



January 24, 2014

Mr. John Swiecki, AICP
Community Development Director
City of Brisbane
50 Park Place
Brisbane, CA 94005

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MICHAEL J. SCANLON
EXECUTIVE DIRECTOR

Re: Peninsula Corridor Joint Powers Board comments on the Brisbane Baylands Draft EIR

Dear Mr. Swiecki:

The Peninsula Corridor Joint Powers Board (JPB) is pleased to provide the following comments on the Brisbane Baylands Draft Environmental Impact Report (DEIR). Caltrain supports the development of transit oriented uses that build ridership for our system and enhance our stations and their surroundings.

The JPB understands that the intent of the Brisbane Baylands Draft EIR is to achieve programmatic clearance of a broad set of potential development and infrastructure changes in the Baylands area of Brisbane. Given the programmatic nature of this analysis, the JPB has endeavored to focus its comments on clarifying our factual understanding of the proposed project and identifying issues where future coordination and study will be necessary as the Baylands development program moves forward. We have organized our comments into four broad subject areas that reflect our particular points of interest:

1. Agency Jurisdiction

The DEIR describes the jurisdictional relationship of the JPB to the Project on pages 3-35 through 3-38 in the section entitled "Agencies with Jurisdiction over Site Development, Studies to be Conducted, and Issues to be Resolved" as follows:

"Encroachment permits will be required if construction occurs in right-of-way owned by the California Department of Transportation (Caltrans District 4) or the Peninsula Corridor Joint Powers Board (Caltrain). Site-specific engineering designs for development and infrastructure within the Baylands would be required prior to determining whether any encroachment permits were, in fact, necessary"

Caltrain staff is concerned that this statement may not sufficiently capture the extent to which the JPB has jurisdiction and a need to be involved with various aspects of the project. All project elements and construction activities that incur over, through or under the JPB right-of-way (ROW) will require coordination and review with the JPB including a wide range of design coordination, engineering review,

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agreement and permitting from the JPB. Additionally, any of the proposed transportation improvements involving or related to Caltrain need to be coordinated directly with the JPB (in addition to coordination with SFCTA and C/CAG as indicated in the DEIR) to ensure compliance with JPB standards and plans as well as agreement on cost and maintenance responsibilities. In particular we strongly feel that the JPB should be included directly in any future engineering and architectural studies and funding discussions related to the Bayshore Intermodal station and associated access and egress elements. To that end, we believe the JPB should be listed along with the other agencies on page 3-37 as agencies where “Interagency Cooperation Agreements will be needed to coordinate and implement public facilities and infrastructure improvements.”

2. Incursions into the JPB Right-Of-Way:

The project description includes numerous physical structures and elements that will incur onto, under or over the ROW. Examples include the Roundhouse Arc street, pedestrian bridges, drainage systems and the possible wetlands expansion shown in the CPP and CPP-V scenarios. All of these project elements have the potential for a direct and significant impact to Caltrain infrastructure. As the project proceeds, close coordination with JPB is highly recommended to maintain the integrity of our system and comply with Caltrain design standards.

3. Transportation Improvements and Programs included or assumed within the Project

The DSP, DSP-V, CPP and CPP-V scenarios all envision walkable, transit-oriented development with a relocated Bayshore Intermodal station serving as a mobility hub for the community. Achieving this outcome will require the successful coordination of multiple different infrastructure projects some of which are included in the project and others of which are separate undertakings. Caltrain is particularly interested in the following:

- **Bayshore Intermodal Station and connecting transit improvements:** Caltrain understands that various transit improvements at and connecting to the Bayshore Intermodal Station are assumed within the DEIR analysis of the Baylands development but that these improvements do not constitute part of the actual Baylands project (see description on p.4-N.59). Caltrain participated in the SFCTA led *Bayshore Intermodal Access Study (2012)* and is supportive of improvements to the station that enhance intermodal connectivity and support surrounding land uses. However, station enhancement plans are at a conceptual stage and require further design and review. Caltrain also strongly feels that there needs to be agreement between all interested jurisdictions before it can support a change in the station’s location. Finally, funding for station improvements is conceptually identified in the 2012 Bi-County Study Update but must still be secured.
- **Pedestrian access and egress improvements:** As described on page 4-N.60, each of the Project site development scenarios proposes a network of pedestrian and bicycle paths across the Project site that would enhance internal connectivity and improve connections to the Bayshore Intermodal Station. As described, pedestrian circulation would include sidewalks or single- or

