

Summary of Responses to Station Area Development Guidelines

Introduction

The California High-Speed Rail Authority has developed a draft document outlining general principles and guidelines for HST Station Area Development encouraging communities to enhance local plans to accommodate and support proposed HST service. The principles and guidelines initially were included as a chapter of the Final Statewide Program EIR/EIS document, certified in November 2005. Based on the policies adopted by the board, this chapter was updated as part of the Bay Area to Central Valley Program EIR in May 2008. As part of that document (and the Authority's adopted policies) the Authority made a commitment to use its resources to encourage cities to do appropriate station area planning.

As directed by the Executive Committee, on Friday, August 13, 2010 this Bay Area to Central Valley chapter with minor revisions was shared with regional agencies (e.g., MTC, SACOG, etc.), transportation agencies (e.g., LA Metro, BART, Caltrans, etc.), all the municipalities slated to host HST stations, and other organizations and agencies. As the topic was scheduled for discussion at the Board's September meeting, the announcement was sent through the existing databases of the Authority's regional consulting teams, and requested feedback by August 27, 2010 in order to meet the Board meeting schedule. This short schedule put undue pressure on cities, counties, and agencies and the topic was moved to the Board's February 2011 meeting to give the entities more time to review and comment on the proposed guidelines.

Entities that Provided Input

Some initial responses from communities and agencies were requests for more time. With the topic moved to February, the Authority asked the regional agencies (e.g., MTC, SACOG, etc.), transportation agencies (e.g., LA Metro, BART, Caltrans, etc.), and all the municipalities slated to host HST stations to review and comment on the draft guidelines by September 27, 2010. To date the Authority has received written comments and input from the following:

1. Alameda-Contra Costa Transit District (AC Transit) Mr. Robert Del Rosario, Senior Transportation Planner
2. California Department of Transportation (Caltrans) Mr. Martin Tuttle, Deputy Director
3. California Public Utilities Commission Mr. Moses Sites, Rail Corridor Safety Specialist
4. Central California Irrigation District..... Mr. Russel Landon, Engineering Technician
5. City of Burbank Mr. David Kriske, Principal Planner, Transportation
6. City of Escondido..... Mr. Jay Petrek, Principal Planner
7. City of Fresno Mr. Bruce Rudd, Assistant City Manager
8. City of Gilroy Mr. Thomas Haglund, City Administrator
9. City of Gilroy (two letters) Mr. Dan Dey, City Transportation Engineer
10. City of Millbrae Mr. Paul Seto, Mayor
11. City of Modesto..... Mr. Patrick Kelly, Planning Manager

12. City of Murrieta Ms. Mary Lanier, Community Development Director
13. City of Palo Alto Mr. Pat Burt, Mayor
14. City of Palo Alto Mr. Rob Braulik, Project Manager, City Manager’s Office
15. City of Redwood City Mr. Chu Chang, Director of Building, Infrastructure, and Transportation
16. City of San Diego Mr. Tait Galloway, Senior Planner, and Ms. Christine Rothman, Community Planning Program Manager
17. City of San Fernando Mr. Ron Ruiz, Public Works Director
18. City of San Francisco Mr. David Alumbaugh, Acting Director of Comprehensive Planning
19. City of Stockton Ms. Ann Johnston, Mayor
20. City of Turlock Ms. Debbie Whitmore, Deputy Director of Development Services
21. Council of Fresno County Governments Mr. Clark Thompson, Planning Coordinator
22. Gateway Cities Council of Governments Mr. Frederick Latham, Santa Fe Springs City Manager, and Mr. Richard Powers, Executive Director
23. Kern Council of Governments Mr. Ronald Bremmett, Executive Director
24. Kern County Development Services Agency Mr. Ted James, Director
25. Los Angeles County Metropolitan Transportation Authority (LA Metro) Mr. Alex Clifford, Executive Officer, High-Speed Rail
26. Peninsula Corridor Joint Powers Board (Caltrain) Ms. Marian Lee, Executive Officer, Planning and Development
27. San Diego Association of Governments (SANDAG) Ms. Linda Culp, Principal Planner-Rail
28. San Joaquin Regional Rail Commission Ms. Stacey Mortensen, Executive Director
29. San Joaquin Regional Rail Commission Mr. Thomas Reeves, Strategic Development & Communication
30. Southern California Association of Governments (SCAG) Mr. Rich Macias, Director of Transportation Planning
31. Transbay Joint Powers Authority Mr. Brian Dykes, Principal Engineer
32. United States Environmental Protection Agency Region IX Ms. Jennifer Blonn, High-Speed Rail NEPA Lead
33. United States House of Representatives The Honorable Nancy Pelosi, Speaker of the House
34. Urban Land Institute Mr. Richard Dishnica, Mr. Jeff Mayer, Mr. Christopher Morrow, Mr. Alex Rose, Mr. Allen Folks, Regional Chairs
35. (No agency affiliation) Mr. Geoffrey Thompson, Mountain View citizen

Brief Summary of Comments

Most of the agencies, regions, and cities that responded to the Authority’s request for comments welcome the opportunity to work with the Authority to build the HST system, and many appreciate the Authority’s efforts to include them in the process. The compressed schedule by which the draft guidelines first were distributed and comments were solicited was too rushed and the deadline was extended, as some agencies and cities stressed that the Authority must be more accommodating when it is dealing with municipalities and agencies with limited resources.

Respondents generally welcome Authority cooperation and support, but several temper this with a reassertion of their own jurisdiction—many are wary of a state agency potentially coming into town, disrupting things, and forcing unwanted features and expenses onto the host cities. A recurring theme among the comments was “don’t assume one-size-fits-all.” The various cities preparing to host an HST station vary greatly and many wish to retain some sense of place and some distinguishing characteristics. Some would like to see scalable station designs that can be modified to correspond with the immediate surroundings. Some would like fewer parking requirements. All would like to see flexibility in the process so each city can develop the most appropriate station

for its community, and all would like to retain some control over design. Central Valley cities point out that they are very different in form and character from the large coastal cities, and San Francisco points out that while large parking structures may be crucial in areas with little transit, they are not appropriate or efficient in large central cities with supportive transit service. Several local agencies expressed concern that higher densities and restrictive parking policies alone will not change travel behavior and greater vehicular congestion is an inevitable consequence, one that must be addressed. More than one commenter notes that increased densities potentially may conflict with context-sensitive designs.

