



Transbay Transit Center Program

Final Supplemental Environmental Impact Statement/ Environmental Impact Report

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U.S. Department
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**Federal Railroad
Administration**

Final Supplemental Environmental Impact Statement/ Environmental Impact Report

for the

Transbay Transit Center Program

prepared by the

U.S. Department of Transportation Federal Transit Administration

and the

Transbay Joint Powers Authority

pursuant to

National Environmental Policy Act (42 USC 4332), Public Transportation Law (49 USC 53), Section 4(f) of the Department of Transportation Act of 1966 (49 USC 303), National Historic Preservation Act (54 USC 300101 et seq.), 40 CFR 1500-1508, 23 CFR 771, 23 CFR 774, Executive Order 12898, California Environmental Quality Act, PRC 21000 et seq., and the State of California CEQA Guidelines, California Administrative Code, 1500 et seq. FTA may issue a single Final Environmental Impact Statement and Record of Decision document pursuant to Pub. L. 114-94 Section 1304 unless FTA determines statutory criteria or practicability considerations preclude issuance of the combined document pursuant to Section 1304.

APPENDIX A

Responses to Comments on the Draft SEIS/EIR

APPENDIX A RESPONSES TO COMMENTS ON THE DRAFT SEIS/EIR

OVERVIEW TO THE PUBLIC REVIEW AND COMMENTS ON THE DRAFT SEIS/EIR

This appendix contains responses to written comments received on the Draft Supplemental Environmental Impact Statement/Environmental Impact Report (SEIS/EIR) for the Transbay Transit Center Program, which was released on December 28, 2015. In conformance with Section 15088(a) of the California Environmental Quality Act (CEQA) Guidelines, 40 Code of Federal Regulations (CFR) 1503.4 of the Council on Environmental Quality (CEQ) regulations for implementing the National Environmental Policy Act (NEPA), 23 U.S. Code 139, Pub. L. 109-59, Pub. L. 114-94, and Section 1304 of Fixing America's Surface Transportation Act (FAST Act), written responses have been prepared addressing comments on environmental issues received from reviewers of the Draft SEIS/EIR. Written comments were received during the 60-day public review period from December 28, 2015 to February 29, 2016. Several comment letters were received after the close of the public review period; however, the TJPA and FTA are including them in this Final SEIS/EIR. In addition, the Transbay Joint Powers Authority (TJPA) held a public meeting in its offices at 201 Mission Street, San Francisco, on February 10, 2016, to receive comments from the public and interested agencies on the contents, findings, and conclusions presented in the Draft SEIS/EIR. At that meeting, the TJPA received a number of general information requests, plus a few written comments raising environmental issues or disagreeing with the analysis. Responses to written comments received at the meeting are included in this appendix. No oral comments were recorded at the public meeting, because the exchange of information and responses to questions occurred outside the public comment portion of the meeting; speaker cards that were submitted at the meeting are included. Copies of the written comments in their entirety are presented in this appendix.

The responses to comments provide clarification of, elaboration on, and further documentation of the setting, impact analysis, and mitigation measures in the Draft SEIS/EIR. In some instances, the responses have resulted in revisions to Draft SEIS/EIR text; where changes were made to the Draft SEIS/EIR text based on the master responses or individual responses, the appropriate pages within the Final SEIS/EIR are noted. Text revisions are contained in Chapter 2 of the Final SEIS/EIR. These text revisions are intended to clarify the description of the proposed project, refine measures to minimize environmental impacts, and ensure that the project is carried out in a manner consistent with the laws and policies governing the project area and its resources.

The comments or responses presented in this appendix do not warrant a further supplemental NEPA document or recirculation of the Draft SEIS/EIR pursuant to 23 CFR 771.130 and the Council on Environmental Quality guidance found in 40 CFR 1502.9 and 1506.3, since:

- There were no changes to the proposed project that would result in significant environmental impacts that were not previously evaluated, and
- No new information or new circumstances relevant to environmental concerns and bearing on the proposed project or its impacts have been identified that would result in significant environmental impacts not previously evaluated.

Similarly, the comments and responses do not include new information of substantial importance, as defined by CEQA (CEQA Guidelines Sections 15088.5), which shows that the proposed project will have:

- New significant or adverse impacts not disclosed in the Draft SEIS/EIR;
- Impacts that are substantially more severe than disclosed in the Draft SEIS/EIR;

- Feasible mitigation measures or alternatives that are considerably different from those presented in the Draft SEIS/EIR and would substantially reduce a significant or adverse impact of the proposed project but the FTA or TJPA has declined the mitigation measure or alternative.

LIST OF COMMENTERS ON THE DRAFT SEIS/EIR

Table 1 identifies the unique “commenter descriptor” assigned to each comment letter received (i.e., a discrete identifier for the comment author), the author of the comment letter, the date of the comment, and the number of individual comments identified and addressed in each comment letter.

Table 1 List of Commenters on the Draft SEIS/EIR			
Commenter Descriptor	Commenter	Date	No. of Comments
Federal Agencies			
USDOJ	US Department of Interior	February 22, 2016	1
EPA	US Environmental Protection Agency	February 29, 2016	1
State Agencies			
Caltrans	California Department of Transportation District 4	February 3, 2016	9
Caltrans A	California Department of Transportation District 4	February 25, 2016	7
SCH	California Governor’s Office of Planning and Research, State Clearinghouse and Planning Unit	February 4, 2016	1
UCSF	University of California San Francisco	February 29, 2016	19
Local Agencies			
Caltrain	Caltrain (SamTrans)	February 29, 2016	1
CCSF	City and County of San Francisco, Planning	February 29, 2016	5
SFCTA	San Francisco County Transportation Authority	February 29, 2016	31
Individuals and Organizations			
Agid	Bruce Agid	February 29, 2016	1
CCN	Cox, Castle & Nicholson, LLP	February 26, 2016	6
FR	Fox Rothschild, LLP	February 29, 2016	24
Protiva	Linda Protiva	February 29, 2016	4
Lyft	Lyft	February 24, 2016	1
RJR	Reuben Junius Rose, LLP	February 29, 2016	6
Lebrun	Roland Lebrun	February 29, 2016	7
TRANSDEF	Transportation Solutions Defense and Education Fund	February 29, 2016	5
February 10, 2016 Public Meeting (both speakers provided their comments in written form)			
Schmit	Sandra Schmit	February 10, 2016	3
Lebrun	Roland Lebrun – oral comments are included within commenter’s letter of February 29, 2016	February 10, 2016	7

Table 1
List of Commenters on the Draft SEIS/EIR

Commenter Descriptor	Commenter	Date	No. of Comments
Comment Letters received after the close of the Public Review Period			
WHIT	James Whitaker	February 12, 2017	6
CCN	Cox, Castle & Nicholson, LLP	March 6, 2017	6
RJR	Reuben Junius Rose, LLP	March 27, 2017	1

Each of the letters and speaker cards from the February 10, 2016 public meeting in Table 1 were reviewed, and individual comments were identified. Comments from each comment letter were bracketed and numbered in the margin of the letter. The comments are coded using a “commenter descriptor” for each commenter (as listed in Table 1) followed by a number, indicating the bracketed comment number. For instance, comment “Caltrans A-03” is the third comment in the California Department of Transportation District 4 letter dated February 25, 2016.

