



DATE: June 17, 2016

TO: **Mark A. McLoughlin**
Director of Environmental Services
California High-Speed Rail Authority

FROM: **John Rahaim, Planning Director**
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Tilly Chang, Executive Director
San Francisco County Transportation Authority (SFCTA)
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RE: **Comment Letter on the Notice of Preparation of a Project Environmental Impact Report/Environmental Impact Statement for the California High-Speed Rail System, San Francisco to San Jose Project Section, Blended System Project.**

The City and County of San Francisco (City) is a responsible agency for the California High-Speed Rail (HSR) system, San Francisco to San Jose Project Section, as the City will have discretionary approvals in connection to some proposals within the EIR/EIS. As a funder of planning and design studies at Caltrain's 4th and King station, and of Caltrain Electrification and Downtown Extension as well as of the Transbay Transit Center, the City is also vitally interested in advancing the blended Caltrain/High Speed Rail system. We are fully supportive of the HSR system and are excited to see the program reach the Bay Area, and ultimately connect to San Francisco's Transbay Terminal as outlined in the 2016 Business Plan.

As a responsible agency, the City appreciates the efforts of the CHSRA in working with the City regarding the content and scope of the Transportation Study and EIR/EIS. The City would like to be considered a "cooperating agency" to assist CHSRA in scoping and refining the San Francisco to San Jose corridor blended system project and EIR/EIS analysis. We would like to continue our conversation regarding the comments within this letter. The comments below reflect the combined staff comments from the San Francisco Municipal Transportation Agency (SFMTA), San Francisco Public Utilities Commission (SFPUC), the San Francisco County Transportation Authority (SFCTA), and the Planning Department.

COMMENTS:

HSR Grade Crossings

The rail crossing at 16th Street adjacent to Seventh Street is the most critical at-grade intersection within City limits. Due to major natural and infrastructure obstacles, 16th Street is the only major arterial for a two-mile stretch along the existing tracks that connects the east side and west side of the City. This street is the primary and only effective route for emergency vehicles, traffic, transit, pedestrians, and bicyclists travelling between the rapidly developing dense urban districts of Mission Bay and the Central Waterfront on the eastern waterfront, to the existing dense neighborhoods to the west, which also continue to grow.

The 16th Street corridor is an important route for goods movement between the growing Mission Bay community and the areas to the west, including the Mission District. With implementation of the Eastern Neighborhoods Plan, the City has invested great resources and energy in connecting these neighborhoods together and creating walkable, bicycle-friendly, and transit-oriented connections. Already a significant thoroughfare for recent opened developments in Mission Bay, including the University of California San Francisco (UCSF) campus and Children's Hospital, 16th Street is anticipated to be more important in the near future due to forthcoming development in Mission Bay from UCSF, the approved Warriors Event Center, and the proposed development from the Giants at Seawall Lot 337.

The approved *Muni Forward* 22 Fillmore Transit Priority Project extends along 16th Street between Third and Church Street. This project will re-route and extend the 22 Fillmore electric trolley bus to operate along 16th Street to Third Street and Mission Bay Boulevard to serve the growing 16th Street corridor and employment and educational centers in Mission Bay. Along 16th Street in the segment between Third and Seventh Streets, side-running transit-only lanes will be implemented on 16th Street by converting a mixed-flow lane to a transit-only lane. West of Seventh Street, the transit lanes will be a combination of side-running and center-running transit-only lanes. The 22 Fillmore Transit Priority Project will also include corridor-wide improvements such as transit bulbs, new traffic signals, pedestrian signals, sidewalk widening, and upgrading of the bicycle infrastructure on 17th Street to provide a parallel, contiguous, and safe bicycle route for traveling in the east-west direction. The implementation of the side-running transit-only lanes should be assumed in the transportation intersection analysis.

Additional HSR train frequency at the 16th Street at-grade crossing would limit access for people traveling by all modes (auto, transit, bicycle, and pedestrian) further bifurcating this area of the City. Increased frequency of trains crossing 16th Street would create a hostile and uninviting connection for pedestrians, cyclists, and limit emergency vehicle access between the area surrounding the UCSF Campus and Hospitals and employment centers to the east with rapidly growing residential development along 16th Street just west of Seventh Street. This will create considerable physical separation of the community and street network and diminish the viability of major approved development projects on adjacent parcels. The 16th Street corridor has been identified as key gateway for neighborhood development and improvement in plans adopted by the City, including the Eastern Neighborhoods Plan, the Transit Effectiveness Project (aka *Muni Forward*), and the Eastern Neighborhoods Transportation Implementation Planning Study. Grade separating 16th Street (by depressing 16th Street) would irreparably sever the two sides of the City. Additionally, such an expansive network of below-grade roadways and sidewalks would create personal safety issues and significantly impact the aesthetics and visual connection of this corridor between the two neighborhoods. It could also create drainage issues. The EIR/EIS needs to address the full range of impacts (auto, transit operations, bicycle, pedestrian, urban design, land use) of the at-grade crossings and prepare alternative designs that minimize community and transportation impacts.