Inevitably, several comments relate to costs and financing. While many agencies and cities express willingness to work with the Authority, almost all question from where the financing will come. Some assert the Authority is responsible for all costs, including plan updates, while others express concern that they do not have the resources to enact the Authority's vision. More than one city expects the Authority to help support the cost of updating a General Plan if it must be done out of cycle and one city expressed doubt that this process could take place before the Authority selects station sites. Several commenters note that increasing downtown densities may require expensive infrastructure capacity upgrades, and question who will pay for them. Some note that their communities are not ready for major new roads into their downtowns to address access to a new HST station, and some smaller cities question their ability to attract sufficient development to finance improvements.

Many cities and agencies applaud the effort to promote denser development around HST stations, but there are varying opinions on the best methods for achieving this goal. One commenter suggested that instead of prescriptive zoning and design guideline, the Authority should allow local jurisdictions to demonstrate how land uses around proposed HST stations would meet these general objectives and the objectives of SB 375. Emphasis on non-automobile access is countered with strong feelings that many station users will arrive by automobile anyway and vehicular access and storage likely will be necessary. There is some skepticism about citing studies about travel behavior near transit stations (people who live and work within a half-mile of a rail transit station are more than ten times more likely to use transit) to be applied to statewide rail travel. Some believe HST stations will function more like air terminals than rail transit stations.

Ideas suggested include: prescribe passenger amenities at stations; consider Complete Streets policies; incorporate safety into the planning process; link station planning to the environmental process; incorporate high energy standards and efficient building standards in the guidelines; focus on transit and support transit expansion; incorporate principles of SB 375. Many agencies and cities express interest in the HST program, but they want the Authority to make clear exactly what is expected of them, when actions must be taken, and how these efforts will be financed.

Below are summaries of the comments received from each agency or city. Copies of the complete original letters are available on the Authority's website.

Alameda-Contra Costa Transit District

- Need more framework for the local/regional transit network to support station area development
- Need to address probable increases in transit demand (potential capacity constraints)

- Need to design HST stations to accommodate bus interface
- Should prescribe passenger amenities (e.g., bus shelters, lighting, way-finding signage, ticket machines, security cameras, real-time information)
- Any future Oakland station should be Downtown, not in West Oakland
- Include transit accessibility and proximity to transit corridors when locating stations
- Consider financial incentives to help cities increase downtown infrastructure capacity

California Department of Transportation

- Draft policy is generally consistent with Caltrans' TOD policies and practices
- Consider Caltrans' Complete Streets policies for all modes connecting to HST stations
- Please provide HST station locations and HST system project alternatives where they interact with the state highway and railroad network
- State can encourage local and regional agencies to more closely coordinate land use and transportation planning and development
- Promote bicycle parking and locking facilities and support innovative arrangements to encourage alternatives to single-occupant vehicles
- Will be especially interested in traffic impact studies and in impacts to state highway ingress and egress near HST stations
- Encourage structured parking within one-quarter-mile to one-half-mile radius of HST stations or feeder transit stations
- Local jurisdictions should seek long-term state and federal funding/programming through the Regional Transportation Planning process
- Locate stations to make the best use of existing rail services to serve as feeder-distributor services to HST

California Public Utilities Commission

- Development projects proposed near rail corridors should be planned with the safety of these corridors in mind
- CPUC willing to work with HST staff through the planning process to help identify potential impacts and appropriate mitigation measures to improve public safety
- Local agencies need to consider the cumulative rail safety-related impacts created by other projects in the area
- While HST service is proposed to be grade separated, other rail services (e.g., existing passenger and freight operations) in the vicinity may continue to have at-grade crossings and any increased density near these lines may increase potential for safety conflicts
- Recommend reducing the number of at-grade crossings in the vicinity of HST stations
- Recommend local agencies begin the land-use planning process with rail safety as a priority
- CPUC approval is required to modify existing highway-rail crossings or to construct any new crossing
- Recommend the Authority incorporates Rail Safety as a key component in the station area planning process

Central California Irrigation District

- The Central California Irrigation District has no input to give for substations (sic) at this time.

City of Burbank

- While the City of Burbank agrees TOD will be an important component, the draft policy should recognize that different styles of TOD may be appropriate for different HST station types, depending on the existing land use context of each station. The city hopes the Authority will work with local agencies to identify appropriate TOD types and densities.
- High transit, bicycle, and walking mode-splits to and from a dense city-center station may not apply to other station types where height restrictions, connections to transit, and other land use factors may cause high densities necessary to support these travel modes to be infeasible.
- Urban form is not the only variable that encourages non-motorized travel. Adequate regional and local transit is equally important, but most local agencies have limited control and require regional cooperation to develop regional transit. The draft policy does not recognize the importance of regional transit nor the responsible parties for planning and funding these connections.
- The draft policy states local agencies are expected to finance other public spaces to support the HST stations, but is silent on the funding mechanism expected for parking facilities and other required infrastructure.
- The draft policy suggests local agencies are expected to implement “value capture” and other financing mechanisms, but it does not define these proposed mechanisms (e.g., redevelop agency funding, transit benefit district). What are the specific funding mechanisms the Authority expects local agencies to pursue?
- The relationship between urban form and travel behavior is not as directly correlated as the draft policy suggests. Simply building higher commercial densities and introducing residential development near HST stations will not necessarily directly cause a dramatic shift away from automobile travel. Station planning efforts will still need to consider that a large number of station users will arrive via private automobile. The environmental review should assume realistic mode-split assumptions so as not to underestimate the additional automobile traffic induced by the stations. The draft policy is silent on whether local agencies of the Authority will be responsible for any roadway improvements identified as mitigation measures in each station’s environmental analysis.
- The Authority should not assume the very high mode-split assumptions for existing facilities in San Francisco would apply in other parts of the state (e.g., Los Angeles) with less developed local and regional transit systems and lower land use densities.
- The studies referenced in the draft policy apply to local transportation nodes and may not directly apply to inter-regional rail travel. Work with local agencies to determine what travel behavior can be expected to and from each station, given its location and the particular nature of HST travel.
- In addition to the 20 percent match offered in the draft policy, the Authority should encourage regional agencies to offer station planning assistance and other infrastructure grant programs through local transportation funding mechanism, such as

Call For Projects programs. Also, the Authority should lobby the federal government to introduce funding programs that support local-level HST development.

