



Californians For High Speed Rail

A Statewide Coalition of High Speed Rail Supporters | www.ca4hsr.org | 510.931.0384

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Mr. Dan Leavitt, Deputy Director
California High Speed Rail Authority
Attn: Los Angeles to San Diego via the Inland Empire Section EIR/EIS
925 L Street, Suite 1425
Sacramento, CA 95814

RE: Los Angeles to San Diego Section Scoping Comments

Californians For High Speed Rail is a grassroots, statewide coalition of high speed rail supporters advocating for the high speed rail project approved by California voters in November 2008. Founded in 2005 and re-launched in 2009, we exist to educate, inform, and organize Californians about ways they can help make high speed rail a reality in this state. Additionally, Californians For High Speed Rail also encourages sustainable development of the high speed rail (HSR) system, promoting the building of HSR stations in city centers and surrounding transit-oriented development, as well as developing/improving feeder transit systems.

We are submitting this letter to provide our scoping comments regarding the Los Angeles-to-San Diego section of the environmental review process being undertaken by the California High Speed Rail Authority (Authority).

Planning Criteria

Alignments for the California High Speed Rail (CHSR) system should be pursued which ensure the best possible locations of stations. Therefore, the determination of ideal station locations should be given high priority, with alignments designed to access these sites. Several specific criteria should be considered when deciding the location of HSR stations. These criteria are summarized below. Please note we have also provided much more detailed suggestions for planning and mitigation criteria in Attachment A to this letter (see page 9).

Potential for Transit-Oriented Development (TOD)

- Give priority to station locations where there are strong commitments to significant amounts TOD within a half mile radius of the station site.
- Ensure that growth management policies adopted by a given locality have teeth and are designed to efficiently direct growth into the half-mile radius of HSR station sites.
- Consider eliminating station sites in localities that are not committed to maximizing

development around HSR stations.

Ability of Riders to **Walk** from a HSR Station to Large Volumes of Urban Development and Major Destinations

- Closely study and analyze “walk sheds” based on a 12-minute walk time from a HSR station to the surrounding area. With a 12-minute walking radius, determine how many square feet of development there is and what types of land uses exist. Prioritize station location that are within a 12-minute walking distance to land uses that stimulate high speed rail ridership, such as offices, residential, and large cultural and commercial destinations.
- Transportation strategies for access to and from HSR stations should focus on transportation demand management (TDM) measures that **reduce** automobile trips generated (ATG). The amount of travel demand that can be satisfied by walking, transit usage, and bicycling will greatly impact the effectiveness of TDM measures used to mitigate the ATG impact of each station.

Convenient and Seamless Connections to Existing and Planned Transit Services

- Stations should be located where the most transit services converge, including metro and light rail services, commuter rail service, and bus service.
- A goal of one transfer from the HSR station to another form of transit should be established to encourage convenient access to a large percentage of prominent destinations in a given city.
- Two or more transfers to prominent destinations should be discouraged.

Station and Alignment Alternatives

The comments of Californians For High Speed Rail are discussed below for various alternative alignments and station alternatives presented by the Authority at recent scoping meetings for the Los Angeles to San Diego section environmental impact report/environment impact statement (EIR/EIS). Additionally, new alternatives are suggested in certain areas of the Los Angeles to San Diego section, especially in San Diego County. We have provided a few comments below regarding certain stations and alignments. Some text is bolded, which emphasizes our recommendations and considerations that differ somewhat from alternatives presented at the scoping meetings and current planning trends of certain localities.

Los Angeles and Riverside Counties

Generally, we support further study of all existing alternative alignments and station locations shown on the scoping meeting poster boards for Los Angeles County and Riverside County.

- **UPRR Riverside/UPRR Colton, UPRR Colton, and Metrolink Alignment Options**
These two rail corridors should be studied as shown on the scoping maps presented at recent public scoping meetings. Conversely, **the Metrolink corridor is not a good candidate to carry forward (between Los Angeles Union Station and the area north of Ontario Airport)** due to the surrounding residential development. However, the Metrolink corridor should be

studied between the area north of Ontario Airport to the Santa Fe Depot/Metrolink station in downtown San Bernardino, to allow for the consideration of a HSR station there.

- **City of Industry / Downtown Pomona Station Alternatives**

The City of Industry does not provide good opportunities for a HSR station or for future TOD due to existing industrial development that dominates the landscaping surrounding the UPRR Riverside rail corridor. Though there may be a National Football League stadium near a future HSR station, there would only be 10 games a year at the site. Therefore we feel that the existing Metrolink service to the area is adequate. **The City of Industry station should be considered for elimination** based on sound planning criteria for the high speed rail project unless there is a concerted effort and commitment to transform a large area surrounding the proposed station site into a dynamic and massive TOD that goes far beyond a football stadium.

