



July 20, 2021

Therese W. McMillan
Executive Director
Metropolitan Transportation Commission
Bay Area Metro Center
375 Beale Street, Suite 800
San Francisco, CA 94105

Via E-mail to: eircomments@bayareametro.gov

RE: Comments on the Draft Environmental Impact Report Plan Bay Area 2050

Dear Ms. McMillan,

This letter is the California High-Speed Rail Authority's (Authority) comments on the Draft Environmental Impact Report (EIR) for Plan Bay Area 2050 (PBA 2050) dated June 2021.

We want to thank the Metropolitan Transportation Commission and staff for your leadership as the first region in the State to consider including in your long range plans discretionary funding towards delivery of high-speed rail. This step will build on the long-term partnership that our agencies have had and will assist the Authority in pursuing and leveraging additional state and federal funds.

The Authority appreciates MTC's foresight to plan for resiliency and equity with the preparation of the PBA 2050 to shape the region's Sustainable Communities Strategy as mandated by SB 375. We are highly supportive of PBA 2050's strategies to advance Bay Area quality of life to be more affordable, connected, diverse, healthy and vibrant for all.

Comments on the Draft Environmental Impact Report

The Authority supports approval of the Proposed Plan, which includes investment in high-speed rail as part of the PBA 2050 strategy to expand and modernize the regional rail network. The Proposed Plan aligns with the Authority's priorities in several topic areas: climate change, expanding transit, equity, open space preservation, land use and economic development. The core strategy of the Proposed Plan – to focus growth in existing communities along the existing transportation network, which leverages existing infrastructure, builds upon existing community characteristics and reducing effects on areas with less development – is consistent with the Authority's priorities and our work to expand and improve rail on existing corridors in the region.

Regarding the PBA 2050 Alternatives, the Authority supports Alternative 1: Transit-Rich Area (TRA) Focus Alternative, which includes capital investment in support of bringing high-speed rail to the Bay Area. Alternative 1 proposes additional core capacity transit investments in lieu of adding highway lane-mileage and a compact regional growth pattern with the greatest share of housing and job growth within walking distance of high-capacity regional transit stations. This land use/transportation strategy is consistent with Authority priorities.

Alternative 2: High-Resource Area (HRA) Focus Alternative aligns transportation funding with projects that advance equity and climate goals, shifts investment to reform transit fares, enhance local transit frequency and build an integrated regional express lane and bus network, in lieu of expanding the regional rail network including Caltrain/HSR modernization – Tamien to Pacheco Pass.

This alternative would be strengthened by including high-speed rail in the list of transportation projects that will advance both equity and climate goals. California suffers from regional economic disparities between the coastal and in-land areas. High-speed rail will change the travel geography of the state, connecting regions together with time efficient inter-city travel and, for that reason, is a key part of the state's strategies to address and balance inter-regional equity. Silicon Valley to Central Valley service, also known as Valley-to-Valley service, will link Central Valley communities to the economic opportunities of the Bay Area while attracting investment to the Central Valley. The travel times offered by high-speed rail will expand options for where people can live and work, or where companies can locate jobs, and support the concentration of employment in urban, regional transportation hubs. These changes to the way our State is structured and moves around will be important parts of reducing emissions and ensuring that regions rise together. If this alternative is selected, we encourage MTC to work with the State on ensuring that both statewide and regional climate and equity goals are fully considered.

The economic effects provided by investment in high-speed rail are already being felt today. As construction has advanced, the Authority's investment in the Central Valley has generated close to \$10 billion in economic activity. Additionally, more than half of the 5,000 construction workers who have worked on the program live in disadvantaged communities. The Authority is actively working to ensure that the local workforce is prepared for these kinds of economic opportunities by investing in workforce development. In 2020, the Authority started a construction industry job training facility in Selma, serving Valley veterans, at-risk young adults, minority and low-income communities. For these reasons high-speed rail is a transportation investment that advances equity and climate goals that would be preferable to building highway express lanes.