- It is not clear how local planning efforts to change land use policies around potential HST station sites will coordinate with the Authority's efforts to select final station locations. The draft policy suggests agencies are responsible for amending relevant policy documents to accommodate HST **prior** to final station selection. Such local planning work is extremely costly and time consuming. Such efforts would be wasted if a station location ultimately were not selected. It is unlikely cities could conduct the extensive planning, outreach, and public process necessary to amend a General Plan or specific plan to accommodate a station within the short timeframe (one year or less) that the Authority plans to make final station selections.

City of Escondido

- The two alternative HST station locations are within two study areas under consideration in the city's Update. The station site near I-15 is within Study Area EL-3. The station site near Centre City Parkway is within Study Area SG-1. For information contact Jay Petrek (760-839-4556 or jpetrek@ci.escondido.ca.us).

City of Fresno

- The City of Fresno generally agrees with much of the draft policy, including specific goal statements.
- Does the Authority have any plans to form various joint powers authorities (JPAs) that would have jurisdiction over all HST development, or will it be the responsibility of local governments to establish a JPA or some other governing/operational entity?
- Please define "value capture." The city agrees that strong private-public partnerships and sound zoning and development policies would be appropriate as a financing strategy for some of the improvements needed to support HST, but it is concerned that the revenue generation capacity of downtown Fresno would be insufficient to fund these types of improvements.
- Downtown Fresno may lack to the infrastructure capacity to accommodate higher densities and the types of upgrades needed could be an order of magnitude larger than minor urban design improvements. Traditional value capture mechanisms like property assessments and TIF are very unlikely to be sufficient. Additionally, these investments typically must be made upfront in order to attract private investment development.
- Please provide a list of incentives the Authority will provide.
- Fresno has applied for TIGER II grants for a comprehensive economic study of downtown. If the Authority were to provide grant monies now the city could integrate the proposed comprehensive economic analysis into the current downtown study.
- The City of Fresno should have control over facility design and be free to enhance and integrate the station into other local plans.
- High-density transit-oriented development can be quite costly, and this may detract from the affordable housing goal.

City of Gilroy (City Administrator)

- The August 27, 2010 deadline for comments meant a very short time for the review of such an important document and it imposed a burden on the city to review and comment quickly. The City of Gilroy requests lengthier comments periods in the future.
- The draft guidelines have been only very slightly modified from the original 2005 document and now propose to have practical application. We believe the draft guidelines are in need of substantive revision before the Board acts to approve or apply them.
- In the furtherance of governmental transparency in the identification of the actual cost of the proposed project, we recommend that the draft guidelines specifically identify the responsibility of the Authority to fund what are otherwise hidden (and therefore unaccounted) costs of the project on local government and Californians generally. These costs should be borne by the Authority and included in the current design expenditures and in future bond measures placed before California voters.
- Contain a statement that the Authority's construction of stations, tracks, and other facilities in smaller city downtowns will not alter the historic areas of commerce either aesthetically or through the impacts of the use of high-speed rail by end users. Any such impacts will be appropriately mitigated through track, station, and other facility location determinations and/or construction methodologies. Additionally, the Authority's draft guidelines should expressly address policy statements regarding environmental justice and affordable housing to the extent they affect potential downtown, or other track, station, or facility locations.
- In addition to the architectural provisions the guidelines should contain a definitive statement as to the Authority's responsibility to fund local infrastructure in support of the operation of the HST system. This includes stations, parking, and maintenance-of-way facilities.
- The guidelines should be modified to identify that the Authority will pay for costs associated with local government planning efforts, general plan amendments, and TOD specific and other related plans devised to accommodate the necessary HST stations, tracks, and facilities.
- Look forward to working with the Authority to develop an HST station in Gilroy consistent with the city's vision for development of our community

City of Gilroy (City Transportation Engineer)

- The draft policy seems reasonable for a city of 250,000 to 1,000,000 people, but how can these principles be applied to a small (50,000) semi-rural city with a large catchment area? Our downtown is small and narrow, so will the HST station and parking structure dwarf our town? The policy needs to be flexible towards city size. The policy should account for small communities in semi-rural settings.
- Gilroy has a compact downtown grid. Would this street grid network serve an HST station development area? For an East Gilroy station, how would the Authority establish a "pedestrian-oriented" grid roadway network?

- The Authority should use its powers to develop and finance the parking structures. Gilroy will function as a regional station and the parking structure needed clearly exceeds Gilroy's funding capabilities.
- The Authority offers to assist cities in the Central Valley with a comprehensive economic study of the kinds of businesses that would uniquely benefit from being located near an HST station. Please include the City of Gilroy in this offer, including its regional influence in the economic analysis.
- The city must be the lead agency in developing plans which best suit the Gilroy community with the Authority providing "full financial support" for technical analysis and project integration.
- The development of the station area plan needs to be lead and developed by the local agency with a supporting "full financial" role coming from the CHSRA. The policy must recognize that the local agency is the lead for all TOD studies with "full financial" support provided by the Authority.
- When will the Authority identify its financial responsibility to local governments in pursuit of the guidelines established in the draft policy document? Where will the CHSRA identify its financial responsibility to local governments in pursuit of the draft policy?
- The city recommends that CHSRA should provide "full financial support" for preparation of the technical analysis and plans to prepare such studies that would not be otherwise required of communities in the absence of the High-Speed Rail project.
- The City of Gilroy believes the CHSRA should contribute 100 percent of the cost for the development of the plan.
- The City of Gilroy has two concerns about proposed funding:
 - The 20 percent match is not enough incentive to have local governments pursue these study activities. Consider 88.5 percent (offered by FHWA for road projects), 80 percent (VTA Bicycle Expenditure Program), and 50 percent (Proposition 1B programs).
 - The \$200,000 maximum per HST station falls short of the true needs for local agencies. A more realistic minimum would be \$500,000 per station.
- Gilroy is analyzing two separate potential station locations and because of the vast differences between these two alternatives, we are requesting they be considered two separate stations so a full maximum of \$500,000 grant each would be necessary.
- The city believes the full cost of required studies and planning documents to accommodate high-speed rail facilities in and through local communities should be fully funded by the CHSRA, which most closely aligns with the electoral intent of Californians.