As things stand now, a more appropriate location for a station in this area is the proposed downtown Pomona station site (or the proposed Cal Poly Pomona site if the UPRR Colton alignment is selected). There are numerous underutilized parcels of land near the existing Amtrak/Metrolink station in downtown Pomona, mainly due to large quantities of surface parking lots. A Cal Poly Pomona site is also a strong candidate, though given the importance of TOD and downtown development, a downtown station is likely to be the stronger candidate of the two.

- **Ontario International Airport Station**

We encourage that the final alignment of HSR trains to Ontario International Airport be designed in a way that would locate the HSR station immediately adjacent to the air passenger terminal by diverting the HSR alignment slightly south off the UPRR Colton Line for a short stretch. Forcing everyone into a shuttle bus seems unnecessary when the HSR line could easily cut across the surface parking lots that lie immediately north of the air passenger terminal to provide easy access by foot.

- **Downtown San Bernardino (Santa Fe Depot) Station**

Though this station site will increase travel times between Los Angeles and San Diego approximately five minutes per trip over the estimated travel time for the preferred I-215/I-15 corridor alignment from the program-level EIR/EIS and cost significantly more than not providing a station in San Bernardino, the large population of San Bernardino may warrant the extra trip time and expense. Therefore, we urge the Authority to continue to examine a station site in downtown San Bernardino at the Santa Fe Depot as part of the alternative analysis process.

- **Downtown Riverside / UC Riverside Station Alternatives**

A station in downtown Riverside should be further studied due to the complex trade-offs the location presents. Downtown Riverside already has numerous large buildings and room for more land use intensification, which would support an HSR station. Additionally, three Metrolink lines serve the Riverside-Downtown Metrolink station. Therefore, an HSR station at this location would provide great connectivity to the region's commuter rail network. The

disadvantages of the locating the HSR station in downtown Riverside include diverting the HSR alignment away from I-215, requiring running the line from downtown to I-215 via city streets. This could lead to the need for expensive aerials, trenches, or tunnels along major city roads with nearby residential development. Additionally, the Metrolink station is located on the east side of Highway 91, whereas the core of downtown is located on the west side of Highway 91.

Californians For High Speed Rail would like to see a downtown station in Riverside. However, due to the site constraints, it is prudent to continue to examine the UC Riverside station site as well. To improve the performance of a UC Riverside station location, we encourage that an intense TOD be pursued on the west side of I-215 that would provide synergistic development to UC Riverside (which lies immediately east of I-215).

Californians for High Speed Rail **does not** support further study and consideration of the following stations and alignments:

- **Corona Station / I-15 Alignment (north of I-15/I-215 junction)**

Though a Corona station location would serve western portions of Riverside County and allow for a slightly faster travel times down the I-15 corridor over the I-215 corridor, there are no large urban centers along the I-15 corridor.

Given the high populations centers along the I-215 corridor in northeastern Riverside County (i.e. San Bernardino and Riverside), we recommend the elimination of the I-15 corridor (north of the I-15/I-215 junction) from consideration as an alignment for the CA HSR system.

- **March Air Force Base**

Unless a new large “green” city is proposed at the March Air Force Base site that is walkable in nature and extremely dense, we recommend the elimination of this station site from consideration in the alternative analysis planning process.

San Diego County

San Diego County presents many considerations, given the current political dynamics. Overall, we are very concerned with the direction that San Diego area is pursuing for the development of HSR and feel if current planning efforts prevail, the ridership of the CHSR system in San Diego County will be lackluster and downtown San Diego will become less competitive to other major downtowns around California. Therefore many of the comments below provide our views on the current planning trends taking place in San Diego County.

- **Escondido - Transit Center Station / Escondido - I-15 Corridor Location**

Californians For High Speed Rail supports the examination of the both Escondido station options currently be conducted by the Authority. The preferred station location, along the I-15 corridor, from the program-level EIR/EIS, would likely reduce expenses significantly by not forcing the HSR line to navigate through city streets south of the Escondido Transit Center. However this does not provide a direct connection the Sprinter line, numerous bus services or the downtown area. As a part of this alternative, **we recommend study of the possibility of**

moving the transit center and adding a Sprinter station immediately adjacent to the station site at I-15. Additionally, redevelopment of the office parks, industrial sites, and vacant land that immediately surround the I-15 site should be strongly considered to ensure a walkable environment and higher levels of development.

A high speed rail station at the existing Escondido Transit Center site should also be considered. TOD is possible in this area as well and is in close proximity to downtown. As part of this alternative (along with the I-15 alternative), the Authority should encourage local leaders to plan for an expansion of the Sprinter line eastward that would connect the HSR station sites to City Hall and the hospital farther to the east, as well as to the Westfield North County Mall to the south. A possible alignment for HSR to return to I-15 is along South Centre City Parkway/Mission Road.

