



January 21, 2014
John Swiecki, AICP
Community Development Director
City of Brisbane
50 Park Place
Brisbane, CA 94005

via e-mail: eir@ci.brisbane.ca.us

Re: Draft Environmental Impact Report (DEIR) for the Brisbane Baylands

Dear Mr. Swiecki:

Enclosed are comments from San Francisco Agencies and Departments on the above-referenced Draft EIR. Included are comments from the San Francisco Municipal Transportation Agency (SFMTA), the San Francisco County Transportation Authority (SFCTA), and the San Francisco Planning Department. It is our understanding that you will also be receiving a separate comment letter from the San Francisco Public Utilities Commission.

In addition to the enclosed comment letters, we would like to highlight several issues of local and regional importance:

San Francisco strongly supports Recology's desire to modernize and consolidate its existing facilities to meet San Francisco's goal of achieving zero waste by 2020. Recology's plan to expand its operations on 21.3 acres of the Brisbane Baylands project area, as reflected in the CPP-V variant, is critical to achieving this goal. We applaud Recology's thoughtful expansion plan and would not support alternative uses at the proposed Recology expansion location.

San Francisco does not support moving the Caltrain Bayshore Station farther south from its current location. With the coming electrification of Caltrain and more frequent service, tens of thousands of future San Francisco households and workers in Visitation Valley, Executive Park, Hunters Point Shipyard and Candlestick Point will increasingly depend on a convenient and accessible Caltrain Bayshore Station. The attached letter from SFMTA expands upon this concern and related technical issues.

San Francisco appreciates acknowledgement in the Baylands DEIR that the California High Speed Rail Authority (CHSRA) has identified the Baylands as the recommended location for an approximately 100-acre High Speed Rail Terminal Storage and Maintenance Facility (TSMF), as the HSR service will be a blended service, with facilities jointly used by California High Speed Rail and Caltrain (Bay Area to Central Valley High Speed Rail EIR – Supplemental Alternatives Analysis, 2010). We suggest a more in-depth analysis of the implications of the Baylands proposals upon the CHSRA project. We suggest that you combine the future storage facility with the Renewable

Energy Alternative already analyzed in the DEIR (Chapter 5) into a new Variant on that Alternative.

We disagree with the statement in the Draft EIR that the CHSRA project is premature and speculative. Construction contracts for the first 29 miles of rail have already been signed and requests for qualifications for construction of the next 60 mile segment of rail have been released by the CHSRA. Summary of Requirements for Operations and Maintenance Facilities for that project has also been prepared in April of 2013. That document identifies the need for and conceptual design of an approximately 100 acre railyard facility in the vicinity of San Francisco. The Baylands was the recommended location for such a railyard in the CHSRA EIR.

Thank you for the opportunity to comment on this important and transformative project. Please feel free to contact the undersigned if you have any questions.

Sincerely,



Ken Rich
Director of Development

Office of Economic and Workforce
Development



Gillian Gillett
Director of Transportation
Policy



SAN FRANCISCO PLANNING DEPARTMENT

January 21, 2014

John Swiecki, AICP
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Re: Comments on Brisbane Baylands Draft EIR

Dear Mr. Swiecki,

Thank you for the opportunity to comment on the Brisbane Baylands Draft EIR. This letter contains the Planning Department comments, both from a technical CEQA perspective and also from a policy perspective.

As stated in the cover letter from our Mayor's Office, San Francisco strongly supports the proposed expansion and modernization of the Recology site, as included in one of the Draft EIR Alternative Plans. We believe that there could be conflicts that would arise out of siting high intensity commercial, office, institutional, residential or open space uses in close proximity to the Recology site. Traffic increases from future Baylands activities could conflict with necessary truck and vehicular access to and from the Recology site on nearby streets. This could result in transportation impacts not only with respect to truck and vehicle traffic, but also to planned Bus Rapid Transit (BRT), pedestrian and bicycle routes through the area. Additionally, noise, odor or air quality complaints or impacts could arise from siting proposed Baylands uses immediately adjacent to an active industrial use.

We believe that the EIR needs to look more closely at the potential for future development on the Baylands site to cause such conflicts with the Recology operations, and then more rigorously discuss and analyze potential Mitigation Measures or Alternatives that may be available and necessary to reduce or avoid potential impacts in order to ensure smooth co-existence of the various activities in the area. We did not find sufficient analysis unique to the potential impacts of siting future Baylands development in close proximity to the expanded Recology operations in the Draft EIR.

Regarding transportation impacts, the Draft EIR states that the Cumulative Without Project travel demand forecasts utilize the Candlestick Point/Hunters Point Study forecasts, developed by the SFCTA CHAMP 3 Model, as part of the analysis for the Candlestick Point/Hunters Point Shipyard EIR. The CHAMP 3 Model included certain assumptions about transportation mode splits, in particular transit and vehicular mode splits, based upon the proximity of existing neighborhoods and other area plans (such as Visitacion Valley, Executive Park and Candlestick Point/Hunters Point) to transit, which would have encouraged pedestrian trips from those areas to an intermodal transit hub connected to the Caltrain Station. The Brisbane Baylands Alternatives propose to move the Caltrain Station south of its current location (i.e., south of the location assumed in the CHAMP 3 Model.) We believe such a relocation of the Caltrain Station would reduce the attractiveness of transit for many

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San Francisco residents, and the likelihood of pedestrian trips to the transit hub in particular. This would require a corresponding shift in mode split assumptions for the transportation analysis in the Baylands Draft EIR. We did not see any discussion or analysis of that in the Draft EIR.