City of Millbrae

- In general, Millbrae supports the draft principles and guidelines, but requests that in the future the Authority provide more time to review and comment on important project issues.
- The City of Millbrae is looking forward to working with the Authority to implement the Millbrae Station Area Specific Plan (MSASP) development in the vicinity of the proposed Millbrae HST station, but reiterates its previous comment that Site 1

development is vital to the City of Millbrae's economic vitality and the proposed Millbrae HST station needs to be designed in such a manner and fashion as not to hinder our ability to fully develop Site 1 as envisioned in the Millbrae MSASP.

- The City of Millbrae looks forward to working with the Authority to develop an acceptable station footprint which preserves Millbrae's ability to implement its MSASP and to improve upon the current forms of alternative access that are mutually beneficial to Millbrae and the Authority.
- The MSASP was prepared some years ago during the BART planning process and therefore will need to be updated to reflect the new economy as well as complimenting the proposed Millbrae HST station. The best way to incorporate an HST station and capture as much value as possible is to thoroughly amend our existing specific plan; however the city will need to rely heavily on the Authority for financial support to accomplish this major undertaking.

City of Modesto

- The draft policy calls for higher densities around station sites. Establishing goals/target densities and distances from the station would be very helpful. We expect density goals will vary based on city size and nature, i.e., large vs. small, metropolitan vs. agricultural, etc.
- Establishing goals/target land use mixes would assist in our planning. What is the preferred ratio of office to residential uses? Should residential development be restricted in area adjacent to an HST station?
- The policy should establish station area goals/target parking limitations.
- Please assist local governments by providing sample value-capture techniques for transit-oriented development.
- Please include examples of station and feeder service siting that will help the city create the best possible access to the station.
- Parking expectations for HST and regional rail may conflict. Will the Authority include assistance to local governments in resolving potential conflicts and developing compromises?

City of Murrieta

- Consider the type of area. Inland communities, such as Murrieta, are more suburban and although higher density development may be desired, consideration should be given to what higher density can be developed reasonably and to create the mix of land uses that would complement and support a HST station. It is important to maintain the reference to "a mix of housing types to meet the needs of the local community." While a grid street pattern may be desirable, it may be difficult to develop in areas that have a suburban street model.
- Consider opportunities for station locations in areas that are not "traditional city centers." Areas such as Murrieta that do not have the traditional city center for a HST station location, however, will be able to create a unique development, which will not displace longstanding residents or businesses. "Greenfield" sites will need to be considered in the inland areas that are not fully developed, but that provide an integral link between Los Angeles and San Diego.
- While multimodal transportation hubs may be preferred, there are a number of potential stops that do not yet have a complete transportation network in place. Planning for these stops may be at different locations, but in proximity to one another and

with connection opportunities. Cities in southwestern Riverside County are working together on area plans, connecting linkages, and transportation hubs, as well as implementing the development of infrastructure.

- Incentives for planning, TOD and public spaces certainly will be needed for local communities to develop areas surrounding the HST stations. The benefit of a station is a regional benefit that requires the support and participation of regional agencies. Local finances are becoming more limited and less urban cities do not have the same property tax base or financial resources that traditional urban cities have. Since the population base in the inland areas is more spread out and a number of communities would rely on a give station, financial resources for public spaces and maintenance options should be further studied.
- Overall the guidelines seem geared more toward commuter/light rail, as opposed to HSR. A HST station location, especially in a location like Murrieta, would depend more on riders from surrounding cities and not as much on residents in a TOD zone.

City of Palo Alto (Mayor)

- The City of Palo Alto will not provide comments on the draft guidelines until the Palo Alto High-Speed Rail Committee and the full Palo Alto City Council have had adequate time to review them.
- The city voices strong objections to the practices and procedures engaged by the CHSRA in its interactions with the City of Palo Alto and its staff. The committee, let alone the full council, does not have sufficient time to review this material and provide thoughtful responses in three working days. Asking the city to respond within days of notifying us shows CHSRA staff either made an honest error, staff is unfamiliar with municipal practices and procedures, or this was a part of a concerted effort on behalf of the CHSRA to not give the City of Palo Alto and similar agencies sufficient time to respond.
- In the future, the Authority should formally request comments on draft documents published by the Authority in a written letter addressed to the Mayor and/or the City Manager.

City of Palo Alto (City Manager's Office)

- The draft policy asserts a variety of potential benefits (e.g., increased HST ridership, increased revenue to the state, reduced land needs for new development, enhanced joint development opportunities) to denser development around HST stations. As there is no HST system operating in the United States, how do we know any of the proposed impacts would apply? What quantitative data support these assertions? In reasonable economic times, densification around well planned stations can successfully attract joint development, but station and support facility scale are key. Station size is based on ridership forecasts and we believe the Authority's current forecasts are suspect.
- The draft station area development policy should include consistency with any local General Plan/Comprehensive Plans and with any local Rail Corridor Plans. The Authority should provide support to cities to complete this work and not rely only on its preliminary assumptions outlined in the environmental documents.
- Please elaborate further regarding value capture. How does it work, what is involved, what are the benefits and costs?
- Each station site is different. It seems the Authority is trying to develop station area development policy in support of SB 375 by providing incentives for development around transit station areas.