multi-use paths adjacent to roadways. Each of the scenarios includes at least one pedestrian overcrossing over the ROW and Tunnel Avenue to minimize internal travel distances for pedestrians and bicyclists. Caltrain supports convenient, high quality connections to our stations, but notes that further coordination and detailed design will be required to ensure that bicycle and pedestrian facilities crossing the ROW are both functional and safe.

- **TDM Strategy:** Caltrain is pleased to see that the DEIR identifies an aggressive TDM strategy (p.4.N-66, 4.N-147-48) that will encourage members of the Baylands community to use alternative modes of transportation. Caltrain will work actively to assist with the implementation of any TDM efforts and looks forward to being involved in the planning and coordination of such a program.

4. Caltrain Ridership and Service Assumptions

The Caltrain ridership numbers presented for all of the potential development scenarios suggest that the project will add 5,925 to 10,517 trips to the Caltrain system at the Bayshore Station (4.N-88).

Counterintuitively, the DEIR also finds no impact to Caltrain's capacity or station facilities despite the large projected increase in ridership. Caltrain staff has significant questions with the DEIR's analysis of ridership and potential impacts to Caltrain capacity and facilities (as described below). Staff requests that further examination and explanation of the DEIR's findings be provided. Staff is available to meet with project sponsors and provide any additional information that may be necessary.

- **Analysis methodology:** The DEIR references the "Transit Capacity Utilization" methodology used by the City and County of San Francisco and indicates that the methodology is being applied using methods and forecasts derived for the "CPHPS EIR." (pp. 4.N-86, 4.N-129, 4-N.132). The basis for the Existing and Cumulative transit numbers taken from this document is unclear and difficult to trace or evaluate (as of 2014, the referenced EIR is not easily accessed on line). Given the magnitude of the ridership increase projected and the importance of transit to the proposed Baylands development Caltrain staff feels that the methodology and ridership assumptions used should be clearly and directly documented in a technical appendix.
- **Impact on Caltrain Operations at Bayshore Station and on Bayshore/Brisbane Four-Track Rail Segment:** The DEIR indicates that the current level of service provided to the Bayshore station is expected to continue in the future (4.N-133-34). However the DEIR goes on to make the following statement:

Given the increased ridership demand, changes to Caltrain operations would be required. For example, based on the level of service provided to other, high-ridership Caltrain stations, it is likely that all, or at least most, trains (including Baby Bullet trains) would stop at the Bayshore Station, and Caltrain would not continue its current use of the Bayshore Station's four-track segment as a strategic "passing zone" for Baby Bullet service. This, however, would be part of a natural adjustment process of operational changes that Caltrain and other transit providers make in response to changes to ridership levels and would not represent an adverse effect on level of transit service (4.N-134)

This statement is speculative and seems to contradict both prior and subsequent statements that no changes to Caltrain operations or level of service at the Bayshore station are assumed. The DEIR should analyze and clearly state whether changes to Caltrain's existing and future anticipated schedule and operations are required to support the projected level of ridership. In particular the DEIR should explicitly indicate whether any required increase in service would have an operational impact on the four-track "passing zone." Caltrain staff is available to assist with this analysis.

- **Farebox Revenue:** The DEIR includes statements about the likely increases farebox revenue that will accrue to Caltrain resulting from anticipated ridership increases. Caltrain staff agrees that the added ridership is a benefit that will provide Caltrain with new revenues but suggests that the specific dollar amounts cited in this section may be overly specific (given the future timeframe of the development) and should be removed.

Thank you for the opportunity to review the DEIR for this important project. Caltrain looks forward to working closely with the City of Brisbane as the Baylands project advances. Our staff is available to answer questions and assist with analysis as you move forward preparing the final EIR.

Sincerely,

A handwritten signature in black ink, appearing to read 'M. Lee', with a stylized flourish at the end.

Marian Lee, Executive Officer
Caltrain Modernization Program