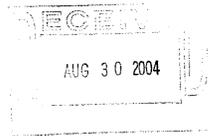


Comment Letter AL062

AL062

SAN DIEGO COUNTY REGIONAL AIRPORT AUTHORITY



August 26, 2004

Attn: California High-Speed Train Draft Program EIR/EIS Comments

Subject: California High-Speed Train Draft Program EIR/EIS (SCH #2001042045)

To the California High-Speed Rail Authority:

Thank you for the opportunity to provide comments on the California High-Speed Train Draft Program Environmental Impact Report/Environmental Impact Statement (EIR/EIS) circulated by the California High-Speed Rail Authority (State Clearinghouse Number 2001042034).

San Diego County Regional Airport Authority

The San Diego County Regional Airport Authority was established by state law in 2003 to operate San Diego International Airport and to address the San Diego region's long-term air transportation needs.

The comments from the San Diego County Regional Airport Authority are related to: 1) the operations of San Diego International Airport; and 2) the Airport Site Selection Program.

Comments on the Draft Program EIR/EIS

Chapter 1, Purpose and Need and Objectives, Section 1.1, Page 1-3: This section discusses the purpose of and need for high-speed rail system for intrastate transportation, including a discussion of the total capacity of and projected demand expected to be experienced by California's intercity transportation system.



SAN DIEGO INTERNATIONAL AIRPORT

California High-Speed Train August 26, 2004 Page 2 of 11

to determine the future demand for air transportation in the San Diego region. While the San Diego region in general and SDIA in particular are not included in Table 1.2-2, any projections of future airport demand that do include the San Diego region should incorporate the most recent information available in the Activity Forecast.

AL062-1 cont.

Chapter 1, Purpose and Need and Objectives, Figure 1.2-4: This figure depicts airport delays for arrivals and departures at California airports in 1999. Given the substantial changes in air travel demand and air travel service resulting from the State's economic downturn and reduction in air travel following the events of 9/11/2001, the information provided in this figure is not accurate.

AL062-2

Chapter 2, Alternatives, Section 2.4, Table 2.4-2: The No Project Alternative describes the "Total Programmed, Funded and Operational Airport Improvements" for the year 2020. The footnotes and text provide a more accurate description of improvements assumed to be funded, programmed and in operation by 2020.

AL062-3

Chapter 2, Alternatives, Page 2-16: The conclusion presented in the EIR/EIS which states that air travel is not competitive with other travel modes for trips of less than 150 miles is not supported by factual information. This characterization of air passengers should be more carefully analyzed and interpreted.

AL062-4

Chapter 2, Alternatives, Page 2-93; and Chapter 6, High-Speed Train Alignment Options Comparison, Page 6-77: The EIR/EIS identifies SDIA as a potential station site for both the LOSSAN inland corridor option and the LOSSAN via Orange County alternative.

AL062-5

AL062-1

Comment Letter AL062 Continued

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August 26, 2004
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location should only be considered after thorough traffic impact analysis and mitigation for traffic impacts.

Section 3.1, Traffic Circulation: In this regard, please refer to the “Freeway Deficiency Plan, Central Interstate 5 Corridor Study” prepared by the San Diego Association of Governments (SANDAG). The purpose of the plan was to identify short-range and long-range actions to reduce traffic congestion on freeways, interchanges, and arterials that provide regional access to Centre City, including San Diego International Airport. The EIR/EIS should be revised to reflect the findings of that plan.

Section 3.1, Traffic Circulation, Page 3.1-20: The EIR/EIS discusses reductions in level of service on roadways resulting from the implementation of the Modal Alternative. The EIR/EIS states that the level of service (LOS) on Archibald Street will drop from LOS “B” to LOS “F”. This street is misidentified (the Thomas Brothers guide for San Diego County does not list an “Archibald Street” in the vicinity of SDIA or central San Diego).

The traffic analysis in the EIR/EIS understates the traffic impacts of development in downtown central San Diego. Traffic studies performed for SDIA indicate that there will be unacceptable levels of service on both North Harbor Drive and Laurel Street by 2020. The EIR/EIS only indicate changes in level of service of LOS “A” to LOS “B” and LOS “E” to LOS “F” for North Harbor Drive and Laurel Street, respectively. This may result in untenable operations when combined with the high-speed rail system facilities.