- Providing incentives to local governments is a great idea, but we need more details. What kind of incentives? Monetary or in-kind? Will there be funding for HST station plans? For planning and engineering studies? Will funding be grants, loans, or both? Has a process been identified for the review of potential TOD plans and for the development of an incentive package that fits each community? Will the Authority help underwrite the costs of station area planning? Would the Authority facilitate, organize, and conduct a formal community HST planning process?
- Please clarify how an open trench or covered trench design option in Palo Alto would relate to a station downtown. What are the options related to this?
- For Palo Alto, it is critical that there be some discussion of Stanford University's interests and role in the downtown station as it owns the land.
- We need more information on parking. We have been told the responsibility for providing parking would fall to the local government; to a local agency in partnership with a private developer; or to a private developer. Which is it? Based on the estimated 3,000 spaces required parking spaces for a mid-peninsula station and a conservative estimated cost of \$50 per space, the cost could be \$150 million. Would the Authority consider fewer than 3,000 spaces? Under what circumstances? If the local government does not want additional parking or there is insufficient funding for parking would the Authority fund greater transit connections to the HST station?
- Why does the draft policy offer comprehensive economic studies only for Central Valley communities? Why not apply this standard to all potential station host cities? How can a local agency demonstrate its support of TOD: an adopted plan? A draft plan? What funding streams are anticipated to pay for local agency pedestrian and bicycle facilities and ongoing operations/maintenance costs?
- How do we know an HST station would lead to job and housing growth? What about traffic, noise, vibration, construction and air quality impacts of the station?
- Any TOD plans must be coordinated with the Grand Boulevard Task Force studies of housing opportunities, economic growth and transit use along El Camino Real. A significant portion of the proposed HST alignment is very close to El Camino Real between San Francisco and San José.
- Any TOD station design should incorporate the highest energy efficiency standards, high building performance standards, and provide easy access to bicycle and alternative transportation, including charging stations for vehicles of all types.
- Any mid-peninsula HST station should not negatively affect the operations of Caltrain and not reduce the opportunities for cities to have the benefits of improved and enhanced Caltrain service, including revised and upgraded stations along the corridor.

City of Redwood City

- It is unclear how the HST station plans are scalable to mid-Peninsula municipalities such as Redwood City. Please include a section describing in more detail the plans for scaling HST stations to make them more appropriate for a city our size and tailored to our community.

- Other than the request for initial comments and suggestions for improvements to the draft guidelines there is no specific mention of a deadline, process, timeline, action plan, or other steps and milestones defining how and when station locations will be determined, how the process will unfold, or how the Authority will communicate with cities, their residents, and their businesses. It is not clear if there is an application process for interested communities or a feedback process for communities not interested in hosting an HST station.

City of San Diego

- The draft policy appears to be too prescriptive and at times seems like it is trying to make the case for TOD and how local jurisdictions should conduct planning for TOD centers. The goal of this policy should be more related to implementing SB 375 and sustainability with smart growth development that reduces greenhouse gas and vehicle trips. The Authority should consider encouraging local jurisdictions to be creative in how they could meet larger state planning goals rather than defining any one specific approach.
- The Authority should recognize there will be different station types that serve different users based on locations and existing land uses. Some stations may be more employment- or residential-focused while others, such as San Diego International, may not provide opportunities for mixed-use development but would provide needed intermodal connections.
- There could be just as much benefit in having a station in a mixed-use urban center outside of downtown as there is in having one downtown. There could be locations outside the downtown that may have more redevelopment potential than others downtown. The ability to site a station at a major multimodal center may outweigh other locations with more potential for mixed-use development, but fewer multimodal connections. The Authority should avoid a “one-size-fits-all” approach to station area planning.
- The draft policy seems to go into too much detail about site-specific urban design, form, scale and type, financing, and maintenance of facilities. The Authority should consider evaluating station sites on their ability to reduce greenhouse gas and vehicle trips (principles of SB 375), and improve economic development, multimodal access, and community enhancement (smart growth). The Authority also should consider allowing local jurisdictions the flexibility to demonstrate they can implement a station area plan that fits into the local planning and development environment and context without mandating land use mixes, locations, or geographic size of the station area plan. The state should avoid encouraging plans and zoning that over-regulates development since this would be a long-term disincentive towards supporting station area development. While the goal of TOD near the station in most locations makes sense, there should be more flexibility and understanding that there could be different types of station areas and the role of these stations in regional and statewide context should not be overlooked.
- How would a Station Area Plan relate to our Community Plans? Would it be a separate document?
- The draft policy states local governments are to use value-capture techniques to finance and maintain station amenities and public spaces needed to create an attractive pedestrian environment. What does this mean for a city already under a severe budget crunch?
- Do people who live near an airport travel by air more than those who do not live near an airport? It is more likely that residential and mixed-use development would occur in Riverside County or the Central valley with people commuting to

employment centers. The policy should locate HST stations near employment centers that are connected via transit to other residential and employment centers in the region.

- While bicycle and pedestrian access is valid for a local or regional commuting transit system, what percentage of travelers with luggage will walk or bike to a station?
- The policy should recognize that each station may have a different role in the statewide system. The policy should focus on trip- and greenhouse gas-reduction strategies, not prescriptive zoning. Not every station can have TOD.
- Local government financing for public spaces and long-term maintenance is not likely.
- While it may be true that studies show people who live and work within a half-mile of a rail station use transit more than ten times as much as others in a region, it seems stations on a statewide rail system would function more like an airport, so the fundamental travel behavior patterns may not be the same.
- The draft policy should focus more on allowing local jurisdictions to define what works to meet more general objectives; allow local jurisdictions to demonstrate how land uses around proposed HST stations would meet these general objectives and the objectives of SB 375.

City of San Fernando

- The City of San Fernando strongly supports the general principles for HST station area development. Moreover, the city has adopted a specific plan in downtown reflecting the principles of smart growth.
- We seek additional direction concerning the timing of the required TOD studies. Should they precede, be concurrent with, or follow the Authority's environmental review process?
- The development of a HST station will have welcomed far-reaching impacts. Our specific plan includes land-use and design standards that support TOD, but HST was not anticipated when it was written. We believe the best time to update the plan would be after the Authority completes the environmental review process so the identified mitigation measures can be integrated into the plan. A plan with this level of specificity also would facilitate the identification of particular value-capture techniques to finance and maintain station-related infrastructure. Please advise us as to whether such an anticipated sequence of events would be consistent with the Authority's criteria and process for selecting station locations.
- We offer the following recommendations for the draft policy:
 - Increase the level of funding for cities to conduct TOD studies. While larger cities such as Los Angeles may be able to allocated funds for TOD studies, smaller cities may have limited funds to conduct formal and comprehensive studies.
 - Provide strategies and resources to assist with the development of TOD projects. Until the regional and national economies recover, many cities, redevelopment agencies, and private developers will be challenged to finance TOD projects. The city recommends that both state and federal agencies play a major role to support TOD through funding due to the regional importance of the station sites.

