

Transportation Solutions Defense and Education Fund

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October 25, 2007
By E-mail and U.S. Mail

Hon. Quentin Kopp, Chairman
California High-Speed Rail Authority
EIR/EIS Comments
925 L Street, Suite 1425
Sacramento, CA 95814

Re: Bay Area to Central Valley DPEIR/S

Dear Chairman Kopp:

The Transportation Solutions Defense and Education Fund (TRANSDEF) is a Bay Area environmental organization advocating the regional planning of transportation, land use and air quality. We are especially focused these days on policies that are responsive to the challenge of climate change. We strongly support High Speed Rail (HSR) and see it as likely to become the State's most far-reaching (literally as well as figuratively) climate change mitigation project.

The long list of capital projects that need to be built to provide a low-carbon way of life places tremendous pressure on your Authority to economize with this project. Cost-effectiveness in achieving an integrated California High Speed and intercity rail system will be key. That is why the "hybrid" recommendation that MTC adopted yesterday is a total non-starter. Because of its \$5 billion dollars of additional cost, we urge you to discard it from further review as an option, due to its financial infeasibility.

TRANSDEF finds this environmental document profoundly unsatisfactory. Major new work will be necessary to make the Bay Area to Central Valley Draft Program Environmental Impact Report/Statement (DPEIR/S) a valid basis for the important decision of selecting an HSR alignment to connect the Bay Area with the rest of California.

It is nothing short of inconceivable that an environmental document whose sole purpose is to inform the choice between two competing alignments is silent on the issue of the relative merits of those alignments. In its present form, the DPEIR/S offer no guidance on this weighty question, and doesn't offer even a summary table of benefits and impacts of the two alignments. Hundreds of pages go by without this issue being addressed. Did the EIR preparers think we would be so overwhelmed by the data as to miss this glaring absence? This flaw is so profound as to require revision and recirculation, without ever getting to the substance of our comments.

Comprehensive Rail Network

The capacity of HST facilities is so great that their unused capacity can be used to provide regional and interregional mobility solutions without building additional infrastructure. The Altamont alignment offers the opportunity to provide quality service to three travel markets (Bay Area to L.A., Bay Area to Sacramento, and Bay Area to Central Valley), where the Pacheco alignment only can serve one well. Piggybacking additional services on the same infrastructure enables dramatic capital cost savings.

Building an HST line over the Altamont pass will cover most of the capital cost of providing fast, reliable ACE regional and interregional service. If the DPEIR/S cumulative impact analysis were to assume that ACE's future expansion funds were used to purchase rolling stock and operations, ACE would then be able to provide top notch service to Silicon Valley. This in turn would catalyze transit-oriented development in the Central Valley and in Silicon Valley that might otherwise not occur. The cumulative impacts analysis of such a scenario would note the difference between these results and the sprawl development that would occur in Santa Clara, Merced and San Benito Counties if the Pacheco alignment were built-out.

The operating plan assumptions used in the DPEIR/S were silly. The Base Case for the Altamont alignment assumes that only a fraction of the trains from southern California would connect with San Francisco, with the rest going to San Jose. DPEIR/S at S-12. The model then produces a lower ridership estimate for the Altamont alignment, because travel demand models project less ridership when less train service is available. That assumption is the product of a flawed mindset that sees HSR in isolation. HSR needs to be recognized as the backbone of an extensive regional and interregional rail network. Despite the hope that planning would produce a vision for a comprehensive system, TRANSDEF is profoundly disappointed at MTC's mismanagement of the Regional Rail Plan, and its asinine HSR recommendations and final conclusions.

Nonetheless, the HSR project cannot be meaningfully evaluated on its own. It is only through the synergistic effects of the regional rail network on the HSR system that HSR will achieve maximal environmental benefits. Modelling HSR without the regional rail network will result in ridership calculations that completely ignore the further objective of HSR: "to relieve capacity constraints of the existing transportation system in a manner sensitive to and protective of the Bay Area to Central Valley region's and California's unique natural resources." DPEIR/S at 1-4.

