



Californians for High Speed Rail

A Statewide Coalition of High Speed Rail Supporters | 337 Green St. San Francisco, CA 94133 | 510.931.0384

October 30, 2009

Ms. Carrie Bowen, Regional Director
Attn: Fresno to Bakersfield HST Project EIR/EIS
California High Speed Rail Authority
925 L Street, Suite 1425
Sacramento, CA 95814

RE: Fresno to Bakersfield Section Scoping Comments

Californians For High-Speed Rail is a grassroots group of California residents dedicated to ensuring that the California High Speed Rail (CA HSR) network is sufficiently funded and supported. Additionally, Californians for High-Speed Rail is working to ensure that the development of high speed rail (HSR) in California is done in a way that best serves all citizens, and in particular, the future riders of the CA HSR network.

We are submitting this letter to provide our scoping comments regarding the Fresno-to-Bakersfield section of the environmental review process being undertaken by the California High Speed Rail Authority (Authority). This letter covers three subject areas. First, high priority criteria and mitigation measures are proposed for inclusion in the project-level EIR/EIS planning process for HSR stations. Second, station sites and track alignments are proposed for inclusion in the alternative analysis. Third, this letter briefly discusses the potential impacts of choosing either the UPRR or BNSF corridors for the track alignments of the CA HSR network.

Criteria and Mitigation Measures

The land use impacts, growth inducement potential, and transportation impacts of a HSR station in or near Fresno or Bakersfield can be very environmentally beneficial or negative, depending on the station location, mitigation measures chosen, and land use and transportation policies undertaken by the host localities. The following criteria and mitigation measure should be included in the process of selecting station and alignment alternatives.

Land Use and Growth Inducement:

- Amount of transit-oriented development the locality has committed to planning for within a half mile radius of the station site.
- Growth management policies the locality has adopted or is committed to adopting that would direct growth into the half-mile radius of the station site.

Transportation:

- Transportation demand management measures to be adopted by the station operator to mitigate automobile trips generated (ATG).

- Use of the Natural Resources Agency 2009 Proposed Rulemaking to evaluate transportation impacts in a broader more multi-modal approach, rather than the conventional intersection automobile level-of-service (LOS) analysis.¹ This includes use of ATG rather than LOS as the measure to mitigate.
- Transportation demand management measures adopted or committed to by the locality to mitigate traffic generation.
- Availability of current and planned local transit access to HSR stations to mitigate traffic generation.

Station Alternatives

Californians for High Speed Rail asks that the following alternatives be included in the alternatives analysis for the Fresno to Bakersfield section.

- **Downtown Fresno**

The most critical element of a successful Fresno station is the proper location and design of the HSR station to support high levels of economic development and transit-oriented development (TOD). The experience of HSR services around the world has shown that downtown city center stations, rather than green field stations, maximize economic development.² Therefore, Californians For High Speed Rail currently supports the preferred downtown station in Fresno (per the program-level EIR/EIS) within the UPRR ROW, and believes any other alternatives studied for the station location should be within the immediate vicinity of the UPRR ROW in downtown. We oppose any station location outside of downtown Fresno.

A downtown station in Fresno would provide a convenient connection by foot from the HSR station to the existing downtown area to the east. Additionally, the tremendous amount of vacant land to the west (and to some extent along the very wide UPRR ROW) presents a great opportunity to construct high levels of TOD, potentially more than any other station location along the entire CA HSR system.

A downtown Fresno station will reinforce the downtown as a destination for business and other activities. A station downtown will make it much easier to access Fresno for business trips, reducing the current drive times of around four hours from the Bay Area or Los Angeles to approximately one hour or so. At the same time, studies show that daily commuting won't be that prevalent when one-way rides (on HSR) are still about an hour or more, helping to prevent Fresno from becoming a bedroom community to the Bay Area or Los Angeles.³

Californians For High Speed Rail fully support efforts to move the Fresno Amtrak Station from the BNSF ROW to the UPRR ROW so a dual HSR/Amtrak can be created at the preferred downtown Fresno station site. Transfers between HSR and Amtrak should be fast and convenient. It is critical that the CA HSR system connect to Amtrak in major cities such as Fresno. Amtrak will serve as a feeder service from small cities that aren't big enough to receive

¹ California Natural Resources Agency. "Proposed Guideline Amendments" ("to the "Guidelines for Implementation of the California Environmental Quality Act"). <http://ceres.ca.gov/ceqa/docs/Text_of_Proposed_Changes.pdf.>

² Stanke, B. 2009. "High Speed Rail's Effect on Population Distribution in Secondary Urban Areas." pp. 11-12, 26-27. <<http://www.ca4hsr.org/wp-content/uploads/2009/10/Brian-Stanke-298-High-Speed-Rails-Effect-on-Population-Distribution.pdf>.>

³ Ibid pp. 12-14

their own HSR station. To accomplish this, we urge that the Authority include detailed planning, as part of the environmental process and preliminary engineering, for the construction of connector tracks for CA HSR/Amtrak north and south of central Fresno as necessary. Additionally, studies and designs need to fully anticipate and accommodate a shared CA HSR/Amtrak station.

