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UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION IX
75 Hawthorne Street
San Francisco, CA 94105-3901

October 29, 2004

David Valenstein
Office of Railroad Development
Federal Railroad Administration
1120 Vermont Avenue, N.W., MS 20
Washington D.C. 20590

Subject: Draft Program Environmental Impact Statement for LOSSAN, Los Angeles to San Diego Proposed Rail Corridor Improvements in the State of California, (CEQ 040396)

Dear Mr. Valenstein:

The U.S. Environmental Protection Agency (EPA) has reviewed the above-referenced document pursuant to the National Environmental Policy Act (NEPA), Council on Environmental Quality (CEQ) regulations (40 CFR Parts 1500-1508) and Section 309 of the Clean Air Act. Our detailed comments are enclosed.

EPA supports the Rail Improvements Alternative of the Los Angeles to San Diego (LOSSAN) rail corridor as a way of increasing the capacity, speed, reliability and safety of rail service within the existing corridor. EPA believes that the improved rail service will help enhance alternative modes of transportation which can reduce traffic congestion and consequent air emissions, and accommodate a portion of the growing demand for intercity travel between Los Angeles and San Diego through the year 2020. The project also proposes to relocate the existing tracks away from the sensitive coastal bluffs near Del Mar and San Clemente, and improve rail crossings on the six lagoons along the San Diego portion of the corridor.

The Draft Program Environmental Impact Statement (Draft PEIS) is a Tier 1 NEPA document to provide a landscape-level analysis of the potential environmental impacts. Project-level alternatives and impacts will be evaluated in future Tier 2 NEPA documents. While tiering can be an appropriate tool for addressing such a large-scale project, we are concerned that the LOSSAN Draft PEIS does not clearly articulate the decisions that the Federal Railroad Administration (FRA) seeks to make. High- and Low-Build alternatives, as well as the corridor alignment alternatives, will be retained for analysis in the Tier 2 evaluations. However, even at the Tier 1 level, we find that basic but important environmental information is lacking in the Draft PEIS such as locations of designated critical habitat for endangered species, and Habitat Conservation Plans and Special Area Management Plans within the LOSSAN study corridor. The Draft PEIS also does not sufficiently address the cumulative impacts and discuss potential mitigation measures, which are appropriate to program-level evaluations. We believe that the

cumulative effects of implementing both the Low Build and High Build Rail Improvements Alternatives within the LOSSAN corridor as a whole, should also be evaluated at the program level.

For these reasons, we have rated the LOSSAN Draft PEIS as Environmental Concerns-Insufficient Information (EC-2). Please see the enclosed Summary of EPA Rating Definitions.

We request clarification regarding FRA's assumptions that rail service will be the same with or without the proposed actions (page 3.3-15), and that land use within the corridor Study Area will be the same in the year 2020 as it is today (page 3.13-18). While this appears to discount the benefits of improving the LOSSAN corridor, it also affects the impact assessments that are based on these assumptions such mode shifts, air emissions, and biological resources.

EPA participated in several interagency meetings on LOSSAN in 2002 and 2003. We also provided input on the purpose and need statement and the proposed alignment alternatives, some of which were eliminated from further review. EPA's comments focus on how the Tier 1 Program EIS should be improved to provide better direction for the Tier 2 studies and inform the project-level decisions. We offer our continued participation and assistance to address the concerns that we have raised

We appreciate the opportunity to review this Draft PEIS. When the Final PEIS is released for public review, please send two copies to the address above (mail code: CMD-2). If you have any questions, please contact me or Connell Dunning, the lead reviewer for this project. Connell can be reached at 415-947-4161 or dunning.connell@epa.gov.

Sincerely,

David P. Schmidt

for Lisa B. Hanf, Manager
Federal Activities Office
Cross Media Division

Enclosures

EPA's detailed comments
Summary of Rating Definitions

cc:

Patrick Merrill, Caltrans Division of Rail, Sacramento
Arturo Jacobo, Caltrans, District 11, San Diego
Susan Meyer, Corps of Engineers, Los Angeles
John DiGregoria, U.S. Fish and Wildlife Service, Carlsbad

EPA DETAILED COMMENTS ON THE LOSSAN DRAFT PROGRAMMATIC ENVIRONMENTAL IMPACT STATEMENT, OCTOBER 29 2004

Tiering

The Draft PEIS addresses two alternatives, the No Action and the Rail Improvements Alternative. The Rail Improvements Alternative includes a Low-Build improvements alternative and a High-Build improvements alternative. The components of these two options are somewhat independent although combinations of High-Build and Low-Build alternatives would likely be anticipated. The Low-Build and High-Build alternatives include the acquisition of rights-of-way in some cases, and construction of major new facilities such as trenches, tunnels, and new stations. These components of the rail improvements alternatives will have some of the greatest environmental impacts on land use and natural resources, and warrant a substantive evaluation in Tier 1.

