



*The City of Burlingame*  
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*Centennial Celebration*

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August 31, 2010

California High Speed Rail Authority  
Attn: Roelof van Ark, Chief Executive Officer  
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 August, 2010 Revised Final Program Environmental Impact Report for the Bay Area to Central Valley High Speed Train EIR/EIS** *(Sent via email [comments@hsr.ca.gov](mailto:comments@hsr.ca.gov) and followed by hard copy mail)*

Dear Mr. van Ark,

The City of Burlingame has reviewed the Responses to Comments for the Bay Area to Central Valley High-Speed Train, Revised Final Program Environmental Impact Report (EIR), dated August, 2010. We request that the California High Speed Rail Authority not certify the EIR document. The City of Burlingame has continuing concerns that the Revised Final EIR does not adequately identify, evaluate and address issues regarding the optimal route into the Bay Area. The Authority should make all efforts to avoid and address significant adverse impacts to the Peninsula for the High-Speed Train (HST) alignment.

The City objects to the EIR and Responses to comments as follows:

1. **Ridership** – The ridership model which determines the revenue forecast for the project is inadequate and based on flawed assumptions. The University of California at Berkeley's Institute for Transportation Studies, in their June 30, 2010 report, critiqued the project and raised serious questions regarding the basis for the ridership parameters in the EIR that would reduce the differences in ridership between the Altamont and Pacheco Pass alternatives. This has not been adequately addressed in the responses to comments (Standard Response 4). Obtaining the correct ridership projections is critical to the decision making process of the Authority.
2. **Cumulative impacts on a programmatic level** – There are many more impacts now known since the environmental work has continued, but were not included in the updated EIR. For example, sensitive receptors such as medical facilities, schools and community centers were not identified or addressed. The extended length of project construction and resulting cumulative impacts were not evaluated or addressed.
3. **Inadequate studies of alternate alignments** – The EIR states that 21 alignment options were evaluated. However, no detailed information regarding these alignments was provided such as noise, vibration, visual impacts, property values, economic impacts, historic resources, utilities

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and construction disruption impacts. The EIR did not include a comprehensive comparison identifying the benefits and impacts of each of the alternatives prior to the selection of the preferred alignment. In particular, the City objects to the characterization of difficulties described in the document related to U.S. 101 corridor alignment. The document should provide a more thorough comparison of the benefits and impacts of the U.S. 101 corridor compared to the Caltrain corridor.

4. **Physical Barrier** - The City objects to statements in the EIR that the proposed San Francisco to San Jose corridor would not constitute any new physical or psychological barrier that would divide, disrupt, or isolate neighborhoods, individuals, or community focal points. An increased number of trains with greater speeds would be a significant deviation from our current rail system and will most certainly create a new physical divide. Additionally, to facilitate this alignment, an "Embarcadero Freeway" structure along the entire length of the RR ROW will require removal of a significant portion, if not all, of a stand of heritage Eucalyptus trees, will result in permanent defacement of the City's historic train station, will create a permanent shadow on the City's two commercial districts, will cause destruction and deterioration of residential properties along significant portions of the right-of-way and will increase noise levels that will forever destroy Burlingame's quality of life. To equate the current existing visual impact of the Cal Train right-of-way with the proposed 4-track wide, 40 foot high aerial structure of HSR is disingenuous at best and deceitful at worst. These significant impacts have not been addressed in the revised Bay Area to Central Valley program EIR.
5. **Physical and Visual Impacts upon the Historic Burlingame Train Depot** - The Burlingame Train Depot is listed on both the National and California Register of Historic Places as a cultural resource. The City's concerns regarding both physical and visual impacts upon the historic Burlingame Train Depot have not been adequately addressed. Regardless of the ultimate configuration of the California High-Speed Rail lines (i.e. the form of grade separation) there will be impacts upon the iconic depot structure either due to the elevation of train tracks or work within the right-of-way necessary to accommodate other forms of grade separation. The EIR document fails to adequately address potential means of mitigating impacts upon this historic resource; nor does it rationalize how the benefits of the high-speed rail system outweigh the impacts upon this historic resource within the City of Burlingame.
6. **City's comments not adequately addressed** - The concerns stated in my April 26, 2010 letter to the California High Speed Rail Authority, attached hereto, expresses Burlingame's concerns with several of the alternatives, whether through the Caltrain rail corridor or the U.S. 101, Altamont pass and the Dumbarton railroad crossing. The response to comments has not adequately responded to the City's concerns, choosing instead in many instances to simply disagree or to defer to the project EIR. We disagree with the Final Program EIR on all of the issues discussed in this letter and feel there are many unanswered questions that need to be addressed so that the Authority has sufficient information regarding significant environmental impacts sufficient prior to its selection of the final route.

Finally, the City of Burlingame urges the Authority to adequately address these issues to avoid future delays to the programmatic EIR. Further information is necessary in order to make an informed decision on the appropriate route for the High Speed Train to the Bay Area. The City will continue to participate in the EIR process to review any impacts and proposed mitigation measures within Burlingame.

Sincerely,



Cathy Baylock

Mayor City of Burlingame

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Enclosures: April 28, 2010 letter to the California High Speed Rail Authority from Cathy Baylock, Mayor  
City of Burlingame

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

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