Section 3.3, Air Quality, Page 3.3-6: The EIR/EIS attempts to determine the number of airplane trips that would be replaced by implementation of the High-Speed Train (HST) alternative. The EIR/EIS assumes that 25.3 million trips would switch to the HST mode of travel. Even if this estimate is accepted, the resulting calculations appear to be based on a year length of 325 days. A 365-day year would result in a replacement of 686 flights rather than the 771 flights reported.

Chapter 5, Economic Growth and Related Impacts, Page 5-9: The EIR/EIS suggests that existing airport user fees and Passenger Facility Charges (PFCs) could be used for construction of the HST alternative. PFCs may only be used for improvements to airports, or to some transit or transportation projects that provide improved access to the airport. It is not clear whether the document is suggesting that the PFCs would be used only to fund the airport improvement component of the HST alternative or the construction of the HST itself. The document should clarify the proposed uses of PFCs and should indicate that they may not be appropriate for construction of the HST.

Appendix 2-G, Description of the Modal Alternative Aviation Improvement Option Methodology: Page 2-G-2 of Appendix 2-G of the EIR/EIS states that only Los Angeles and San Francisco airports can accommodate large aircraft such as the 747 and 777. Table 2-G-1 indicates that SDIA would require airside and landside improvements in order to

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August 26, 2004
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accommodate larger aircraft. The 747 and 777 are among the largest aircraft currently in commercial operation and both aircraft can be accommodated currently at SDIA. In the past, British Airways has operated flights using both types of aircraft for flights between San Diego and London. This section and Table 2-G-1 should be revised to reflect this.

Summary, Table S.5-1: Table S.5-1 is a comparison of projected travel times in 2020 for selected intercity travel corridors by auto, air, and HST. The tabulation indicates that for travel between downtown San Diego and downtown Los Angeles, HST would present an advantage in door-to-door travel time over air travel. Travel time for HST would be 2 hours and 16 minutes, compared to 3:00 hours for air. In this table, the air travel time estimate is for the “No Project” alternative in which it is assumed that there would be no improvements, beyond committed improvements, to the air transportation system or to systems that provide access to and from airports. With improvements to the air travel mode, as described in Section 2 of the EIR/EIS, the door-to-door travel time for air travel between downtown San Diego and downtown Los Angeles would be reduced to 2 hours and 45 minutes. In this estimate of door-to-door travel time, no time savings in travel time to and from the origin and destination airports is assumed. Is this assumption appropriate, considering that ground transportation system improvements (both highway and transit) are planned in both the San Diego and Los Angeles Regions, in fact, in all major metropolitan areas of the State? If travel times to and from airports were in fact reduced, the door-to-door air travel time would be further reduced, becoming closer to the HST travel time.

Section 3.2, Travel Conditions, Page 3.2-9: For air travel, the EIR/EIS states on Page 3.2-9 that door-to-door travel time includes “Terminal time” or the time spent getting through the airport terminal. It is not clear from the description if the terminal time is on the basis of the current levels of security at airports or on the basis of routine security checks that were in effect prior to September 11, 2001.

Section 3.2, Travel Conditions, Page 3.2-11: The EIR/EIS states that door-to-door HST travel time includes “Terminal time” or time spent getting through the train station. Per the EIR/EIS, the terminal time for HST is assumed to be less than the terminal time for air travel because:

- “First, trains may be boarded swiftly, often in less than 2 minutes because of the number of doors and ability to accommodate extra passengers. In contrast, boarding an airplane must be controlled for security and typically takes place through one door (or at most two doors), a process that can take up to half an hour.
- “Second, current airline practice requires passengers to be present at the gate at least 20 minutes before the scheduled departure time.” Such practice would likely be required for HSR as well.

AL062-5
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AL062-6

AL062-7

AL062-8

AL062-9

AL062-10

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AL062-11

AL062-12

AL062-13

Comment Letter AL062 Continued

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Regarding the first point, time for security checks at HST stations does not appear to be included in the EIR/EIS. It is likely that security checks at HST stations will be needed similar to those now in effect at airports. If so, door-to-door travel time for HST will be higher than indicated. Similarly, if times for airport security checks do not reflect current conditions, door-to-door air travel times are also understated. The EIR/EIS does not discuss the implications, if any, of increased (color coded) alert levels issued by the Department of Homeland Security.