- **University City / Rose Canyon**

Californians For High Speed Rail **does not support further consideration of the program-level preferred station site in the University City area given its location along Rose Canyon (south of UTC mall), where there is no adjacent development appropriate for an HSR station.** However, we do support further study of the alternative site identified on the scoping meeting posters at the UTC transit center. This area may warrant a station because of plans to extend the San Diego Trolley system to the site, as well as high levels of planned TOD at the site. However, given the loud opposition to HSR in the area, an existing urban form that does not promote walkability, and the 24 station limit for the entire HSR system, it may also make sense to eliminate the proposed University City station site later in the planning process. However, for the alternative analysis process, we still feel it warrants further study, politics notwithstanding.

Regardless of whether there is a station located in the University City area or not, the existing alternative alignments identified in both the program-level EIR/EIS and on the scoping meeting posters should continue to be thoroughly studied. Attempts to eliminate these alternatives should be resisted at this time. This area may turn out to be the only feasible alternative to get HSR trains to the coastal areas to access downtown (and possibly the airport). **A bored-tunnel under the existing BNSF right-of-way (a.k.a. the LOSSAN corridor) should be considered for the HSR alignment through the Rose Canyon area (with no station) to avoid impacts to the canyon and the operation of existing freight and passenger rail services.**

There may also be an opportunity to run trains underground to and from the UTC Transit Center and go directly to I-5 (possibly via Nobel Drive), where it would then run along the I-5 corridor between Nobel Drive and SR-52 before re-joining the LOSSAN corridor (thereby bypassing Rose Canyon). There are no overpasses along this stretch of I-5, allowing for a much easier construction. The Authority should explore such an alignment as concerns over vibrations of a subway option (in the University City area) are likely to overblown.

- **New Alternative Alignments to Connect the HSR Alignment from I-15 to the LOSSAN Corridor**

It is essential that the Authority create new HSR alignment alternatives that explore routes to bring HSR trains from the I-15 corridor to the LOSSAN corridor. This is critical to ensure a feasible alternative to getting HSR trains to downtown San Diego.

New alignments should be considered along the following route:

- SR-56 and I-5 (possibly joining the LOSSAN corridor around Camel Mountain Road).
- SR-163 to SR-52 (would meet the LOSSAN corridor at SR-52).
- SR-163 to I-8 (would meet the LOSSAN corridor just east of I-5).
- Others should also be explored by the Authority in the area not listed here.

- **New Alternative: Qualcomm Stadium Site *and* a Downtown San Diego (Sante Fe Depot)**

Some residents and local leaders are calling for a station located at or near the existing site of the **Qualcomm Stadium in East Mission Valley and then possibly running HSR trains south to Tijuana along I-805. A station location at this site should be considered due to its central location**, which would provide easier access to large numbers of people than would locating all high speed rail stations in San Diego along the coast. However, given that serving downtown San Diego should be the highest priority for the HSR system in San Diego, it is our opinion that **an alternative that includes a station location at the Qualcomm Stadium site should only move forward if the following elements are included and excluded:**

- **A downtown San Diego station is still the terminal station** in San Diego and new an alignment, possibly along the I-8 corridor (or some other east-west corridor), is studied between Qualcomm and downtown San Diego. **(Note: If it is determined that constructing HSR between Qualcomm and downtown is not feasible, as was previously determined in the program-level EIR/EIS, the Qualcomm station site should be eliminated from consideration).**
- A large TOD is constructed at the Qualcomm Stadium site that is within walking distance with from the HSR station.
- **Consideration of running HSR south to Tijuana via the I-805 corridor is eliminated.** Plans to run HSR trains downtown San Diego need to be solidified and committed to before any access to Tijuana is considered. Furthermore, an I-805 alignment is vastly inferior to running trains downtown. We strongly oppose an I-805 alignment and feel any access south of downtown San Diego in the future should take place closer to the coast, possibly along the existing BNSF, Trolley, or I-5 corridors.

- **New Alternative: Dual Stations – Downtown San Diego (Sante Fe Depot) *and* San Diego International-Lindbergh Field Airport**

Californians For High Speed Rail **strongly encourages the Authority to add a new alternative that would include both the Downtown San Diego Station at the Santa Fe Depot *and* an airport station at Lindbergh Field.**

We vigorously **oppose** the current thinking amongst some in the San Diego that the “Destination San Diego” station at the Lindbergh Airport should become the terminal

station in lieu of the downtown San Diego station at the Santa Fe Depot site. Current efforts in the San Diego area to eliminate the downtown station are ill advised.

Having both stations would allow for easy access to downtown by foot while also providing a large park-and-ride lot for those with poor access to connecting transit services (which will likely be a very significant portion of the HSR ridership to San Diego due to the low-density land-use patterns in the majority of the San Diego area). Additionally, we should emphasize we see merit in providing direct HSR access to Lindbergh Field.

