



August 4, 2010

Mr. Robert Doty
Program Director, Peninsula Rail Program
California High Speed Rail Authority
925 L Street, Suite 1425
Sacramento, CA 95814

Dear Mr. Doty:

Thank you for the opportunity to comment on the Draft Alternatives Analysis for the San Francisco to San Jose section of the California High Speed Rail Authority's (CHSRA) project-level environmental document.

As the owner of the Caltrain Rail Corridor, the Peninsula Corridor Joint Powers Board (JPB) has been working collaboratively with CHSRA as a part of the Peninsula Rail Program (PRP), which was formed in accordance with the agreement adopted by both agencies to establish an organizational framework for the coordinated planning, design and construction of improvements in the Caltrain Rail Corridor that will accommodate and serve both the near-term and long-term needs of CHSRA inter-city high speed rail service and JPB commuter rail rapid transit service.

The agreement outlines partnership principles and actions related to the delivery of these services. A great deal more study is needed, but many of the design options specified in the Alternatives Analysis clearly meet, or have the potential to meet, these principles. When selecting alternatives to carry forward, we urge you to focus on alternatives that address:

- **Phased Implementation** – Several factors support the opportunity for phased implementation of high speed rail service on the Caltrain Rail Corridor including the JPB's readiness to proceed with elements of corridor modernization projects and a recent Federal Railroad Administration waiver allowing the operation of light weight, non-compliant rolling stock.

Corridor electrification and federally mandated signaling system improvements have received Federal environmental clearance allowing elements of these projects to proceed as long as they are consistent with, and will accommodate future high speed rail operations and will not predetermine any of the design alternatives being considered for high speed rail.

In addition to pursuing opportunities to leverage Caltrain projects that advance the phased implementation of high speed rail, the CHSRA environmental review should consider an approach that anticipates the design, engineering, construction and implementation of high speed rail service on a phased basis.

The project team should identify service levels required to meet initial ridership projections, explore design and engineering solutions that would accommodate these service levels and allow CHSRA and JPB to pursue construction of project infrastructure that meets initial operating requirements before pursuing the full build of a project designed to meet 2030 ridership projections.

Phasing the implementation of high speed rail construction has the potential to reduce risk, minimize project costs, leverage existing infrastructure and enhance the feasibility of design alternatives that will mitigate potential environmental impacts on Peninsula communities.

- **Interoperability** – The corridor should be designed to maximize interoperability between Caltrain and high speed rail. Commuter and high speed passenger rail service should operate on a fully integrated, grade separated, shared use corridor and all facilities should be designed to achieve maximum compatibility between both systems.

In advancing the analysis and selection of preferred alternatives, JPB would like to maintain our priority projects unchanged and exercise very close coordination with the PRP on engineering design, planning and current construction efforts.

While furthering the analysis and development of alternatives in close partnership with JPB, we recommend that CHSRA accommodate our Priority Capital Program projects which focus on the safety, state of good repair, reliability and modernization of operations of the Caltrain system.

Accommodating Caltrain commuter rail through compatible engineering design standards is necessary to allow Caltrain and high speed rail operations to operate as an integrated system that maximizes our ability to meet the evolving needs of our customers.

- **Preservation of Caltrain operations during construction** – The design should reflect the requirement that Caltrain operations be maintained during construction of the project. Future studies should include a full analysis of the impacts associated with the steps necessary to achieve this obligation.

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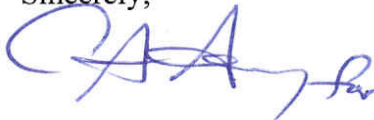
- **Community Involvement and Public Participation** – The Peninsula Rail Program has taken great steps to engage Peninsula communities in the process to review and study project design alternatives. This includes providing opportunities over and above what is required under Federal and State law. The project team should continue to respond to community concerns and allow the public to participate to the fullest extent possible. It is important that the project be designed with consideration of the cities on the Peninsula through which the high speed rail system will be constructed and operate.

In addition to continuing to pursue the principles specified in the agreement between CHSRA and JPB, the ongoing study of alternatives should also include:

- **Station Area Planning** - Accommodating Station Area Planning efforts should focus on enhancing livability opportunities along the corridor by promoting transit oriented development, and encouraging access improvement to sustain ridership.
- **Fundability** - A thorough analysis of the project costs associated with each alternative will be critical as the project-level environmental review continues. In order to implement a project that will deliver integrated high speed rail and Caltrain commuter rail service on a fully electrified, modernized and grade separated corridor, the preferred alternative must reflect realistic expectations in terms of anticipated funding for the San Francisco – San Jose section.

Thank you for considering these comments as a part of the Alternatives Analysis and for incorporating them into the next phase of design and engineering refinements and the overall environmental review. JPB looks forward to continuing its support of our coordinated planning effort with CHSRA.

Sincerely,



Michael J. Scanlon
Executive Director

Cc: Peninsula Corridor Joint Powers Board of Directors
Mark Simon
Seamus Murphy
David Miller