



Kings County Association of Governments

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Member Agencies: Cities of Avenal, Corcoran, Hanford and Lemoore, County of Kings

October 11, 2011

California High Speed Rail Authority
770 L Street, Suite 800
Sacramento, CA 95814

RE: FRESNO TO BAKERSFIELD DRAFT EIR/EIS COMMENTS

To Whom it May Concern:

Below you will find the Kings County Association of Governments' (KCAG's) response to the California High Speed Rail Authority's Fresno to Bakersfield Draft EIR/EIS. Following some general comments, KCAG has included some preliminary feedback on the Authority's recent decision to conduct a detailed analysis of the West Hanford Alignment for inclusion in the EIR/EIS in early 2012. The rest of the letter was written prior to the October 5 announcement and is organized to correspond with the section naming conventions of the existing draft EIR/EIS for your convenience. As the regional transportation planning agency for the Kings County area, KCAG's comments on the draft EIR/EIS focus on a regional analysis of the proposed HSR alignment and station location. KCAG's member agencies (Kings County and the cities of Avenal, Corcoran, Hanford and Lemoore) may be providing comments on the EIR/EIS that are specific to their agencies as they see fit.

As a general comment, the EIR/EIS identifies the Kings-Tulare Regional Station (KTRS) as a "potential station." We would like to request an impact analysis if there is no station in the Kings-Tulare region, particularly considering the proposed discontinuation of Amtrak service at Hanford and Corcoran. This would have a huge impact on our region in terms of greenhouse gas emissions, as residents would have to travel to Fresno or Bakersfield for train service. We would also like to see ridership projections and greenhouse gas (GHG) analyses both with and without the KTRS integrated into the document.

With the "independent utility" aspect, it has been suggested that if no further funding was available to complete the high speed rail system, the existing Amtrak service would then use the new rail line that would be connected to the BNSF rail line. If this were to occur, the question must be asked as to what happens to the current Hanford and Corcoran Amtrak stations and the investments made in each of the intermodal facilities, as well as the impacts to the local economy when these downtown stations are abandoned. The draft EIR/EIS does not identify mitigation measures to address this issue of the abandonment of existing Amtrak stations in either event.

Additionally, KCAG would like to clarify that our RTP does not state that HSR should not be along an Interstate 5 alignment as the EIR/EIS asserts. At the time our RTP was written, I-5 alignments were no longer under consideration by the CHSRA so they were not specifically included in some discussions of HSR. KCAG has supported HSR along either I-5 or SR 99.

KCAG would like to request a traffic analysis be included for the various KTRS parking options discussed in the draft EIR/EIS. Specifically, the traffic analysis for the KTRS includes analysis of the proposed 1,600 vehicle parking lot located at the proposed KTRS site. However, while the draft EIR/EIS notes that a portion of this parking could be placed in Hanford's central business district, the traffic impact of travel into Hanford to access new downtown parking is not analyzed. We would like to see an analysis and mitigation of the impact accessing downtown parking would have on our local transportation system. In addition, KCAG believes that the Authority should fund the construction of a parking structure, as its primary purpose would be to serve KTRS. A parking structure, as opposed to a surface lot, would support the idea of reducing the need for land around a station.

As you are undoubtedly aware, citizens, legislators, and local governments alike in this area have spoken in support of including an alternative alignment that follows the existing transportation corridor adjacent State Route 99 and the Union Pacific Railroad in the final EIR/EIS. As it stands, SR 99 alignments are no longer being considered by the Authority in this area. While we appreciate the addition of a second alignment alternative for analysis with the inclusion of the West Hanford alignment in early 2012, we respectfully request that SR 99 corridor also be included as an alternative alignment for analysis in the final EIR/EIS.