Similarly, the Draft EIR lists several transit improvements as being included within its future cumulative scenario (e.g., T-Third Line extension to Caltrain Station; Geneva Avenue BRT; Bayshore Intermodal Station Improvements.) The Baylands proposal to relocate the Caltrain Station further to the south, and the Baylands Alternatives which do not include any new housing, could create significant barriers to the substantial funding that would be required for those transit improvements, based upon MTC's funding criteria. That could seriously jeopardize the construction of those transit improvements. The Draft EIR did not examine whether relocation of the Caltrain Station to the south or adoption of project Alternatives without housing could hinder or preclude construction of the assumed transit improvements, which would in turn require a change in the assumptions built into the transportation methodology and analysis.

Regarding Mitigation Measures, as pointed out in the enclosed letter from SFMTA, the transit mitigation measures in the Draft EIR (4.N-7 and 4.N-9) are too vague and lack the specificity or clarity necessary to understand what is being proposed, how the measures would be implemented or funded, or how effective they would be in terms of mitigating identified impacts. Those measures defer the mitigation to future study, plan development and agreement, without presentation of specific performance criteria, feasible mitigation options potentially available or the effectiveness of such measures. Information regarding the necessary timing, funding requirements or implementation of such measures is also lacking. For example, Mitigation Measure 4.N-7 requires the project sponsor to work with San Francisco's Municipal Transportation Agency to reach an agreement to provide a fair share contribution to capital costs for increased transit service. However there are no performance objectives, no parameters for the types of improvements, no addressing of feasibility and no recognition of the significant lead time required for development, approval, funding and implementation of any such measures. Nevertheless, the Draft EIR concludes that the mitigation measures could reduce impacts to less than significant. We do not see how those conclusions can be reached based upon the level of information provided in the Draft EIR.

Regarding Alternatives analysis, the Draft EIR examines four main Alternative Specific Plan build schemes, each of which results in a large number of significant unavoidable transportation and air quality impacts. The Draft EIR examines a No Project, existing General Plan Build Out Alternative (approximately 2 Million square feet of industrial and commercial development) and the Draft EIR concludes that this No Project Alternative would avoid the significant transportation and air quality impacts of the Build Alternatives. The Draft EIR also analyzes two Reduced Intensity development Alternatives (approximately 5.3 Million – 6.8 Million square feet of development) and the Draft EIR concludes that such Alternatives would not avoid the significant impacts related to transportation and air quality. Hence, all Specific Plan mixed-use Build Alternatives analyzed in the EIR have substantial significant unavoidable environmental impacts, and the only transit-oriented mixed-use Alternative that reduces or avoids those impacts is a No Project Alternative. This leaves a hole in the EIR, whereby the readers and decision-makers are left guessing as to what level of mixed-use development, including residential, could constitute a Specific Plan Build Alternative and still avoid many of the significant transportation and air quality impacts identified for the four main Alternatives and the Reduced Intensity Alternatives analyzed in the Draft EIR.

Given the enclosed comments from other San Francisco agencies, we suggest that the EIR should include within its range of Alternatives a Specific Plan Mixed-Use with Housing Build Alternative that furthers the stated project objectives related to environmental protection, sustainability, contribution to regional housing, transportation and air quality solutions, but minimizes the significant impacts to surrounding communities identified for all of the Specific Plan Build Alternatives presently analyzed. The parameters for such an Alternative would include the following:

Mixed-use development, including housing, at reduced levels (amount of development to be determined by further analysis, presumably somewhere between 2 Million and 5.3 Million square feet) which substantially reduce or avoid the significant and unavoidable transportation and air quality impacts identified for all other mixed-use Build Alternatives;

Transit/transportation infrastructure changes to encourage transit use and reduce potential transportation conflicts: See SFMTA enclosed letter for suggested transportation infrastructure improvements; two variants analyzed, one with Caltrain station moved north, and one with Caltrain station moved south, to compare impacts between different intermodal connection locations;

Expansion of Recology site; and

Revised site layout (or alternative layouts) to maximize transit utilization and minimize or mitigate potential conflicts arising due to proximity of surrounding mixed uses to the Recology site.

We believe that such an Alternative would not only further the stated project objectives, but would also be more in keeping with the regional plans of ABAG, MTC and the BAAQMD, as presented in the Draft EIR. For a project at the size, scale, location and regional importance of the Baylands, we believe that the EIR should provide the public with analysis of a feasible reduced impact Build Alternative such that decision-makers are not left with a choice only between significant, unavoidable impacts of a new plan, or no project.

As also indicated in the enclosed comments from our Mayor's Office, we note that the Draft EIR provides very little information and calls little attention to the conflicts between all Alternatives considered in the EIR and the California High Speed Rail Authority (CHSRA) proposal to use a portion of the Baylands site as an operations and maintenance yard. For the reasons pointed out in the cover letter from our Mayor's Office, we believe that the CHSRA project is reasonably foreseeable rather than speculative. Since the CHSRA project has potential statewide and regional significance and contemplates use of the Baylands site, it would seem that decision-makers and the public should be provided with that information and analysis of potential conflicts between the CHSRA and Baylands proposals in the Baylands EIR. That would require additional impact analysis for each of the Baylands Alternatives, as well as possible inclusion of a new Alternative (or perhaps a Variant to an existing EIR Alternative such as the Renewable Energy Generation Alternative) which would include the CHSRA operations and maintenance yard on a portion of the Baylands site.