Because the level of Bay Area congestion on Highways 80 and 580 is very high, far outstripping conditions in southern Santa Clara County, the Altamont alignment does far more to serve this objective. Ridership calculations done without adding in the regional riders that use the HSR infrastructure are therefore worthless for purposes of determining which alignment produces the maximal social benefits (which should be the determining factor).

The goal should be to build a regional rail network that provides frequent BART-level service around the region, using the excess capacity of the HSR infrastructure.

Under such a scenario, a train from the southland would be met in Fremont by a train to San Jose, so that, with a platform-to-platform transfer, every train would access San Jose and San Francisco. With regional service assumed like this (or by coupling and uncoupling trainsets), the two alignments will have the same frequency of service. This then will result in meaningful ridership calculations, in which Altamont is sure to have more total riders.

Growth Inducement

We contend the findings of the growth inducement analysis fail to pass the common sense test, and are simply not credible. Peak hour highway conditions between the Bay Area and outlying counties are miserable now and heading towards becoming much worse in 2030. These conditions are represented in the DPEIR/S as the No Project Alternative. They will prevent any kind of substantial expansion of commuting into the Bay Area. Under the Network Alternatives, one would expect Central Valley employment, Table 5.3-2, to drop below the No Project Alternative as Central Valley residents stream onto HSR in search of the Bay Area's higher wages. But it doesn't. Similarly, one would expect Bay Area employment with the Network Alternatives in Table 5.3-2 to increase sharply in relation to the No Project Alternative, as a large pool of lower-cost-of-living employees becomes accessible.

The fact that the growth inducement analysis fails to show a substantial change in employment between the No Project and Network Alternatives indicates that the model considers the travel connection between the Bay Area and the Central Valley to be convenient enough. That finding clashes with everyday traffic reports that always have problems. Given how bad the traffic is now, it is especially egregious that the DPEIR/S concludes that adding HSR does little to change travel patterns, i.e., induce growth. This whole section needs to be redone, starting with accurate traffic counts now and into the future.

Statewide Growth

With urbanized land in the core study area projected to increase by an astonishing 40% between 2000 and 2030 (at 5-12), it is clear that HST and a comprehensive Smart Growth mitigation package could play a dramatic role in reducing the environmental impacts of a projected tremendous increase in population and jobs. In the absence of a State growth management regime, a statewide project EIR serves as a de facto state plan.

The DPEIR/S must propose mitigations for this massive projected increase in sprawl. Mitigations are tested by studying how the alternatives compare to the 2005 baseline, as well as to the No Project Alternative. Mitigations that should be evaluated:

- Drop the planned and funded transportation highway improvements that are assumed in the No Project Alternative. Use the funding to instead build a

network of intrarregional trains that connect with the HSR network.¹

- Assume that voters authorize a shift in Proposition 1B Transportation Bond funds from highways to HSR. Calculate the reduction in GHG emissions resulting from building out the HSR system sooner.
- Propose a Blueprint for 2030 for the Project core study area minus the 9 Bay Area counties (which already have a Smart Growth Plan), modelled on SACOG's Blueprint, with higher densities outside and much less conversion of vacant land.
- Propose Indirect Source Mitigation Fees similar to those in place in the San Joaquin Valley, but increase the cost high enough to restrain the growth of large lot subdivisions.
- Assume a \$1.00 increase in the gas tax, with revenues used to fund bus and shuttle operations, following a Constitutional Amendment by voters to authorize transit use of gas tax receipts.

Conclusion

TRANSDEF was very involved in preparing the extensive comments submitted by our attorney, Stuart Flashman. We appreciate this opportunity to provide additional comments to the CAHSRA. We hope that the agency will seriously consider what we have said here, and decide to work on behalf of the people of the State of California to provide the greatest benefit to the greatest number.

Sincerely,

/s/ DAVID SCHONBRUNN

David Schonbrunn,
President

¹ For an off-the-shelf set of assumptions to model this scenario, see the TRANSDEF Smart Growth RTP Alternative in MTC's 2005 RTP FEIR, Appendix D.1. All highway funds were transferred to transit projects. Many new bus lines were initiated. HSR was built. The transit network definition files are available from MTC.