Recommendation:

The Final Program Environmental Impact Statement (Final PEIS) should clearly articulate the issues that are ripe for decision within the framework of this Tier 1 evaluation, and the basis for the specific decisions that are made as a result of the Draft PEIS. The Final PEIS should also outline how FRA and Caltrans intend to subdivide the LOSSAN corridor geographically in the Tier 2 NEPA evaluations, and which activities are likely to be evaluated further in environmental impact statements, or environmental assessments. If not yet known, the Final PEIS should describe the steps needed to define the project-level analyses.

Impact Analysis in Tier 1

The Council on Environmental Quality's (CEQ) guidance to agencies for implementing NEPA (*Forty Most Asked Questions Concerning CEQ's National Environmental Policy Act Regulations,* March 23, 1981) addresses the issue of area-wide or overview EISs. Questions 24b and 24c state that such EISs can be very useful when similar actions share common timing or geography. Future site-specific or project specific EISs would be tiered to the original EIS to provide further project specific analysis without duplication.

For the specific LOSSAN corridor improvements such as constructing grade separations at road intersections, curve realignments, double tracking, trenches and tunnel options, the Draft PEIS provides a comprehensive list. However, the Draft PEIS provides only a general description of the types of impacts that could occur, and defers site specific analyses of environmental impacts in future, tiered NEPA documents. While it is appropriate to evaluate project-level impacts of individual projects in Tier 2, EPA believes the PEIS should evaluate the environmental impacts of the proposed actions, particularly in the context of the entire corridor and the cumulative environmental impacts, at the program level.

Recommendation:

The Final PEIS should better describe the kinds of environmental impacts that can be expected from the construction of various categories of improvements such as undercrossing grade separations, double tracking, curve realignment, etc., and evaluate what sort of impacts and conflicts can be expected from these activities in different

locations throughout the LOSSAN corridor. The Final PEIS should provide information that is pertinent to the corridor as a whole, that may not be covered in project level analyses.

Cumulative Impacts

Context for Understanding Cumulative Impacts

Section 3.16 includes brief, qualitative discussions of cumulative impacts. However, a program NEPA document is the optimal level to evaluate cumulative impacts of large-scale projects. Tier 1 analyses should provide the context for understanding the magnitude of the impacts of the project as a whole by analyzing the impacts of other past, present, and reasonably foreseeable projects or actions and then considering those cumulative impacts in their entirety. Where adverse cumulative impacts are identified, the Draft PEIS should disclose the parties that would be responsible for avoiding, minimizing, and mitigating those adverse impacts (CEQ's Forty Most Asked Questions #19). For some resources, the Draft PEIS identifies opportunities to avoid or minimize impacts through future project-level modifications. At the program-level, however, the Draft PEIS should focus on identifying landscape-level opportunities to avoid and minimize impacts, which may include working with other entities.

Recommendations:

For each resource analyzed:

- Identify the current condition of the resource as a measure of past impacts. For example, the percentage of wetlands lost to date.
- Identify the trend in the condition of the resource as a measure of present impacts. For example, the health of the resource is improving, declining, or stasis.
- Identify the future condition of the resource based on an analysis of the cumulative impacts of reasonably foreseeable projects or actions added to existing conditions and current trends.
- Assess with specific measures, the contribution of the impact from each alternative to the long term health of the resource.
- Disclose the parties that would be responsible for avoiding, minimizing, and mitigating those adverse impacts.
- Identify landscape-level opportunities to avoid and minimize impacts, including working with other entities.

