DEIR Traffic and Circulation Comments

Citizen Comments Submitted by Linda M. Dettmer

Table 2-1 Note: This table contains SU (Significant Unavoidable) situations too
P. 2-67 numerous to count. This suggests that not enough mitigation for the traffic scenarios represented here have been investigated. Any items presented as SU must be mitigated for safety and continued ease of traffic flow. *see end of comments - excerpts from DEIR

4.B-7 **Diesel Particulate Matter DPM** The CARB identified DPM as *a toxic air contaminant.... primarily based on evidence of demonstrating **cancer** effects in humans. (bold added) Exhaust from diesel engines includes hundreds of different gaseous and particulate components which are toxic. Mobile sources such as trucks and buses are among the primary sources of diesel emissions, and concentrations of DPM. DPM sources are higher near heavily traveled highways ...The estimated cancer risk from exposure to diesel exhaust is much higher than the risk associated with any other toxic air pollutant routinely measured in the region. (Excerpt from American Cancer Society, 2009)*

The number of routine diesel vehicle trips created by building of any Project will be a significant producer of DPM. Also future increased vehicular traffic by buses, cars, trucks etc. will add to the DPM in our air. Mitigation suggested would be to require Developer to use clean air vehicles during any permitted build-out or other mitigation as described and enforced by the City .

4.B-11 Diminished air quality is a major factor of traffic increase due to Project build-out.

4.B-38 Mitigation measures and enforcement must be described.

4.N-12 Table This transportation analysis estimates that development of the Project Site would result in approximately 44,985 new vehicle trips per day for the DPS scenario and almost twice as many for the CPP scenarios.

Such levels of traffic congestion as suggested in DEIR are unacceptable to health and safety during and after build-out. Emergency vehicles in particular must have acceptable access to all areas at all times, before during and after Project build-out. As well, traffic flow must remain at a pace where gridlock is avoided. (LOS C) Mitigation needs must be described and enforced.

4.N-1 DEIR states we are regionally served by three major freeways. Geographically **Freeways** only one freeway (101) is readily available for quick access to freeways 280 and 380. The Project along with other major development in close proximity of the Site will compromise driveability and commute, particularly during peak hours. Mitigation proposals and measures must be described and enforced to avoid permanent gridlock.

4.N-4 No one likes to mention it, but many of the roadways proposed for use as **Local** additional relief to the congestion are through what are known as "socially obsolete" **Roadways** areas beset by crime and in transition. Mitigation measure must be described and instituted to make these roadways safer for travelers.

4.N-14 CAL TRAIN and Transit Districts are overviewed on this page with current ridership and schedules. No projections for future needs or how to meet them are included. Projections and mitigation measure for any future increased ridership are needed.

4.N-28 Critical focus areas for pedestrians must consider of <u>safety first</u> and create easily traversable pedestrian and bicycle corridors to Project site, well away from vehicle traffic, while still being connected to current downtown Brisbane. This should be a transition that creates connectivity between current and future Brisbane and appears logical and natural.

4.N-31 Traffic Calming Program (initiated for 2010-2015) must be included in this project. The EIR should define a plan of exact measures to ensure smooth traffic flow and bicycle and pedestrian safety.

4.N-34 An additional Caltrain station would be an asset to relieving traffic and encourage connectivity and use by local residents. Paragraph 1 of this page indicates that Caltrain intends to minimize the number of stops. This contradicts the intention of a *transit centered* development and will add to less than desirable mobility of residents and other users of Caltrain. A plan to mitigate congestion must be in place prior to Project commencement.

4.N-37 Policy 69. Consider making some streets **one way** during emergency or disaster situations.

4.N-39 **City and County of SF** In order to effect a huge change to commute and transportation congestion, mitigation by formation of mutual transit districts should be formed allowing the San Francisco Muni T line to serve Brisbane and South San

Francisco.

4.N-40 Changes in air traffic patterns due to Project will result in impacts on the quality o1f0 life in Brisbane, and mitigation measures must be described and implemented well in advance of changes to air traffic.

4.N-46 **Bayshore Intermodal Station Access Study Improvements**: In addition to taking into account all impacted areas including SF, Daly City, SSF, and Brisbane, these improvements will have far reaching implications for the entire Bay Area and should be studied for mitigation actions that will be implemented to keep traffic and people moving easily with the increased use projections.

