CALIFORNIA STATE PARKS FOUNDATION

The Voice for California's State Parks

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October 31, 2005

Mehdi Morshed, Executive Director
California High Speed Rail Authority
925 L Street, Suite 1425
Sacramento, CA 95814

Joseph Boardman, Administrator
Federal Railroad Administration
U.S. Department of Transportation
1120 Vermont Ave., N.W. M/S 20
Washington, D.C. 20590

Dear Messrs. Morshed and Boardman,

On behalf of the California State Parks Foundation and our 65,000 members statewide, I am writing to comment on the final Environmental Impact Report/Environmental Impact Statement (EIR/EIS) of the California High Speed Rail Authority (HSRA).

The California State Parks Foundation is the only statewide non-profit membership organization dedicated to protecting, enhancing and advocating for California's 278 natural, cultural and historic state parks. Through programs that help restore park properties, educate teachers and students about environmental resources in parks, built volunteerism and stewardship in our state parks, and promote sound public policy, we work to protect countless natural, cultural and historical treasures found within our parks, as well as the 280 miles of coastline, 625 miles of lake and river frontage, 18,000 campsites and 3,000 miles of hiking, biking and equestrian trails. On behalf of our members, we are committed to ensuring that state parks continue to provide recreation, adventure, renewal, and inspiration to all Californians.

We appreciate the HSRA staff's and board members' attention to issues relating to potentially significant impacts on state parks. Specifically, the commitments to avoid transecting Henry W. Coe State Park, study additional alternatives to the Bay Area routes, and the decision to allow further study on the Burbank to Union Station corridor, in order to minimize potentially significant impacts to Rio de Los Angeles State Park (formerly known as Taylor Yard) and Los Angeles State Historic Park (formerly known as Cornfield), address two important issues we raised during the comment period on the draft EIR/EIS. As further study and analysis progresses on potential options for a mountain crossing alignment, however, we urge the Authority to continue its commitment to avoiding Henry W. Coe State Park as well as other state parks in the affected region. With respect to the further study on the Burbank to Union Station

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corridor, we encourage the HSRA to establish an official Advisory Committee similar to that proposed for the Bay Area study. This new committee should include community members, local transportation and engineering experts, representatives of the Department of Parks and Recreation and others to provide community input and transparency in studying that segment.

However, we believe the final EIR/EIS, overall, remains inadequate in its response to potentially significant park impacts and inappropriately defers critical analysis for land management, habitat preservation, cultural and biological resource management and noise and visual impacts to future project-level analysis. While we appreciate that the final EIR/EIS appears to narrow its focus on park impacts to five parks specifically identified as within 900 feet of preferred High Speed Train (HST) alignments, the lack of specificity regarding the issues identified above causes concerns about the scope of additional park units that may be indirectly impacted by the HST. This final EIR/EIS establishes the parameters for future analysis and sets a framework for the work of multiple, segment-specific project EIR/EIS documents. As such, it is imperative that this final EIR/EIS contain specificity appropriate to avoiding, minimizing or mitigating the potentially significant impacts of selected and suggested alignments of the proposed HST. Examples of responses that inadequately respond to our concerns include, but are not limited to, the following:

With respect to Response ASO051-1, we respectfully disagree that use of existing rail corridors for HST operations is not expected to greatly alter the environmental effects of these existing rail lines. The parks near or adjacent to rail lines experience use of light rail and low-speed Amtrak, as well as some freight train use. Addition of HST operations in the vicinity of these existing services is not simply an adjunct. The speed, velocity, and noise of HST, even at lower than full speeds, creates potentially significant impacts that do not currently exist with the current rail services. Visitors to state parks, even in urban environments, are entitled to an experience that recreates historic atmospheres, provides a refuge from urban life, and creates a connection with biological and cultural resources. As such, the addition of HST in areas where existing rail corridors are in use near state parks does warrant additional analysis of potentially significant impacts and avoidance or mitigation strategies. A revised analysis must be prepared to address these potentially significant impacts for each park near or adjacent to a proposed HST operation.

We disagree with Response ASO051-3, which states that it is premature at this level of design to develop more specific mitigation measures for potential effects. The alignment proposals in the final EIR/EIS essentially predetermine the scope of future analysis. By deferring more specific environmental review, including developing of mitigation measures, to future project-level design, the final EIR/EIS prevents a full analysis of whether all opportunities for park avoidance have, in fact, been pursued, and whether mitigation measures would be effective in addressing inevitable park impacts. We continue to have strong concerns regarding potentially significant visual and noise impacts in state parks resulting from HST. The uncertainty regarding mitigation measures that would be pursued to alleviate those impacts contributes to our position that the final EIR/EIS is deficient in its response to potentially significant park impacts and fails to

document that these impacts will be less than significant with or without mitigation. Again, a revised analysis must be prepared to address these additional potentially significant impacts.

We are concerned that significant funding is already being considered for additional planning (Senate Bill 1024 [California State Senate, 2005]; Safe, Reliable High-Speed Passenger Train Bond Act [Secretary of State's Office, prepared for November 2006 election]) at a time when the final EIR/EIS contains important gaps that prevent a full analysis of the 700-mile HST project. At this time, we do not believe that sufficient information has been disclosed that would lead to a thorough assessment of the proposed project, particularly as it relates to potentially significant impacts on state parks.

As the HRT process advances, we will be monitoring the various segment considerations and will continue to voice our concerns regarding the areas identified above. We urge the HSRA to develop and make available a process that will resolve the issues identified here prior to formal initiation of the project-level EIR/EIS work. We look forward to an opportunity to work together in that regard and appreciate your continued diligence to the stated intention to avoid potentially significant impacts on park and recreational resources.

Sincerely,

Elizabeth Goldstein

CC: Ruth Coleman, Director, California Department of Parks and Recreation