The Brisbane Baylands DEIR highlights the Renewable Energy Generation Alternative as the environmentally superior alternative for the Baylands. The DEIR also states that the City of Brisbane must balance economic, social and environmental objectives in establishing a development plan for

the Baylands. The Planning Department supports these objectives, especially as they pertain to bi-county and regional impacts on housing and transportation.

The Planning Department supports analyzing impacts on housing and transportation infrastructure and reducing them through alternatives that maximize housing, retail and office in a mixed-use centers near high capacity transit. The City of San Francisco does not support moving the Caltrain station south, especially with over 1,600 units planned adjacent to the station, just north of the county line at the old Schlage lock site. Similar transit-oriented development is supported in the Baylands as well. Local transportation impacts should also be considered in light of maximizing regional opportunities in new facilities for California High Speed Rail, Caltrain and Recology.

Additional impacts of concern include:

- 1) The impacts of uses linked to a high drive-alone mode share and underutilization of transit. These tend to be:
 - a. Retail and entertainment uses that are not part of a mixed-use development are frequently linked to a high auto mode share.
 - b. Industrial uses are frequently linked to high auto mode share/low transit usage.

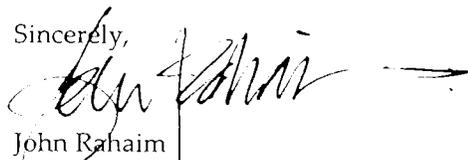
These impacts are greatest with both of the CPP alternatives. In some scenarios, providing mixed-uses that are linked to higher transit use, or a transit-oriented development alternative, may reduce impacts on the regional environment and transportation systems.

- 2) The Visitacion Valley/Schlage Lock site plans just to the north of the Baylands include open space, housing and commercial development. The impacts on the mixed-use neighborhoods within that site should be considered in each alternative.
- 3) Demand for housing is high in the Bay Area, especially in and near the City of San Francisco. While development to the north of the county line is increasing regional supply, the City of Brisbane should also address impacts on bi-county and regional housing demand by including housing to the maximum feasible extent.

Lastly, a correction to the Draft EIR should be made at page 4.I-13. The Visitacion Valley/Schlage Lock site plan is being revised: The plan for the site now proposes 1,679 residential units and 43,700 square feet of commercial and institutional development.

Once again, thank you for the opportunity to comment on the Draft EIR for this large and important project on our border. San Francisco looks forward to working together and helping Brisbane create the best possible project for this site.

Sincerely,



John Rahaim
Director of Planning

**Office of Community
Investment and Infrastructure**
(Successor to the San Francisco
Redevelopment Agency)

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January 21, 2014

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John Swiecki
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RE: Draft EIR for the Brisbane Baylands Specific Plan

Dear Mr. Swiecki:

Thank you for the opportunity to review and comment on the Draft EIR for the Brisbane Baylands Specific Plan, June 11, 2013. The Brisbane Baylands project is of interest to the Office of Community Investment and Infrastructure (OCII), Successor Agency to the San Francisco Redevelopment Agency, as the project site adjoins the Visitacion Valley/Schlage Lock Site to the north and is close to the Candlestick Point & Hunters Point Shipyard (Phase 2) Project area and the Executive Park, which involves demolition of an existing 230,000 square feet office building and conversion to 1,600 residential units. In addition, there are a number of existing and planned transportation facilities that require close coordination between Brisbane and San Francisco.

Program level vs Project Level

Because the Draft EIR has been prepared as a "programmatic" rather than a "Project-level" EIR, OCII requests that future development that may occur within the Project Site must be subject to preparation and adoption of project level CEQA analysis. Specifically, an environmental impact analysis of potential increases in air pollutants and noise at intersections, such as Bayshore Blvd., at Sunnydale Avenue and Bayshore at Leland Avenue and other major intersections near existing and future residential neighborhoods should be properly identified and mitigated.

Transportation

The Draft EIR primarily uses traffic counts recorded in 2007 and traffic counts "taken in November 2012 confirmed that volumes in pre-recession 2007 were higher than current volumes. Thus, the use of pre-recession 2007 traffic counts in this EIR results in a more conservative analysis of Project impacts than would re-running traffic models based on post-recession 2010 or 2012 traffic counts" (pg. 4.N-42). It is unclear whether or not the traffic counts utilized take into consideration the adopted Candlestick Point & Hunters Point Shipyard plans, which no longer includes a stadium option. If so, the proposal to relocate the existing Caltrains station to the south should be independently analyzed. The EIR prepared for the Candlestick Point & Hunters Point Shipyard (Phase 2) assumed the existing Caltrain Station would remain at the same location.

Specific comments for the Transportation Resources analysis.

- No reasonable justification has been provided for the proposed relocation of the Caltrain station to the south. No assumption should be made that moving the Caltrain platform to the south, as stipulated in the Draft EIR, would be supported by the Office of Community Invest and Infrastructure, Successor Agency to the San Francisco Redevelopment Agency.