4.N-50 **Bicycle Improvements:** Use of protected, safe, designated, separated bicycle lanes away from speeding traffic are absolutely necessary and must be designed, instituted and enforced as one mitigation measure.

4.N-61 Bioswales are landscape elements designed to remove silt and pollution from surface water runoff. (Wikipedia) Pathogens from bioswales containing chemical or other waste can lead to a variety of diseases in humans and aquatic life. Mitigation must be studied and implemented to protect pedestrian and aquatic life from the pathogens inherent in bioswales. Please refer to report for BBCAG by Dr. Fred Lee.

4.N-63 Any areas used by pedestrians must be completely remediated to ensure safety from airborne toxic or other potential chemical harm. Please refer to report for BBCAG by Dr. Fred Lee.

4.N-64 Funding has not been established for the needed and projected transportation scenarios and should be established and in place prior to any build-out of Project. This would ensure, in advance, that gridlock does not occur for residents and particularly emergency vehicles .

4.N-66 **Linkage: Transportation Demand Management Program** looks to combining trips through employer relocation assistance and job/housing linkage. Without knowing who the future employers are and housing affordability, it is not dependable to rely on these projections to decrease daily trips. More study is needed and projections must be based in fact.

4.N-68 **Parking Strategies Un-bundling:** Residential parking that is not included with the purchase of a residence may be a direct cause of parking difficulties for future populations. Streets are needed today and will be needed for parking and as populations increase leading to more demand upon the area for parking, possibly creating a frustrating parking situation. As witnessed here in Brisbane's downtown and residential areas, parking has become a dilemma at peak business hours and in the evening when residents return home from work. Mitigation measures taking into account the changing/growing populations of the future must be studied, described and implemented.

4.N-70 All parking in Project should conform to the City of Brisbane's General Plan.

4.N-71 Parking places should be provided for all employees instead of as described, 2 spaces for 3 employees. As this Project has a long term build-out scenario, parking should be generous and planned for the full load of expected employees. This must be mitigated with worst case scenarios in mind.

4.N-83 Tranportation and parking impacts of a sold out arena event (17,000 attendees) must be studied with mitigation measures described and implemented, not only for adequate parking, but for the traffic flow conditions that will be created.

4.N-85 **Footnote**: Projecting peak traffic using San Francisco's methodology does not work in this case for the DEIR, as San Francisco 's methodology only accounts for traffic leaving the area. Mitigation measures for traffic leaving and also entering the area must be described and implemented.

4.N-90 **Conflict with applicable plan, Ordinance or Policy Establishing Measure of Effectiveness for the Performance of the Circulation System.** All traffic circulation scenarios shown are Significant Unmitigable and will not prevent traffic congestion. Mitigation measures must be determined and implemented to avoid gridlock or less than LOS C movement at all times.

4.N-94 Current and existing traffic are all at less than LOS D. All projections on this table **Table 4.N-26** show LOS D except at Geneva Avenue and Carter. LOS D is described as, *Operations with increasingly unacceptable delays*. LOS D is currently acceptable in the General Plan in certain areas of Brisbane. These projections if allowed will create constant traffic congestion and difficulty of movement throughout the Brisbane area. Mitigation measures for better than LOS D must be described and implemented.

4.N-95 *Impact at San Bruno Avenue & Bayshore Boulevard (Intersection 5)...the un-signalized intersection of San Bruno Avenue and Bayshore Boulevard...*
This intersection is already performing poorly. With projected increases in traffic and congestion, this could become a dangerous intersection. Measures must be taken to provide safe medians, traffic signals and monitoring of motorist's speed. As well safe bicycle and pedestrian passage throughout this strip of highway (as at Old County Road and Bayshore) must be a primary consideration. With increased projections in traffic on Old Bayshore, this would most importantly help mitigate safety needs for pedestrians, bicyclists and allow those making a left turn on to and off of San Bruno Avenue, more of an ability to turn safely.

Footnote 16: As noted in Section 4. Land Use and Planning, each of the Project Site development scenarios are inconsistent with the General Plan in that they result in levels of service in excess of General Plan standards.