Comments on the Transportation Project List

The inclusion of high-speed rail in MTC's Transportation Project List will greatly expand statewide accessibility to the Bay Area and further advance the equity and sustainability of the region. The Authority has two comments on the Transportation Project List and associated project descriptions.

- 1) The first is a preference for how dual-purpose investments are characterized. These changes are important for consistency with the Commission's direction in September 2020 to ensure that electrification of the rail corridor is an explicit priority of Plan Bay Area 2050 as it was adopted in the Blueprint. The Authority requests, the following changes from the currently proposed language (shown in red from revised language):

<p>21-T11-102</p>	<p>Rail Modernization and Electrification Modernization & Electrification Grade Separations & Modernization Caltrain/High Speed Rail San Jose to Pacheco Pass</p>	<p><i>Existing Scope:</i></p> <p>This program includes funding to implement improvements to the Caltrain/High-Speed Rail Corridor. Improvements include corridor electrification south of Tamien station in San Jose and grade separations from San Jose through the Pacheco Pass.</p> <p><i>Revised Scope:</i></p> <p>This program includes funding to implement improvements to the Caltrain/High-Speed Rail Corridor. Improvements include corridor electrification south of Tamient Station in San Jose, corridor electrification south of Tamien station in San Jose and grade separations from San Jose through the Pacheco Pass grade separations and other modernization improvements that serve the dual purpose of connecting High Speed Rail to the Bay Area and improving the Caltrain system. Improvements could be on the Union Pacific right-of-way between San Jose and Gilroy when High Speed Rail reaches an agreement for purchase or use of that corridor, or potentially on the Pacheco Pass corridor when a full funding plan is developed for the High Speed Rail connection to the Central Valley.</p>	<p>2036 - 2050</p>	<p>\$3,000</p>
<p>21-T11-103</p>	<p>Rail Grade Separations, Electrification & Modernization Caltrain/High Speed Rail</p>	<p><i>Existing Scope:</i></p> <p>This program includes funding to implement improvements to the Caltrain/High-Speed Rail Corridor. Improvements include grade separations funded by Santa Clara County's Measure B and San Mateo County's Measure A, as well as future grade separations to enable High-Speed Rail service within the Bay Area's urban core.</p> <p><i>Revised Scope:</i></p> <p>This program includes funding to implement improvements to the Caltrain/High-Speed Rail Corridor. Improvements include grade separations funded by Santa Clara County's Measure B and San Mateo County's Measure A, as well as electrification, future grade separations, and other modernization improvements within the Bay Area's urban core that serve the dual purpose of connecting High Speed Rail to the Bay Area and improving the Caltrain system to enable High Speed Rail service within the Bay Area's urban core.</p>	<p>Various</p>	<p>\$5,760</p>

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- 2) The second is a request to add, in the plan implementation language, a formal review process for projects to potentially move from a later to an earlier timeframe based on project readiness, availability of matching funds, and other considerations. While funding projections are important drivers of long-range planning, the plan should include enough flexibility to adjust to changing circumstances. The Authority's 2020 Business Plan lays out a strategy for bringing high-speed rail to the Bay Area before the 2036-2050 timeframe shown in the Transportation Project List for projects 21-T11-102 and 21-T11-103. While there is substantial work to do to realize the Authority's Business Plan, we want to ensure that we have opportunities for ongoing engagement and partnership with MTC to bring high-speed rail to the Bay Area at the earliest possible date including a formal process for how those timeframes may be adjusted in the future.

Future Collaboration

In summary, we want to express the Authority's appreciation to MTC commissioners and staff for your long-term support of the high-speed rail program and vision in putting together this Plan. Over the past decades we have shown that the State and Region working together can make substantial improvements in our transportation network and quality of life and this plan lays out the necessary work to keep doing that in the years to come. We look forward to being a partner with you on that journey.

Sincerely,



Boris Lipkin
Northern California Regional Director
California High-Speed Rail Authority

cc: Margaret Cederoth, Director of Planning and Sustainability, CHSRA
Kelly Doyle, Supervising Transportation Planner, CHSRA