City of San Francisco

- The draft policy is generally well considered and sets up appropriate expectations and policies for local jurisdictions.

- The Planning Department is undertaking a feasibility study of air rights development over the 4th/King station site to consider the potential for major TOD opportunities that would complement the HST/Caltrain station. A major goal of this study is to provide parameters to ensure that infrastructure planning at the 4th/King station site do not preclude such development. One issue of concern is the Planning Department's perception that the Authority is considering an above-ground parking structure at 4th/King and this notion is echoed by the draft policy.
- The policy statement on page 2 that "sufficient train passenger parking would be essential to the system viability" is in conflict with San Francisco policy to limit center city parking to encourage transit ridership and avoid automobile congestion. In the case of dense mixed-use areas in central city locations, such as San Francisco, constructing more parking structures in the immediate vicinity is likely not an appropriate or efficient use of land.
- HST passengers coming from outside the core urban area (or its transit shed) would be advised to drive to a non-central city location for parking facilities.

City of Stockton

- Stockton has worked diligently to facilitate and encourage an urban mix of land uses in our Downtown and Waterfront, and we understand the importance of well planned development around stations in ensuring the success of the HST system. Our objectives are mutually beneficial and supportive—that of concentrating infill development in the city center and moving people in and out of this area efficiently.
- Stockton's recently completed Events Center (waterfront ballpark, 10,000-seat arena, parking structure, hotel, and retail) was designed to attract and accommodate large numbers of people in a downtown urban setting. The Cabral station is within walking distance (or a short bus ride) to these venues and the city is working with the San Joaquin Regional Rail Commission to strengthen these connections as part of a complete street design between the station and the Waterfront.
- Early community involvement is critical in ensuring support of downtown development. We suggest early outreach and involvement by the Authority to help stakeholders understand and support the potential scale and passenger volumes of the station area. This is particularly true if trains or stations are elevated above grade.

City of Turlock

- Will the funds be available for the planning of the ACE regional rail stations, or only for high-speed rail stations? The City of Turlock would be interested, but current plans are for a regional rail station only.

Council of Fresno County Governments

- In order to more fully develop the proposed HST station as a multimodal hub, Amtrak service through metropolitan Fresno should be relocated to the UP corridor and a joint HST/Amtrak station developed.
- Some people may consider higher-density development (in relation to the existing pattern of development) in conflict with the objective to promote context-sensitive building design that considers the continuity of building masses. It might be helpful to provide additional explanations of these two principles.

Gateway Cities Council of Governments

- The construction of the HST through a community could have such negative impacts on existing land uses that any opportunities to share in the development of station areas may be outweighed by the negative impacts of implementation.
- Traffic impact analysis must be part of any station area development effort.
- The guidelines suggest stations will be developed in town centers. This may apply to Fullerton, but not to the other Gateway Cities along the Los Angeles-to-San Diego section. Any strategy to develop HST stations of this magnitude must take into account existing land uses, developments, and zoning around the proposed sites (which may NOT be town centers). A single strategy cannot encompass all potential situations and needs to be more flexible.
- The draft policy should further stress the importance of connections to existing and potential local, regional, and sub-regional transit services. An overall transportation and transit strategy should be included.
- The draft policy should be expanded to suggest an approach to make it implementable.
- The draft policy emphasizes pedestrian and bicycle access but pedestrians and bicyclists may represent a small minority of actual users.
- The draft policy should include a comprehensive economic study that addresses all economic impacts and issues.
- It seems unlikely that a HST station could relieve traffic congestion and improve air quality if activities are being concentrated in one place. The draft policy overemphasizes benefits but neglects potential negative impacts, particularly traffic impacts.
- Please reconsider the TOD concept. How many people will live near an HST station and use the HST daily? The draft policy should focus on interfacing with existing and planned transit services, and on concentrating long-term parking around systems to be built or shared intermodal facilities with airports. Parking intercepts and transit hubs should be the focus of the draft policy, not TOD.

Kern Council of Governments

- The draft guidelines look good. This is the direction we are trying to move with the Kern Regional Blueprint and the Sustainable Communities program for the Regional Transportation Plan.

Kern County Development Services Agency

- The Authority must acknowledge that the area surrounding potential HST stations may be private property subject to land use controls by a local government. Policies promoting specific development patterns, densities, and improvement designs are fine, but the Authority should not attempt to take over local land use control that is the responsibility of a city or county jurisdiction.
- The draft policy needs to acknowledge that the San Joaquin Valley urban pattern is a different scale than downtown Los Angeles or San Francisco. The draft policy needs to be sensitive to each community's existing urban patterns and characteristics. Potential HST station sites are not blank canvases upon which to apply standards for surrounding development. One size does not fit all situations.