Below are “master responses” and “individual responses” to comments received on the Draft SEIS/EIR. Master responses were prepared to address comments made by multiple commenters and begin on page 3 of this appendix. Individual responses address each of the bracketed comments in the comment letters and communications listed in Table 1 and begin on page 47 of this appendix. To assist review of the individual responses, each comment letter is reproduced and is followed immediately by responses to the bracketed and numbered comments.

MASTER RESPONSES

The following responses address similar comments on specific topics that were made by multiple commenters. These “master responses” allow for comprehensive responses on particular topics, and provide context, background, and also address the topic of interest. Master responses have been prepared for four comments/topics:

1. Additional Land Use, Development, and Transportation Plans and Projects in the Proposed Project Vicinity
2. Transportation Analysis of Eliminating Train Crossings during the AM and PM Peak Hours along the Proposed Turnback Track South of the Caltrain Railyard
3. Localized Circulation Effects associated with the Intercity Bus Facility
4. Cut-and-Cover Construction Description, Impacts, and Mitigation

Master Response 1 – Additional Land Use, Development, and Transportation Plans and Projects in the Proposed Project Vicinity

Some commenters identified public and private projects in the vicinity of the proposed project that they believed were not discussed sufficiently in the Draft SEIS/EIR. These plans and projects are the Mission Bay South Redevelopment Plan, San Francisco Municipal Transportation Authority’s (SFMTA) Transit Effectiveness Project (TEP, also known as Muni Forward), the University of California San Francisco

Long Range Development Plan (UCSF LRDP), the Golden State Warriors Event Center, and the Railyard Alternatives and I-280 Boulevard Feasibility (RAB) Study (now referred to as the Rail Alignment and Benefits Study).

Additional information regarding these plans and projects is presented in this Master Response to provide more background and context for the proposed project's affected environment and potential impacts. The RAB study is part of an ongoing planning process that is not yet a reasonably foreseeable future project (see pages 2-24 and 3.2-42 of the Draft SEIS/EIR). The information available about the RAB study at the time of the Draft SEIS/EIR publication was provided, and is updated in this Master Response.

Mission Bay South Redevelopment Plan

The Mission Bay Redevelopment Plan zone was delineated on Figure 3.3-3, Project Area Zoning, and the Mission Bay South Redevelopment Plan area was delineated on Figure 3.3-4, Area Plans, of the Draft SEIS/EIR; however, a description of the plan was not included in the Draft SEIS/EIR. The following information is provided to describe the city's visions for future development of this area.

The Redevelopment Plan for the Mission Bay South Redevelopment Project was approved by the San Francisco Board of Supervisors on November 2, 1998, and an amendment was approved on July 9, 2013. The Redevelopment Plan covers the area bounded by Mission Creek to the north, between Seventh Street and the San Francisco Bay on the west and east, respectively, and Mariposa Street to the south. The plan proposes development in the area for residential, hotel, commercial/industrial, retail, open space, public facility, and UCSF uses. The Redevelopment Plan incorporates uses defined in the 1996 UCSF LRDP and conforms to the Central Waterfront Plan, which outlines broad land use objectives and policies for the Central Waterfront, of which Mission Bay South is a part. The Mission Bay South Redevelopment Plan describes all land uses within the plan area, general controls and limitations on development/uses (e.g., building height, number of dwelling units, fees, etc.), and proposed redevelopment actions. The TJPA's proposed additional trackwork south of the Caltrain railyard would be on the western boundary of this plan area.

The Redevelopment Plan also contains several transportation objectives: establishing a functional and efficient street system, accommodating expanded transit to/from/through Mission Bay South, and providing for convenient and safe bicycle use and pedestrian circulation. The area within which the additional trackwork would be located is identified in the Redevelopment Plan for public facilities, which includes railroad tracks and related facilities. Regarding the street system, the plan includes policies to design plan area streets to the minimum scale necessary and in consideration of the layout of surrounding City streets; facilitate truck movements within/through the area; consider the needs of residents, workers, visitors, and service providers when providing parking; and explore opportunities for shared parking. Transit policies focus on coordinating transit stop locations near high-density uses and encouraging transit shelters, and encouraging retail and personal service uses at or near transit stops. Regarding pedestrian circulation, the plan includes policies related to the importance of enhancing the pedestrian environment in street-level building design, providing for public pedestrian-dominated streets with limited vehicular access, ensuring quality street-level environments, and expanding and enhancing pedestrian access to San Francisco Bay and the China Basin Channel. The Redevelopment Plan also includes a recreation and open space policy to provide connections to citywide bicycle, pedestrian and open space networks, where applicable.

Revisions to the Draft SEIS/EIR to incorporate text describing the Mission Bay Redevelopment Plans can be found on pages 2-103, 2-184, 2-187, and 2-188 of the Final SEIS/EIR. In addition, references for the Mission Bay South Redevelopment Plan and UCSF LRDP are included in revisions to Chapter 8 of the Final SEIS/EIR.

San Francisco Municipal Transportation Authority Transit Effectiveness Project/Muni Forward

The SFMTA's Transit Effectiveness Project (TEP) encompasses a service policy framework, service improvements, service-related capital improvements, and travel time reduction proposals. The improvements affect many Muni routes (bus and light rail) throughout the City; the most applicable to the proposed project are improvements to the 22 Fillmore bus route and changes along 16th Street. Along this corridor, the SFMTA plans to reroute the 22 Fillmore to continue along 16th Street to Third Street and along Mission Bay Boulevard between Fourth and Third Streets, Fourth Street between Gene Friend Way and Mission Bay Boulevard, and along Gene Friend Way. Improvements to reduce transit travel time are included for the 22 Fillmore, as well as a midday frequency change from 10 to 7.5 minutes. The TEP EIR was certified March 27, 2014.

Relevant to the proposed project (i.e., the additional trackwork south of the Caltrain railyard), the SFMTA plans a left-turn restriction from eastbound 16th Street to northbound Seventh Street. West of Seventh Street, the bike lanes on both sides of 16th Street would be removed, and new transit-only lanes in each direction would be installed west to Bryant Street. East of Seventh Street, the two existing outside (curbside) automobile lanes would be converted to transit-only lanes in each direction. The SFMTA Board of Directors approved the 22 Fillmore improvements on January 22, 2016. SFMTA anticipates project implementation will start in mid-2016, with striping of the new bike lane on Seventh Street, consolidation of bus stops, and striping of the transit-only lanes. By the end of 2019, more permanent street features such as transit and pedestrian bulbs, traffic signals, and extension of overhead wires will be complete, in addition to painting the transit-only lanes red. These proposed improvements affect the street network, lane configurations, and circulation in the vicinity of the turnback track and maintenance of way (MOW) track proposed by the TJPA.