Regarding the second point, many airlines require that passengers arrive at the gate at least 30 minutes before the scheduled arrival time. The EIR/EIS should reflect a value consistent with airline practices.

Section 3.2, Travel Conditions, Pages 3.2-34 through 3.2-37: The EIR/EIS presents average door-to-door travel costs for the air, auto, and HST modes of travel. Based on the information presented, HST cost per passenger for travel between downtown San Diego and downtown Los Angeles would be \$47 per passenger, compared to \$148 per passenger for air. Based on current air fares, the estimated door-to-door cost per passenger for air travel appears to be too high. Since a very clear cost advantage is asserted for HST, the derivation of these per-passenger costs should be described more thoroughly and revised, if necessary, based on current air fares. What are door-to-door travel cost comparisons for air travel and HST between San Diego and other metropolitan areas in the State?

Section 3.2, Travel Conditions, Pages 3.2-25 and 3.2-26: The EIR/EIS presents information on the intercity market share of HST, compared to auto and air travel. The EIR/EIS indicates that in 1997 air travel accounted for 10.1% of all intercity travel in California. Automobile travel was predominant and accommodated 88.6% of intercity travel. AMTRAK rail served the remaining 1.3%.

The EIR/EIS states that in 2020, with an HST system, 14.7 to 22.4% of California intercity travel will be by HST, depending on whether a "Low End" or a "High End" forecast is used. In 2020, for the "Low End" HST forecast, air travel is projected to constitute 7.6% of all intercity travel. For the "High End" forecast, air travel would be 2.2% of all California intercity travel. Both of these market shares for intercity air travel would be smaller than the 1997 market share of air travel. Since there would be a total California intercity travel market (by all modes) of about 217,000,000 per year, a change of 1% in market share represents over 2,000,000 annual airline passengers statewide. A decline from a market share of 10.1% in 1997 to 2.2% in 2020 for the "High End" HST forecast, represents an annual reduction of about 17,000,000 in intercity airline passengers. This information is contrary to regional and national forecasts.

Section 3.2, Travel Conditions, Pages 3.2-25 and 3.2-26: The EIR/EIS presents air passenger demand information specifically pertaining to California intercity travel to and

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from San Diego. This information, extracted from Tables 3.2-12, 3.2-13, and 3.2-14 is presented in **Table 1, below.**

Table 1

Intercity Air Travel Demand between San Diego and Selected Metropolitan Areas in California

Travel Corridor	Annual California Intercity Air Passengers		
	1997	2020 with HST "Low End"	2020 with HST "High End"
San Diego-Los Angeles	407,185	20,805	1,393
San Diego-Sacramento	613,341	745,079	60,065
San Diego-San Francisco	2,417,203	2,820,117	177,361

Source: Draft Program Environmental Impact Report/Environmental Impact Statement (EIR/EIS) for the Proposed California High-Speed Train System
 Prepared by: California High-Speed Rail Authority and the Federal Highway Administration

The information in Table 1 indicates that with the HST "Low End" forecast, California intercity air travel will be about 15% higher in 2020 compared to 1997. With the "High End" HST forecast, California intercity air travel to and from San Diego would virtually disappear. Based on the SDCRAAs aviation system planning work, the SDCRAA disagrees with the projected low levels of passenger demand for intercity air travel to and from San Diego in 2020.

Airport Site Selection Program

GENERAL COMMENTS

The EIR/EIS does not discuss specifically the role of HST in providing access to a regional airport in San Diego. The role HST can play in providing airport access will depend on the specific HST alignment selected, the specific HST station locations, and the regional airport site selected by the SDCRAA. In some cases, such as SDIA, Camp Pendleton, and March Air Reserve Base, it may be possible to integrate the HST station into the airport. If an HST station is integrated into the airport, the airport Master Planning implications and additional land requirements would need to be evaluated, especially at SDIA because of space limitations. For airport sites at Miramar, Miramar East, and North Island, a guideway transit connection may need to be provided between the HST station and the airport. In the case of the airport sites under consideration in eastern San Diego County and in Imperial County, the connection between the HST station and the airport will constitute an entirely separate corridor that would have to be studied on its own merits.