- The Candlestick Point & Hunters Point Shipyard (Phase 2), Visitacion Valley and Executive Park plans based their traffic circulation analysis on the fact that Caltrain would, at the very minimum, remain in its present location. Relocation of the station to the south would result in loss of access and increased travel time to the transit station, which would result in diminished transit usage from existing communities and planned and approved projects within San Francisco. The cumulative traffic impact analysis, and proposed mitigation measures, should reflect diminished transit usage that would result from moving the existing Caltrain station to the south. The DEIR does not clarify or acknowledge loss of ridership.
- The bicycle diagram, depicted on **Figure 4.N-6**, raises a concern: no bicycle access to BRT/Caltrain hub is provided. In addition, the proposed unclassified bike routes should be clearly classified as part of the overall circulation plan. Because the growth concept scenarios involve increased use of the site for work, recreation or residential use, the a program level EIR should be prepared and should analyze the reasonable foreseeable indirect impacts that such growth could have on bike travel lanes and long term storage capabilities at the Caltrain station. It is unclear whether or not adequate bike parking and storage facilities are planned to accommodate the anticipated growth.
- **Outdated Information:** The DEIR employs exhibits from the Project described in the Candlestick Point/Hunters Point Shipyard Phase 2 ("CP/HPS2") EIR. However, the CP/HPS2 EIR also contained a non-stadium variant project, which will be under construction starting in March 2014. The Baylands DEIR should be revised to reflect the implementation of the non-stadium variant at CP/HPS2, including land use and transportation diagrams and the analysis contained in this variant. For example, the non-stadium variant introduces a different street grid on Hunters Point Shipyard, shifts density among the sites, and incorporates additional commercial square footage. As a result, the cumulative analysis contained in the Baylands DEIR may underestimate PM peak traffic demand generated by the CP/HPS2 Project.
- **Recommended Revision:** The transportation analysis in the Draft EIR should be revised to appropriately reflect the impacts of the proposed Caltrain station location on existing and already approved development and overall transit ridership in the interim and horizon years. In particular the analysis must take a finer-grained approach toward understanding the impacts of location on planned and existing development within ½ mile of the current station and on the ridership of the BRT, which depends on timely transfers to attract riders. Implementation of the Baylands project should take into account the development phasing so that station relocation does not precede appropriate development triggers, in effect diminishing transit performance among existing and already approved development for the sake of potential development which phasing may depend on a variety of factors including subsequent approvals, market demand and land acquisition.

Thank you for the opportunity to comment on the Draft EIR. We request that your agency consider our comments prior to certification of the Draft EIR. Please send us copies of all future project level documents, including Mitigation Monitoring and Reporting Program (MMRP) for the project, CEQA findings and, if applicable, statement of Overriding Considerations.

Regards,



Wells M. Lawson
Senior Project Manager



January 17, 2014

Mr. Paul Maltzer
Senior Planner
San Francisco Planning Department
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Re: Brisbane Baylands DEIR

Dear Mr. Maltzer:

Thank you for the opportunity to comment on the Brisbane Baylands Specific Plan DEIR. We understand the following San Francisco Municipal Transportation Agency (SFMTA) comments will be attached to a City and County of San Francisco letter to the City of Brisbane.

The development of the Brisbane Baylands ("The Project") will have a critical effect on San Francisco's transportation system and other infrastructure. Not only does the site border San Francisco, but it is immediately adjacent to three major San Francisco development sites (Candlestick/Hunters Point, Executive Park and Visitacion Valley/Schlage Lock). These are all envisioned to provide affordable housing, economic revitalization and major transportation improvements that will benefit the entire San Francisco Bay Area region.

In this letter, we first cover broad concerns that apply to all variants and scenarios. Then we review concerns specific to different variants. Finally, we discuss some changes that Brisbane could consider to better ensure the integrity and sustainability of the San Francisco and regional transportation network while accommodating the Project goals and broad land use principles.

GENERAL COMMENTS

Need for Effective Transit-Oriented Development

The SFMTA supports Transit-Oriented Development (TOD) concepts where development is proposed in and near San Francisco, for four essential reasons:

- 1) **Reduced environmental impact:** TOD encourages use of transit, bicycle and walking over the private automobile and therefore reduces emissions, sprawl, impacts on other infrastructure, and related degradation of open space.

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Cheryl Brinkman
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- 2) **Reduced automobile congestion:** TOD provides an alternative growth prototype that would be less likely to add cars that in turn would clog local streets and undermine multi-modal transportation access.
- 3) **Increased use of transit:** provided that resources are provided to ensure sustainable transit operations and reduce transit overcrowding, SFMTA supports development that invest in growth in transit ridership, particularly so when Muni is the service provider.
- 4) **Compliance with local and regional planning and funding priorities:** TOD that meets regional (MTC) land use mix and density criteria, as well as multi-modal access criteria, is readily supported by numerous planning and legislative policies and related funding programs that sustain and support current and future operating needs and capital investments, Development near transit facilities that do not meet these criteria face great policy and funding challenges, including failure to compete well in competitive regional, state or federal grant and financing award programs.

The Project as described in this DEIR does not comply with the metrics and criteria that measure “successful” TOD as described above. . Land use proposals and multi-modal access characteristics of several Project variants (including the Community Proposed Plan and its Recology Expansion Variant) do not reflect regionally-accepted minimums of density and land-use mix that support “viable” TOD. These proposals incentivize rather than discourage use of the automobile for transit station access, and (as a direct contradiction to regional TOD guidelines), jeopardize the long-term funding sustainability of Caltrain station and the related operations that rely on compliance to attract and secure vital regional funding.