Revisions to the Draft SEIS/EIR to incorporate text describing the TEP can be found on page 2-123 of the Final SEIS/EIR.

University of California San Francisco Long Range Development Plan

The University of California San Francisco Long Range Development Plan (UCSF LRDP) guides future campus growth and development through 2035 (UCSF 2014). The plan and its accompanying EIR were approved on November 20, 2014. The LRDP encompasses development at three campuses: Parnassus Heights, Mission Bay, and Mount Zion. The 60.2-acre UCSF Mission Bay campus is located within the Mission Bay South Redevelopment area, in the area generally between Third Street (east boundary), Mariposa Street (south boundary), Owens Street (west boundary), and Mission Bay Boulevard South (north boundary). The north and south portions of the campus site are separated by 16th Street, which serves as the primary access street from the west into the Mission Bay area.

Under the previous LRDP (1996) and the 1998 Mission Bay South Redevelopment Plan, the North Campus was approved for 2.65 million gross square feet (gsf) of development, 1.92 million gsf (73%) of which has been built: six research buildings, a campus community center, and 430 housing units. Approximately 1.46 million gsf of new space at the Mission Bay campus is proposed under the LRDP, all of which would be located on the North Campus and includes 458,500 gsf of existing remaining development plus 991,800 gsf of new development. With the 991,800 gsf of new development, development capacity for the North Campus would increase from 2,650,000 gsf to 3,641,800 gsf. Development proposed for the North Campus would be located east of Owens Street (and east of the additional trackwork south of the Caltrain railyard). Uses within the North Campus include research, housing, open space, support, and parking.

The UCSF Medical Center at Mission Bay Phase 1 opened in February 2015 on the South Campus and includes a children's hospital, women's hospital, cancer hospital, and outpatient cancer building. Phase 2 of the Medical Center likely will not be constructed until after 2035, and will be constructed across the Fourth Street Public Plaza. This phase calls for substantial new growth in the Mission Bay area that is south and east of the proposed project.

The proposed realignment of the Fourth and Townsend Station is about 350 feet north of the LRDP North Campus, and the additional trackwork south of the Caltrain railyard is about 650 feet west of the LRDP South Campus.

Revisions to the Draft SEIS/EIR to incorporate text describing the LRDP can be found on pages 2-103, 2-184, and 2-188 of the Final SEIS/EIR.

Golden State Warriors Arena (Event Center and Mixed-Use Development at Mission Bay Blocks 29-32)

The Golden State Warriors Arena was identified as a reasonably foreseeable project in the cumulative project list (see #42 in Table 3.1-1 of the Draft SEIS/EIR). The project consists of constructing a multi-purpose event center and a variety of mixed uses on an 11-acre site on Blocks 29-32 within the Mission Bay South Redevelopment Plan Area. This project site is about one-third mile east and three-quarters of a mile southeast of the following proposed project components: the turnback and MOW tracks, and the realigned Fourth and Townsend Station, respectively. The event center would host the Golden State Warriors National Basketball Association (NBA) team and provide a venue for other events on a year-round basis. The Subsequent EIR for the Arena project was certified on December 8, 2015 (San Francisco Office of Community Investment and Infrastructure 2015). Litigation was filed on January 7, 2016 challenging the City and Office of Community Investment and Infrastructure's compliance with CEQA. In July 2016, the San Francisco County Superior Court ruled that the environmental review of the proposed arena was adequate. That decision was appealed to the Court of Appeal. On November 29, 2016, the First District Court of Appeal ruled that the environmental review was adequate. The California Supreme Court denied review of the case on January 17, 2017, and the case is now concluded. A second lawsuit was filed in Alameda County Superior Court on February 26, 2016, which alleges that the project violates zoning and other planning requirements, but does not allege violations of CEQA, is still pending.

The Mission Bay South Redevelopment Plan designates Blocks 29-32 as Commercial Industrial/Retail use and allows for either principal or secondary uses at the site. Primary uses could include manufacturing; institutions; retail sales and services; arts activities and spaces; office use; home and business services; animal care; wholesaling; automotive; and other uses. Allowable secondary uses include institutions, assembly and entertainment, and other uses. The proposed development would consist of 1,955,000 gsf of development including the event center, office and retail space, and parking and loading area. Up to 225 events per year would be hosted at the event center for functions ranging from approximately 3,000 to a maximum of about 18,500 attendees.

16th Street would be a major ingress/egress route for the Arena project, and would be used as the primary auto access to/from the garage at Illinois Street and the only truck access point to the below-grade loading docks. The 16th Street driveway would be the only event ingress, although the South Street driveway could be used for event egress. Access to and from the office space would be from the 16th Street driveway. The project includes rebuilding 16th Street and extending it to the planned realigned Terry A. Francois Boulevard (SF OCII 2015). The Warriors Arena project was identified as a reasonably foreseeable project in the Draft SEIS/EIR on page 3.1-11, and is also discussed in the updated text regarding traffic impacts from additional trackwork south of the Caltrain railyard under Impact TR-1 on page 2-139 of the Final SEIS/EIR.

Railyard Alternatives and I-280 Boulevard Feasibility Study

San Francisco's Railyard Alternatives and I-280 Boulevard (now referred to as the Rail Alignment and Benefits [RAB]) Feasibility Study is discussed on pages 2-24 and 3.2-42 of the Draft SEIS/EIR. The study has four components:

1. The first component would replace the elevated portion of Interstate (I) 280, either north of Mariposa or 16th Street, with a surface boulevard. This component is intended to improve circulation, create open space, and provide connectivity with the larger area that includes Mission Bay, South of Market (SoMa), Showplace Square, and Potrero Hill.
2. The second component would involve value engineering the Downtown Rail Extension (DTX) alignment by reviewing construction methods and rail alignment. This component is intended to identify ways to reduce the projected costs for the DTX. As of February 2016, three alignment options had been identified for further analysis – Pennsylvania Avenue, Third Street, and the existing alignment.
3. The third component would create a loop that would allow Caltrain and/or high-speed rail (HSR) trains to turn around and return south or to continue eastward to the East Bay, if this crossing becomes available in the future. This component is intended to increase the Transit Center's overall capacity for future rail service. As of February 2016, two loop track options were being evaluated – extending east from the Transbay Transit Center (Transit Center), the loop would use Steuart Street and the Embarcadero or an alignment further east and south in San Francisco Bay to reconnect with the alignment to the south.
4. The final component would reconfigure, relocate, or substantially reduce the existing Fourth and King Caltrain railyard for future development opportunities if railyard operations can be relocated. This component is intended to create new development and urban form opportunities in this area of the city.