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AL062-17



Comment Letter AL062 Continued

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One of the alternative HST alignments would provide an HST connection between Los Angeles and downtown San Diego via the Inland Empire. With this alignment option, San Diego County HST stations are envisioned in Escondido, Mira Mesa, University City area, Lindbergh Field, and downtown San Diego. If this option were implemented, HST could serve as a competitive mode of access for Lindbergh Field. None of the other alignment options would serve SDIA directly, but would offer opportunities for connections.

The EIR/EIS does not address specific security checking, passenger check-in, and luggage handling procedures at HST stations and how these might be affected if direct connections with airports are implemented.

Chapter 2, Alternatives: The California High-Speed Rail Authority should also be aware that SDCRAA is in the process of potentially selecting a site or sites to relocate or augment SDIA. The EIR/EIS should reflect the fact that this process is underway.

Nine (9) locations for a new or expanded regional airport for San Diego are under evaluation by the San Diego County Regional Airport Authority (SDCRAA) in the San Diego Airport Site Selection Program (SANASSP). These locations, listed in random order are:

1. A site in Imperial County – specific location to be determined – Adopted
2. March Air Reserve Base – Adopted and deferred beyond Base Realignment and Closure (BRAC) actions
3. Miramar Marine Corps Air Station – Adopted and deferred beyond Base Realignment and Closure (BRAC) actions
4. Miramar East – specific site to be determined, east of I-15 – Adopted and deferred beyond Base Realignment and Closure (BRAC) actions
5. North Island Naval Air Station – Adopted and deferred beyond Base Realignment and Closure (BRAC) actions
6. Camp Pendleton – Adopted and deferred beyond Base Realignment and Closure (BRAC) actions
7. Expansion of Lindbergh Field – Adopted
8. Anza Borrego – Adopted
9. Campo – Adopted

The EIR/EIS should discuss how the HST alignment and station options (Inland Empire and Coastal corridors) for service between Los Angeles and San Diego would connect with and serve the existing and six (6) (possibly eight [8]) new regional airport sites under consideration by the SDCRAA.

The preliminary thoughts of the SDCRAA about connections between the HST and the eight (8) potential new airport sites are presented below for the consideration of the CHSRA.

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Site 1 – Imperial County

A site in Imperial County would be far removed from any HST corridor. Any connection to and from HST corridors would constitute an additional corridor or supplemental connector service which would need to be studied on its own merits. The closest HST station to an airport site in Imperial County site would be the Qualcomm Stadium station. The construction of a guideway would need to be the subject of an engineering and environmental evaluation, especially in view of topographical conditions in the area.

Site 2 – March Air Reserve Base

The HST corridor between Los Angeles and San Diego via the Inland Empire envisions a station at the March Air Reserve Base (MARB), offering the opportunity to integrate an HST station into the planning of a regional airport at MARB. With other potential stations in San Diego, Riverside, San Bernardino, and Los Angeles Counties, the HST could provide very convenient access to a regional airport at MARB and help mitigate potential negative traffic impacts along the I-15 and I-205 freeways.

Site 3 – Miramar Marine Corps Air Station

The HST corridor between Los Angeles and San Diego via the Inland Empire would offer opportunities for a linkage to this site via stations envisioned in the Mira Mesa area and in the University Towne Centre area. Linkages could be in the form of buses or shuttles over the roadways in the area or in the form of a fixed guideway system, such as Group Rapid Transit (GRT), monorail, or other technology with vehicles on a guideway. The construction of a guideway would need to be the subject of an engineering and environmental evaluation, especially in view of topographical conditions in the area.

Site 4 – Miramar East

This would be a site east of I-15 and east of the Marine Corps Air Station. The opportunity would exist to make a connection via a fixed guideway system between the HST station envisioned for the Mira Mesa and this potential regional airport site. Such a connection would need to be the subject of an engineering and environmental evaluation.

Site 5 – North Island Naval Air Station

One of the routing options for the HST corridor between Los Angeles and San Diego via the Inland Empire is a coastal route to connect Mira Mesa, the University City area, San Diego International Airport (Lindbergh Field), and downtown San Diego. With this alignment option stations are envisioned at San Diego International Airport and in downtown San Diego. These two stations would be the closest the HST system would come to North Island Naval Air Station. Over the road access between either of these two stations would be via the Coronado Bridge and would entail substantial travel time. A guideway connection between either of these two stations and North Island Naval Air Station would require a crossing of San Diego Bay. Extensive engineering and environmental studies would be needed for such a guideway connection.

AL062-17
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AL062-18

AL062-18
cont.

