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Centennial Celebration

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April 26, 2010

California High Speed Rail Authority
Attn: Dan Leavitt, Deputy Director
Central Valley to Bay Area High Speed Rail Program EIR/EIS
925 L Street, Suite 1425
Sacramento, CA 95814

Subject: City of Burlingame Comments on the Revised Draft Central Valley to Bay Area High Speed Rail Program EIR/EIS

Dear Mr. Leavitt,

Thank you for the opportunity to comment on the California High Speed Rail Authority's March, 2010 Bay Area to Central Valley High Speed Train Revised Draft Program EIR. The City of Burlingame has continued concerns that the revised EIR does not adequately identify, evaluate and address issues regarding the optimal route into the Bay Area. The Authority should continue to make all efforts to analyze alternate routes and/or methods in order to avoid significant adverse impacts to the peninsula for the High Speed Train (HST) alignment.

The City of Burlingame will be directly affected by the project and several of the alternatives, whether through the Caltrain rail corridor or the Altamont pass and the Dumbarton railroad crossing. Burlingame has previously expressed issues related to the project and reiterates the following concerns that need to be addressed when determining the appropriate route.

Route Alternatives – The authority should continue to further analyze terminating the HST in either San Jose or Union City. At these locations there is existing transportation infrastructure to have time coordinated connections to regional rail systems such as BART and Caltrain. These trains can run at similar speeds to the current trains on the same number of tracks. This route alternative would significantly reduce the impacts to the Peninsula, while still providing a way to serve High Speed Rail.

Also the Highway 101 and /or 280 corridors should be adequately reviewed for High Speed Rail through the Peninsula. These existing transportation corridors are already part of the Peninsula infrastructure and would accommodate train service without impacting neighborhoods and businesses. This needs to be thoroughly reviewed and considered as part of the Route Alternatives selection through the EIR process.

Underground (tunnel) and/or Covered Trench through the City of Burlingame –
Additional alternatives for construction of the High Speed Rail system underground through the peninsula should be carefully studied and included in the document. The City prefers the rail line to be either in a tunnel or in a covered trench, to reduce the impacts to the community. Placing

the rail line underground will diminish a visual and physical barrier through the City. This option would significantly reduce and / or eliminate many of the impacts associated with the use of the Caltrain railroad alignment. A tunnel option could also be constructed in specific areas of greatest impact such as narrow right-of ways from North Lane south to Peninsula Avenue. This will greatly reduce impacts to the character of our downtown and residential neighborhoods, while meeting the goals of the High Speed Rail. With respect to financial feasibility, the air rights above the system could be leased to help offset the costs with this option. This preferred design option should be studied thoroughly in the EIR/EIS.

CHSR Project shall not create a visual or physical divide through the community –
The proposed corridor for the CHSR project runs north-south through the City of Burlingame, bisecting major residential areas in the City. Homes begin just south of the existing Millbrae Intermodal station and end at the San Mateo border. In some areas there are residences, parks, several schools and the Caltrain railroad corridor. Burlingame High School and Washington Park are adjacent to the proposed corridor with east-west connections across the corridor to the downtown and the Broadway and Burlingame Avenue Train Stations. Essentially one-quarter of our population lives east of the rail line and the CHSR improvements could adversely divide our city in two. The project shall not disrupt existing services nor create a physical barrier bisecting the city.

All plans shall be consistent with City zoning and General Plan requirements. The existing General Plan and preliminary Downtown Plan encourage high-density housing along transportation corridors. A physical barrier along the rail line will diminish the desirability of living close to the train and decrease property values. The City requests an economic study on the future impacts of the high speed rail service on properties in and around the corridor.

Other impacts to be reviewed in the environmental impact report / environmental impact statement (EIR/EIS) include but are not limited to: emergency vehicle access, aesthetic (visual, lighting, and fencing), noise, vibration, vehicle traffic, pedestrian and bicycle traffic, air pollution, right-of-way impacts and land takings.

Alternatives Review and Impacts - The project shall study and identify all the following options for the City of Burlingame including:

- Underground (tunnel)
- Covered Trench
- Use of an existing Caltrain modified bullet service to serve as a high speed rail connector between San Jose and San Francisco. This option may reduce the impacts to all the Peninsula communities and save significant costs to the CHSR project
- Restoration of Caltrain service at the Broadway station, which Caltrain authorities have identified as an improvement possible with electrification

Property Impacts -The EIR only analyzes the impacts to properties within 50 feet of the HST corridor. The impact due to the HST system such as noise, vibration, and aesthetics will have a much wider reach and effect on properties further from the system. The EIR should clearly analyze the impacts to properties much further from the HST system.