Currently, only Phase I (Technical Feasibility Assessment) of the RAB Study has been completed. The City is working on Phase II of the planning process: Alternatives and Refinement, and a draft report was issued in May 2018. The study is now referred to as the Rail Alignment and Benefits Study. Once Phase II is completed, Phase III would result in selection of a Preferred Alternative (estimated timeline is 12-18 months), followed by Phase IV during which environmental review would occur (undetermined timeframe). Depending on available funding and local priorities, Phase V would be implementation of the approved project. According to the City, the recommendations from the RAB study would not be expected to affect the construction schedules of the rail station at the Transit Center or the DTX, and have reaffirmed the DTX alignment previously approved and modified as part of the proposed project. Further, since Caltrain electrification is under construction and scheduled to be complete in 2022, future recommendations from the RAB study would not affect Caltrain capital improvements related to electrification.

As stated in the Draft SEIS/EIR, funding beyond Phase II of the planning process has not been secured to undertake or implement any aspect of this project. The study is early in the conceptual planning phase, is not included in any adopted plan, and would be the subject of separate environmental review by Caltrain or the City and County of San Francisco. As a result, any future redevelopment of the Caltrain railyard, alteration to I-280, or realignment of the already approved DTX alignment would not be considered reasonably foreseeable, and any analysis of this study in the SEIS/EIR would be speculative. For the reasons cited above, the RAB study and its major components also were not included in any of the cumulative analyses for EIRs recently certified by the City, including the Golden State Warriors Arena

EIR, which was certified in December 2015. Because this study reflects a possible long-range vision for this area of the City, although speculative, it is described herein for public disclosure and informational purposes.

Master Response 2 – Transportation Analysis of Eliminating Train Crossings during the AM and PM Peak Hours along the Proposed Turnback Track South of Caltrain Railyard

Multiple comments addressed the additional trackwork south of the Caltrain railyard. These tracks, which are needed to enable trains to move efficiently between the Caltrain railyard and the Transit Center and for maintenance activities, would be within the existing Caltrain right-of-way adjacent to and east of Seventh Street, extending from Hooper Street on the north to Mariposa Street on the south. The comments included the following:

- The analysis of the effects of the at-grade crossing needs to account for street changes that are proposed by other public and private projects in the vicinity;
- The existing and future levels of congestion at intersections in the vicinity need to be consistent with the level of congestion reported in other recently approved CEQA review documents in the vicinity;
- The description of potential significant impacts and the mitigation measures needs to be more detailed; and
- The effects of the at-grade crossings need to consider impacts on service vehicles and emergency vehicles, in addition to automobiles, pedestrians, and bicyclists.

This Master Response discusses this proposed project component; its potential impacts, taking into account near-term and long-term changes to the transportation network; and associated mitigation measures. This information is intended to clarify and refine the description of the proposed project, refine measures to minimize environmental impacts, and ensure that the project is carried out in a manner consistent with the laws and policies governing the project area and its resources.

This Master Response also presents information from Caltrain regarding its storage assumptions and operating parameters. The Draft SEIS/EIR described a scenario in which no Caltrain trains would be stored at the Transit Center, which means trains would use the proposed turnback track approximately 40 times a day to move trains from the Caltrain railyard to the Transit Center in order for Caltrain trains to start their scheduled runs. Caltrain, in consultation with the TJPA and the California High-Speed Rail Authority (CHSRA), has determined that Caltrain trains can be stored at the Transit Center, which would reduce use of the proposed turnback track to 24 crossings per day. Caltrain has also committed not to have any scheduled operational train movements across 16th Street during the AM and PM peak hours in an effort to avoid impacts to traffic circulation. This information takes into account a typical Caltrain schedule and includes the maximum number of trips per day using the turnback track in order to present a conservative analysis of potential impacts. As explained below in this Master Response, the updated Caltrain schedule would reduce the potential traffic impact of the proposed turnback track from a significant CEQA impact (adverse effect under NEPA), as reported in the Draft SEIS/EIR, to less than significant (Impact TR-1) under CEQA (no adverse effect under NEPA) and remove the need for traffic mitigation (New-MM-TR-1.1). Nevertheless, this Final SEIS/EIR acknowledges that traffic impacts could occur should future changes in service requirements and operational plans result in the need to use the turnback track and cross 16th Street during these critical travel periods and includes a revised New-MM-TR-1.1. Use of the turnback track would adversely affect pedestrians and bicycles during off-peak hours, but this impact would be mitigated to a less-than-significant level under CEQA (no adverse

effect under NEPA), as explained in the Draft SEIS/EIR (pages 3.2-31 and 3.2-32), and as discussed further in this Master Response. Use of the turnback track would not adversely affect emergency access for the reasons stated in the discussion of Impact TR-6.

Description of Proposed Project Component and Its Effects – Summary of Information in the Draft SEIS/EIR

The additional trackwork being proposed south of the Caltrain yard includes adding a turnback track and relocating an existing MOW track. The turnback track would be used by Caltrain to move trains stored at the Fourth and King Caltrain railyard into the DTX tunnel and travel to the Transit Center without backing a train onto the mainline, which would be highly disruptive to both Caltrain and CHSRA service. The turnback track would extend from about Hubbell Street on the north to Mariposa Street on the south. The only through street that would be traversed by the turnback track would be 16th Street. The turnback track would not cross streets to the north and south (i.e., Mission Bay Drive and Mariposa Street, respectively).

The MOW track is used to store track maintenance equipment, and is currently located at 16th Street east of the mainline tracks. The proposed project would relocate this track to the west side of the mainline tracks, and the turnback track would be built in the former location of the MOW track. The MOW track would extend from about Hooper Street on the north to a point north of the intersection of Seventh, 16th, and Mississippi Streets; this track would not cross any City streets.

This additional trackwork is described in the Draft SEIS/EIR on pages 2-30 through 2-34, and illustrated in Figure 2-14. The Draft SEIS/EIR was circulated for more than 60 days, from December 28, 2015 through February 29, 2016, which is more than the maximum amount of time provided for in the CEQA Guidelines and NEPA regulations. The public and other public agencies have been given ample opportunity to review and comment on this proposed project component.

As explained in the Draft SEIS/EIR, operating plans for Caltrain service to the Transit Center were still being defined at the time the Draft SEIS/EIR was published. Preliminary information available at that time indicated that the turnback track could be used for crossing 16th Street between 10 to 40 times per day (see page 2-34), of which one crossing during the AM peak period and one crossing during the PM peak period were conservatively assumed for purposes of the Draft SEIS/EIR analyses (see Impact TR-1, page 3.2-21). Based on this assumption, the Draft SEIS/EIR in Impact TR-1 described the following effects:

- Changes to the lane configuration, and particularly the length of turn lanes, at the westbound approach on 16th Street that affect delays;
- Potential queues (cars backing up) as a result of the crossings that affect ingress and egress from 16th Street to loading zones by service vehicles; and
- Additional time for vehicles, pedestrians, and bicyclists traveling along 16th Street to cross Seventh Street, the existing Caltrain mainline tracks, and the additional trackwork.