In addition to providing excellent access to the people headed to the airport or those with limited transit access at an airport station, a downtown HSR station at the Santa Fe Depot would further strengthen San Diego's dynamic downtown by allowing high percentages of riders to walk to their final destination. A tremendous amount of development is within a 10-12 minute walk from the proposed Santa Fe station site. Additionally, for those that would still need to hop onto the San Diego Trolley to reach their final destination, all lines would be integrated with the HSR station (whereas an airport station would likely not provide access to the heavily-used Orange Line of the Trolley). Therefore, no double transfers would be required to reach destinations such as the convention center (an airport station would likely require such double transfer). Also, Trolley capacity in downtown would be available to handle high numbers of HSR riders transferring to the Trolley to reach destinations such as the convention center. There would be space for HSR riders because of the fact that a high percentage of normal daily Trolley commuters disembark off the Trolley at or before the Santa Fe Station and the adjacent American Plaza Station.

However, without a station in San Diego's downtown, the downtown would become less desirable to businesses travelers and other visitors than other major downtowns around the state that would have HSR stations. One just has to imagine the ramifications of an airport-no downtown station scenario. If **all** downtown-bound riders are **forced** to connect to another form of transit (Trolley or taxi) at an airport station, not only will this be a large inconvenience to those that could walk from a downtown station to their destination, it would likely strain the capacity of the Trolley system, and probably break the system's ability to handle people at morning and evening rush hours, regardless of the new transit hub being planned at the airport. It is necessary to keep in mind that a huge number of people would be disembarking all at once at an airport terminal station, probably from trains that are 10 cars long. This mass of people would then inundate the smaller 2-3 car Trolley trains. One can only envision how many people would be discouraged from riding the CHSR system if they are required to squeeze themselves (and for some their large bags) into already crowded Trolley trains or are left stranded at the platform, forced to wait for an unknown number of Trolley train before finding available space to get on.

Finally, there is essentially no TOD development opportunity in the vicinity of the airport station. At the same time, downtown San Diego still has much potential to further intensify its land uses and become an even more dynamic place. An HSR station will be essential to provide additional transportation capacity to allow for such land use intensification downtown.

We believe that this new alternative provides the best of both worlds and supports the unique situation in the San Diego area.

- **Downtown San Diego (Santa Fe Depot) with no Station at the Airport**

Californians For High Speed Rail strongly supports the downtown San Diego station at the San Fe Depot site. This station is far superior to an airport station site in terms of connectivity to the light rail system and for the encouraging easy access to downtown for via foot for all the reasons mentioned above. **Therefore, we recommend including one alternative in the alternative analysis that examines a downtown only station without an airport station.** The intent of this recommendation is to allow for a downtown station if it is determined that it is not feasible to construct both the downtown and airport station due to the limited number of stations allowed in the CHSR system.

Californians for High Speed Rail **does not** support further study of the following alternative in San Diego County:

- **San Diego International-Lindbergh Field Airport with no Downtown San Diego Station**

See comments above. Our organization's current policy is that a downtown station is absolutely essential for high speed rail to be successful in San Diego. Therefore, we **strongly oppose** all efforts to eliminate the downtown station in favor of a terminal station at the San Diego International-Lindbergh Field Airport site (though we support the concept of an airport station).

Thank you for your consideration,



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



Brian Stanke
Executive Director
Californians For High Speed Rail

Attachment A

Criteria and Mitigation Measures

The land use impacts, growth inducement potential, and transportation impacts of a HSR stations along the Los Angeles to San Diego alignment 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.

The station sites need to maximize walking and transit access to the station in order to maximize ridership and minimize automobile trips generated (ATG). Therefore the amount of existing and planned transit-oriented development (TOD) around the site is of critical importance.

Station site selection criteria:

- Number of residences and hotel rooms existing within a half-mile radius of proposed station site.
- Square footage of commercial/ retail space within a half-mile radius of the proposed station site.
- Amount of transit-oriented development (TOD), residences and commercial square footage, the locality has committed to planning for within a half-mile radius of the proposed station site.
- The existing and planned peak hour capacity of connecting transit network to the proposed station site.
- Number of residences and hotel rooms and square footage of commercial and retail space within a one-seat, 15-minute, transit ride of the proposed station site.

Land use mitigation needs to focus on pulling development into the station area, away from more environmental sensitive areas on the urban fringe.

Land Use and Growth Inducement mitigation strategies:

- 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 mitigation strategies likewise need to focus on the reduction of automobile trips generated (ATG) rather than the subsidization of automobile parking and access. Transportation mitigation strategies include:

- Transportation demand management measures to be adopted by the station operator to mitigate 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.

¹California 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>