



THE CITY OF SAN DIEGO

**SHERRI S. LIGHTNER**  
CITY COUNCILMEMBER – DISTRICT 1

**DONNA FRYE**  
CITY COUNCILMEMBER – DISTRICT 6

November 20, 2009

California High-Speed Rail Authority  
Mr. Dan Leavitt, Deputy Director  
Attn: LA - SD HST Project EIR/EIS  
925 L Street, Suite 1425  
Sacramento, CA 95814

Dear Mr. Leavitt:

Subject: Comments on the Notice of Preparation for the Los Angeles to San Diego via Inland Empire Section Project EIR/EIS

Thank you for the opportunity to comment on the path of a high-speed train (HST) corridor through our region. We support bringing HST to San Diego. HST will benefit our region in many ways, including adding 45,250 more jobs by 2030, stimulating the economy, decreasing the demand for auto travel, and reducing our overall carbon emissions. We may submit additional comments and respectfully request that they be included in the LA-SD HST Project Level EIR/EIS that you will be preparing.

We respectfully request that the process include the following:

- An alignment alternative along I-15 to a station alternative at Qualcomm Stadium should be studied in depth in any EIR/EIS.

Data from the *Final Program Environmental Impact Report/Environmental Impact Statement (EIR/EIS) for the proposed California High-Speed Train System* prepared by the California High-Speed Rail Authority and the Federal Railroad Administration in 2005 demonstrates that this alignment is cheaper to build, faster to the region, and will attract 350,000 more intercity passengers by 2020 than the two proposed alignments along the I-15 to I-5 corridor (Table 6.5.3). This alignment will have lower potential impacts to aesthetic, visual, archaeological, and cultural resources. Moreover, a stop at Qualcomm is more centrally located in the San Diego region and provides opportunities for Smart Growth and redevelopment. This route does not preclude a final stop at Lindbergh Field or downtown San Diego. The corridor could also be continued to the international border.

The 2005 EIR/EIS found that the I-15/Qualcomm route would be superior in the following ways:

- **Cheaper to build** – The 2005 EIR/EIS evaluated the costs of the alternatives and found that the I-15/Qualcomm route would be at least \$75 million cheaper to build than the I-15/I-5 routes—and that did not take into account the cost of tunnels and an underground station in University City, which have since been proposed as part of the I-15/I-5 routes. Other route options in San Diego have been rejected as too costly because tunneling was necessary (pp 2-80).
- **Easier to build** - The 2005 EIR/EIS found that the LOSSAN route from Oceanside to San Diego would be constrained with the addition of HST (pp 2-87 to 2-88). It is not clear whether the 2005 EIR/EIS evaluated the constraining effect of HST on the existing Amtrak and freight routes, and proposed light rail route (the Mid-Coast Corridor project) along the I-15/I-5 routes from University City to Lindbergh Field.
- **Faster to the region** – The 2005 EIR/EIS found that high-speed trains along the I-15/Qualcomm route would travel at greater average speeds and have shorter travel times than high-speed trains along the I-15/I-5 routes. High-speed trains along the I-15/Qualcomm route were predicted to travel at average speeds of 153 mph, compared to 91 mph or 93 mph for the two I-15/I-5 routes (pp 2-80). The transit time for the I-15/Qualcomm route would be 4.2 minutes from Mira Mesa, compared to transit times of 14 minutes for the two I-15/I-5 routes (pp 2-80 and Table 6.5.3). (Please note the discrepancies between the speeds and travel times listed on pp 2-80 and in Table 6.5.3.)
- **Fewer aesthetic/visual impacts** – The 2005 EIR/EIS found that the I-15/I-5 routes would have significant visual and aesthetic impacts while the I-15/Qualcomm route would not: “In the Mira Mesa to San Diego segment, the two alignment options that would join the coast and serve downtown San Diego would have more potential high visual impacts than the alignment option that would serve the Qualcomm Stadium station” (pp 3.9-17).
- **Fewer archaeological/historical impacts** – The 2005 EIR/EIS found that the two I-15/I-5 routes impact 47 and 49 recorded archaeological sites, which is nearly an order of magnitude greater than the 5 sites impacted by the I-15/Qualcomm route (pp 3.12-25). Similarly, the potential for impacts on historic resources is higher for the I-15 to I-5 routes than it is for the I-15/Qualcomm route: “For Mira Mesa to San Diego, the two alignments each average about 21% of the study area built during the historic period. None of the spur from I-15 to Qualcomm Stadium developed during the historic period. Over 95% of the area around the San Diego Station at the Santa Fe Depot was developed during the historic period, and the station structure is listed in the NRHP” (pp 3.12-26).

Given its better ranking on these and other issues, the Qualcomm route should not have been eliminated from consideration

- **An HST corridor to the border should be studied in depth in any EIR/EIS.**

We believe that a continuation of the I-15 corridor route to the border should be included in the evaluation. HST presents a remarkable opportunity to partner binationally to bring progress to our entire region. Building HST to the border will provide redevelopment opportunities and economic growth in Otay Mesa, San Ysidro, and the South Bay area. An HST station at Rodriguez International Airport could be a part of a larger plan for a binational regional airport.

- **Facilitate meaningful public participation as promised in the 2005 EIR/EIS (“Provide opportunities for community involvement early in project level studies” (pp 3.7-26).**

Our constituents have shown great interest in participating in this project, as demonstrated by the numbers from the public scoping meetings held in October, 2009. 178 individuals attended the scoping meeting held in the University City neighborhood of San Diego—more than the other two meetings in the region combined, and many more than the 34 who attended the April 24, 2004 meeting at the San Diego Association of Governments (SANDAG). CHSRA officials said that major themes of public comments they have received so far are to consider the I-15 corridor to Qualcomm, and concerns regarding Rose Canyon, property impacts, earthquake safety, and financing.