Comment Letter AL062 Continued

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Site 6 – Camp Pendleton

The HST corridor between Los Angeles and San Diego via the coastal route (LOSSAN Corridor) traverses Camp Pendleton. Stations are envisioned in San Clemente and in Oceanside. Roadway and fixed guideway transit connections could be considered from either of these two potential stations. Alternatively, if HST operating strategy would permit, a station at Camp Pendleton could be considered to serve the Airport more directly.

Site 7 – San Diego International Airport (Lindbergh Field)

One of the routing options for the HST corridor between Los Angeles and San Diego via the Inland Empire is a coastal route to connect Mira Mesa, the University City area, San Diego International Airport (Lindbergh Field), and downtown San Diego. A component of this alignment option is a station at San Diego International Airport, which would allow the station to be integrated into the Airport. With this configuration, the HST would facilitate access to and from the Airport and help mitigate traffic impacts.

The current Master Plan for Lindbergh Field does not provide for an HST alignment or an HST station at the airport. Land would need to be set aside to accommodate the HST and the HST station. This may reduce the amount of land available to accommodate Airport Master Plan improvements, or may require additional land adjoining the airport.

Site 8 – Anza Borrego

A site in Anza Borrego would be far removed from any HST corridor. Any connection to and from HST corridors would constitute an additional corridor which would need to be studied on its own merits. The closest HST station to an airport site in Anza Borrego would be the Escondido station. The construction of a guideway would need to be the subject of an engineering and environmental evaluation, especially in view of topographical conditions in the area.

Site 9 – Campo

A site in Campo would be far removed from any HST corridor. Any connection to and from HST corridors would constitute an additional corridor which would need to be studied on its own merits. The closest HST station to an airport site in Campo would be the Qualcomm Stadium station. The construction of a guideway would need to be the subject of an engineering and environmental evaluation, especially in view of topographical conditions in the area.

Table 2, attached, presents a summary of considerations pertaining to the connectivity of the nine potential San Diego Regional Airport sites with the HST alignments and potential HST station locations.

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Thank you for the opportunity to comment. Please contact Angela Shafer-Payne, Vice President of Strategic Planning, at ashafer@san.org or at (619) 400-2455 if you have any questions.

Sincerely,



Thella F. Bowens
President/CEO

TFB/TA/ljt

- cc: Joseph W. Craver, Chair, SDCRAA Board
- Paul Nieto, Vice Chair, SDCRAA Board
- Councilman Ralph Inzunza, SDCRAA Boardmember
- Xema Jacobson, SDCRAA Boardmember
- Mayor Terry Johnson, SDCRAA Boardmember
- William D. Lynch, SDCRAA Boardmember
- Paul Peterson, SDCRAA Boardmember
- Ted Reynolds, SDCRAA Boardmember
- Mayor Mary Sessom, SDCRAA Boardmember

AL062-18
cont.



Comment Letter AL062 Continued

Table 2
Access Considerations between Potential San Diego County Regional Airport Sites and High Speed Train System