Loss of Property Values – The draft EIR document doesn't identify potential loss of value of properties along the corridor due to noise, vibration, visually unaesthetic berm, retaining wall and aerial viaduct. The EIR should thoroughly study the impacts to property ownership through the potential loss of values, reduction in property taxes as well as its impact to local Government services.

Noise and vibration impacts and mitigation -The revised EIR does not include any additional vibration analysis as requested in the Court's verdict. The impacts of vibration cannot be clearly

understood without the required information. The additional noise and vibration caused by the HST needs should be thoroughly studied, evaluated and addressed. Mitigation measures for noise and/or vibration impacts should be included as integral components of the project. These measures should not create other impacts such as construction of a sound wall that might divide the City and adversely affect the residential character of the community.

Utility impacts - Major utility lines currently cross the railroad corridor throughout the city. They include gravity storm drains and culverts, water lines, sewer mains, signal conduits, and street lights. The environmental document doesn't adequately identify all utilities crossing the railroad tracks that may be impacted by the project. The EIR should identify the utilities in conflict, and identify appropriate mitigation measures acceptable to the City of Burlingame Public Works Department. No City utility must be modified or relocated without an approved Public Works Department Encroachment permit.

In addition, a portion of the railroad corridor carries storm water from seven watershed creek systems including Easton, Mills, El Portal, Burlingame, Ralston, Terrace and Sanchez Creeks, and thus acts as a detention basin during heavy rains and high tides. The proposed project may significantly upset the drainage capacity of the system, and compromise flood protection to the community. The storm drain system must be thoroughly studied and addressed by the EIR to avoid impacts.

Historic Resources – There are two historic train stations listed with the National Historic Register in the City of Burlingame. To the north is the Broadway station, currently a restaurant, and to the south the recently improved Burlingame Avenue Train Station. In addition, there is an historic eucalyptus grove from North Lane to beyond Oak Grove Avenue, on the west side of the tracks (the Franchard Trust Grove). These historic resources need to be preserved and maintained at their current locations.

If future improvements will impact any other existing landscaping elements adjacent to the tracks, the City recommends installing replacement landscaping now to ensure future screening. Landscaping along the corridor has been critically important in reducing visual and aesthetic impacts from the existing rail line and should be maintained with all future construction.

The community participated and spent more than five years in the planning, design, and construction of the new $20.5 million improvements at the Burlingame Avenue Train Station, while respecting the station's historic elements. It is imperative that the EIR clearly analyze the impacts to all of these historic resources.

Construction impacts to residents, schools and businesses – The EIR doesn't adequately identify the sensitive receptors including schools, hospitals and other environmentally sensitive issues. The EIR shall study, identify and mitigate all potential construction impacts to the residents, schools, and businesses in the City. Residents, businesses and emergency services such as Police, Fire and Medical services heavily depend on the existing railroad crossings for emergency access. These railroad crossings must remain open to the public throughout the project construction period.

In addition, the EIR shall also include in its study potential loss of revenue to the businesses from the project construction activities and shall address such impacts.

Downtown business districts – The EIR must take into account the two main commercial districts in the City of Burlingame: Burlingame Avenue and Broadway. Both were developed adjacent to the train tracks when the stations were built. These commercial streets are the heart

of the retail districts for the City. There shall be no impacts to these two vital areas from the proposed project. Existing connections across the tracks to the two downtowns must be seamless and continuous with the proposed project. Also, there shall be no impact to the retail areas during construction.

The City of Burlingame has recently completed a Downtown Specific Area Plan which defines the land use and development adjacent to the railroad corridor. The project EIR doesn't take into consideration the planned development project impacts on the proposed developments, which include rezoning of the commercial areas into mixed use housing immediately adjacent to the railroad corridor. The EIR should study, evaluate and avoid potential project impacts to housing developments.