Californians for High Speed Rail also support efforts to create bypass tracks west of Fresno for the consolidation of all freight operations in the Fresno area. As a part of this effort, we ask that the Authority explore the idea of including HSR express tracks as part of this bypass project.

- **Downtown Hanford**

Californians For High Speed Rail supports further examination of placing a CA HSR station in downtown Hanford just south of the existing Amtrak Station to serve the Hanford/Visalia/Tulare area. By placing the station near the existing downtown, it would maximize the station's development potential while limiting potential sprawl-inducement. It would allow easy transfers with the Amtrak's San Joaquin service. However, given the 24 station limit mandated by state law, we are not sure that it makes sense to sacrifice another station somewhere else in the system that will have a high population density (since this will likely be the lowest density station in the system). Several other disadvantages to this alternative include the extra expense of going through the downtown Hanford area, the questionable utility of having a HSR/Amtrak transfer station in Hanford (when it is likely Fresno and Bakersfield will both have transfer stations, as we believe is necessary), its close proximity to the planned Fresno station (approximately 35 miles), and the likelihood that the speed of HSR trains (including express trains) would be curtailed in Hanford.

- **Junction of S.R. 43 and S.R. 198**

This station alternative, located at the junction of S.R 43 and S.R 198, is a green field site that is being considered to serve the Hanford/Visalia/Tulare area. Californians for High Speed Rail supports an examination of a station alternative in the alternative analysis. Again, given the 24 station limit mandated by state law, we are concerned about sacrifice another station somewhere else in the system. We also have the spacing concerns described above in relation to the planned Fresno station.

This site would serve both Hanford and the Visalia/Tulare area. Unfortunately, to serve these areas, this station will likely be designed as a park-and-ride lot. To encourage more ridership that is not reliant on automobiles, and to create a pedestrian-friendly environment around a station at this location, we would like to see high levels of TOD be required for the station area before the Authority would agree to build it. Such a TOD should be built in conjunction with the station to guarantee such development would take place. Several thousand of housing units and significant levels of pedestrian-oriented retail should also be included to make a station at this location viable and to prevent sprawl from being induced from the HSR service. Additionally, TOD development should be designed in a way that would allow full-speed express trains to travel through the station site (up to 220 miles per hour).

Note, we do not support any further consideration of a station near the immediate vicinity of Visalia (i.e. an area near the junction of Highway 99 and S.R 198) because that would necessitate using the UPRR alignment (which will likely prove much more difficult than the BNSF line) and would also require the addition of crossover tracks north of Bakersfield to

allow HSR trains to access the downtown Bakersfield station site on the BNSF tracks.

- **Downtown Bakersfield**

As in Fresno, Californians For High Speed Rail supports moving forward with the preferred alternative from the program-level EIR/EIS, which is the downtown Bakersfield Amtrak Station just south of Truxtan Avenue (along the BNSF ROW). Potential for TOD is almost as good as in Fresno, with large areas of developable land to the south of the preferred station site.

In addition to the potential for TOD, another advantage of the downtown station is that the BNSF alignment goes through the station site. Given our support for the BNSF alignment (see below) between Fresno and Bakersfield, and the fact Amtrak already utilizes the BNSF ROW, no crossover tracks would be necessary north or south of Bakersfield for the development of a dual HSR/Amtrak station in downtown Bakersfield.

As in Fresno, the development of a dual CA HSR/Amtrak station is a high priority to allow Amtrak to serve as a feeder service from smaller cities that aren't big enough to receive their own HSR station. Once again, we urge that the Authority to conduct detailed planning and design work for HSR station that will also accommodate Amtrak and convenient transfers.

Californians For High Speed Rail does not support examining other alternative station sites in Bakersfield except for slight variations within the preferred station area.

Alignment Alternatives

Californians For High Speed Rail prefers the use of BNSF alignment for HSR between Fresno and Bakersfield. Though the UPRR alignment will be utilized in downtown Fresno, there is no way to access the Downtown Bakersfield Amtrak Station site if the alignment approaches downtown Bakersfield along the UPRR alignment. Possible station sites in Bakersfield along the UPRR ROW were not determined by Californians For High Speed Rail as sites with good potential for transit-oriented development or downtown revitalization. Additionally, given that BNSF is generally cooperating more than the UPRR, this is an easy call.

Californians For High Speed Rail supports the consideration of variations to the BNSF alignment that would allow HSR trains to leave the BNSF corridor occasionally to bypass smaller urban areas such as Hanford. The purpose of this would be to allow for operation of the CA HSR system at higher speeds and to reduce construction costs.

Thank you for your consideration,



Brian Stanke
Executive Director
Californians for High Speed Rail



Daniel Krause
Vice-Chair of the Board of Directors
Californians for High Speed Rail