Potential San Diego Regional Airport Site	Potential for Connectivity to California High Speed Train (HST) System	Closest HST Corridor (s)	Closest HST Station	Distance to Closest HST Station	Highway Connectives	Potential Transit Connection Technologies	Topographic Barriers for Direct Transit Connections	Comments
Airport in Imperial County—specific location to be determined	SDLA E 15	Qualcomm Stadium	Seventy miles or more, depending on specific location of HST station and airport terminal	I-8 and connecting	HST, MAGLEV, or other high capacity, high speed line haul transit technology	Mountain passes, Cleveland National Forest	Extensive engineering and environmental studies would be needed for major roadway improvements or for a transit guideway connection.	
March Air Reserve Base	SDLA E 15	March Air Reserve Base	Station potentially integrated into airport	None needed if HST station is integrated into airport	SR-78 and connecting roadways as appropriate	HST, MAGLEV, or other high capacity, high speed line haul transit technology	HST would provide convenient access between the regional airport site and many locations in San Diego County.	
Marine Corps Air Station	SDLA UC	Mira Mesa or University City	Five miles or less, depending on specific location of HST station and airport terminal	New roadway(s) may be necessary depending on specific location	Light Rail, GRT, or other medium capacity transit technology to connect HST station with airport	Rugged topography may be a barrier for transit guideway connection depending on specific location	Highway system in the vicinity of other HST station is and will continue to be congested.	
Mission East—specific site to be determined, east of I-15	SDLA E 15 or SDLA UC	Mira Mesa or University City	Five to ten miles, depending on specific location of HST station and airport terminal	New roadway(s) may be necessary depending on specific location	Light Rail, GRT, or other medium capacity transit technology to connect HST station with airport	Rugged topography may be a barrier for transit guideway connection depending on specific location	Highway system in the vicinity of other HST station is and will continue to be congested.	
North Island Naval Air Station	SDLA UC	Lindbergh Field or Downtown San Diego	Five miles or less, on a straight line depending on specific location of HST station and airport terminal	Existing routing via Coronado Bridge with connector roads as needed depending on specific location	Light Rail, GRT, or other medium capacity transit technology to connect HST station with airport	San Diego Bay	Highway access via the Coronado Bridge would place heavy traffic loads on the roadway system in Coronado. Additional capacity of a transit guideway connection across San Diego Bay would need to be the subject of extensive engineering and environmental studies.	
Camp Pendleton	SDLA CR	Oceanside or San Clemente	Ten to 20 miles, depending on specific location of HST station and airport terminal	New roadway(s) may be necessary depending on specific location	Light Rail or other medium capacity line haul transit technology	Rugged topography may present a barrier depending on specific location	San HST station is east of Camp Pendleton, distance would be less than 5 miles, depending on specific location of HST station and airport terminal	
Expansion of SDA	SDLA UC	San Diego International Airport	Station potentially integrated into airport	None needed if HST station is integrated into airport	SR-78 and connecting roadways as appropriate	HST, MAGLEV, or other high capacity, high speed line haul transit technology	Master Plan for SDA does not include an HST station. Additional land may be needed for some Master Plan components that may be affected with HST station	
Anza Borrego	SDLA E 15 or SDLA UC	Escondido	Forty miles or more, depending on specific location of HST station and airport terminal	SR-78 and connecting roadways as appropriate	HST, MAGLEV, or other high capacity, high speed line haul transit technology	Very rugged topography	Extensive engineering and environmental studies would be needed for major roadway improvements or for a transit guideway connection.	
Campo	SDLA E 15	Qualcomm Stadium	Five miles or more, depending on specific location of HST station and airport terminal	I-8 and connecting roadways as appropriate, or SDLA Corridor with connecting roadways	HST, MAGLEV, or other high capacity, high speed line haul transit technology	Mountain passes and/or Cleveland National Forest	Extensive engineering and environmental studies would be needed for major roadway improvements or for a transit guideway connection.	

- (a) SDLA E 15 Inland Empire Alignment between San Diego and Los Angeles via I-15, with terminus at Qualcomm Stadium
- SDLA UC Inland Empire Alignment between San Diego and Los Angeles via I-15, University City, and Lindbergh Field, with terminus in downtown San Diego
- SDLA CR Coastal Route between San Diego and Los Angeles, with terminus in downtown San Diego, often referenced as the COSSAN Corridor

Response to Comments of Thella F. Bowens, President/CEO, San Diego County Regional Airport Authority, August 30, 2004 (Letter AL062)

AL062-1

Acknowledged.

AL062-2

Figure 1.2-4 and the associated discussion have been updated in the Final Program EIR/EIS to reflect the Air Travel Consumer Report, 2004.

AL062-3

Tables 2.4-2 and 2.4-3 have been revised to more clearly reflect the assumed nature of the improvements included.

AL062-4

Acknowledged. The Authority and the FRA respectively disagree with your comment. In California, while air transportation carries over 40% of the intercity travel market for passenger trips exceeding 150 miles, intercity trips less than 150 miles are overwhelmingly dominated by automobile travel. Between Los Angeles and San Diego, it is estimated that there were nearly 35 million intercity trips made by automobile, nearly 1 million by intercity rail, and only about 400,000 by air transportation – only 1% of the intercity market (CRA, January 2000). Many of the air trips between Los Angeles and San Diego are connecting trips to other flights, which cannot be considered part of the intercity market between San Diego and Los Angeles. The capacity problems at San Diego Airport have been well publicized, and 1,210 operations to Los Angeles International Airport in May 2004 (as stated in your comment letter) to capture only about 1% of the intercity market between the Los Angeles and San Diego metropolitan regions would not seem to be the best use of precious air transportation capacity. The proposed statewide HST system would compliment air transportation and reduce the need for

short distance flights, which serve smaller market shares and are not as profitable as longer distance flights.