Excessive levels of traffic are unacceptable at any of the points of intersection and must be mitigated to levels enforced <u>at minimum</u>, consistent with the General Plan or LOS C.

Table *4.N-27* ...DSPV SCENARIO...ARENA EVENT... *Traffic associated with a sell-out event at the arena would exacerbate traffic operations at six intersections that would operate at LOS E or LOS F conditions under Existing plus Project with DSP-V scenario.*

Traffic levels of LOS E or LOS F are unacceptable and unsafe in an emergency situation. Further study of mitigations must be done and implemented prior to issuance of permits for such a situation.

4.N-115 3rd Par. *To provide the capacity to accommodate the northbound left-turn traffic, the northbound approach would be restriped by either removal of the existing median or widening to add the third left-turn pocket*.

Removal of the center median would create an unsafe situation, similar to the left turn area onto San Bruno Avenue at Bayshore at which speeding traffic is divided by simple lines and little space. This mediation method does not account for safety of traffic. An additional lane with separated pedestrian and bicycle lane should be studied and implemented as a preferred mitigation.

4.N-122 ***Mitigation Measure 4.N-3g:*** *Prior to the issuance of the first building occupancy permit for new development other than relocation or improvement of an existing use within the Project Site, signal timing settings at the Carter Street/Geneva Avenue intersection shall be modified by the City and County of San Francisco to provide longer green time on eastbound/westbound permitted movements and longer cycle length.*

It is this commenter's opinion that the financial burden of creating and modifying streets for the benefit of the Project should be borne by the Developer. While these mitigation measures are very necessary, they do pose a burden on already financially stressed cities impacted by this development. It seems unfair that UPC will be the only entity that will gain financially. Unless financial assurances are in place ensuring the surrounding cities can and are willing make the needed changes to streets, this Project should not be approved.

4.N-125 Table 4.N-33 shows traffic levels at LOS E and F in all scenarios. This unacceptable congestion level must be better mitigated to LOS C and mitigations enforced.

4.N-126 ***Conclusion with Mitigation:*** *While implementation of* ***Mitigation Measures 4.N-13 and 4.N-4*** *would reduce this impact, Mitigation Measure 4.N-4 requires participation or and decisions by agencies over which Brisbane has no authority, and it is not within the City's power to impose such mitigation.*

Footnote 17: Page 4.N-106
*Mitigation Measure 4.N-13 reads as follows: **"**Prior to issuance of the first building occupancy permit for new development other than improvement or relocation of an existing use within the Project Site, the developer(s)`and/or tenants of Project Site land uses shall prepare, submit to the City/County Association of Governments of San Mateo County (C/CAG) for approval, and establish a Transportation Demand Management (TDM) program to mitigate the C/CAG project impact of generating more than 100 net new vehicle trips during the peak traffic hours.*
Implementation of TDM programs shall be made a condition of approval for all new development within the Project Site that generates 100 or more net new trips during the AM or PM peak hour. A summary of TDM strategies can be found in Table 4.N-45."

This disturbing conclusion virtually eliminates the lead agency, Brisbane, and the community most impacted, Brisbane, from imposing mitigation measures as recommended. Mitigation measures that do not include the approval of Brisbane and that directly affect the quality of life in Brisbane should give sufficient cause to Brisbane for rejection of this project in it's entirity.

4.N-133 *Footnote 23: As discussed in Section 4.N.4 in relation to transit use, project site development would have a significant effect on the environment if it would: Cause an increase in transit demand that: **could not be accommodated** by adjacent transit capacity (i.e., **would exceed 100-percent capacity**), or **would necessitate changes to Caltrain operations at the Bayshore Station and on the Bayshore/Brisbane four-track rail segment, resulting in unacceptable levels of transit service;** or cause an increase of more than 2 percent in transit demand on transit lines where transit demand exceeds 100-percent capacity under Existing or Cumulative Without Project conditions; **or cause a substantial increase in delays or operating costs such that significant adverse impacts in transit service levels could** result (e.g., require additional buses or trains due to project transit trips); or **cause an onsite transit demand that would not be adequately served by adjacent transit service** (i.e., project generated demand for transit service would be located more than one-third mile from transit service at the Caltrain stations).*

This entire footnote speaks to the possible frustration and congestion of the Site not being able to handle the influx of users to the transit system. This is unacceptable planning that must be re-planned for additional mitigation measures describing what is acceptable, why and be implemented and enforced to bring this to acceptable levels.