KCAG has recently been made aware of a planning study by the Lincoln Institute of Land Policy entitled "High-Speed Rail: International Lessons for U.S. Policy Makers" (http://www.lincolnst.edu/pubs/1948_High-Speed-Rail). This document provides a cautionary case study of a HSR station located outside the city of Avignon, France. The station is surrounded by protected wetlands and is outside Avignon's center in a manner similar to the proposed urban reserve and the KTRS. According to this report, the benefits of Avignon's HSR station are limited due to its location and inability to be fully incorporated into existing infrastructure.

This report concludes that the station's location serves as a "physical barrier" to its being integrated into the historic center (29). Ultimately, this distance put it in direct economic competition with Avignon's central business district. As stated in the report, "In terms of broader municipal impacts, the TGV station has become the primary gateway to the region at the expense of development activity around the conventional rail station in the city center" (31). It also indicates that, despite shuttle buses departing to/from the station in 15 intervals, "...most station visitors access the area by automobile using a network of roads that link nearby highways to 1,800 parking spaces in the station lots" (p. 31). KCAG feels this case study should be carefully considered by the Authority and all interested stakeholders moving forward, as it serves as a poignant reminder of outcomes that are not in line with local, state, or federal planning priorities. It underscores the need for comprehensive planning and capital improvements beyond available funding levels to achieve a sustainable KTRS.

Preliminary Comments on Proposed West Hanford Alignment

As noted in an October 5 press release, the Authority intends to release an additional draft EIR/EIS in early 2012 that evaluates the "West Hanford Alignment." We are aware of two iterations of the proposed West Hanford Alignment, one that runs along 12 ½ Avenue and one that runs along 13 ¼. A few general comments to consider are the proximity of this alignment to the new Sierra Pacific High School located at 13th Ave. and Grangeville Blvd., the College of the Sequoias center, an agricultural preservation area outlined in Kings County's 2035 General Plan, and the impacts of access to the potential station along the SR 198 corridor, including each of the interchanges spanning from 9th Ave. through to and including SR 41.

Section 1.0: Project Purpose, Need, and Objectives

1. The Link between a Rural Station Site and a Transit-Oriented, Mixed-Use Downtown is Unclear

It is widely understood that the proposed KTRS is unique among all proposed HSR stations due to its status as a multi-county, regional transit hub. As is discussed in the EIR/EIS, the proposed KTRS site location is outside an urban center and surrounded by farmland. This does not inherently lend itself to TOD, mixed-use development, and other density-based sustainable planning practices associated with HSR stations in urban cores.

Page 1-21 of the EIR/EIS asserts that HSR "provides an opportunity to create transit centers in the central business districts, where mixed land uses (residential, commercial, and business uses) and urban densities are best suited... Worldwide and national examples demonstrate increased land values adjacent to large multimodal centers to develop more densely around stations." While we appreciate that this is likely to be true for proposed site locations in downtowns (such as Fresno and Bakersfield) this does not hold true to KTRS, which is in unincorporated Kings County.

As such, we would like to see a discussion of the unique status KTRS holds among proposed station sites in addition to an explanation of how its location will preserve agriculture and benefit our central business districts. While we have heard the notion of maintaining properties adjacent KTRS as an "urban reserve" until growth naturally occurs in that area, the 3+ mile distance between the KTRS location and Hanford's downtown core will remain.

Were this area to urbanize in fifty or so years, for example, it could establish a competing business district that would detract from Hanford's existing downtown, as has been noted above in the case study of Avignon, France.

2. Clarification on the San Joaquin Valley Blueprint and County-Specific Blueprints

Section 1.3.1 references the San Joaquin Valley Blueprint process, an unprecedented planning effort the eight valley metropolitan planning organizations launched in 2005. It should be noted that, in addition to the valley-wide effort, each of the individual eight counties undertook county-specific Blueprint processes that outlined goals, priorities, and smart growth planning objectives. There are planning principles specific to the Kings County Blueprint that were outlined during our county-specific public outreach efforts. The eight county-specific Blueprints provide a more detailed look at each county's planning priorities. We would like to request that the Kings County Blueprint Principles, which are available for review on our website's planning page, be evaluated and integrated into the EIR/EIS.