Cumulatively Impacted Resources of Concern

While the Draft PEIS identifies the environmental sensitivity of improving the rail crossings across the coastal lagoons in northern San Diego County, there is little information about the cumulative impacts to these lagoons, other than they are all listed as Impaired Waters under 303(d) of the Clean Water Act. Because most of the LOSSAN corridor crossings are proximate to the mouth of the lagoons, EPA believes the overall effects of the existing rail structures on the lagoon tidal hydrology and health have been extensive and largely detrimental. The Federal Highway Administration/Caltrans I-5 North Coast Corridor Project, which is currently undergoing environmental impact review, will also address proposed improvements to

freeway crossings of each of these lagoons. The concurrent timing provides an excellent opportunity for Caltrans in cooperation with FRA to evaluate the collective and cumulative impacts of these two improvement projects to each lagoon, together. Further, the LOSSAN Draft PEIS should assess the combined and cumulative effects of all other projects, not just transportation, within each of the lagoons, and seek ways to address cumulative impacts and collectively identify meaningful mitigation within each lagoon system.

Cumulative impacts to coastal resources from the proposed LOSSAN improvements in combination with other transportation projects warrant attention in the DPEIS. For example, there will be impacts to San Onofre State Beach from proposed double-tracking near where a large interchange with I-5 and the Southern Orange County Transportation Infrastructure Improvement Project (SOCTIIP, also known as the Foothill South Toll Road) is proposed. Even without the SOCTIIP interchange, the cumulative impacts on Camp Pendelton Marine Corps property from the likely widening of both the I-5 and LOSSAN corridors, which are located next to each other and very close to the ocean, should be estimated. This stretch has many sensitive natural resources including critical habitat.

Recommendation:

The Final PEIS should assess cumulative impacts from past, present, or future projects that are affecting the ecological health of the six lagoons, and discuss the potential impacts from the proposed rail crossings in a cumulative impact context. At a minimum, there should be more specific information about the I-5 North Coast Corridor Project, and how cumulative environmental degradation is being addressed by Caltrans for all its projects that affect each lagoon.

The Final PEIS should also assess cumulative impacts to sensitive resources in coastal areas where LOSSAN rail corridor (double tracking) and I-5 freeway improvements (widening) are proposed and being studied, or are underway.

Traffic Analyses

The Draft PEIS presents forecast roadway traffic conditions in the year 2020 as justification for the Rail Improvements even though it assumes that rail service will increase to the same level with or without the proposed LOSSAN improvements. The Draft PEIS does not explain why it assumes anticipated rail congestion under the No Action alternative would not influence the number of scheduled trains that are anticipated to use the LOSSAN corridor, or how elevated rail congestion might affect ridership on those trains. Nor does the Draft PEIS support the projected level of service on I-5 by identifying which traffic models were used and on what data the results were based. Specifically, Table 3.3-4, (Total Point-To-Point Travel Times), estimates the time it takes to travel between San Diego and Los Angeles by auto as compared to the time by rail, both under current conditions and then in the year 2020 (page 3.2-8). The basis for these estimated travel times should be better explained and substantiated in the Final PEIS.

If rail corridor congestion is reduced to the degree that passenger trains could travel faster, more frequently, and more reliably than they do today, an increase in passenger rail ridership might result. However, the Draft PEIS does not address passenger numbers, only numbers of trains. The assumption that the projected numbers of trains will be the same with the No Action alternative as with the Rail Improvements Alternative despite the likelihood for having much greater train congestion under No Action conditions, should be substantiated. Further, the PEIS should explore the relationship between people's behavior with respect to mode choice. At what degree of congestion on I-5 would commuters likely abandon auto travel and switch to trains?

Recommendation:

The Final PEIS should include more information about the travel models, assumptions and data that were used in the travel forecasts to support conclusions. Further, the assumption that rail service would be the same under the No Action scenario as with the proposed rail improvements should also be supported and should reflect a level of train traffic that could reasonably be operated along the LOSSAN rail corridor as a basis to compare the Action/No-Action alternatives.

Aquatic and Biological Resources

Coastal Lagoons

The proposal to upgrade the rail crossings at each of the six lagoons the LOSSAN project will cross in San Diego County offers unique and promising opportunities for large-scale lagoon enhancement and restoration. EPA considers avoidance and minimization of discharges of fill material into these waters a high priority. EPA applauds the Federal Railroad Administration (FRA) and Caltrans for incorporating improvement of environmental conditions in the LOSSAN project purpose. Executing this intention is particularly important at these lagoon crossings. Given this rare opportunity to enhance the environmental sensitivity of these lagoon rail crossings, EPA encourages FRA and Caltrans to implement design improvements to these crossings that not only have no net increase in the existing footprint, but which removes and minimizes existing fill. EPA recommends that Caltrans coordinate the hydrology and ecology studies from the I-5 North Coast Corridor Project for each of these lagoons as well as to examine rail and roadway bridge designs that support lagoon restoration efforts, while providing seismic safety and increased travel capacity in both corridors.