The Draft SEIS/EIR then identified a mitigation measure, which is described on page 3.2-24 (New-MM-TR-1.1: Modify Signal Operations at the 16th Street Intersection with the Caltrain tracks and Owens Street).

Updated Caltrain Schedule Information

After publication of the Draft SEIS/EIR, Caltrain developed additional information on its operating plan and the use of the turnback track. This information takes into account a typical Caltrain schedule with its planned fully electrified fleet, which is anticipated to commence service in 2020, and the use of the Transit Center by HSR trains. The maximum number of trips per day using the turnback track has been included in order to present a conservative analysis of potential impacts.

Table MR-1 lists the number of one-way trips across 16th Street within five time periods during the day. The first time period is called “AM ramp up” and takes place between 4:02 a.m. and 6:34 a.m. “Ramp up” refers to putting additional trains into service so that there are sufficient trains on the line to meet the peak period timetable frequency of six trains per hour in each direction. The turnback track would be used to move four trains from their overnight storage position in the Caltrain railyard to the Transit Center, where they would enter service. Each train movement would cause two crossings of 16th Street, one moving south out of the Caltrain railyard, and another moving north to the Transit Center. The last “AM ramp up” train would use the crossing at 6:34 a.m. and depart the Transit Center for its first service run of the day a few minutes later. At this point, there would be enough trains in service to provide six trains per hour in each direction. No trains would need to use the turnback between 6:34 a.m. and 9:13 a.m.

Table MR-1 Caltrain Service Levels to Transit Center – Trains Required and Use of the Turnback Track			
At 6 Caltrain Trains/Peak Hr/Direction to Transit Center		With Caltrain Storage at the Transit Center**	
High-Speed Rail Dwells*	Time Period	Trains Required	All Day One-Way Trips (across 16th Street)
40 min	AM ramp up (4:02-6:34)	4	8
	AM ramp down (9:13-10:39)	2	4
	PM ramp up (15:08-16:34)	2	4
	PM ramp down (19:13-20:39)	4	8
	End Service (23:00-24:00)	0	0
Total		12	24
Notes:			
* High Speed Rail (HSR) dwell times define Caltrain scheduled arrival and departure times at the Transit Center.			
** Assumes three Caltrain consists stored overnight and two Caltrain consists stored midday at the Transit Center; the Draft SEIS/EIR assumed no trains stored at the Transit Center.			
Source: Caltrain, April 2016.			

The AM ramp down would begin at the end of the morning commute period. “Ramp down” refers to removing trains from service because train frequencies would be reduced for the midday off peak period. Two trains would be removed from service and moved to the Caltrain railyard for midday storage. Another two trains would be stored at the Transit Center. The turnback track would be used between 9:13 a.m. and 10:39 a.m., therefore, there would be no crossings within the AM peak period. As is the case during the AM peak period, no trains would use the turnback track between the end of the AM ramp down and the beginning of the PM ramp up at 3:08 p.m. The pattern described above would continue through the PM peak period and the evening off peak. There are up to four train crossings that are

anticipated to occur between 3:08 and 4:34 p.m. Thus, one to two crossings could occur between 4 and 4:30 p.m. during the PM peak period, which is from 4-6 p.m., but before the start of the PM peak hour at 4:30 p.m. Assuming conservatively that two crossings were to occur at the beginning of the PM peak period, the total delay would be up to 140 seconds (70 seconds for each crossing), which would be equivalent to two signal cycles/crossings at the intersection.

The critical difference with the updated schedule is a reduction in use of the turnback track, because trains would be stored at the Transit Center both overnight (3 train sets) and during the midday (2 train sets). As a result, fewer trains would need to move from the Caltrain railyard to the Transit Center and vice versa along the turnback track. With this refinement to the storage assumptions and operating parameters for Caltrain, train movements across 16th Street on the turnback track would be lessened by almost 50 percent. Caltrain has also committed to not having any scheduled operational moves across 16th Street during the AM and PM peak hours (7:30 a.m. to 8:30 a.m. and 4:30 p.m. to 5:30 p.m., respectively).

Traffic Effects (pertaining to Impact TR-1 and Impact CU-TR-8 of the SEIS/EIR)

Master Response 1 identifies several public and private plans and projects that alter the existing and future traffic conditions in the vicinity of the additional trackwork south of the Caltrain railyard. Specifically, the SFMTA TEP and the 22 Fillmore Transit Priority Project, the UCSF LRDP, the Golden State Warriors Arena project, and their companion EIRs each describes existing and future conditions along 16th Street, and particularly at its intersections with Seventh Street and Owens Street. A summary of each of these plans and projects is provided in Master Response 1. The Draft SEIS/EIR relied on the Caltrain Peninsula Corridor Electrification Project (PCEP) EIR to characterize conditions with and without the turnback track. The PCEP EIR was used as the basis for the turnback track analysis for the following reasons:

- It evaluates Caltrain movements along the Caltrain corridor, including the segment through the southern part of the City to the Caltrain railyard, and identifies transportation conditions and impacts in the vicinity of the turnback track.
- The time of the data collection for the PCEP EIR (2013) is similar to that for the SEIS/EIR and thus the description of existing conditions for this study intersection would coincide with that of the other 11 study area intersections addressed in the SEIS/EIR.
- The effects of the turnback track on the 16th Street crossing would be in addition to those associated with the PCEP and the PCEP EIR specifically examined the effects of gate downtime for passing trains in deriving the Level of Service (LOS) for the study intersections adjacent to at-grade crossings.

The Draft SEIS/EIR evaluated the additional number of at-grade crossings of trains across 16th Street due to use of the turnback track. As described in Impact TR-1 of the Draft SEIS/EIR, the PCEP EIR identifies that 2020 intersection operations at 16th and Seventh Streets would be at level of service (LOS) F during the AM peak period and at LOS E during the PM peak period without the PCEP project. The PCEP project would worsen those future baseline conditions, and would result in a significant impact in 2020. In 2040, under cumulative conditions with the PCEP, levels of service at the 16th and Seventh Streets intersection would deteriorate further, and would operate at LOS F during the AM peak hour and at LOS E during the PM peak hour. The PCEP EIR identified mitigation measures involving intersection modifications that would reduce the significant project and cumulative impacts to less than significant. Caltrain certified the EIR and adopted the project and the mitigation measures in 2015. The Draft SEIS/EIR acknowledges that the proposed project would increase the severity of the traffic impact

identified for this intersection, and that additional mitigation measures would be needed to reduce the impact to less than significant under CEQA (no adverse effect under NEPA).

The analysis performed in the PCEP EIR did include changes to the street network identified in the SFMTA's TEP and 22 Fillmore Transit Priority Project (in Chapter 4 of the EIR which provides the cumulative analysis), and this information from the PCEP EIR is summarized in this Final SEIS/EIR. The cumulative project list used for the PCEP EIR considered major land development projects that are adjacent to the Caltrain corridor (within 0.15 mile). As a result, the Golden State Warriors Arena project, which is not adjacent to the Caltrain corridor but is farther to the east, was not identified as part of the cumulative project list. This project would have the effect of increasing the number of automobile trips along 16th Street, especially when there is an event at the arena or a baseball game at nearby AT&T Park. Information from the Warriors Arena project EIR is provided below.