Section 2.0: Alternatives

1. Clarification on the West Hanford Alignment

The EIR/EIS asserts that "...the Hanford West Bypass would be located between the cities of Hanford and Lemoore, an infill area where local plans seek to guide future development" (2-25). While we understand additional information will be included in a future draft EIR/EIS, it would be helpful to clarify that this alignment is adjacent to the unincorporated community of Armona.

2. Discrepancies between Table 2-8, Figure 2-24, and Section 3.2

As mentioned in the Section 3.2 portion of this letter, there are inconsistencies regarding the SR 198 widening project in Kings County. This project is currently under construction with SR 198 slated to become an operational four-lane expressway in 2012. This is appropriately reflected in Table 2-8 but is then listed as a "proposed improvement" in Figure 2-24. It should be updated to reflect its status as a four-lane expressway prior to the HSR construction start. This should also be considered when outlining proposed mitigation measures.

3. Central California Railroad Authority and Interregional Goods Movement Study in Freight Section

Senator Michael Rubio's SB 325 was enacted this year which created the Central California Railroad Authority with membership from Merced, Tulare, Kings, Fresno and Kern counties. This bill is intended to maintain short-line railroad service in the San Joaquin Valley, which would work to increase goods movement via freight rail and decrease freight trips via truck. Furthermore, the San Joaquin Valley MPOs are currently conducting an interregional goods movement study as a way to outline more sustainable strategies for goods movement in the valley, such as increased freight rail opportunities. It could be helpful to touch on both of these in the freight rail section (page 2-49) of the no project discussion.

4. Creating an Agricultural Lands Figure to Accompany Figures 2-32 & 2-33

In reviewing Figures 2-32 (BNSF alternative without shared right-of-way) and Figure 2-33 (BNSF alternative showing opportunity for shared right of way), KCAG would like to see a figure illustrating HSR right-of-way in relation to agricultural lands and segments of the alignment which do not follow existing rights-of-way. This would provide better visual perspective as to the right-of-way requirements needed for HSR and agricultural operations to occur as symbiotically as possible.

5. Evaluating Telecommuting in Travel Demand and Ridership Forecasts

Section 2.5 provides a discussion of Cambridge Systematics' travel demand forecasts for HSR in the future. KCAG is curious if these ridership estimates take into consideration the rise in telecommuting and other such technologies for their calculations of HSR commuter and work trips.

6. *Clarification on Station Area Development Policies Discussion*

The discussion of the Authority's Station Area Development Policies on page 2-94 focuses on policies for stations located in urban cores. KCAG appreciates that, because the KTRS site is unique among proposed station sites in the HSR system, land use planning for this area is not necessarily in accordance with the outlined Station Area Development Policies, lest it encourage sprawl. KCAG would like to see a discussion detailing the complex land use planning issues surrounding KTRS and an acknowledgment in the EIR/EIS that the Authority's Station Area Development Policies are not entirely feasible in the surrounding area. In addition, effective transit planning for KTRS would likely require the displacement of existing multi-modal transit stations in downtown cores, such as the Kings Area Rural Transit Center and the adjacent Hanford Amtrak station, where significant investments have been made.

Section 3.2: Transportation

1. *State Route 198 Mitigation Measures*

On pages 3.2-17, 3.2-31, 3.2-37, and 3.2-63, State Route 198 is listed as having one lane in either direction east of State Route 43. State Route 198 is in the process of being widened to two lanes in each direction with an anticipated completion date of 2012. The mitigation measures proposed for SR 198 were designed for a 2 lane system instead of the 4 lane system we will have next year. As such, KCAG requests the mitigation measures proposed for SR 198 be reevaluated with its status as a four lane expressway in mind.