The Draft PEIS states that the Rail Improvements Alternative would result in no net increase in the existing footprint of rail infrastructure or fill in the coastal lagoons (page 3.13-19). Documentation supporting this statement (e.g., typical cross-sectional diagrams of existing and proposed rail crossing structures) or a demonstration of how this no net increase would be achieved is not provided in the Draft PEIS. Figure 3.7-5, a photo-simulation of what a new bridge structure might look like across San Elijo Lagoon, provides pictorial information for how this no net increase could be achieved. However, the Draft PEIS should also address to what extent approach fills could be removed and bridge spans lengthened to restore and enhance tidal circulation for each of these coastal lagoons.

To obtain Clean Water Act authorization from the Corps of Engineers, the project must demonstrate compliance with the Section 404(b)(1) Guidelines (40 CFR 230). An analysis of alternatives that identifies the least environmentally damaging practicable alternative (LEDPA) will be central to the Tier 2 review. Although longer bridge spans that provide for reductions in encroachment fill may be more costly than leaving, or increasing, the volume of fill currently in these waters, relative costs alone do not render an alternative impracticable pursuant to the Section 404(b)(1) Guidelines. EPA recommends identifying all bridge design features that reduce discharge of fill materials to waters of the United States (e.g., minimizing the need for rock slope stabilization around the bridge abutments at the shoreline). These bridge design features should be evaluated further in Tier 2.

Recommendation:

The Final PEIS should indicate which of the lagoon crossings are currently single and double tracked, and provide typical cross sectional drawings of the proposed bridges in comparison to the existing bridge structures. The Final PEIS should indicate how this portion of the LOSSAN rail corridor improvements will be addressed in the Tier 2 analyses. For example, will each lagoon crossing be evaluated in separate NEPA documents (and permits) or as one continuous segment?

The Final PEIS should include a comprehensive list of the various agencies, organizations and entities involved with restoration and management of each lagoon. The Final PEIS should include a commitment from FRA and Caltrans to work cooperatively with these groups in designing the improved rail crossings of the lagoons to share information and optimize the ecological benefits to the lagoons from these projects. The LOSSAN Final PEIS should also include information about bridge improvements being considered for the I-5 North Coast Project and provide details as to how this information will be incorporated into the LOSSAN Tier 2 planning and evaluations. The goal of this coordinated effort should be to use this information to optimize restoration and the enhancement of these coastal lagoons.

Because of the environmental sensitivity associated with the lagoon crossings, and the requirement to obtain Section 404 authorization for each of these crossings, EPA recommends that FRA and Caltrans consider involving EPA, the Corps of Engineers, and U.S. Fish and Wildlife Service in early planning, following steps similar to those outlined in the NEPA/404 Integration MOU for surface transportation projects by the Federal Highway Administration. The advantage of the NEPA/404 Integration process is to engage the resource and regulatory agencies to enhance the project planning process while taking advantage of early opportunities to avoid and minimize adverse environmental impacts. Additionally, this early coordination allows for identification of opportunities for the proposed project to provide environmental benefits (e.g., removal of existing fill in waters of the U.S., restoring historical hydrologic conditions in the lagoons, etc.).

Trabuco Creek

In removing the rail corridor from downtown San Juan Capistrano, Orange County, the Draft PEIS proposes alternative alignments that either trench along the east side of Trabuco Creek (the Low-Build option), or tunnel underneath I-5 (the High-Build option). Although details about the Trabuco Creek cut and cover tunnel are not presented in the Draft PEIS, nor is the rail corridor's immediate proximity to the Creek described, EPA is concerned that these alternatives may result in direct and indirect adverse impacts to the creek and its surrounding riparian environment. Based on the basic information provided in the Draft PEIS, the tunnel under I-5 would be appear to be environmentally preferable from a Clean Water Act perspective.

Recommendation:

EPA believes that the proposed Trabuco Creek corridor alignment alternative has the potential to cause substantial adverse impacts to waters of the United States. In addition to the High Build tunnel option, EPA encourages FRA and Caltrans to develop other alternatives to the Trabuco Creek trench which expands the separation between the creek and the rail alignment. These alternative alignments that seek to avoid and minimize adverse impacts on regulated waters should be included in the Tier 2 evaluation.