North of 16th Street is Mission Bay Drive, which also crosses the Caltrain tracks at-grade. The EIR/EIS needs to address the full range of impacts (auto, transit operations, bicycle, pedestrian, urban design, land use) of this at-grade crossing with HSR operation and propose alternatives that minimize community and transportation impacts. No aspects of the HSR environmental analysis should preclude any options that the City is exploring to avoid at-grade rail crossings that will be utilized by HSR. The City would like to continue ongoing discussions and work in close consultation with CHSRA to address

any potential conflicts in the environmental analysis that would preclude the City's ability to study alternatives to the at-grade crossings.

San Francisco/ Brisbane border – Light Maintenance Facilities

The study area boundary shown (in the scoping meeting presentation in slide 23) for a Brisbane maintenance facility alternative raises several issues. The maintenance facility would be immediately adjacent to the existing Caltrain Bayshore station platform. The impacts of this and other location options on existing/approved and potential future land uses should be assessed. For the Brisbane site in particular this includes the compatibility with desirable mixed use development including housing to address the severe affordable housing shortage in the San Francisco Bay Area, as well as other potentially valuable urban land uses. The area west of the tracks seems clearly unsuitable for a maintenance facility, considering that it includes the Schlage Lock development (the northwest corner) under construction for nearly 1,700 residential units, which would be incompatible with the noise and other impacts of a maintenance facility. The southwest portion of the study area (in Brisbane) is a prime location for mixed-use development, which could provide affordable housing and employment with excellent transportation access. The area east of the tracks seems more appropriate for consideration of a maintenance facility, although there are issues to consider, such as the effect on potential mixed-use development or possible expansion of the Recology site to facilitate achievement of Zero Waste goals.

The impacts on the Caltrain Bayshore Station operations and modification possibilities should be assessed. Any maintenance or other facilities also needs should be compatible with planned Bus Rapid Transit service connecting between Geneva Avenue and Candlestick development. The City welcomes the opportunity to be highly involved in determining the location, footprint, and concepts for any maintenance facilities, considering the direct impacts on San Francisco land uses and transportation connections. Also, the scoping meeting presentation map of the maintenance facility study area seems to relocate the Caltrain platform south of the existing placement (into Brisbane). Such a move would place this increasingly important station further from San Francisco development that is under-construction, approved, and planned. Finally, CHSRA should provide space in the maintenance facility for Caltrain use.

Caltrain Impacts

According to the operating plan of the blended system, Caltrain commuter rail would at maximum be six trains per direction per hour. It should be clarified how these will be coordinated with HSR operations to meet growth in demand. For example, the Bayshore Station was shown in the Caltrain Electrification EIR's prototypical schedule to revert to hourly peak service after HSR begins operating, although ridership at this station can be expected to grow substantially with major development within two miles under construction, approved, or potential approval in the near future. The secondary impacts of constrained Caltrain capacity on transportation, air quality, GHG emissions, should be assessed. We would like to continue ongoing discussions and work with CHSRA to address the cumulative year operation plans to address impacts related to the increased capacity of the combined HSR system throughout the San Francisco to San Jose corridor.

4th & King Interim Station

San Francisco supports the consistent use of the term "Interim Station" for 4th & King railyard location. As an interim station, the City would like to understand how the station would accommodate substantial increases in access needs from auto loading, pedestrian, bicycle, ride hailing, etc. as San Francisco/North

bound trips served by this station would grow substantially with HSR. The station modifications are not identified yet in the exhibits provided. The City, Transportation Authority and the SFMTA request to be involved in determining the scope of the station concept plan to be assessed, along with Caltrain JPB. We would like to continue working with CHSRA in optimizing boarding at the 4th & King station and throughout the San Francisco to San Jose combined system corridor. The City looks forward to the continuation of a cooperative planning effort to integrate HSR into City infrastructure to connect the system to the Transbay Transit Center as its permanent terminus.

Rail Alternative & Interstate 280 Boulevard (RAB) Study

At this time San Francisco has not addressed how HSR/Caltrain will connect to the Transbay Transit Center and are looking at addressing this issue through the RAB Study. If we prefer an alternative that requires additional environmental review, we will do so as a supplemental to HSR and TJPA EIRs/EISs, in cooperation with both agencies and Caltrain. The City will continue to work with CHSRA and TJPA regarding those potential alignment connections.

Connections between SFO Airport and the Millbrae Station

SFO is part of the City and County of San Francisco jurisdiction; therefore, the City would like to continue cooperating with CHSRA to scope and plan an efficient connection/transfer between SFO and the Millbrae Station. The direct and indirect effects of major increases in transfer demand on existing and planned linkages (transit, taxi, ride hailing, etc.) with HSR should be assessed in the EIR/EIS.