KCAG opposes the signalization of intersections on this 4-lane facility as discussed on page 3.2-90. KCAG's RTP includes long-range projects to construct interchanges on SR 198 at the intersections of 2nd, 6th, and 9th Avenues. With KCAG's request for additional analysis of the local transportation system for accessing parking in downtown Hanford, the potential need to construct an interchange on 9th Avenue and modifications to the Central Hanford/Reddington St. interchange should be analyzed as well. Funding for these projects should be provided as a mitigation measure.

2. *Roadway Classifications*

On Page 3.2-24 (Figure 3.2-9), the draft EIR/EIS identifies Lacey Blvd. as a local street. Other areas of the document identify Lacey Blvd. as an arterial (See Transportation-Technical Analysis Report, Page 4.3-2). In addition, roadway segments of Grangeville Blvd. from 10th Ave. to SR 43 and Lacey Blvd. from 10th Ave. to SR 43 will be impacted by this project. These two road segments are designated as arterials and should be included in the traffic impact analysis.

3. *Technical Correction: Kings County General Plan*

Table 3.2-1 incorrectly lists Kings County's General Plan as having been last updated in 1997. Its 2035 General Plan update was adopted by the Kings County Board of Supervisors in January 2010.

4. *Potential Discontinuation of Amtrak Service at Hanford, Corcoran*

KCAG supports the notion of Amtrak serving as a feeder service for the HSR system (3.2-43). Since the inception of California's HSR project, KCAG has adamantly vocalized its support of maintaining our existing transportation infrastructure in Kings County, particularly the Amtrak stations in Hanford and Corcoran. This sentiment is in line with the local planning priorities of our citizenry as evidenced through the Kings County Blueprint process' planning principles:

Improve air quality through enhanced commuter connectivity by implementing alternative transportation modes and enhancing existing modes, and supporting the continuation of Amtrak passenger rail service through Kings County on the existing BNSF alignment (Kings County Blueprint Planning Principles August 27, 2008).

The EIR/EIS' assertion that Amtrak service could be discontinued in Hanford and Corcoran following completion of HSR (3.2-48) is disconcerting because it is in direct conflict with the planning principles outlined by stakeholders during the Kings County Blueprint process. KCAG also has concerns regarding the economic impact discontinued service could have on Hanford and Corcoran's downtowns, whose roles as multi-modal transportation hubs contribute to the success and viability of downtown merchants. The discontinuation of Amtrak service in Kings County would be tantamount to a disinvestment in our downtowns. The increased potential for downtown deterioration, in combination with the unknown status of redevelopment funding, could create serious problems as we begin developing our 2014 Sustainable Communities Strategy document as per the requirements of SB 375, as investment in urban cores is one of the most common strategies for rural communities.

Furthermore, KCAG does not agree with the assumption that "existing riders would shift to HST service as it becomes available" (3.2-48). Currently, a one-way ticket from Hanford to Fresno costs \$5 on Amtrak. Given our region's socioeconomic composition, we are uncertain that a simple migration of all of Kings County's current Amtrak passengers to HSR is economically feasible. We would like to see a discussion of the impacts a discontinuation of Amtrak would have on Kings County residents and proposed mitigation measures both in the Transportation and Environmental Justice sections of this document, as we believe it pertains to both.

5. *Access to KTRS via SR 43*

The draft EIR/EIS notes that primary access to the proposed KTRS will be via direct access from SR 43 between the SJVRR and Grangeville Blvd. and Figure 2.4 of the Transportation Technical Analysis Report also shows a map identifying this access. It is highly unlikely that Caltrans would allow a direct access connection from the highway. Access to the proposed KTRS will most likely be required off of Grangeville Blvd.

6. *SR 43 and SJVRR Grade Separation*

The draft EIR/EIS states that the segment of SR 43 from SR 198 to Grangeville Blvd. will be adversely impacted with the development of a HST station. Mitigation measures as identified on Table 3.2-32, page 3.2-91, specify construction of an additional travel lane on SR 43. Since this segment of SR 43 crosses the SJVRR, construction of a grade separation may be required, and as such Caltrans' long range plans for SR 43 specifies the need to install a grade separation structure at this location at the time of road widening.