Los Angeles County Metropolitan Transportation Authority

- Local jurisdictions should be required to evaluate their existing development standards and validate that they have taken or will take appropriate steps to legislate out conflicts in their HST station area plans.
- Funding and financing should be made available for development that supports mass transit solutions.
- The draft policy should make a clear distinction between major urban and smaller or suburban station sites. Terminal or hub stations are likely to have different requirements. This variation should be reflected in the policy by incorporating awareness that a HST station area TOD plan should maintain balance between the station area and the surrounding neighborhoods.
- The policy should recognize that not every HST station will function as a significant destination and the type, level, and nature of development should reflect the functional purpose of the station.
- The HST system is a corridor linking major destinations, and the type and level of development does not need to be uniform across the system, nor should the stations compete. A more sustainable program would look to encourage development that is appropriate in providing HST patrons ease of access to various destinations, including places of business, places of employment, and places of residence to encourage high levels of ridership.
- The Authority should clarify whether it intends to develop the stations properties itself; sell the land to local governments; or convey title to the local governments subject to an approved development agreement.
- If the Authority intends to participate in the revenue from development of its properties, whether in the station area or from the development of any CHSRA properties tendered to the local jurisdictions, revenue participation standards should be part of the draft policy.
- Many host cities will not have revenue sources to promote the envisioned development. Thus, properties will need to be acquired, assembled, and made ready for new development and public infrastructure to support the development needs to be provided.
- Assembly Bill 1221 was proposed in 2007 to allow local jurisdictions to adopt a transit village plan to engage in tax increment financing. The Authority should promote the adoption of this or a similar bill to provide a local source of capital financing and land assembly to maximize the potential for new development and supporting infrastructure in HST station areas.
- The draft policy should include a comprehensive parking development and management approach. As some proportion of the total parking requirement will be developed in proximity to the HST station and/or generally within the TOD area (½ mile radius) parking facility connectivity, location, design, mass, aesthetics, and impact on local circulation should be a component used to select an HST station location as well as determining what proportion of parking should be in remote facilities.
- The Authority should be responsible for the environmental clearance and the construction of HST parking facilities. Local jurisdictions' provision of parking facilities should not be a criterion for HST station selection.
- The Authority should establish a parking pricing strategy with the following characteristics:
 - Parking fees should be significantly higher during peak periods than during off-peak periods.
 - Off-peak pricing should be higher than prevailing market rates within the HST TOD area.
 - HST remote parking pricing should be set at a rate to encourage use.
 - HST parking prices should escalate as the number of available spaces decreases (dynamic pricing).

- The Authority should allow patrons to purchase a guaranteed parking space at any of its facilities.
- The percentage of total parking spaces at HST parking facilities set aside for pre-sales should be highest at the parking facility closest to the HST station (e.g., 90 percent decreasing to 50 percent at the most remote facility).
- The Authority should provide funds directly to the local jurisdictions to develop parking facilities.
- The Authority and the local jurisdictions should jointly prepare a plan that disperses parking consistent with the vehicle trip and greenhouse gas reduction goals of the HST TOD plan.
- The Authority should allow local jurisdictions to operate and manage HST parking facilities, share in the revenue generated, and use revenues to support further development in the HST TOD.
- The CHSRA parking policy should deter automobile access in favor of transit, high-occupancy vehicles, and/or non-motorized access to the HST stations.
- CHSRA guidelines should be consistent with emerging standards for sound TOD planning in local communities.

Peninsula Corridor Joint Powers Board (Caltrain)

- Complementary to the HST draft policy, the JPB encourages cities to implement TOD along the Caltrain corridor as guided by the Caltrain Access Policy (<http://www.caltrain.com/Assets/Public+Affairs/pdf/Comprehensive+Access+Policy.pdf>). JPB's primary interest in station area planning is the opportunity presented to maximize ridership, grow sustainably, and link land use patterns with transit service systems.
- Since the potential HST station areas along the San Francisco Peninsula are significantly built up and/or have existing plans for TOD, the focus of the HST station area policy for this region would be more applicable if it focused on assisting local agencies in assessing how the HST system will affect the existing environment and plans, and in preparing updated station area plans to accommodate HST. We need to understand how Caltrain stations will be affected by changes in Caltrain service resulting from the introduction of the HST on the Caltrain right-of-way.
- In keeping with smart growth and sustainable principles, it is good to limit parking in the immediate station area and prioritize "green" transportation modes of access. However, we will need HST assistance in undertaking the implication of this policy. If a HST rider is unable to park near the station due to limited supply, what will that rider do? What level of demand will there be on feeder services? How will the parking demand affect local neighborhoods and land uses throughout a HST station city? These questions must be answered to inform the necessary development of access plans.
- There is appreciation for the CHSRA's commitment to provide a 20 percent (up to \$200,000) match for station area planning. However, most local agencies do not have the resources to find the other 80 percent of funding. Given that these planning efforts are necessary for the HST system, we request the Authority to identify a complete funding strategy for local station area plans as well as the anticipated local capital investment and operation/maintenance needs.
- Please provide an explanation of how the encouraged station area planning process relates to the HST project-level environmental review process. It is our understanding that the draft HST environmental documents will be released at the end of this year. Three months is not sufficient time to complete the referenced planning efforts. How will the station area planning efforts tie into the HST project development process?

San Diego Association of Governments

- We agree with your statements regarding TOD/smart growth areas and multimodal hubs, which are consistent with our local policies and long-range transportation plans.
- We agree with limits on the amount of parking for TOD/smart growth area around stations, but we would appreciate more information regarding HSR parking and what is meant by “sufficient train passenger parking,” especially since these stations will be multimodal hubs.
- Please consider remote/offsite parking for rail passengers (e.g., remote sites with direct or “FlyAway” bus service to the station).
- The draft policy should note that all stations are not alike and that the Authority and local jurisdictions will need to collaborate on station area planning (e.g., include a discussion on stations with airport connections or near employment centers, not just residential).
- We encourage the Authority to partner with regions and local jurisdictions in smart growth planning and consider it appropriate for the Authority to provide funds for these efforts. SANDAG administers a Smart Growth Incentive Program with planning and capital grants available to local jurisdictions. Project matching funds are one evaluation criterion.
- There are resources on the Smart Growth Toolbox page of the SANDAG website, including Smart Growth Design Guidelines and Planning and Designing for Pedestrians: <http://www.sandag.org/index.asp?projectid=334&fuseaction=projects.detail>

San Joaquin Regional Rail Commission (Executive Director)

- Plans for connecting transit should be a direct component of the station area plan. Too often when dense development is encouraged, adequate space and accommodation for transit is an afterthought precluding the development of safe, efficient transit service.
- The planning process should identify early land acquisition or reservation strategies. Lack of control over the surrounding land has been one of the biggest deterrents to successful station area expansions, especially in the Central Valley where joint development examples are less common.
- The planning process should prioritize early community involvement, including nearby residents, businesses, private developers, and financing representatives. Care should be taken to ensure this process is viewed as a vision the communities are developing for themselves, not something that is being imposed on them by the Authority.
- It has been suggested that some of the major HST stations will be more appropriate for concentrated commercial, retail, civic, and entertainment land uses and that the housing component (TOD aspect) might be more appropriate one station away from these HST centers surrounding a regional stop that feeds into the HST system.

San Joaquin Regional Rail Commission (Strategic Development & Communication)

- The draft policy references two state codes which outline examples of transit-specific plans a city may adopt. Elsewhere the draft policy references developing plans, development agreements, zoning overlays, and the use of redevelopment authority.