AL062-5

The station option at San Diego International Airport was not identified as part of the preferred HST system, due, in part, to the site limitations, adjacent land use constraints, and access constraints explained in your comment. If there were to be further consideration of this site, there would be detailed project level review of these issues.

AL062-6

The Authority has reviewed the suggested publication "Central Interstate 5 Corridor Study, Final Report", June 2003. The recommendations contained in this report would not change the highway network definition for the system alternatives (No-Project, Modal, and HST) compared in Section 3.1 of the Final Program EIR/EIS. Please reference Sections 2.4 – 2.6 regarding the definition of the system alternatives.

AL062-7

The discussion of traffic impacts of the Modal Alternative compared to the No Project Alternative on Page 3.1-20 of the Draft Program EIR/EIS has been revised in the Final Program EIR/EIS to remove erroneous information regarding levels of service on specific streets.

The traffic conditions forecasted for 2020 in the vicinity of San Diego International Airport would impose a constraint on the future implementation of an HST station at this location. As stated in Response 5 above, this constraint was considered in the Authority's identification of a preferred alignment and station options.

AL062-8

The assumption of 325-day year is consistent with the level of service defined in the conceptual HST operating plan. While it is assumed that high-speed trains would operate 365 days per year, the conceptual service plan defined variations in the level of service with a higher level on weekdays than on weekends, based on the expected ridership demand. These weekly variations in service levels are reflected in the 325-day factor applied to estimate number of flights replaced. The services defined in the conceptual HST service plan (distribution and number of trains) have been applied consistently throughout the various cost and environmental analyses contained in the Program EIR/EIS.

AL062-9

The list of potential funding sources (Section 5.3.2 of the Program EIR/EIS) noted by the commenter was meant to be illustrative of the types of sources that might be available. Potential use of airport user fees or passenger facility charges (PFCs) was specific to the airport-related elements of the Modal Alternative. The Program EIR/EIS was modified as follows to make this clarification:

For the purposes of this analysis, it was assumed that the total cost of the HST Alternative and the first \$25 billion in cost for the Modal Alternative would be funded through revenue sources that would not require direct tax increases or significant diversion of general fund revenues. Examples of these revenue sources include general obligation bonds, federal grants or loans, existing airport user fees and passenger facility charges (only for airport-related improvements that are part of the Modal Alternative), private sector participation, local funds (from existing sources), and existing state transportation revenue sources (e.g., gas tax, sales tax on gas).

AL062-10

Table 2-G-1 indicates that large aircraft (e.g., 747 and 777) can be accommodated at SDIA; however, some airside and landside improvements would be necessary to provide service using these larger aircraft at the level necessary to accommodate the

representative demand. The Authority recognizes the past services offered at SDIA using these larger aircraft; however, both taxiway and terminal improvements would be necessary to accommodate numerous daily operations of these larger aircraft. Appendix 2-G has been revised to clarify this assumption.

AL062-11

The assumption that access times to airports remain unchanged between the No Project and Modal Alternatives is appropriate for the referenced comparison of "door-to-door" travel times for the following reasons. First, the broad level station and airport area traffic analysis that is presented in Section 3.1 of the Program EIR/EIS found no significant change in the levels of service for key access routes in the vicinity of San Diego and Los Angeles International Airports between the No Project and Modal Alternatives. While programmed and funded improvements to major roadways in the vicinity of the airports are accounted for in both the No Project and Modal Alternatives, there is also additional ground access demand at the airports in the Modal Alternative. Second, calculating specific travel time savings from local highway/roadway improvements would require detailed local and regional traffic forecasting and analysis that is beyond the scope of this program level environmental document. Third, access times were estimated for each city and applied consistently for airports and high-speed train stations alike. Fourth, the projections reflect increasing travel demand due to population and economic growth.

AL062-12

The total travel times, including the terminal time, are based on pre-September 11, 2001 conditions according to the Independent Ridership and Passenger Revenue Projections for High-Speed Rail Alternatives in California, California High-Speed Rail Authority, 2000. See Appendix 3.2-B. As a result, total travel times for air travel are likely to be underestimated.

