



SPUR

San Francisco | San Jose | Oakland

Mr. Mark McLouglin
Director of Environmental Services
California High-Speed Rail Authority
100 Paseo de San Antonio
San Jose, CA 95113

Ms. Stephanie Perez
Environmental Protection Specialist
Office of Program Delivery
Federal Railroad Administration
1200 New Jersey Avenue SE (Mail Stop 20)
Washington, DC 20590

Submitted electronically

June 8, 2016

Re: San Francisco to San Jose Section EIR/EIS-Notice of Preparation

Dear California High-Speed Rail Authority and Federal Railroad Administration,

This letter is in response to the Notice of Preparation for the EIR/ EIS for the San Francisco-San Jose segment of California High-Speed Rail.

SPUR is a non-profit urban policy think tank with offices in San Francisco, San Jose and Oakland with thousands of individual and business members in the Bay Area. SPUR is an early supporter of High-Speed Rail and is supportive of the Authority's decision to bring the initial operating segment to San Jose with service continuing on to San Francisco. We have authored numerous reports on how the Bay Area can make the most of high-speed rail in Bay Area, and are deeply engaged in efforts to support transportation integration and placemaking at Diridon Station and the Transbay Transit Center.

Below, we suggest some considerations that we think should be addressed in the EIR/ EIS. We are emphasizing Diridon Station, the Diridon Station Area and Central San Jose given that San Jose is High-Speed Rail's gateway to the Bay Area.

We are excited that the operators in San Jose are working together with a shared goal of growing the usefulness and relevance of public transportation to an increasing number of people, with strong attention to placemaking. To that end, the EIR/ EIS is an opportunity for the Authority to:

- **Coordinate ridership projections with other transit operators at Diridon Station in order to evaluate the space requirements for platforms, tracks, right of way, ticketing facilities, station access and other transit and passenger facilities.** We are glad that the Diridon Intermodal Conceptual Study will identify the envelope and requirements of each operator based on ridership projections and travel patterns and hope that ridership projections for all operators will be included in the EIR/ EIS for high-speed rail. While different operators may serve different transportation markets, it is important to share facilities wherever possible rather than building separate infrastructure. Coordinating ridership projections is a good way to ensure that the passenger facilities are adequately sized to the volume of people and trains coming through Diridon Station and makes efficient use of limited space.
- **Coordinate ridership projections with the San Jose Mineta International Airport, which is currently updating their 10-year demand forecast.** High-speed rail can replace some air travel, which can reduce greenhouse gas emissions and free up capacity at congested airports. Previous San Jose Airport capital improvement and master plans have not fully accounted for the impact of high-speed rail on demand for air travel to and from San Jose. The EIR/EIS is the right time to disclose information about demand projections for both air and high-speed rail travel and indicate how these relate to each other.
- **Update and make clear how ridership projections and air travel trip diversions may change with the addition of new stations statewide.** In order for high-speed rail to be competitive with air travel, it will need to be more convenient than flying and offer door-to-door travel times that are competitive with air. The addition of high-speed rail stations south of San Jose, specifically Madera and Kings/Tulare, will lengthen trip times for the vast majority of HSR riders who will come from the state's major urban centers. It is important to consider how sensitive air travel diversion estimates are to the addition of high-speed rail stations, particularly in the context of greenhouse gas emissions, ridership and financial impacts.
- **Consider service scenarios and ridership projections beyond 2029.** A blended system between commuter rail (Caltrain) and high-speed rail can create challenges for integration, such as a need for greater safety distances and scheduling and coordination challenges. Overtake tracks can help overcome some of these challenges and should be considered carefully, particularly because Caltrain could run more frequent service post-electrification. It is important that the alternatives consider future service scenarios and growth plans for each operator so that facilities and infrastructure are sized appropriately. While the Authority has moved away from a four-track system, we encourage the Authority to analyze the potential of overtake tracks along the corridor.
- **Identify parking needs for all transportation operators at Diridon Station and the Mineta San Jose Airport and work to minimize the parking supply in this area.** It is not appropriate for each transportation operator to construct separate parking facilities.

The commitment to high-speed rail is a commitment to changing how people travel within cities, regions and the state and to organize California's growth in a more compact and less auto-oriented manner. Providing too much parking undercuts this commitment. Additionally, it replicates today's challenges and travel patterns at a time when we know that mobility options and preferences are rapidly changing. Parking is an inefficient use of scarce station area land and public dollars.

In some ways, airports are similar to high-speed rail stations but in other ways they are different. The most successful high-speed rail stations are located in urban areas and provide intercity connections. If high-speed rail stations are planned like mini-airports, surrounded by parking and access roads, they become areas that repel good development in their vicinity because of wide streets and parking lots. If not properly managed, the provision of parking could overwhelm the station area, destroy the pedestrian environment around the station and reduce opportunities for joint development around the station. It is important that the station access plans focus on walking, biking, transit and drop-off services, which will also have mutual benefits for building densely.

- **Identify opportunities for shared train storage and maintenance facilities as part of the project alternatives.** We think that there is some efficiency that can be gained with a clear understanding of the market that each operator serves and its future service plans. In order to provide expanded and reliable services, many operators anticipate needing additional space to store, maintain and repair train cars. This is particularly true for ACE, which stores layover trains at Diridon, in addition to VTA and BART, which have indicated a desire to store 240 train cars near the Santa Clara station. We encourage the California High-Speed Rail Authority to work with other transit operators to identify train storage and maintenance solutions that would make the best use of limited track space, use land around stations efficiently and minimize impacts to communities and public funds.
- **Identify the impacts of project alternatives on pedestrian street life and other transit services, particularly around Diridon and Central San Jose.** The neighborhoods surrounding Diridon Station are some of the most unique and walkable neighborhoods in San Jose. The success of downtown San Jose and the Diridon Station area will depend, in part, on growing the pedestrian, bike and transit connections between these neighborhoods. We encourage the Authority to identify the impacts of high-speed rail alternatives on the street life and the impacts of new infrastructure on the potential for new development to reinforce or create new urban fabric. In addition, we encourage the Authority to proactively create a station access policy that prioritizes space-efficient and sustainable modes of travel to and from Diridon Station.
- **Use criteria for evaluating alternatives based on long-term impacts and policy goals rather than constructability and cost.** We are sensitive to the need to manage project costs. However, constructability and cost should not be the driving factors in evaluating project alternatives. Evaluation criteria should prioritize maximizing the full

range of mobility options, connectivity and ease of transfers, economic development, non-auto access and greenhouse gas impacts. Of particular concern is whether and how costs may be deferred to other operators and stakeholders. If high-speed rail stations are not easily accessible by foot and by bike other costs are incurred to bring people to and from stations.

Thank you for the opportunity to provide input on the environmental analysis. Please feel free to contact us with any questions you may have at 408-638-0167.

Sincerely,

A handwritten signature in black ink, appearing to be 'Laura Tolko', written in a cursive style.

Laura Tolko
San Jose Policy Director

cc:

Melissa Dumond
Leyla Hedayat
Nanci Klein
Jim Ortbal
John Ristow
Ben Tripousis
Kim Walesh
Ru Weerakoon