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June 3, 2010

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Re: Comments: Preliminary Alternatives Analysis EIS/EIR San Francisco-San Jose Segment

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Dear Mr. Leavitt:

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The San Francisco Planning and Urban Research Association (SPUR) makes these comments concerning the San Francisco-San Jose High Speed Rail PEIS/EIR. SPUR is a public policy organization representing thousands of individual and business members in San Francisco and the Bay Area. Our mission is to promote good government and good planning, and we have been deeply involved with planning for high speed rail for many years.

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We read with interest the letter from Will Kempton and Art Leahy of March 23, 2010, suggesting the use of shared tracks and operations between Los Angeles and Anaheim. As the letter notes, new regulatory guidance could allow for the shared use, not only of the right-of-way but also tracks and operations, between high speed trains, commuter trains and even freight rail services.

We further note the seamless integration of “local” and “express” service on mature rail systems such as the Amtrak routes in the Northeast United States and more importantly, on successful HSR systems in Europe and elsewhere.

We believe that more needs to be done to explore the integration of regional and inter-regional service in the Peninsula between San Jose and San Francisco.

It is our understanding that the current Peninsula PEIS/EIR allows high speed and commuter trains to share the right of way, but not operations or tracks. We believe this ignores an obvious alternative (a shared use system) and believe that the principles outlined in the Leahy-Kempton letter must be incorporated into the Peninsula HSR PEIS/EIR as another alternative.

Accordingly, we request that the PEIS/EIR be revised to include a joint operation alternative. Under this alternative, not only would high speed and Caltrain share the tracks, but they would operate as a single, unified system on the Peninsula. We note that under some current studies, some high speed trains would make up to four stops on the Peninsula, which is not vastly different than the existing Baby Bullets. We believe that significant efficiency opportunities exist if the services are considered jointly.

In addition, we also offer the following additional comments for consideration in the PEIS/EIR:

Ridership projections can be improved. Under the shared-use/joint operation scenario, a common and unified ridership forecast must be performed. This would then lead into an operating plan that created the best balance between HSR trains and local trains.

The 4th and King station needs to be re-thought. We support the selection of the Transbay Transit Center (TTC) as the San Francisco terminal station and we support the inclusion of a subsurface station at 4th and Townsend for local trains, but we are opposed to any continued use of the surface 4th and King Street station. The PEIS/EIR has made no justification for the continued blight this facility represents in a very dynamic part of the city, and SPUR cannot endorse a continuation of no economic activity on 20 acres that are so important to San Francisco's continued urban and economic development.

The case has not been made that the Transbay Transit Center cannot handle all the trains that are expected based on reasonable forecast passenger volumes in 2035. Rather than tie up 20 acres for the next 25 years, a more productive approach would be to estimate when the TTC as currently designed would exceed capacity and identify measures, such as a loop track, that would increase capacity and could be built at the appropriate time. We also note that the property value and the tax increment value of the 4th and King site could easily exceed \$1 billion and represents a significant potential revenue source for the HSR and TTC projects.

SPUR believes that there are other train storage options, such as Pier 96 or Bayshore, which should be studied as alternatives. These alternatives should consider these yards as shared use facilities between high speed trains (which we understand will need overnight storage) and commute trains (which need midday storage). It would appear that one facility could meet both needs.

A new alternative for I-280 should be studied. We understand that the City and County of San Francisco is proposing the final environmental document consider removing the I-280 freeway between its current ramp at 5th Street back to Cesar Chavez and replacing it with a surface boulevard. This could allow the railroad facilities to be built at less expense and at less disruption to the city. We urge the Authority to formally study this concept.

Connections to SFO need more elaboration. Connections to SFO are a major benefit of the HSR project. If the HSR trains can replace commuter flights to Fresno, Bakersfield and other Central Valley cities, runway use at SFO can be optimized. However, the PEIS/EIR does not detail how passengers would connect between the Millbrae station and SFO. An extension of the AirTrain system would appear to be the most logical approach and it should be identified as a system element

In sum, SPUR believes that due to funding and political constraints, high-speed rail can only be implemented in a series of incremental steps that lead to an effective system. The PEIS/EIR overreaches in some key respects, requiring stations, trackways and facilities significantly larger than needed to initially operate the system safely and reliably. We agree that the systems and components need to be “future-proofed,” but we believe that thoughtful plans for designing-in the ability to increase capacity will sometimes make more sense than building in the ultimate system up-front. This approach has a well-established history of success in California with the freeway system, which was built incrementally within an overall plan, and with HSR in Europe, where high speed trains were initially operated on existing facilities within metro areas and at high speed between metro areas. These are good lessons to learn and to apply to the design of California’s high speed rail system.

Sincerely,

A handwritten signature in black ink, appearing to read 'G. Metcalf', with a long horizontal flourish extending to the right.

Gabriel Metcalf
Executive Director, SPUR

Cc: Executive Director Roelof van Ark