the Final Program EIR/EIS in Chapter 3 on mitigation strategies and design practices, and Chapter 6B in regards to transit-oriented development measures.

The total cost of environmental mitigation was estimated to be 3% of the line construction costs (i.e., track, earthwork, structures, etc.) for each segment, based on other recently implemented transportation corridors in California. This cost is intended to represent the total cost associated with potential mitigation of environmental impacts such as impacts to wetlands, parkland, biological resources, and wildlife habitat. Noise mitigation with sound walls and right-of-way impact and relocation mitigation are estimated separately and thus not included in the 3% estimate. This factor is based on the average to estimate a total cost of mitigation across a system. While it does not account for potential differences between alignment options or variations along segments, it provides an overall estimate of mitigation costs consistent with other projects of this magnitude.

O049-24

The co-lead agencies believe the Final Program EIR/EIS document meets the requirements of CEQA and NEPA. Please see standard response 6.3.1. Please also see Chapter 2 of the Final Program EIR/EIS for a discussion of the process for identifying the alternatives to be addressed. The USACE and the USEPA have concurred in the identification of alternatives for analyses and all the

cooperating agencies concurred with Chapter 1, the purpose and need statement for the Final Program EIR/EIS.

O049-25

Please see standard response 2.18.1 and response to Comment O049-24.

O049-26

Please see standard response 2.18.1. Please also see response to Comment O067-23.

O049-27

Please see response to Comment O049-24, the Co-lead agencies respectfully disagree with your assessment of the Program EIR/EIS and the need for recirculation. Individuals, organizations, agencies and others that have submitted comments on the Draft Program EIR/EIS as legible addresses will receive an electronic copy of the Final Program EIR/EIS. Eddy Moore and Terrell Watt will be included on the Authority's mailing list.

Attachment A & B

Please see standard response 2.18.1 in regards to the Altamont Pass. Please see response to Comment O067-21 in regards to the ridership analysis done in support of the Authority's June 2000 Business Plan. Please see response to Comment O049-9 in regards to the phasing of the HST Alternative.

The co-lead agencies determined that the ridership and revenue forecasts done for the June 2000 Business Plan were appropriate for use in the Program EIR/EIS process. Please see standard response 2.1.1 and standard response 2.1.2 in regards to the ridership forecasts. Additional forecasts for design options that were not part of the Business Plan analysis were done by Charles River Associates using the same models used for the Business Plan (such as for the "Diablo Direct" route options) and the results summarized in the

Program EIR/EIS. Detailed results of the "Diablo Direct" forecasts were provided by the Authority on request. The co-lead agencies agree that Sacramento to the Bay Area is an important intercity travel market and this market is included as part of the HST Alternative. The catchment areas listed were for the purposes as outlined for the screening evaluation. These calculations were not used to develop ridership and revenue forecasts. The ordering of the objectives listed in Table 2.6-5 were not intended to represent an hierarchy of importance for the objectives as your comment implies (while maximizing ridership is listed first in this table, it was listed as on page 2-42 of the Draft EIR/EIS). For the multitude of options analyzed in screening, at a program level of detail it was not practical to do detailed ridership and revenue forecasts for every potential HST design option considered. The co-lead agencies determined to quantify travel time and population and employment within a reasonable catchment area in order to indicate the potential ridership and attractiveness of alignment and station options. Please see the "Alignment/Station Screening Methodology" (Authority/FRA, May 16, 2001) technical report for more details.

Please see information in the Final Program EIR/EIS regarding mitigation strategies and design practices (Chapter 3), construction methods (Section 3.18), and transit-oriented development measures (Chapter 6B).

Attachment C

Please see response to Comment O049-15.

Attachment D

Please see response to Comment O049-19.

Attachment E

Acknowledged.

Attachment F

Acknowledged.

Comment Letter O050

FROM : www.bayrailalliance.org

FRAX NO. : 408-732-8712

Aug. 31 2004 04:16PM P1

FROM : www.bayrailalliance.org

FRAX NO. : 408-732-8712

Aug. 31 2004 04:16PM P2

O050



August 31, 2004

Attn: California High-Speed Train
Draft Program EIR/EIS Comments
925 L Street, Suite 1425
Sacramento, CA 95814

Re: Comments on the DEIR/DEIS for California HSR

Dear High Speed Rail EIR/EIS Staff:

BayRail Alliance wishes to submit the following comments on the draft EIR/EIS for California High Speed Rail. These are in addition to comments that we have made orally at public hearings on the EIR/EIS.

We would very much like to see HSR built. Two years ago we organized a community forum on California HSR with the help of the HSRRA, the Mineta Transportation Institute and a number of industry partners. We believe that HSR is necessary for California's transportation future, and that it would provide great environmental and economic benefits for our state.