San Francisco Public Utilities Commission (SFPUC) Infrastructure/Facilities

The influx of additional people entering the City could lead to the construction of new or expanded water facilities, which could lead to indirect environmental effects. We request the EIR/EIS estimate the volume of influx and the estimated distribution in the City (e.g., downtown shopping, businesses, ball park), and coordinate with the SFPUC to determine if any improvements to the distribution system would be warranted.

Vibration from new construction could lead to damage to both potable and Auxiliary Water Supply System (AWSS) infrastructure. The need for settlement monitoring should be determined.

Improvements or additions to Caltrain or future HSR improvements may necessitate the replacement or realignment of underlying potable and/or AWSS water infrastructure. If any portion of track is to be removed or modified over existing water infrastructure, the SFPUC should be consulted to determine if replacement of its water infrastructure would be necessary.

The Project Sponsor will be required to design all new applicable water facilities, including potable, AWSS, and non-potable water systems, to conform to the current SFPUC City Distribution Division (CDD) and San Francisco Fire Department standards and practices. These include, but are not limited to, the following:

- SFPUC-CDD Protection of Existing Water and AWSS Facilities;
- SFPUC Asset Protection Standards;
- Rules and Regulations Governing Water Service to Customers;
- SFPUC-CDD Design Criteria for Potable Water Systems;

- Application for Water Supply and Responsibility of Applicants;
- San Francisco Fire Code and Reliability;
- California Waterworks Standards; California Code of Regulations Titles 17 and 22
- AWSS Distribution Piping; and
- Any other regulation governing the installation and protection of water facilities not already stated.

A hydraulic analysis would be required to confirm adequacy of water distribution system for new potable, non-potable, and fire uses. If current distribution system pressures and flows are inadequate, the Project Sponsor would be responsible for capital improvements required to meet the proposed project's water demands. Depending upon the size and complexity of the proposed project, the Project Sponsor could be required to pay for the hydraulic analysis. Additionally, a capacity fee would be assessed for the project. To initiate this process, please contact the Customer Service Bureau at 415-551-2900.

To ensure adequate fire suppression reliability and capacity for new facilities, the Project Sponsor could be required to include one or more of the following: two sources of water delivery (connections to two separate water mains), AWSS high pressure distribution piping, AWSS cistern, and/or Potable Water Supply System equipment.

The City, through the SFPUC, owns property immediately adjacent to Caltrain property in several Peninsula cities. The SFPUC Commission has adopted land use policies which heavily restrict the scope of use of the SFPUC property by third parties. The intent of these policies, among others not included with this letter, is to avoid any use on our land that, in the SFPUC's sole discretion, conflicts with the SFPUC free access to our lands and infrastructure. We require any third party that desires to use our property to adhere to our policies. This would affect plans to use SFPUC lands for either the construction of passing tracks or staging areas. The SFPUC looks forward to continued collaboration with CHSRA to address the agency's concerns regarding potential impacts of the HSR combined system with the SFPUC water infrastructure.

Cultural Resources

The proposed project is within archeologically sensitive areas and has the potential to impact significant historical resources and historic properties within the City. The Planning Department requests to be consulted regarding the identification and evaluation of historical resources and historic properties (including archeological resources), the analysis of impacts to historical resources and historic properties (including archeological resources), and the determination of appropriate mitigation measures. Additionally, the Planning Department requests to be consulted on the scope of all technical background studies on historical resources and historic properties, including archeological resources, and to review and comment on all such technical background studies. Depending upon the identification of significant impacts to historical resources or historical properties, a review and comment on the EIR/EIS by the San Francisco Historic Preservation Commission (HPC) may be requested and project approvals by the HPC may be required. An informational presentation on the EIR/EIS to the HPC, if historical resources are impacted, and Planning Commission will likely be requested.

Conclusion

Thank you for the opportunity to provide comments on the HSR San Francisco to San Jose Segment NOP of an EIR/EIS. We look forward to continuation of a cooperative and successful planning effort to integrate the local, regional and inter-city benefits of high-speed rail to California and the San Francisco peninsula. Please do not hesitate to contact Gillian Gillett, Director of Transportation Policy, of the Office of Mayor Edwin M. Lee (gillian.gillett@sfgov.org) or any of the undersigned if you have any questions.



John Rainin - Planning Director

6.17.16

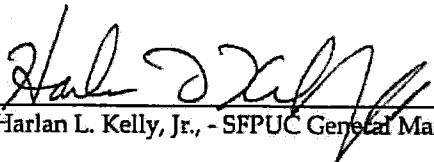
Date



Edward D. Reiskin - SFMTA Director of Transportation

June 17, 2016

Date



Harlan L. Kelly, Jr., - SFPUC General Manager

JUNE 17, 2016

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Tilly Chang - SFCTA Executive Director

June 17, 2016

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