Conservation Plans

The LOSSAN corridor is located in a region which historically supported a high diversity of native species and biological communities. The natural habitat that remains today has been severely fragmented and continues to be affected by advancing development. The region in which the LOSSAN project is proposed has one of the highest numbers of proposed and listed threatened and endangered species in the entire country. This important biological diversity is reflected in the several pending and established Habitat Conservation Plans, (HCPs) and Natural Community Conservation Plans (NCCPs) (U.S. Fish and Wildlife Service is the lead Federal agency) and Special Area Management Plans (SAMPs) (the Corps is the lead Federal agency) within the LOSSAN corridor. While these plans can serve as a valuable source of information on habitats and species, as well to direct the priorities for conservation within the boundaries of these various conservation Plans, the Draft PEIS does not address the relevance of the plans to LOSSAN alternatives. Instead, the Draft PEIS defers conservation planning and habitat reserve discussions to the Tier 2 analyses (page 3.13-15). EPA believes that integrating the applicable HCPs, NCCPs and SAMPs within the LOSSAN Tier 1 document is appropriate as it helps frame future studies, prioritizes conservation goals, and provides direction for mitigation.

The Final PEIS should also contain maps and tables addressing the location of designated critical habitats for threatened and endangered species that occur within the LOSSAN study area and describe the potential impacts to these habitats from the proposed project. Additionally, the document should list all the coastal creeks, rivers and lagoons that have the potential to support southern steelhead trout populations.

Recommendation:

The Final PEIS should list and describe all of the NCCPs, HCPs and other conservation plans that are pending and in place in Los Angeles, Orange, and San Diego Counties which could be affected by the LOSSAN improvement projects, and include corresponding maps that show the boundaries of these plans, with designated conservation zones, in relation to the LOSSAN corridor. Similarly, the Final PEIS should include maps and text describing all designated critical habitat, including coastal sage scrub, occurring within or proximate to the LOSSAN corridor. The document should provide an estimate of the area of critical habitat (by type) that could be directly affected by the LOSSAN improvements.

Water Quality

The Draft PEIS states that the Rail Improvements Alternative could be beneficial to water quality because it may result in fewer vehicle miles traveled (VMT) on roadways and reduce stormwater runoff. The reduced congestion may induce vehicular travel which could compromise this benefit. Additional parking capacity at stations will be needed to support the increased train ridership. The effects from having additional impervious surfaces for expanded parking areas are not addressed in the Draft PEIS.

Recommendation:

The Final PEIS should address potential expansion of parking facilities at the LOSSAN stations in terms of approximate area and potential locations, and identify general mitigation measures that could be implemented to minimize detrimental effects on stormwater quality.

Impact Assessment and Land Use

The Draft PEIS asserts that, "Because estimating the extent of change (in land use) prior to 2020 would be speculative, no substantial change to the existing conditions is assumed for purposes of this program-level evaluation and comparison of alternatives" (Page 3.13-18). However, available county and city general plans, pending and approved tentative tract maps and Specific Development Plans, habitat conservation plans, and other planning documents that apply within the LOSSAN corridor study area can inform a more realistic assessment of the potential land use changes that can be predicted between now and the year 2020. Presumably, the estimation of natural resources remaining within Zone A and B in the year 2020 would be less than that represented in the Draft PEIS. The potential growth inducing effects of the LOSSAN rail improvements, improved rail service, and new stations should be addressed consistent with 40 CFR 1508.8(b), and CEQ's Forty Most Asked Questions, #18.

Recommendation:

The Final PEIS should utilize general plans and other readily available information that is applicable to the LOSSAN study area to represent a more realistic future land use scenario on which to assess the environmental impacts of the proposed LOSSAN improvements.

The potential indirect effects on land use from improved LOSSAN rail service, in combination with anticipated increasing roadway traffic congestion within the region should be more vigorously evaluated in the Final PEIS. The Final PEIS should address whether LOSSAN would have growth-inducing effects around stations or contribute to new development pressure affecting housing densities and/or land use. The Final PEIS should propose conceptual mitigation measures that might be appropriate if adverse effects are anticipated.