The Project must sustain the critical environmental infrastructure, understandably of regional importance, of Recology’s existing large recycling and transfer station facility and as well as Recology’s proposal for a modernized expanded recycling facility as reflected in the CPP-V variant. The DEIR, however, does not acknowledge or resolve the challenges of transforming the Bayshore Caltrain Station into a regional Bus Rapid Transit (BRT)/Light Rail Transit (LRT)/commuter rail station at its current site, or by moving the Caltrain station south. Instead, it should consider moving the station closer to existing transit-oriented land uses (with a higher density of employee, services and/or residents than the recycling facility) and the existing pedestrian-oriented multi-modal access network and bus hubs to the north that connect to Visitacion Valley and Executive Park. The recycling facility would still remain within walking distance for its employees if the station were to move north, but the truck access it must depend upon would not be impeded by the multi-modal access paths to the Caltrain station needed for more robust ridership. Moving Bayshore Caltrain a few hundred feet north to connect to the east-west access routes that serve the above neighborhoods and the new mixed-use developments at Candlestick

Point and the Hunters Point Shipyard would allow the transformation of Bayshore Station into a regional transit hub while allowing Recology's facility to expand to the south, benefitting both transit function and recycling operations.

Caltrain Bayshore Station; Location, Access and Future Funding Sustainability

The Caltrain Bayshore Station provides an outstanding opportunity to construct an intermodal station supporting all adjacent development and the effective integration of commuter rail, light rail, bus transit, and pedestrian/bicycle networks. The *Bayshore Intermodal Station Access Study Final Report* (March 2012) states that the station "has the potential to transform into a vibrant, central hub for regional and local transit connections... The Bayshore Station represents a rare and important opportunity to truly coordinate transportation with land use to integrate a regional transit station into the surrounding neighborhood at the same time that the neighborhood itself is taking shape" (p. 5). However, the treatment of this station in the Baylands Specific Plan does not support a high-quality transit hub, and the DEIR does not adequately address this issue.

In fact, the DEIR is excessively vague about the station changes. The Caltrain Bayshore Station upgrade to an intermodal station is not detailed sufficiently to show how it could function as a true multi-modal facility. There is a lack of attention to how existing light rail (T Third), planned bus rapid transit and Caltrain service would interface with the Bayshore Station.

The DEIR shows the station moving south by an unspecified distance. This is inconsistent with the current plans for the approved projects at Candlestick Point/Hunters Point Shipyard Phase II, Visitacion Valley and Executive Park, all of which assumed immediate pedestrian access to Caltrain that would be compromised by moving the station platform south. Furthermore, this is inconsistent with the strong support from San Francisco agencies supporting these projects for the "interim" Bayshore Station configuration described in the *Bi-County Transportation Study*, which relies on access to the existing station site – or a future northern relocation of this platform -- to better connect Caltrain with the T Third light rail and the 9 San Bruno bus at the Arleta Station, and the proposed Geneva/Harney bus rapid transit service that connects via Blanken and Tunnel Avenues from the east and south and avoids the freeway interchange and recycling yard traffic closer to Alana Way. A concept graphic is attached to illustrate the following key features of this configuration.

- Closer to existing, mixed-use neighborhoods, with a high proportion of transit-dependent residents;

- Closer to planned high-density development, especially residential (in Candlestick Point, Schlage Lock/Visitacion Valley and Executive Park); and, by focusing on the light rail-to-Caltrain connection at the existing Arleta station,
- Eliminating the need or the unfunded, unresolved connection of the existing T-Third light rail (A station near Blanken and Tunnel would be walking distance from the Arleta T-Third station, probably less than 1,000 feet away.)

A move south would significantly drive up costs of transportation improvements such as the light rail connection and the Geneva Avenue extension and bus rapid transit that make the Bayshore station an essential transit hub (e.g., as shown in Fig 4.N-15, -16). The extended light rail track in Fig 4.N-16 suggest further, undiscussed and unresolved traffic conflicts between light rail and the Geneva Extension. This extra cost is a concern to Brisbane's partners in the Bi-County Study who must share the costs of this extension. This cost burden is especially inequitable and financially untenable because the lower intensity of the Brisbane Project means the Project would not likely have to contribute as much to capital improvements (nor to eventual ridership) as other developments.

Moving the station location north so it would no longer be surrounded by non-residential uses, and a recycling facility (under the Community Plan, Renewable Energy Generation Alternative and Community Proposed Plan Recology Expansion Variant Alternatives), helps ensure that the transit station can remain competitive for regional, state and federal funding. A northern location would be adjacent to the Executive Park development (planned for 1,600 residential units) and Schlage Lock/Visitacion Valley (planned for 1,250 residential units and about 120,000 square feet of commercial space in mixed-use buildings) and close to the Candlestick/Hunters Point development (planned for 10,500 residential units and roughly 4 million square feet of commercial development). The Sunnydale Hope housing project would also add some 900 affordable and market rate residential units to replacement of 785 subsidized units. Thus the northern location would serve true transit-oriented developments that depend on proximity to Caltrain, BRT and light rail; that have lower parking supply; and that benefit from pedestrian/bicycle networks providing better connections.

The DEIR does not clarify the ridership impacts and increased travel time for the transit, bike and pedestrian networks operated by San Francisco created by moving the station south. No discussion or suggestion is provided regarding mitigating the ridership or loss-of-access impacts from this station move to the historic, existing neighborhoods (Little Hollywood, Visitacion Valley, Executive Park) and to their proposed neighborhood plans

that rely upon – and will rely more upon -- direct access to Caltrain. The Visitation Valley/Schlage Lock, Executive Park and Candlestick/Hunters Point Phase II Environmental Impact Reports did not account for a move south to a less convenient location. (For example, the Executive Park DEIR assumed access to the Bayshore Station via Blanken and Beatty Avenues.)