Existing and Future Traffic Conditions Identified from EIRs of Nearby Projects. Table MR-2 summarizes intersection levels of service for the AM and PM peak hours reported in four recent EIRs for projects near the turnback track, under existing conditions, existing conditions plus the analyzed project, and future conditions with and without the analyzed project.

The 16th/Seventh Street intersection (which was evaluated in the Draft SEIS/EIR) is already operating at LOS E under existing conditions in the PM peak, according to the Warriors Arena project EIR. Of the four EIRs, the PCEP EIR reports the worst existing AM peak operations at LOS E; the Warriors Arena project EIR reports the worst existing PM peak hour operations, which is also at LOS E (this EIR did not report or evaluate AM peak hour conditions, because the PM peak hour represented the worst-case time period for traffic analysis). Both the TEP EIR and the PCEP EIR report that future conditions would have further deteriorated to LOS F in the AM peak under No Project conditions. For the PM peak under future conditions in 2035 or 2040, all four EIRs report LOS F. The Draft SEIS/EIR relied on the PCEP EIR for existing and future traffic conditions at this intersection. This Final SEIS/EIR updates the existing conditions during the PM peak hour to reflect more current information from the Warriors Arena project EIR.

The intersections of Mission Bay/Seventh Street and 16th/Owens were not analyzed in the Draft SEIS/EIR, because the turnback track would not cross Mission Bay Drive or Owens Street and no project components have the potential to generate additional traffic on these streets, resulting in a delay at these intersections. As a result, these intersections were not expected to be substantially affected by the proposed project. However, information regarding these two intersections is provided below because these intersections were identified in comments on the Draft SEIS/EIR.

- For the Mission Bay/Seventh Street intersection, the Warriors Arena project EIR, which is the most recent of the certified EIRs in the area, determined that the level of service during existing conditions in the PM peak was LOS C. This is the same level of service reported in the UCSF LRDP EIR, which also identifies an existing AM peak level of service of LOS B. Congestion levels would increase with the Warriors Arena project under cumulative conditions, and the intersection would operate at LOS E during the PM peak.
- For the 16th/Owens Street intersection, the Warriors Arena project EIR states that the existing level of service is LOS D in the PM peak. The TEP EIR and the UCSF LRDP EIR report that in the AM peak, the existing level of service is LOS C and LOS D, respectively. This intersection is expected to operate at LOS F in the future AM peak (2035) with the TEP project. The TEP and Warriors Arena project EIRs state that PM peak level of service will be LOS F and LOS E, respectively.

Table MR-2
Intersection Levels of Service from Projects in the Vicinity of the Proposed Project Turnback Track

Location	TEP Final EIR March 2014 (AM/PM)				UCSF LRDP Final EIR August 2014 (AM/PM)			PCEP EIR November 2014 (AM/PM)					Warriors EIR October 2015 (PM Only)		
	E	E + P	2035 NP	2035 + P	E	E + P	2040 + P	E	2020 NP	2020 +P	2040 NP	2040 +P	E	E+P	2040 +P
Mission Bay/Seventh	n/a	n/a	n/a	n/a	B/C	C/D	D/D	A/B	B/B	B/B	B/B	B/B	C	D	E
16th/Seventh	C/C	C/E	F/F	F/F	D/D	D/D	F/F	E/D	F/E	F/E	F/F	F/F	E	F	F
16th/Owens	C/C	C/D	F/C	F/F	C/C	C/C	LTS	B/B	B/B	B/B	B/D	B/E	D	C	E

Notes:

Intersection levels of service are presented for the AM/PM peak hour, except for the Warriors EIR which did not assess the AM peak hour.

Worst case project alternative shown

E = Existing

P = With project proposed in EIR

NP = No project

Sources: SFMTA 2014, UCSF 2014, Peninsula Corridor Joint Powers Board 2015 (Appendix D), SF OCII 2015

Traffic Effects with the Proposed Project. Because there would be no train crossings along the turnback track at 16th Street during the AM and PM peak hours, there would be no effect on traffic delays during the critical periods requiring evaluation by the City’s Traffic Impact Study guidelines. Based on the updated service/operating plan from Caltrain, the peak hour LOS at the intersection of 16th/Seventh Street would remain the same with as it would without the turnback track. As a result, contrary to the CEQA determination in the Draft SEIS/EIR, the turnback track would *not* result in significant traffic impacts at this location during the critical traffic commute period, based on Caltrain’s current commitment not to use the turnback track during the AM/PM peak hours (7:30 a.m. to 8:30 a.m. and 4:30 p.m. to 5:30 p.m.) because Caltrain’s proposed schedule at the Transit Center does not require the use of the turnback track during these peak hours, and because it would avoid impacts to peak hour traffic.

Trains would use the turnback track for an estimated 24 crossings a day, all during the off-peak hours. On a daily basis, the proposed turnback track would increase the cumulative amount of gate downtime for the grade crossing at Seventh Street / 16th Street / Mississippi Street. However, the turnback track would not be in regular use during the weekday AM and PM peak hours, when congestion on the local street network is most severe due to commute patterns. Regular use of the turnback track would be confined to off-peak hours such as weekends or the early morning, midday, and late evening periods on weekdays, when traffic congestion and vehicle queues at the grade crossing are less severe.

The grade crossing is an existing condition that predates the redevelopment of the Mission Bay area, and is currently used by 92 trains per day during a typical weekday. An analysis of gate downtime with and without the turnback track shows that the overall change in gate downtime would be on the order of 28 minutes over the course of the entire day, compared to a daily cumulative down-time of approximately 107 minutes in the existing condition without the turnback track. The additional gate downtime due to the turnback track would not be evenly distributed throughout the day. As shown in Table MR-3, much of the additional gate downtime would occur in the early morning and in the evening, and none would occur in the peak commute hours. The project would have a less-than-significant impact for automobiles, because 28 minutes spread throughout the day would result in some delays but would not affect critical commute periods.

Table MR-3			
Change in Gate Downtime by Time Period with the Proposed Project Turnback Track			
Operation	Time Period	Crossings	Total Delay (min:sec)
AM Ramp Up	4:00 a.m. to 6:35 a.m.	8	9:20
AM Ramp Down	9:15 a.m. to 10:40 a.m.	4	4:40
PM Ramp Up	3:10 p.m. to 4:35 p.m.	4	4:40
PM Ramp Down	7:15 p.m. to 8:40 p.m.	8	9:20
Total		24	28:00

Source: Caltrain, AECOM, 2016.