AL062-13

Regarding security checks at HST stations, future requirements cannot be identified at this stage of planning. Existing train operations in the U.S. and abroad do not use security screening procedures which are as time-consuming as those currently applied to air travel. While it is possible that future requirements may be developed that would involve a screening procedure for the HST, it is not likely to be identical to aviation requirements as there are risk and vulnerability differences between rail systems and aviation. Further assessment of security planning and procedures would be completed at the project level of analysis.

AL062-14

Table 3.2-19 and Table 3.2-20 of the Draft Program EIR/EIS respectively show total trip costs based on "business" air and HST fares rather than an average of business and non-business fares. Table 3.2-19 and Table 3.2-20 have been revised in the Final Program EIR/EIS to display total average costs for both "business" and "non-business" travel. Total costs include fares as well as parking, taxi fares, and other costs involved with traveling to and from the airport/HST station. The information from these tables was derived from the Authority's June 2000 Business Plan (see page 27). Please also see the Charles River Associates (CRA) January 2000 technical report "Independent Ridership and Passenger Revenue Projections for High-Speed Rail Alternatives in California". Table 3.6 (page 44) of this CRA report includes a summary of average airfares for air travel between San Diego and other metropolitan areas in the State and the sources for this data.

AL062-15

A decline in intrastate aviation market share of 10.1% in 1997 to 2.2% in 2020 for the "High End" HST forecast does not represent an "annual reduction of about 17,000,000 in intercity passengers". The Authority's ridership analysis was based upon projections that intercity travel in California will grow substantially over the next 20 years (see Authority's June 2000 Business Plan). Furthermore, a

reduction in market share for intercity air travel in California as a result of introduction of a new intercity mode (HST) does not contradict regional and national forecasts for air transportation – which do not include the introduction of HST. On the contrary, regional and national forecasts were used to estimate the annual growth rates for air and auto travel to develop the "High End" forecasts (please see the Authority's June 2000 Business Plan, page 29). The ridership forecasts concluded that within California, a considerable number of intercity passengers would choose to take the HST system who otherwise would have taken air transportation if the HST system was not available.

AL062-16

The comment does not provide information from forecasts by SDCRAA regarding potential future diversion of air transportation by a statewide HST system. The ridership and revenue forecasts prepared for the Authority did assume growth would occur for intercity air transportation if there were no HST system. Please see the Authority's June 2000 Business Plan and CRA ridership and revenue reports (1996, and 2000) referenced in the Draft Program EIR/EIS. The High End forecast tested certain variations in the California travel market including higher air travel prices. Other possible variations could result in less diversion of San Diego air travel.

AL062-17

Acknowledged. The Authority is aware of the SDCRAA "Airport Site Selection Program". In fact, the Authority participated in the program's "Public Working Group" and made a presentation to the SDCRAA board (May 10, 2004). One of the objectives of the HST system adopted by the Authority is maximize intermodal transportation opportunities by locating stations to connect with airports (see Chapter 1, Draft Program EIR/EIS, page 1-4). For the Draft Program EIR/EIS, it was assumed that the existing San Diego Airport (Lindberg Field) would be the regional airport for San Diego. The No Project Alternative represents the state's transportation system (highway, air, and conventional rail) as it is currently and as

it would be after implementation of programs or projects that are currently projected in regional transportation plans (RTPs), have identified funds for implementation, and are expected to be in place by 2020 (Draft Program EIR/EIS, page 2-11). The Authority has identified the Downtown San Diego site as the preferred HST station to serve San Diego. This site would be within a couple of miles of the San Diego Airport and has good access to the airport. The Downtown San Diego station site is supported by SANDAG, NCTD, MTDB and the City of San Diego. As noted in your comments, the Draft Program EIR/EIS also considered a potential HST station site adjacent to San Diego Airport.

AL062-18

The Authority is aware of the "Airport Site Selection Program" of the SDCRAA, and this program is discussed on page 2-23 of the Draft Program EIR/EIS. The Authority and the FRA believe that it is premature and beyond the scope of the Program EIR/EIS process to discuss how the proposed HST alignment and station options would connect with and serve six to eight possible new regional airport sites under consideration by the SDCRRA. The program EIR/EIS assumes that Lindbergh Field will remain the regional airport serving San Diego. Should the region move forward with the selection of a new airport site in the near future, this would be considered in future project specific HST studies.