Muni Transit Circulation, Capacity and Funding Sustainability

The transportation analysis should consider BRT use of Blanken Avenue to cross under the freeway, rather than via the Harney Way interchange and Geneva Avenue extension. This would allow a connection with Caltrain without a conflict with the Recology site.

Muni transit operating and capacity impacts 4.N-7 and -8 are identified as “significant and unavoidable” because Muni is not operated by the City of Brisbane, and capital improvements to the Muni system are not assured. However, the potential mitigation measures to address these impacts are limited to the references of the Bi County fair-share contributions to SFMTA: certainly a capital cost concern, but a future operating cost concern as well. The Project should go beyond the investment in infrastructure it should share with other area developments to include its contributions to extra rolling stock needed to avoid overcrowding and extra maintenance facility space to ensure these vehicles have adequate operational support. These factors were addressed and critical contributions to support these needs were included in the Candlestick Point/Hunters Point Shipyard (CP/HPS) EIR: procurement of additional vehicles, construction of transit non-revenue facilities to accommodate the need to expand capacity. The CP/HPS EIR models the kind of support this Project should also provide. Additionally, the Project should consider the benefits of the more functional, suggested Caltrain and bus rapid transit alignments (and related bike/pedestrian access) moved further north as described in the Bi County Study “interim” plan, bringing transit closer to a land-use mix that complies with MTC’s funding criteria for sustaining intermodal facilities. This in turn would help address the related transit operational funding deficiencies of the Project as proposed.

Muni delays due to automobile and truck congestion generated by the development and the relatively low transit mode share (projected as under 15% on page 4.N-82) are likely to be significant (and should also be mitigated through the procurement and facility expansion recommendations). Alternatively, the Project should consider the more functional, suggested Caltrain and bus rapid transit alignments (and related bike/pedestrian access). It would be particularly valuable to separate these networks from freeway traffic and arterial congestion.

Even with the Harney Way double-lane turns and widening in Mitigation Measures 4N-1d and -1e, traffic impacts are deemed “significant and unavoidable” because the street is in San Francisco. However, the mitigation measures do not address the extra impacts and conflicts to the transit, bicycle, and pedestrian networks the widening would create. Alternatively, the Project should consider increasing transit mode share to reduce congestion by such means as recommending the more functional Caltrain and bus rapid transit alignments (and related bike/pedestrian access) described above, particularly those that separate these networks from freeway traffic and arterial congestion.

The discussion of Caltrain capacity for Bayshore-serving trains on p. 4N-14 should clarify the unused capacity of about 800 seats per hour. It isn't clear if this is an all-day average. A peak hour capacity by direction should be provided.

Pedestrian and Bicycle Circulation Access to Caltrain and between Projects

Pedestrian and bicycle needs are not adequately addressed in the DEIR. Some of these issues are discussed above. Additional concerns include the following:

The pedestrian and bicycle connections to Caltrain and between the large, proposed development projects are not made clear. The figure on p. 4.N-20 does not show the route of the planned bike path and bike lanes near the planned Geneva Avenue Extension clearly, making it harder to understand potential conflicts with land use proposals. If the Geneva Extension/Overpass is intended as the main bicycle and pedestrian connection to Caltrain, this would force these vulnerable modes to use a wide, heavily-trafficked arterial and contend with voluminous on-ramp and through traffic of freeway-bound cars and trucks. These concerns are not acknowledged in the discussion of Mitigation Measures 4.N-10 and -11.

Pedestrian connections to Executive Park, Candlestick Point State Park and Candlestick Point development are not shown in Fig. 4.N-17. While bike lanes are shown, apparently crossing under the freeway on Alana to Beatty, the route is not clearly explained in the text on p. 4N-61. The text refers to an extension of the Bay Trail to Alana and Beatty, yet the accompanying figure shows bike lanes instead of a Class I path. The figure title (Proposed DSP/DSP-V and Presumed CPP/ CPP-V Project Site Pedestrian and Bicycle Circulation) suggests that a reasonably detailed pedestrian and bicycle has not been developed for the CPP and CPP-V alternatives.

Table 4.N-7 refers to peak hour vehicular use of new bike lanes on the Geneva Avenue Extension in a footnote. This seems highly undesirable and should be addressed as an impact to bicycle circulation.

The DEIR needs to be updated as the Cesar Chavez bike lanes have been implemented. On San Bruno Avenue, sharrow markings have been added in both directions between Mansell and Paul. Striping at the Mansell/I280 Off-Ramp has been upgraded.

Errors or Inconsistencies in Text, Graphics and Tables

There are a number of erroneous and outdated assumptions about related projects that have recently been (or are close to being) environmentally cleared, such as Phase II of the Candlestick Point/Hunters Point Project, Executive Park, the SFMTA Transit Effectiveness Project, and the Visitacion Valley/Schlage Lock redevelopment project.

The transportation network shown on maps and in text contains some inconsistencies. For example, the representation of the Candlestick Point/Hunters Point Shipyard (CP/HPS) Bus Rapid Transit, and Caltrain pedestrian and bicycle access network assumes Alana and Beatty Avenues will reach Caltrain (map on page 4.N-31, description of Bayshore Station site and BRT route on page 4N-46, Fig. 4.N-11), but several scenarios make this connection impossible since Beatty is not shown as a through connection to Tunnel Avenue/Caltrain. Perhaps it is assumed that this critical connection will be made through a "streetless" path system in the Recology site for the Community and Recology Variants, yet this lack of connectivity is not discussed in the section describing Mitigation Measures 4.N-10 and -11. The Bayshore Station Access and CP/HPS "interim" Bus Rapid Transit path to Caltrain via Blanken and Bayshore is not reflected in the DEIR.