7. *SR 43 and Lacey Blvd. Mitigation*

The draft EIR/EIS states that the intersection of SR 43 and Lacey Blvd. will be adversely impacted with the development of a HST station. Mitigation measures as identified in Table 3.2-21 specify installation of a traffic signal system to improve operations and LOS. The Traffic Impact Study fails to address the issue of the SR 43 and Lacey Blvd. intersection being in too close proximity to the SR 43 and SR 198 interchange westbound off ramp. In discussions with Caltrans regarding their state highway system, they have stated that relocation of the SR 43 and Lacey Blvd. intersection further north from the existing location will be necessary in the future to accommodate left turn movements onto Lacey Blvd. Mitigation measures need to address this issue and provide for the relocation of the SR 43 and Lacey Blvd. intersection.

8. *Independent Utility Clause of ARRA Funding*

As we understand it, there is a caveat to American Reinvestment and Recovery (ARRA) funding that requires the HSR project to be able to function as an "independent utility" in the event the project does not get fully completed. CHSRA staff has stated that, if this is the case, the HSR track proposed through Kings County could function as an Amtrak "express service" that would curtail and/or eliminate Amtrak service in Kings County by bypassing Corcoran and Hanford's existing Amtrak stations.

If this were to happen, we would like to see a discussion of the independent utility scenario in this document as it would have serious repercussions for our communities in the event HSR is not fully completed. We are specifically looking for information as to how CHSRA intends to mitigate any diminished Amtrak accessibility to local residents should this independent utility scenario come to fruition.

9. *Downtown Parking Garages Discussed but Traffic Impacts Are Not Analyzed*

In different parts of the EIR/EIS, there are references to having a 1,600 space parking lot at the KTRS site (Table 3.2-38). However, the document also states that "...the Authority may provide a portion of the Kings-Tulare Regional Station parking in downtown Hanford, Visalia, and/or Tulare..." instead of at the KTRS station site (3.2-65).

KCAG supports the notion of downtown garages with shuttle service to/from the station as it would support our downtown merchants. However, the traffic impact of travel into Hanford to access new downtown parking is not mentioned in this discussion. We would like to see an analysis and mitigation of the impact access to downtown parking structures would have on our local transportation system.

10. *Maps in this Section Should Include All Existing Amtrak Stations*

We would like to request that maps in this section be updated to include all existing Amtrak stations to show that the existing Amtrak stations at Hanford and Corcoran would be discontinued.

11. *Naming Conventions for State Route 43*

It would be helpful to make the naming convention for State Route 43 consistent in this document. It is listed as 8th Avenue, Central Valley Highway, or State Route 43, which may create confusion.

12. Technical Correction: 7th and 6th Avenues

On pages 3.2-64, 3.2-89, 3.2-90, Table 3.2-19, 3.2-21, 3.2-32, 6th and 7th Avenues are labeled as 6th and 7th Streets. This should be updated to reflect their being "avenues" to avoid confusion. To clarify, numbered streets run east/west within the city of Hanford and numbered avenues run north/south in the county's jurisdiction.

Section 3.3: Air Quality and Global Climate Change

1. Overview of the General Conformity Process

The draft EIR/EIS provides an overview of the general conformity process and how this differs from the transportation conformity process. Page 3.3-2 states "...there may be some smaller highway elements of the project that will be dealt with through the case-by-case modification of the regional transportation plan (RTP) consistent with transportation conformity." KCAG would like some clarification on this section so we have a clearer understanding regarding what will be expected of us for inclusion in our 2014 Regional Transportation Plan.

2. EMFAC 2011

As of September 27, 2011, the Air Resources Board has released EMFAC 2011, which is replacing EMFAC 2007. Will the analysis in this section be updated for the Final EIR/EIS to reflect this change?