Now, two years have passed, and we are greatly disappointed to see what was presented in the DEIS/EIR. We believe that the draft needs substantial work and revision to provide information that is needed for the project to proceed. As it stands, the document is problematic and will not withstand any legal challenge. It lacks the support of a number of groups who support the concept of HSR, such as the Sierra Club, the Planning and Conservation League, the Train Riders Association of California, the Committee for Green Foothills and many other environmental groups.

While there are a great many words in this document, perhaps the most appropriate adjective for it is "vague". In particular, we were disappointed at the light treatment that the Altamont Pass alternative received in the draft document. The explanations given for its alleged inferiority as compared to say, the Pacheco routing, are unconvincing even for those who are not strongly in favor of the Altamont routing, and almost no data is given to back up its assertions.

Furthermore, the operating characteristics of the Altamont alternative are mischaracterized in this draft document, and then attacked as inferior. We'd like to see the operating characteristics properly described and analyzed. For example, the Altamont proposal, as long advocated for by its proponents, doesn't call for a "three-way split", but for trains to go in a two-way split to San Francisco and San Jose. Travelers to Oakland would transfer to BART to reach Oakland under this scenario. So the modeling data given in Table 2.6-4 is misleading and meaningless.

Additionally, we believe that most travelers would be traveling to San Francisco, not to San Francisco and San Jose equally. But no origin-destination projections are given for any city pairs in this draft document. This information needs to be provided. By artificially imposing the same number of trains to go to San Francisco and San Jose instead of basing the split on projected demand, the modeling results are seemingly rigged to produce a less favorable outcome for the Altamont routing. We ask that you work with long-time HSR proponents like Michael Kiesling of Architecture 21 and TRAC to describe the Altamont Alternative more accurately.

We understand that the Altamont routing was actually the preferred alternative in an earlier HSR study, so the strenuous objection to studying it in the DEIR seems odd, especially when you acknowledge in your draft report that it may be significantly cheaper and faster than other alternatives.

We are further disturbed at the unequal treatment and level of scrutiny the routes received in the "Reason for Elimination" Table 2.6-3. For example, the Altamont route is given a poor rating for environment, yet the Pacheco pass route would impact many more acres of wetlands and important birding areas. We understand that the Audubon Society is open to the notion of rebuilding the Dumbarton Rail bridge and for HSR to provide mitigations for that along the Bay, and would prefer that to significant impacts to the wetlands along the Pacheco route. Also, we have heard that very few tall ships would need to pass the Dumbarton rail bridge, only on the order of once or twice a year and always with plenty of notice. Perhaps a lower rail bridge that is designed to open for ships twice a year would be a cost-effective alternative. In any case, the magnitude of the environmental impacts of the Altamont routing on San Francisco Bay wetlands are not discussed in much detail in your draft document to justify the elimination of this route in favor of the Pacheco route.

The poor ratings given to Altamont for Revenue/Ridership and Connectivity/Accessibility seem equally implausible, because the Altamont corridor is much more heavily populated and congested at present as compared to the Pacheco corridor. We think it is likely that the Altamont routing would provide greater revenues to HSR initially. Again, we ask that projected origin-destination data be presented in the draft DEIR/DEIS. No information is presented in the draft DEIR/DEIS to indicate what ridership from San Francisco and San Jose would be lost if the Pacheco route, rather than the Altamont route, is selected. We ask that the Altamont alternative be analyzed fairly with full data given for expected ridership and travel times between city pairs.

Our organization has a significant presence in the south bay. We do feel that San Jose riders would have a better, more appealing travel experience with San Jose becoming a terminus as compared to being a "pass-through" city for HSR. Instead of having to leap onto trains that are perhaps already 2/3 full with travelers from San Francisco, San Jose riders could enjoy having empty trains waiting for them at the station, to be filled mostly with riders from San Jose.

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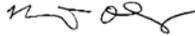
Comment Letter O050 Continued

FROM : www.bayrailalliance.org FAX NO. : 408-732-8712 Aug. 31 2004 04:16PM P3

We note that a number of cities along the Peninsula have concerns about the impacts of HSR on their cities which can be reduced through an Altamont, rather than a Pacheco routing. Finally, there are issues with train capacity at San Jose and San Francisco stations that are not considered. San Francisco will not have the physical capacity to be the terminus for all HSR trains, nor do we believe that it is necessary for it be so.

Please revise and recirculate the DEIR so that it fully considers the Altamont Pass Alternative. By fighting a fair assessment of the Altamont routing, the Authority has lost many friends of the project and decreased the chances of HSR ever winning a bond measure or being built. We hope that the HSR/EIR team will listen to these community voices and rectify this situation so that the project will have a chance to succeed.

Sincerely,



Margaret Okuzumi
Executive Director

O050-1
cont.



Response to Comments of Margaret Okuzumi, Executive Director, Bay Rail Alliance, August 31, 2004 (Letter O050)

O050-1

Please see standard response 2.18.1.