4.N-139 ***Conclusion:*** *Transit ridership under all four proposed development scenarios would contribute to cumulatively significant impacts on Muni operations at San Francisco transit screenline locations and would result in significant impacts...*

Additional mitigations must be in place and enforced to ease the projected significant impacts on transit ridership and must be enforced.

4.N-140 ***Conclusion:*** *Project Site development would cause an increase in delays or operating costs such that significant adverse impacts on Muni transit service levels could result (i.e., additional buses or trains could be required due to Project transit trips).*

A proposed mitigation plan must be derived and enforced to avert delays and adverse impacts prior to issuance of permits.

4.N-141 ***Conclusion:*** *Project Site development would cause an onsite transit demand that would not be adequately served by adjacent transit service for those proposed land uses that would be located more than one-third mile from the Caltrain and Muni T-line stations. This would result in significant baseline and cumulative impacts under all four proposed development scenarios.*

A proposed mitigation plan must be derived and enforced to avert delays and adverse impacts prior to issuance of permits.

4.N-142 ***Pedestrian Access (Existing plus Project and Cumulative with Project)*** Any pedestrian or bicycle activity on Project site must be carefully protected from traffic and toxins**.** Mitigation measures are unclear must be clarified and enforced.

4.N-143 *Sidewalks shall be provided along the Project Site frontage on Bayshore Boulevard between Sunnydale Avenue and Tunnel Avenue*.

For pedestrian and bicycle safety, sidewalks must be separated from streets with landscaped medians. This is a safety mitigation that cannot be ignored when one considers the increase in traffic and traffic speeds in the noted area. (Preferably medians will be landscaped with native, hosts to help propagate endangered species.)

4.N-145 ***Conclusion:*** *Construction activities would result in significant impacts on existing and cumulative traffic flow and transit service and interfere with pedestrian and bicycle circulation patterns.* ***Mitigation Measure 4.N-12*** *below is recommended.*

In addition to Mitigation Measure 4.N-12 Limits must be set on construction activities for traffic, congestion, noise, dust as well as protections measures to ensure that pollution from disturbed toxins are properly contained and do not affect the health of any person working on or living near the project. Also due to the long term and yet undetermined build-out time, the effect on the quality of life in Brisbane must be considered and mitigations offering respite from constant construction must be investigated and enforced.

Note: Since the project build-out is over such a protracted period of time, the door for future adjustments should remain open. As new alternative mitigation measures

are discovered it is prudent to have language allowing for adjustments to be incorporated. Evolving of sciences warant a stronger stance on the predictability of values and standards changing and making an inevitable impact. The potential unknown toxins in the Site may need to be dealt with differently as science progresses and this process of approvals should not be grandfathered to this decade's knowledge. Any scenarios that are significant but mitigable should contain a planned and enforced mitigation prior to issuance of any permits. Scenarios that are planned but unmitigable must be replanned to bring them to the highest standards of safety and public comfort, with as little intrusion to the way life is now enjoyed by the people of Brisbane.

Respectfully submitted,
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***2-10**

Significant Unavoidable Traffic and Circulation Impacts (DEIR)

Impact 4.N-1: The Project would result in a substantial increase in traffic under Existing plus Project conditions at intersections in the vicinity of the Project Site.

Impact 4.N-2: The Project would contribute to significant existing traffic impacts at freeway mainline segments.

Impact 4.N-3: The Project would result in a significant increase in traffic under Cumulative With Project conditions at the study intersections.

Impact 4.N-4: The Project's contribution to future cumulative traffic impacts at freeway mainline segments would be cumulatively considerable.

Impact 4.N-7: The Project would cause an increase in transit demand that could not be accommodated by San Francisco Muni or SamTrans transit capacity.

Impact 4.N-8: The Project would cause an increase in delays or operating costs resulting in substantial adverse effects on transit service levels (i.e., additional buses or trains could be required due to Project transit trips).