If the Authority has a preference for method the draft policy should state it. Otherwise the policy should explicitly state that direction will be at the discretion of the local government to determine which processes would be best for its local conditions.

- The draft policy defines the station area plan by a one-half-mile radius of the station but the state's Transit Village Development Plan code asserts TOD should be within one-quarter-mile radius of stations. This should be clarified.
- As many cities only allow a General Plan amendment a few times each year, the Authority should consider this limitation when timing the announcement of opportunities for planning or financial assistance.

Southern California Association of Governments

- SCAG fully supports the goals and objectives of the draft policy.
- SCAG has received a Caltrans grant to fund a study by UCLA into how TOD functions around HST stations versus how TOD functions around local and regional transit. For information contact Marco Anderson (213-236-1879 or anderson@scag.ca.gov).
- It should be noted that in some locations commercial and office development may be a major component of TOD station area plans, as many people mistakenly associate only residential development with TOD.

Transbay Joint Powers Authority

- The draft policy is similar to that used by the TJPA to promote dense development around the proposed HST station with maximum transit connectivity.
- The policy statement on page 2 that "sufficient train passenger parking would be essential to the system viability" is in conflict with San Francisco policy to limit center city parking to encourage transit ridership and avoid automobile congestion. This contradiction may apply also to other center-city HST station locations. For suburban and small-town station locations with limited public transportation, parking garages may be necessary, but in dense downtown locations, such as San Francisco, parking structures may not be the most appropriate and efficient use of land. This distinction should be made in the draft policy.

United States Environmental Protection Agency Region IX

- The EPA applauds efforts by the FRA and the Authority to promote principles for well planned station areas, including high-density development, mixed use, pedestrian-oriented street design, context-sensitive buildings, and parking limitations.
- Address Green Building - The EPA suggests incorporating green building design in the draft policy. When evaluating station location options, the EPA recommends the FTA and the Authority evaluate whether a local government has committed to green building practices for station area development.
- Incorporate Local Character into Station Area Development - To the list of steps for local governments on page 5, add a bullet encouraging them to identify opportunities to preserve local culture, character, and sense-of-place *while still meeting other policy principles*.

- Link Station Area Policy to Growth-Inducing Impacts Analysis in EISs and Add Details on Timing and Status of Outreach - The EPA recommends the Authority directly links the draft policy to the EIS process. This is particularly important given that the nine project-level EISs being completed for the statewide HST project will need to incorporate a robust analysis of indirect, growth-inducing effects that will result from the implementation of the HST system. The growth-inducing effects assessed through the Programmatic Statewide EIS assumed a higher density of development around HST stations. The EPA continues to request that a thorough analysis be completed to justify this assumption, as previously stated in EPA review comments for that EIS.
- The EPA suggests that the FRA and the Authority begin outreach to local governments on station-area developments as soon as possible in order to obtain the necessary model inputs and make appropriate assumptions for assessing growth-related impacts to the detail required for the nine project-level EISs. The next version of the draft policy should include section-specific details on timing for outreach to local governments.
- Connection to Project-Level EIS/EIR - The EPA suggests including a summary of correspondence with local governments on station area planning within each section-specific project-level EIS/EIR. Also, each EIS/EIR should also include a summary of whether a station-area development plan has been created for each station and which of FRA's and the Authority's development principles have been incorporated. The EPA stresses the need to conduct outreach prior to release of the project level EIS/EIRs. The willingness of local governments to adopt the draft policies will greatly influence growth patterns, and must be known to the fullest extent possible in order to analyze impacts accurately and to project whether significant impacts will occur.
- The EPA recommends that the FRA and the Authority make both the methodology and the assumptions in the growth-inducement analysis as transparent as possible in the project-level EIS/EIRs. This includes any assumptions tied to the HST policies for station area development. We continue to recommend that the FRA and the Authority use FHWA/Caltrans/EPA growth-related impacts guidance which is applicable to non-road projects.
- The EPA requests a conference call to discuss its comments with the appropriate CHSRA staff and consultants at the earliest convenient time.

United States House of Representatives

- The success of the Transbay Transit Center in San Francisco will mark a significant step forward for the dream of high-speed rail across California and is central to our work to invest in our nation's infrastructure, and rebuild and renew America.

Urban Land Institute (San Francisco, Orange County/Inland Empire, San Diego, Los Angeles, Sacramento chapters)

- A detailed review of the draft guidelines should be made with specific attention being given to the relative nature of the typology of the station.
- We suggest a framework for the guidelines that focuses on HST rail-oriented development (ROD) rather than traditional transit-oriented development (TOD).

- A value capture analysis should be conducted for the purposes of making the economic case for local jurisdictions to seize the development opportunities at the stations.
- A comprehensive analysis of the barriers to development should be completed to inform future actions.
- We support the Authority’s resolution to allocate \$200,000 per jurisdiction for the cost of station-area development studies, however the Authority should require that these *allocated funds result in complete “specific plans” as defined under CEQA and full EIRs*, so that new development can tier off the program-level EIR, potentially streamlining project approvals.

Mr. Geoffrey Thompson, Mountain View citizen (no agency affiliation)

- I am a stakeholder as a fourth-generation Californian and by virtue of my residence on the San Francisco peninsula for 39 years.
- I take issue with the draft policy that promotes HST stations to be located “in traditional city centers.” It does not apply well to the mid- and lower-peninsula areas because “traditional town centers” here have not grown around major roadway intersections (as in other areas around the state) but around railroad stations more than 100 years ago. When major roads were built on the peninsula after World War II, they generally went around these old core downtowns. It would be very difficult and overly expensive to upgrade the roads that serve the traditional town centers to accommodate the traffic demand and automobile parking requirements associated with an HST station.
- If a mid-peninsula station is selected, the Authority would be better served to consider locations where arterial highways intersect with the Caltrain right-of-way. These tend to be between historic downtowns, not in them. It would be better for access and land-acquisitions costs to locate stations there.
- The local population has a strong vested interest in preserving the local (somewhat) “small-town” character of the communities and is wary of the potential impacts of large-scale TOD projects on the character of existing town centers.