3. Modeling High Speed Rail in 2014 Regional Transportation Plan

The EIR/EIS indicates that "it is anticipated that the next revision of the Fresno COG, KCAG, TCAG or Kern COG RTPs will include the operation of the HST..." (3.3-38). With high speed rail being unprecedented in the United States, KCAG will need guidance on how to adequately include the HSR project in our 2014 Regional Transportation Plan modeling activities. This includes ridership forecasts, coordinated population projections from DOF/the Authority, and employment projections and other demographic inputs from the Authority.

4. Air Quality Benefits from VMT Reductions Apparently Offset by Operational Emissions

Page 3.3-48 asserts that the Fresno to Bakersfield area will not enjoy improved air quality as a result of HSR. While "motor vehicle emissions would decrease," these would be "offset by operational emissions associated with the train itself" (3.3-48). KCAG will be developing a county-wide climate action plan following receipt of an SGC planning grant. It is disheartening that the San Joaquin Valley will not realize any of the air quality benefits from HSR that will apparently be seen in other parts of the state.

Section 3.12: Socioeconomics, Communities, and Environmental Justice

1. Technical Correction: Prisons at Avenal and Corcoran

A sentence on Page 3.12-21 identifies one of Kings County's state prisons as being in Wasco (which is a community in Kern County). This sentence should be corrected to reflect Kings County's state prison facilities in Corcoran and Avenal, respectively.

Section 3.13: Station Planning, Land Use, and Development

1. Technical Correction: KCAG's RTP Schedule

Page 3.13-4 incorrectly asserts that KCAG's most current RTP was adopted in 2007 and that we are in the process of updating our 2011 Regional Transportation Plan. KCAG shared the same RTP schedule as Fresno COG, TCAG, and Kern COG. This section should be updated to indicate our most current RTP, the 2011 RTP, was adopted in June 2010.

2. Creating a Tie between Kings/Tulare Station and GHG Reductions from Land Use

From a statewide perspective, the link between HSR and reductions in greenhouse gases is evident. From a regional perspective, the link between the proposed KTRS site and reductions in local greenhouse gases, vehicle miles traveled and interregional trips is decidedly obfuscated. The passage of Senate Bill 375 in 2008 placed an increased emphasis on linking land use and transportation planning by incorporating more sustainable infrastructure into local planning decisions.

The EIR/EIS rightly asserts that Fresno and Bakersfield's HSR station locations will facilitate the revitalization of adjacent downtown areas and increase transit-oriented development (TOD) in nearby neighborhoods (3.13-25). As such, the proposed Fresno and Bakersfield stations are examples of how the built environment can reduce transportation-related GHG.

In contrast to the proposed Fresno and Bakersfield stations, KTRS is outside an urban core. Given the rural nature of the proposed KTRS location, KCAG supports the Authority's preference for "[discouraging] growth in the agricultural area around the Kings/Tulare Regional Station (Page 3.18-28)" lest it contradict SB 375 by encouraging leapfrog-style development in an unincorporated area. However, with a lack of adjacent TOD and urban land uses surrounding KTRS, local GHG reductions associated with land use are not readily apparent. This is compounded by the proposed abandonment of Hanford and Corcoran's Amtrak stations, which serve as key resources in maintaining the long-term viability of our downtowns.

As mentioned previously, the no project alternative analysis in the Station Planning, Land Use and Development chapter (section 3.13.5.B) asserts that the presence of HSR in Fresno and Bakersfield's downtowns will encourage more TOD than a no project alternative. This section does not provide any analysis of KTRS, let alone an explanation as to how the KTRS would encourage TOD in other locations while adjacent properties remain an urban reserve. KCAG believes section 3.13.5.B needs to include a no build analysis of KTRS and an explanation as to how the built scenario and its urban reserve (of which we are supportive) will bolster sustainable land use planning like TOD in our cities. We feel the EIR/EIS needs to outline further mitigation measures in the form of capital improvements beyond providing \$600,000 in local planning funding to encourage TOD in appropriate locations (e.g. downtowns). This would effectively create a tie to KTRS's location and reductions in GHG from land use planning and ensure that California does not replicate Avignon's TGV station