Critical transit facilities such as stations for the Bus Rapid Transit, Light Rail Transit and Caltrain are not shown on many of the key land use plans. (For example, Figure 3-11, the DSP land use plan shows the Bayshore station site as "retail" and does not show any BRT station sites.). This makes it especially difficult to understand how the Project's land use development patterns would facilitate or impede immediate access to these stations. This lack of clarity makes it difficult to support assumptions of mode-split shifts that are essential to the DEIR. Direct, convenient access to these stations for existing and proposed land uses should be an essential priority of this Project.

Assumptions and related graphics for adjacent projects, such as Candlestick/Hunters Point are outdated. The DEIR shows exhibits from the

Candlestick/Hunters Point EIR, but the project has changed significantly since then. In particular, the bus rapid transit, other Muni transit routes and bicycle network have changed.

Mitigation Measures

The Project has many significant unavoidable impacts, but the mitigation measures are often not specific enough. In particular, several mitigation measures for impacts to San Francisco transit operations require the developer to work with the SFMTA to reach agreement prior to the first occupancy permit. These include fair share contribution to capital costs for additional transit service; the operating costs of additional bus and train service; and the shuttle bus service plan. These mitigation measures are not specific or clear. What if agreements are not reached? Performance goals and a feasible menu of specific measures to attain goals should be identified. Without this, how can the EIR conclude whether impacts are mitigated to less than significant levels? Additional service may require several years of lead time, to procure additional vehicles and prepare detailed operations plans and schedules. A Memorandum of Understanding between the developer and the SFMTA would be desirable.

Transportation demand management (TDM) incentives, such as bundled or mandatory transit pass purchases for employees and residents, could be a valuable mitigation measure for transit impacts, helping provide the funding needed to increase service.

Mitigation measures are proposed to address pedestrian impacts, but no funding mechanisms or commitments are included to ensure implementation.

The Bicycle impacts mitigation measure (4.N-11) is expected to reduce impacts to less than significant, but no specifics are provided. The DEIR states that: "A detailed bicycle circulation plan for the CPP and CPP-V would be specified as part of preparation of the required specific plan should either the CPP or CPP-V Concept Plan scenario be approved, which makes the type of network improvements defined for the DSP and DSP-V scenarios a reasonable assumption for the CPP and CPP-V scenarios in this assessment." Without having this bicycle circulation plan included in the DEIR, it is not possible to assess the feasibility of the mitigation.

COMMENTS ON SPECIFIC VARIANTS

Below are variant-specific comments reflecting the concerns and issues unique to each variant. These comments highlight where undisclosed

potentially significant impacts might be created, or where discussion and analysis might be lacking to adequately assess potential impacts.

Developer-Sponsored Plan (and Entertainment Variant)

This proposals in Figures 4 and 5 show a mix of land uses in the northwest quadrant that seem to best reflect the regional priorities for TOD, but don't seem to support the station siting and networks shown in Figures 4.N 15, 16 and 17. They do not show the Caltrain station location or BRT/LRT stations. Nor do they clarify the relation between these land uses and the transit stations and other multi-modal networks that would demonstrate how they mutually support each other to support the mode-split assumptions consistent with the essential and related expectations of the recently-approved projects at Hunters Point/Candlestick Point, Visitacion Valley, Executive Park. They do not address the range of Caltrain and bus rapid transit issues cited in the Bayshore Access Study and Bi-County Study. At the very least, the bus rapid transit station at Geneva and Bayshore should be shown, as should the range of Caltrain station locations consistent with the above-mentioned recently approved projects and studies.

Community Plan and Renewable Energy Generation Alternative

The land use proposal does not sustain TOD primarily because it inhibits the functionality (access and passenger environment) and funding sustainability of the Bayshore Caltrain station hub. The Preferred Renewable Energy Generation Alternative, Community Plan and Recology Variant would obliterate the pedestrian, bike and BRT paths to Caltrain as shown in Figure 6. The elimination of Beatty as a public right-of-way is not described as in impact to the bicycle and pedestrian access that would benefit critically from being separated from the freeway interchange: this discussion is missing from the description of mitigation measure 4N-3f and other text on page 4.N-104.

Community Proposed Plan Recology Expansion Variant

San Francisco supports expanding the Recology property as needed to meet the needs of this critical facility. Moving Caltrain north, not south, from its present location helps avoid any conflicts with this plan: this allows the expansion of Recology south to the Geneva Extension while allowing adequate land and access connections to Caltrain to the north to ensure compliance with what MTC and other funding agencies would consider land suitable for TOD to be incompatible for mixed-use development. Viable pedestrian/bike access networks should then be shown to clarify no conflicts with a recycling facility along much of the station frontage. These access routes include bus, bicycle and pedestrian connections that should accordingly be re-routed to the north using Blanken and Bayshore. This would avoid conflicting with the vital truck and auto access routes needed to

support an expanded Recology facility. This also avoids conflicts with the elimination of Beatty Avenue as a public right-of-way, which currently is not described as an impact to the bicycle and pedestrian access, and if it were to remain the primary access to Caltrain from the east, might present added conflicts for bicyclists and pedestrians with freeway interchange and recycling truck traffic.

RECOMMENDED CHANGES

We recognize the challenge in balancing the complex land uses and infrastructure networks of the Project. However, the SFMTA hopes Brisbane would consider the refinements and revisions to the Project as described below that could better support and ensure the integrity and sustainability of our transportation network while supporting the Project land use options. In particular, the following recommendations, based on experience with analyses for major neighboring development projects, would maintain the integrity of an essential, regional transit hub and its immediacy and connectivity to established and approved TODs.