The use of the turnback track would not contribute to trips or traffic in the existing or future conditions, so that even with long-term growth in the Mission Bay area from the UCSF Long Range Development Plan, the Mission Bay South Redevelopment Plan, and the Warriors Arena project, the proposed project would not have a cumulatively considerable trip generation effect. Use of the turnback track would, however, cause additional delay to traffic on 16th Street when the crossing gates are down. In addition, the Transit Effectiveness Project/Muni Forward improvements for 16th Street would alter the street network and intersections resulting in reduced capacity for automobiles.

According to the PCEP EIR, the projected number of Caltrain trains with electrification and installation of Positive Train Control would increase to 114 per day, and the potential number of high-speed trains could be up to 106 trains per day. Therefore, the gates at the 16th Street crossing would close up to 220 times per day for Caltrain and HSR trains operating along the existing mainline (next to the turnback track) in 2040. Many of these crossings would occur in the AM and PM peak hours. Caltrain has committed that none of the turnback track crossings would occur during this critical commute period. Given the relatively small number of turnback gate closures and the removal of automobile lanes to accommodate the transit-only lanes for the 22 Fillmore Transit Priority project, the additional delays due to use of the turnback track would not be cumulatively considerable.

The cumulative projects evaluated in the analysis have the following effects: increased development/activities that result in more traffic on 16th Street, decreased automobile capacity along 16th Street as existing automobile travel lanes are converted to transit-only lanes, and increased transit reliability as travel lanes are converted to dedicated transit lanes. The overall resulting cumulative traffic effect in terms of level of service and delays would be significant, which is the same conclusion presented in the Draft SEIS/EIR under Impact CU-TR-8. However, the project's contribution to cumulative traffic would be less than cumulatively considerable under CEQA, because the downtime due to use of the turnback track would be 70 seconds per occurrence, or 28 minutes throughout an entire day during the off-peak hours. The 70 seconds of delay would be comparable to typical automobile delay during one signal cycle at a signalized intersection with high volumes and multiple turning movements.

This commitment not to use the turnback track during the AM/PM peak hours by Caltrain is based on current best operating and service assumptions. The SEIS/EIR conservatively assumes that there could be a possibility that Caltrain would propose future changes to service requirements and operational plans that may result in the need to use the turnback track and cross 16th Street during these critical travel periods. Under this scenario, the SEIS/EIR includes a revised New-MM-TR-1.1, which requires that a traffic/train operation analysis be conducted prior to any decision by Caltrain to use the turnback track during the AM/PM peak hours. The purpose of the analysis would be to identify traffic impacts along 16th Street due to Caltrain operations along the turnback track and feasible mitigation measures. If needed, the new measures would include traffic and crossing signal modifications, among other actions, to achieve the performance standard specified in the revised New-MM-TR-1.1. Current references to mitigation for impacts to bicycle and pedestrian circulation and safety contained in the mitigation measure are deleted and are now addressed under New-MM-TR-3.1 (see explanation below under "Pedestrian and Bicyclist Effects" of this Master Response 2). Depending on the circumstances and conditions that exist if and when Caltrain considers use of the at-grade crossing during the AM/PM peak hours, further environmental review pursuant to CEQA and NEPA may be required.

In addition to the above mitigation to address the currently unforeseen use of the turnback track during the AM/PM peak hours, this Final SEIS/EIR includes a new improvement measure /environmental commitment, at the request of the City, to provide for monitoring of the two at-grade intersections with the turnback track and to report on traffic conditions, gate down time, delays, and the performance metrics.

Based on the above information and clarifications regarding the turnback track, changes to the Draft SEIS/EIR text were required and can be found on pages 2-67, 2-68, 2-69, 2-135, 2-138, 2-139, 2-140, 2-141, 2-169, and 2-170 of the Final SEIS/EIR.

Transit Effects (pertaining to Impact TR-2 of the SEIS/EIR)

Transit impacts in San Francisco are analyzed in terms of changes to transit ridership and the available capacity of transit to serve the increased demand and in terms of interference or disruption of existing or planned transit service, in accordance with general City guidance issued to transportation consultants by

City Planning on March 10, 2014. A screenline analysis assumes that there are identifiable corridors or directions of travel which are served by a grouping of transit lines. An individual line would be combined with other transit lines into a corridor and corridors crossing a screenline combined to determine significance. For Muni, which is the primary transit service provider in the vicinity of 16th and Seventh Streets, the San Francisco Planning Department and SFMTA use 85 percent capacity utilization as the performance threshold of significance for identifying transit crowding impacts. For regional providers, the SF Planning Department uses 100 percent capacity utilization as the performance threshold of significance to identify regional transit crowding impacts.

Regarding the first transit significance criterion, the provision of the turnback track would not generate an increase of public transit users, and thus would not contribute to an increase in capacity utilization. As a result, use of the turnback track would have no effect on transit utilization and capacity. Regarding the second transit significance criterion, travel time during the peak hours would not be affected by the proposed turnback track because there would not be train crossings on the turnback track. The turnback track therefore would not adversely affect transit services during the peak commute periods. The additional train crossings, of up to 24 times during the off-peak hours, would, however, increase transit travel time during the off peak hours due to the additional gate downtime when the turnback track is being used. There are currently 317 scheduled trips of the 22 Fillmore bus throughout the day, with a relatively small percentage affected during the off-peak hours when the turnback track is anticipated to operate. Trips along the entire length of the route take 45 to 55 minutes depending on the peak period. The delay of 70 seconds per crossing of 16th Street due to use of the turnback track would be comparable to typical automobile delay during one signal cycle at a signalized intersection with high volumes and multiple turning movements. Nonetheless, the provision of transit-only lanes both west and east of this at-grade crossing as part of the 22 Fillmore Transit Priority Project is expected to enable bus passengers to realize faster and more reliable service than under existing conditions. Table MR-3 indicates that delays could be greatest in the evening after 7:15 p.m., but because of the short duration of interference, the impact to transit operations and headways would be less than significant.

Pedestrian and Bicyclist Effects (pertaining to Impact TR-3 and Impact TR-4 of the SEIS/EIR)

The addition of the turnback track would increase the distance pedestrians and cyclists must travel to cross all three tracks, as described in the Draft SEIS/EIR under Impact TR-3 beginning on page 3.2-29 and under Impact TR-4 beginning on page 3.2-31. This means pedestrians and cyclists traveling along 16th Street would be within the 'track zone' longer than under existing conditions that do not include the turnback track. New-MM-TR-1.1 was identified in the Draft SEIS/EIR to address this impact. This mitigation measure has been revised as a result of updated information from Caltrain, and the proposed project would now not result in significant traffic congestion, unless Caltrain proposes to modify its operational and service plans to use the turnback track during the AM/PM peak hours. A new mitigation measure, New-MM-TR-3.1, is identified to address potentially significant pedestrian and bicycle CEQA impacts (adverse effect under NEPA). The purpose of this mitigation measure is to enable pedestrian and bicyclists to cross the widened stretch of Seventh Street, the Caltrain mainline tracks, and the turnback track safely. The following approaches could be implemented by the TJPA to accomplish this performance standard:

- Adjusting signal timing for the warning devices and adjacent traffic signals.
- Providing sufficient refuge areas for pedestrians and bicyclist to wait while the crossing gates are down.
- Installing a smooth surface in the areas next to and between the rails to reduce tripping hazards and unintended forces on bicycle tires.