As the MPO for Kings County, KCAG is required by law to demonstrate how our county will achieve GHG emission reduction targets established by the Air Resources Board. KTRS' location outside an urban core does not inherently lend itself to increased walkability or accessibility by bicycle. This is exacerbated by the EIR/EIS' inclusion of a 1,600 vehicle parking lot adjacent the station site, which appears to encourage single occupant vehicle trips (SOV) to/from the station rather than encourage alternative modes of transportation. As such, we feel the EIR/EIS should include mitigation measures in the form of capital improvements that would serve to connect KTRS with our region's existing multimodal infrastructure. This could work to discourage SOV trips to/from the station and help reduce VMT in our region. An example would be to provide for connectivity to KTRS via bicycle/pedestrian paths.

3. *Show City/County Boundaries in Figures 3.13-3, 3.13-4*

We request that Figures 3.13-3 and 3.13-4 be labeled with city land use designations and county land use designations.

Section 3.14: Agricultural Lands

1. *Restoration of Construction Staging Areas*

When discussing the disruption of agricultural activities for HSR construction, the EIR/EIS indicates the following"

"Some agricultural land outside of the permanent right-of-way would be used for construction activities such as staging areas and material laydown areas. This land would be leased from the landowner and used for 1 to 3 years for construction. After construction, the land would be restored to its original condition and returned to the owner (3.14-36)."

While certainly outside of our wheelhouse as a Metropolitan Planning Organization, many KCAG staff, as San Joaquin Valley natives, have familiarity with agricultural practices. From a farming perspective, we do not think it is possible to restore land that has been used as a construction staging area to its original condition for agricultural purposes. Furthermore, if it were to be done successfully, we believe this could pose a serious public health hazard and would be detrimental to the farmers on whose properties these sites are located.

Depending on what types of materials are used in this staging area, it could become classified as a "brownfield" site. The EPA study *Brownfields and Urban Agriculture* lists "fluoride, metals, nitrate, pathogens, petroleum products, phenols, radioactivity, sodium, solvents, and sulfate" as common contaminants for railroad tracks and yards (http://www.epa.gov/brownfields/urbanag/pdf/bf_urban_ag.pdf, pp. 8). The study concludes that this is an interim report and EPA will continue to evaluate "urban agriculture reuse standards." (pp.16). Though a construction staging area would not be in an urban location, we believe this study is comparable and provides an overview of preliminary steps needed to attempt to restore a HSR staging area to an agricultural purpose. Ultimately, we believe this would severely limit what sorts of crops could be grown on the sites (if, in fact, any could) and would have notable economic impacts on local farmers.

3.18: Regional Growth

1. HSR-Induced Growth Allocation between Kings and Tulare Counties

Table 3.18-16 shows Kings and Tulare's HSR-induced population as being 3% over their respective RTPs' 2035 population projections. Given that the proposed location of the regional station is in Kings County, KCAG believes this would make Kings County a more attractive locale to prospective new residents than Tulare County, which is roughly 14 miles away from the station site. The relative attractiveness of Kings County over Tulare County would likely skew population increases so that Kings County would yield more new residents than Tulare County would. This would, in turn, pose greater impacts on our local street network and land use patterns than are discussed in this section.

3.19: Cumulative Impacts

1. Inconsistency with Projected GHG Emissions from Operations, Transportation

When discussing GHG emission reductions, page 3.19-13 states:

"...HST alternatives would decrease GHG emissions by reducing vehicle and aircraft trips as described in Section 3.3, Air Quality and Global Climate Change. This reduction in GHG emissions would more than offset the increase in GHG emissions associated with project facilities."

However, this appears to be in conflict with Section 3.3, Air Quality and Global Climate Change, which states:

"Motor vehicle emissions would decrease in the region as a result of the HST project. These reductions, however, would be offset by operational emissions associated with the train itself (the HST would be powered by electricity from the regional power grid), by station operations, and by HMF operations (3.3-48)."