Construction impacts to existing Caltrain service - The EIR shall demonstrate by engineering studies how the high speed rail line can be built while maintaining and enhancing existing Caltrain service. Residents depend on Caltrain service for transportation to and from work and other activities. This service shall not be interrupted but maintained at all times during construction. In addition, service at the Broadway station must be restored once the Caltrain line is electrified.

The EIR/EIS shall consider how additional side tracks will be used to divert existing rail service during construction. Where and how will temporary shoo-fly tracks be used for phasing construction? Will there be a permanent shoo-fly line in the City of Burlingame at completion of Caltrain and the high speed rail improvements?

Grade Separations - The different potential routes from the Central Valley to the Bay Area would result in various types of grade separations with different types of impacts. The Program EIR/EIS provided little information regarding grade separations within Burlingame. A more thorough analysis of the potential impacts at each roadway crossing should be included. Grade separations on the Caltrain mainline will create impacts because of construction needs, right of way width, historic structures, and existing facilities.

Project coordination with other regional projects and services - The EIR shall include an analysis of the proposed Broadway Interchange improvements. With Broadway as the only access to U.S. Highway 101 in Burlingame, changes to the Broadway rail crossing will significantly impact traffic flows to the interchange and the freeway. There are more than 230,000 vehicles per day along the freeway at this interchange. Roadway impacts, elevation changes, and right-of-way takings all need to be thoroughly reviewed in conjunction with interchange plans being coordinated through Caltrans and the San Mateo County Transportation Authority.

Freight – Burlingame is concerned about freight traffic using the existing Caltrain rail line. Since the rail lines will be grade separated, which allows for faster train times and reduced vehicle and pedestrian conflicts, the lines would be more easily suited for freight. This may lead to increased freight traffic on rail lines that currently have minimal freight use. The potential increase in freight will increase noise and vibration impacts to adjacent residential neighborhoods in Burlingame. These potential impacts should be included in the EIR analysis.

Funding and Ridership – The project intends to use State General Obligation bonds to fund the project. This funding method would create a long-term financial obligation that could impact existing State programs. The current information related to cost/benefit and fiscal impact analysis needs to be revised to provide an accurate picture of the project. The current Business Plan for the project outlines several funding sources including federal grants and private investment. The federal funds have not been secured and a funding source for the private investment has not been identified. The private investment indicates that a guaranteed ridership

would need to be included. This is contradictory to the Proposition 1A language that does not allow a public subsidy of the operation for the project. The Program EIR indicated that an annual ridership number of 88 million passengers were included for cost/benefit purposes. The current Business Plan indicates that the initial phase of the HST system would include 41 million passengers. Both of these estimates appear to be for the Bay Area segment. The apparent reduction in ridership indicated in the Business Plan should be utilized for the Program Level EIR to better understand the funding requirements of the project.

In addition, the EIR should show that all associated project costs, regardless of options chosen by the community. All mitigation measure costs shall be covered by the CHSRA. This requirement includes a covered trench or tunnel option. The EIR should demonstrate that no costs will be incurred by the City of Burlingame for the design, construction or mitigation of impacts with the CHSR project.

Caltrain Service Levels -The EIR assumes two tracks for the HST that would be shared with Caltrain express service and two tracks for Caltrain local service and freight. A recent study on another section of the HST project indicated that the HST tracks could not be shared by another train service. If this is ultimately determined to be true for the Peninsula corridor, Caltrain service would be directly affected and its level of service would be diminished. The current number of tracks for the Peninsula has not been clearly analyzed including the level of service for Caltrain. A study that clearly identifies the required number of tracks for each system and whether the HST system can share tracks with Caltrain, given safety consideration and other factors, needs to be included in the report.

Electrification -The appearance of overhead electric power supply for the trains, including the wires, supporting poles, mast arms and insulations, is a matter of significant concern. Also, the electrification system should be compatible with the proposed Caltrain electrification such that the two systems do not need to be constructed and maintained. The EIR needs to analyze the impacts associated with electrification of the system for all vertical and horizontal alignments including visual, tree impacts, historic resources, noise, vibration, etc.

Caltrain plans for electrification must be included in all options of the CHSR project. The plans must address how the planned Caltrain improvements will be coordinated with the final design and construction of the CHSR project. The two projects need to be reviewed as one in the EIR, to comprehensively address and mitigate the cumulative impacts.

