



BayRail Alliance

formerly Peninsula Rail 2000

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August 31, 2004

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

Re: Comments on the DEIR/DEIS for California HSR

Dear High Speed Rail EIR/EIS Staff:

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

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

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

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

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

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

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

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

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

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

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

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

Sincerely,

Margaret Okuzumi
Executive Director