These sections should be made consistent with one another based on the results of the analysis conducted by the Authority in developing the draft EIR/EIS.

2. Solar Infrastructure Projects

The draft EIR/EIS indicates the only solar energy development projects planned in the area are in Kern County (3.19-17). There are several solar energy projects in Kings County near Corcoran and Avenal. KCAG requests the Authority check with staff from Avenal, Corcoran, and Kings County to identify these solar projects for inclusion in this discussion.

5.0: Project Costs and Operations

We understand that the updated HSR business and financial plans are slated to be released November 1, 2011. We want to confirm that these documents will be fully integrated into the final EIR/EIS. The draft EIR/EIS notes the estimated cost of construction for this segment has increased. If the updated financial and business plans show a further increase in cost, this should be incorporated into the final EIR/EIS and be included in the additional analysis requested if the entire HST system is not built.

Appendix 2C

1. Figures 4 & Table 1 Do Not Include KTRS

The Horizon Year 2035 Service Plan Basic Train Stopping Pattern (Figure 4) and Horizon Year 2035 Train Stopping Patterns – Typical Peak and Off-Peak Hours (Table 1) do not include the KTRS. We would like to see the peak/off peak information for KTRS in these graphics.

Transportation Analysis Technical Report

1. Naming Conventions for State Route 43

It would be helpful to make the naming convention for State Route 43 consistent in this document and section 3.2 of the EIR/EIS. It is listed as 8th Avenue, Central Valley Highway, or State Route 43, which may create confusion.

2. Kings County Bicycle Plan Date

Page 4-21 should be updated to reflect the 2005 Kings County Bicycle Plan. We are in the process of updating this plan and should have it completed by the end of the calendar year. 4.3.7

3. Bicycle and Pedestrian Access

KCAG supports the report's statement that "the stations would include bicycle racks, pedestrian connections to the existing sidewalks, and bicycle lanes and facilities..." (5-110).

4. Proposed Mitigation Measures for SR 198

KCAG has questions regarding the proposed signalization of intersections along State Route 198 as mitigation measures for HSR (5-126). Modeling analysis and Figures 5.3-2 and 5.4-3 appear to include SR 198's widening to a four lane expressway in the 2035 scenario. KCAG's travel demand model has these improvements in 2012. However, this is not reflected in Figures 5.4-4, 5.5-2a, and 5.5-2b or the mitigation measures of proposed signalization. As indicated earlier, KCAG opposes the installation of signals on this 4 lane facility. Our RTP includes long range projects to construct interchanges at the intersections of 2nd, 6th and 9th Avenues along SR 198.

Community Impact Assessment Technical Report

1. Technical Correction: Table 3-1

Table 3-1 should be updated to reflect KCAG's most recent RTP, the 2011 RTP, and our most recent Transit Development Plan, updated in 2009. In addition, as an MPO, KCAG does not have local land use authority. Table 3-1's name, Local Land Use Policies, implies that we do.

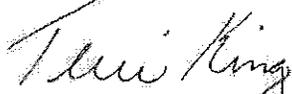
2. Census Figures for City of Corcoran

Page 4-6 provides a discussion of Corcoran's population statistics per the US Census Bureau's American Community Survey. It is worth noting that inmates at Corcoran State Prison are factored into the city's population and demographic figures.

As presented in the Draft EIR/EIS, the Kings County Association of Governments believes that the analysis of the Project fails to identify critical impacts to the Kings County region. We also believe that mitigation measures identified are not adequate to ensure that significant effects are mitigated to less than significant levels. Thank you for your consideration of these comments. Please do not hesitate to get in contact should you have any questions.

Sincerely,

KINGS COUNTY ASSOCIATION OF GOVERNMENTS



Terri King, Executive Director

CC: Larry Spikes, County of Kings
Melissa Whitten, City of Avenal
Kindon Meik, City of Corcoran
Hilary Straus, City of Hanford
Jeff Brillz, City of Lemoore