Coordination with adjacent communities – The City of Burlingame has been meeting regularly with the cities of San Mateo or Millbrae to review High Speed Rail plans. Any alignment in these adjacent cities may cause adverse impacts in the City of Burlingame. The EIR shall include the City of Burlingame in the development of options to the north and south of our City limits. No options shall be pursued without City Council approval.

Public input and outreach - The City of Burlingame requests that the EIR provide a transparent process for public input into the project development, planning, design, engineering and construction. CHSRA shall conduct well publicized community meetings that allow time for public comment on a regular basis during all phases of study, design, and construction. A dedicated project manager shall be assigned to deal with project issues in the City of Burlingame. The City of Burlingame requests quarterly presentations by the EIR team to the City Council on the project progress and includes time for community feedback. These presentations shall include updates on the project schedule and timeline for the CEQA/NEPA process, mitigation measures, financing costs, engineering design, and construction.

City review and approval requirements - The City Council shall review and approve all parts of the project within the City jurisdiction. The EIR shall allow for a timely manner for review and approval of all studies, environmental documents, and preliminary engineering plans as part of the EIR process. There shall be sufficient time allowed in the EIR schedule for City review and comments. No work shall be done in City right-of-way without City approval and an encroachment permit.

Soil Contamination - The City is concerned about the documented arsenic found in the soil at Burlingame High School adjacent to the railroad corridor. The source of the soil contamination was discovered to be from the railroad. This area is also next to a public recreational park. The EIR needs to address this issue with an alignment along the existing railroad corridor.

Millbrae HST Station Impacts –

Traffic congestion impact from the new High Speed Rail Station:

The new High Speed Rail station in Millbrae is being proposed to be located near the northern City limits of Burlingame. This will potentially result in increased volume of vehicular trip generation from and to the new station. The City is concerned about the increased traffic in the northern part of the town along California Drive, Rollins Road, Broadway, Trousdale Drive, Murchison Drive and El Camino Real. The EIR should include a detailed traffic study of the existing traffic level of service and the projected increase in traffic demand resulting from the newly proposed station. Further the EIR should identify impacts and appropriate mitigations acceptable to the City. In addition to the above mentioned streets, a detailed traffic study should be conducted at the following intersections:

- Broadway/Rollins Road
- California/Broadway
- California/Trousdale
- El Camino Real/Trousdale
- El Camino Real/Broadway
- El Camino Real/Murchison
- El Camino Real/California Drive

Increased parking demand and spillover effect:

The EIR doesn't appear to have included the need for the parking demand at the new High Speed Rail station. The EIR should include a thorough study of the parking needs of the new station and how those needs will be met. In addition, the project shall not cause any parking spillover effect in Burlingame.

Construction impact and potential right of way taking along California Drive:

The project does not identify the construction impacts and the potential land taking for the new station. The EIR should thoroughly study land requirement for the construction of the proposed station and evaluate its impacts to the street right of way along California Drive, businesses and residences access. In addition, the project should include construction noise, vibration and dust impacts to the residences, businesses, clinics and hospital buildings located near the corridor.

Security issues:

The security requirements for the new station should be thoroughly studied and included in the EIR. Because of the close proximity of the new station to the residential area along California Drive, the City is concerned about the potential impacts on residential properties in the event of a security breach. The EIR should study, identify and address all possible security impacts to the community arising as a result of the High Speed Rail station.

Other Environmental Impacts -The HST project will require the removal of trees, affect view corridors, and construction will significantly impact local traffic circulation. The HST would also

change the residential neighborhood character and downtown business success that defines Burlingame, by introducing a train system that would not fit within the community. These issues need to be clearly understood prior to making a final decision on the best alignment for the project. The current program level EIR/EIS does not provide sufficient detail to allow those affected to understand the potential impacts before a final route is selected.

Finally, the City of Burlingame would reiterate the concerns raised above and the fact that further information is necessary in order to make an informed decision on the appropriate route for High Speed Rail to the Bay Area. The City expects to have these items addressed as part of the revised Final High Speed Rail Program EIR/EIS. The City will continue to participate in the EIR/EIS process to review any impacts and proposed mitigation measures within Burlingame.

Sincerely,

Cathy Baylock
Mayor City of Burlingame

Enclosures: List of Schools, Community Facilities, Potential Sensitive Receptors

cc: City Council
High Speed Rail Authority Board Members
City Manager
Public Works Director
Director of Community Planning
City Attorney