Air Quality

Modeling Emissions

Tables 3.3-3 and 3.3-4 (page 3.3-12) of the Draft PEIS show estimated locomotive emissions in the LOSSAN rail corridor for the years 2003 and 2020 broken down by pollutant and air basin. This information should be provided in the context of local and regional air quality and in relation to general conformity requirements. What assumptions contributed to these estimated emissions? We note that Appendix 3.3-A provides some information about how the total emissions figures were derived. However, explanation about which emissions models were used, fleet locomotive emissions trends, expected loads, and assumed speeds of passenger and freight trains should be provided.

Recommendation:

In providing information about air emissions, the Final PEIS should describe the emissions models that were applied, and summarize the operating assumptions on which they are based. Total estimated emissions should be presented with context to either relevant Air Quality Management District goals or thresholds, or the potential to contribute to violations of National Ambient Air Quality Standards. Potential mitigation measures that could reduce these emissions should be identified as appropriate.

The Draft PEIS states that rail service of the Rail Improvements Alternative is not expected to increase over No Project levels in 2020 and therefore, no direct change in pollutant burdens from the number of locomotives in the corridor would occur with project implementation (page 3.3-15). The Draft PEIS also concludes that the Rail Improvements Alternative will contribute to better air quality in part, by reducing total locomotive idling time. However, neither idling time nor idling emissions are evaluated to characterize the quality and magnitude of the anticipated reduced emissions within the corridor.

Recommendation:

The assumption about having the same level of rail service with and without the Rail Improvements Alternative should be substantiated since it may lead to underestimating the increased emissions from the Rail Improvement Alternative, in contrast with the No Action Alternative. The contribution to total emissions from idling locomotives (which would thus be in operation for a longer period to complete the route) should be estimated and explained. The Final PEIS should also identify which locations within the LOSSAN

corridor might likely experience the greatest rail congestion and community health effects from idling locomotive emissions.

Effects of Diesel Emissions from Locomotives

EPA is concerned about the health effects from diesel emissions, which include Hazardous Air Pollutants, or air toxics. The LOSSAN rail corridor traverses through densely populated districts of several cities and communities, yet the Draft PEIS does not identify the general locations or densities of sensitive receptors such as schools, hospitals, senior centers and recreational fields that occur in proximity to the rail corridor. Given the anticipated increase in rail traffic over the next twenty years and corresponding increase in diesel emissions and idling locations, the Draft PEIS should identify potential problem areas in terms of relative densities of sensitive receptors and environmental justice communities for detailed evaluation in Tier 2 analyses and propose general mitigation measures that could be applied.

Recommendation:

The Final PEIS should include a section that describes both the criteria pollutants as well as the hazardous air pollutants generated from diesel exhaust, and the health effects these pollutants can cause. It may be relevant to evaluate the age and size of the locomotive fleet, and consider how new diesel locomotive technology may factor in. The Final PEIS should at least characterize which sector of the general population is most at risk, and where these sensitive receptors are likely to occur throughout the LOSSAN corridor. Measures to help avoid and minimize health effects should be identified, for further consideration in the Tier 2 evaluation.

California High Speed Train System

In addressing the need for the LOSSAN rail improvements, the Draft PEIS indicates that I-5 and the LOSSAN rail corridor are the main major transportation corridors that extend between these two cities, and both are currently operating close to capacity. The Draft PEIS evaluates the anticipated future highway traffic conditions with and without the LOSSAN Rail Improvements Alternative, based on highway improvements that are anticipated through the year 2020.

Although FRA is also the lead Federal agency on the proposed California High Speed Train System and LOSSAN is expected to connect directly to the high speed train in Los Angeles, there is very little information about the high speed train system in the LOSSAN Draft PEIS. However, one of the high speed train segments under consideration is an eastern route between San Diego and Los Angeles that would pass through Riverside and San Bernardino Counties. This potential high speed train system extension to San Diego would presumably capture some of LOSSAN's projected future ridership, and serve as a third major facility to accommodate the heavy travel demand between the cities of Los Angeles and San Diego, although not serving the coastal communities within San Diego, Orange, and Los Angeles counties in the same way.

Recommendation:

The Final PEIS should include a description of the proposed high speed train corridor that is being studied, that will extend from Los Angeles to San Diego along an inland route. The Final PEIS should discuss the potential timing of when such a facility might be built, and how it would affect the market on which LOSSAN passenger projections are based. Additionally, the Final PEIS should further clarify the relationship between th high speed train and LOSSAN.