Members of the public sent over 150 emails to the members of the SANDAG Executive Committee before their November 13, 2009 meeting, asking them to request that the I-15/Qualcomm route and an extension to the border be studied. We also made this request in a letter to the SANDAG Executive Committee dated November 12, 2009 (Attachment 1). We urge the public’s main concerns and suggestions to be taken seriously.

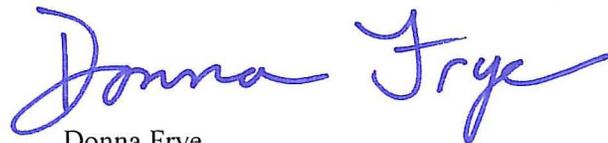
The public involvement seen to date is mainly a result of grassroots citizen action, and not as a result of any initiative by the CHSRA. We have been disappointed by the minimal to non-existent efforts by SANDAG and the CHSRA to involve the public in the process so far, and we hope you find ways to improve those efforts in the future. Suggestions are to engage a broader spectrum of the public by using appealing vernacular in advertisements for scoping meetings, instead of legalese that many are unable to understand; engage the public and elected officials earlier in the process rather than working for years on a project behind closed doors; open meetings of technical working groups to the public or publishing their findings on the internet; place important documents in libraries of neighborhoods potentially impacted by the project, not just a token copy at the central library; advertise scoping meetings prominently throughout the community; and hold scoping meetings at a variety of times when the most people are able to attend, including weekends and evenings. In addition, facilitate public participation by organizing documents along regional lines. In particular, rather than presenting the information for each parameter and all regions, present an evaluation of all parameters for each given region.

Thank you for your consideration, and we look forward to working with you to bring HST to our region.

Sincerely,



Sherri S. Lightner  
Councilmember, First District  
The City of San Diego



Donna Frye  
Councilmember, Sixth District  
The City of San Diego

# Attachment 1



THE CITY OF SAN DIEGO

SHERRI S. LIGHTNER  
CITY COUNCILMEMBER – DISTRICT 1

DONNA FRYE  
CITY COUNCILMEMBER – DISTRICT 6

November 12, 2009

SANDAG Executive Committee  
401 B Street, Suite 800  
San Diego, CA 92101-4231

Dear Chair Pfeiler & Honorable Committee Members:

Subject: SANDAG Comments to the California High-Speed Rail Authority on the Notice of Preparation for the Los Angeles to San Diego via Inland Empire Section Project EIR/EIS

At your meeting tomorrow, you will consider comments from SANDAG to the California High-Speed Rail Authority (CHSRA) on a high-speed train (HST) corridor through our region (Item 4).

We appreciate that your draft comments include a pledge from SANDAG to continue to support the state's efforts to plan, design, and construct an HST corridor through our region, and to work cooperatively to move forward with a project level EIR/EIS and implementation of the corridor. HST will bring many benefits to our region, including 45,250 more jobs by 2030, economic stimulus, decreased demand for auto travel, and an overall reduction in carbon emissions.

We respectfully request that the following comments also be included in your letter:

- **An alignment alternative along I-15 to a station alternative at Qualcomm Stadium should be included in the process.**

The CHSRA's own 2005 program EIR/EIS demonstrated that this alignment is cheaper to build, faster to the region, and will attract more intercity passengers than the Carroll Canyon or Miramar Road alignments. This alignment was also shown to have lower potential impacts to aesthetic, visual, cultural, and paleontological resources. Moreover, a stop at Qualcomm is more

centrally located in the San Diego region and provides opportunities for Smart Growth and redevelopment. This route does not preclude a final stop at Lindbergh Field or downtown San Diego. The corridor could also be continued to the international border.

- **Summary of comments received at local public scoping meetings, including those which the CHSRA has acknowledged receiving.**

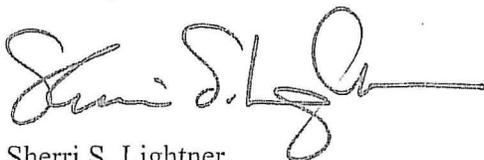
While these comments were also collected by the CHSRA, SANDAG represents the citizens of our region and its comments ought to reinforce and reflect their views. According to your backup material for Item 4, public comments at local scoping meetings “focused on concern for the proposed alignment through Rose Canyon in University City, potential traffic impacts near stations, and the need for additional construction along the Interstate 15 corridor.” At the November 10<sup>th</sup> University Community Planning Group meeting, CHSRA officials said that major themes of public comments they have received so far are to consider the I-15 corridor to Qualcomm, and concerns regarding Rose Canyon, property impacts, earthquake safety, and financing. Most of these comments are not currently reflected in your letter, and we believe they should be included.

- **A corridor to the border should be studied as a part of the project level EIR/EIS.**

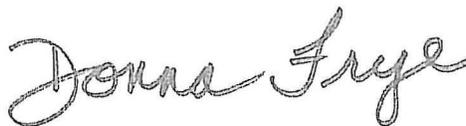
At this stage in the environmental process, we believe that a continuation of the I-15 corridor route to the border should be included in the evaluation. HST presents a remarkable opportunity to partner binationally to bring progress to our entire region. Building HST to the border will provide redevelopment opportunities and economic growth in Otay Mesa, San Ysidro, and the South Bay area. An HST station at Rodriguez International Airport could be a part of a larger plan for a binational regional airport.

Thank you for your consideration, and we look forward to working with you to bring HST to our region.

Sincerely,



Sherri S. Lightner  
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