- Consider the Blanken Avenue BRT alignment as long-term, rather than interim, allowing BRT to better serve the existing, higher-density communities at Executive Park, Little Hollywood and Visitacion Valley. This would also allow BRT vehicles to avoid conflicts with the freeway ramps and with the industrial, truck-“primary” access needs of Recology as it currently functions and expands.
- Enhance the fundability and integrity of the Bayshore Caltrain hub by shifting the platform north toward the tunnel, closer to the MTC-conforming, TOD-compatible land uses to the north, and thereby avoiding the conflicts between multi-modal circulation networks and the traffic/truck circulation and access needs of Recology and the freeway ramps. This also provides a better response to the transit capacity and operation impacts the Project deems as “significant and unavoidable” than the proposed vague mitigation measures alone.
- These recommendations would avoid the expensive, unfunded T Third extensions that are exacerbated by the Project’s southern relocation of Caltrain and the BRT routes by developing the Arleta LRT/BRT stop as the regional transit hub instead. This alternative would provide direct Caltrain connections to the adjacent, existing mixed-use neighborhoods, and rapid connections to the Geneva-Harney BRT (interim and long-term), the 9 San Bruno. This would create a true local-regional transit hub where land uses and access networks best justify it, a location more likely to attract sustainable funding

- These recommendations also allow for the deletion of the unfunded (and Project-exacerbated) T Third extension to Caltrain south of Sunnydale, thereby saving millions for the Bi-County partners, and avoiding undesirable, additional Caltrain connection time.
- The Project should promote as its main transit hub the proposed BRT stop at Bayshore and Geneva. This is the only quadrant with appropriately-mixed land uses and densities to sustain TOD funding and functionality, and this station provides the convenient connections via rapid, frequent and flexible service to Caltrain, BART and LRT. This should be promoted as an essential gateway to Project, and is appropriately farthest from the east side of the Caltrain tracks and the interchange dominated by Recology and other non-TOD land uses. As stated above, siting a major, regional transit hub and the supportive TOD land uses and access networks away from this non-TOD quadrant would best balance transportation and land uses.
- The T Third terminal at Sunnydale represents a similar transit access opportunity within immediate walking distance of the northwest corner of the Project. More intensive land uses would ideally be located adjacent to this station.

Thank you again for the opportunity to comment on this important document and Project.

Sincerely,



Peter A. Albert
Manager, Urban Planning Initiatives
attachment



Proposed Geneva Extension



Blanken BRT, Bike and Ped Route



Approved TOD projects



Recology site w proposed expansion



County Line



Future 101 Interchange



Caltrain Station Existing



Caltrain Station in DEIR



Caltrain Station – TOD preferred



T Third transfer to Caltrain



Other T Third –BRT stops



Other proposed BRT/bus stops



T Third & unfunded Caltrain link

Brisbane Baylands DEIR
Comments
San Francisco County Transportation Authority
October 11, 2013

Thank you for the opportunity to comment on the Brisbane Baylands Draft Environmental Impact Report (DEIR). The Authority recognizes the strong vision in the plan and supports the efforts of the city of Brisbane to encourage quality development of much needed housing and job space. We are also glad to see acknowledgement in the DEIR of key previous planning efforts in the area, including the Bayshore Intermodal Station Access Study and the Bi-County Transportation Study.

Strong connections are needed between the work done on the Bi-County Study and the proposed Baylands development, and we appreciate the city of Brisbane's previous cooperation on and commitment to the cost-sharing concepts agreed upon in the Bi-County Study. We see it as an important function for the DEIR to contain language committing development to be responsible for its fair share. We would appreciate clarification on whether the current language is sufficient, in light of observations we make below.

The DEIR's *Cumulative Without Project* (baseline) scenario assumes completion of several projects proposed by the Bi-County study, including the Geneva Ave extension, the US 101 Candlestick interchange re-configuration, the T-Third Light Rail Line extension, and the Bayshore Intermodal Station re-configuration. These projects are not fully funded and in fact rely on public and private contributions, including from the Baylands development, which raises a question about whether they should be included in the baseline scenario, and whether the DEIR can commit the development project to contribute its fair share to these transportation projects.

The area is a joint Priority Development Area (PDA) between San Mateo and San Francisco counties. In order to retain its designation as a PDA and to be eligible for certain regional transportation funds, housing must be included in the development. We understand there to be multiple land use options under consideration, only some of which would result in housing. We strongly suggest that housing be included in the development, as its absence would affect our ability to advocate for funds to build the transportation projects outlined in the Bi-County Study, ones that are assumed to be built in the *Cumulative Without Project* (baseline) scenario.

The DEIR identifies multiple local traffic impacts as significant and unavoidable, including some intersections in San Francisco. Given that finding, we propose that the development project contribute funds toward efforts to address increases in traffic congestion. We acknowledge and support the DEIR's mention of TDM measures as one such effort. However, the DEIR does not provide any detail of such measures. How will TDM measures and commitments to those measures be codified? We would like to see the inclusion of stronger and more specific descriptions of TDM programs and projects that would be implemented. The Bayshore Intermodal Station Access Study included discussion on TDM concepts that is relevant here. Also, we suggest that an on-demand, area-wide traffic calming program, such as the one proposed as one of the Bi-County Study's list of jointly-funded projects, could also be a developer commitment.