These approaches are described in more detail below.

The warning phase before the gates start to come down would be extended to take into account the additional time needed for pedestrians and cyclists to clear the track zone. This signal adjustment is included in New-MM-TR-1.1 (see page 3.2-24 of the Draft SEIS/EIR) and would provide sufficient time for pedestrians and bicyclists to leave the track zone before the oncoming train arrives. Additional information and warning signs could be installed during the time of implementation if determined to be necessary based on the applicable California Public Utilities Commission (CPUC) codes and regulations in effect at that time or as required by the City and County of San Francisco. Relevant information about adjusting the signal timing for pedestrians and bicyclists has been incorporated into New-MM-TR-3.1.

Over an entire day, more people would encounter a train crossing than without the turnback track. The waiting area at both ends of the crossing can be redesigned to ensure that there is sufficient space to accommodate users waiting during gate downtime. The need for these modifications to the intersection, which is assumed for purposes of this analysis, will be revisited based on the analysis to be conducted at the final design stage as stated in the New-MM-TR-3.1. The design of the waiting area will be compliant with the Americans with Disabilities Act (ADA). The crossing surface will be well-maintained to ensure an even surface for safe and comfortable crossing.

Queuing along 16th Street as a result of the proposed turnback track is not expected to result in hazardous conditions for bicyclists and pedestrians. In particular, all motorists would be expected to follow the applicable rules of the road and yield to bicycles and pedestrians when entering or exiting curb cuts along 16th Street. When traffic is stopped due to queues extending from the grade crossing, motorists are not permitted to impede or disrupt bicycle and pedestrian circulation by queuing in or obstructing portions of the public right-of-way such as sidewalks or bicycle lanes. Given these considerations, as well as the magnitude of the increase in train activity and the associated increase in queues and gate downtime at the grade crossing, the proposed turnback track would not substantially increase queueing at this location such that it would result in hazardous conditions for bicyclists and pedestrians.

Based on the above information, text changes to the Draft SEIS/EIR regarding mitigation for pedestrian and bicyclist impacts can be found on pages 2-149 and 2-150 of the Final SEIS/EIR.

Access and Loading Effects on 1700 Owens Street and 1670 Owens Street (pertaining to Impact TR-5 of the SEIS/EIR)

1700 Owens Street. The office and laboratory building at 1700 Owens Street has an off-street freight loading dock with curb cut access along the north side of 16th Street just east of the Caltrain grade crossing at the Seventh Street / 16th Street / Mississippi Street intersection and the aerial structure carrying Interstate 280 (I-280). This location functions as the primary access for large trucks and service vehicles serving 1700 Owens Street.

The curb cut serving the 1700 Owens Street building also serves a privately owned and maintained access road that continues northwest along the eastern edge of I-280, serving various properties in the Mission Bay South Redevelopment Plan area, including the (automobile) parking structure at 1670 Owens Street. Many of the buildings constructed in the Mission Bay South Redevelopment Plan area—such as 1700 Owens Street, the adjacent building at 1650 Owens Street (Gladstone Institutes), and the nearby building at 1600 Owens Street (Kaiser Permanente Mission Bay Medical Offices)—do not have individual accommodations for accessory automobile parking, and parking is instead shared among buildings in stand-alone structures such as the one at 1670 Owens Street.

Currently, the cross-section of 16th Street just east of the curb cut for 1700 Owens Street has two travel lanes and one bicycle lane in each direction (the eastbound bicycle lane is not yet fully improved and

currently ends underneath I-280). The eastbound and westbound directions of 16th Street are separated by a raised median, which prevents left turns into and out of the curb cut for 1700 Owens Street. As a result, this curb cut functions with right-only ingress and egress, meaning vehicles must enter from and exit onto westbound 16th Street. The lane configuration in the westbound direction of 16th Street also transitions at the curb cut to include a right-turn pocket (for right-turn movements onto northbound Seventh Street).

As discussed above, the SFMTA is planning to implement various changes to lane configuration along this stretch of 16th Street as part of the 22 Fillmore Transit Priority Project. In the westbound direction, the outside general-purpose through lane approaching the curb cut would be converted into a transit lane, although this treatment would disappear beginning approximately 50 feet east of the curb cut and continuing west to the intersection with Seventh Street and Mississippi Street.

Although the turnback track would not be used during the weekday AM and PM peak hours, use during off-peak hours would increase the overall daily gate downtime at the crossing (see Table MR-3). Any queues that form at the grade crossing due to use of the proposed turnback track would be temporary and would generally be expected to dissipate within one to two signal cycles following the reopening of the crossing. Vehicles attempting to service the building at 1700 Owens Street, including those attempting to deliver or pickup potentially hazardous chemicals or waste, would continue to have access to the building as they currently do, although there may be a slight increase in delay when attempting to enter or exit the curb cut along 16th Street. The proposed turnback track and any associated congestion and queuing would not, however, preclude access to and from the curb cut. Given the frequency of truck activity at the building's dock (likely on the order of several trips a day), a slight increase in delay entering and leaving the curb cut would not be substantial enough to constitute a significant/adverse impact on local circulation and access for the building or, by corollary, potential accidents of service vehicles routinely transporting hazardous materials to and from these facilities.

If necessary, freight loading or service vehicles (including trucks carrying hazardous materials) traveling to or from the loading dock at 1700 Owens Street would still have alternative access to the building via the privately owned and maintained access road that continues northwest of the dock along the west side of the parking structure at 1670 Owens Street. This road provides direct access to and from Owens Street, allowing these vehicles to bypass most congestion and queuing issues at the grade crossing by using the intersection at 16th Street / Owens Street. Given the roadway width along this route, the majority of vehicles needing to service the building, ranging from contractor pick-up trucks and vans to small and medium-sized trucks, would be able to use this alternative route for access to and from the dock. While entering the dock may require trucks to pull into 16th Street temporarily before reversing into the dock or adjoining area, any large trucks attempting to service the building already must perform similar movements to access the dock or adjoining area. Extremely large trucks would likely not be able to use this alternative route, but such trucks would be unlikely to need access to and from the building except on rare or infrequent occasions and could be scheduled outside of commute periods to avoid congestion on regional and local roadways.

1670 Owens Street. Similarly, the parking structure at 1670 Owens Street would have alternative access available via the private access road, and vehicles entering or exiting the structure would be able to use this route to access the 16th Street / Owens Street intersection to bypass potential congestion and queues at the crossing. The structure has two ingress / egress points—one located at the southwest corner and another at the northwest corner. Both access points would connect to this alternative route via Owens Street. There is sufficient storage capacity between the property line at the curb cut and the structure's southwest access point to accommodate four to five vehicles queued to exit the curb cut. Given the increased train activity and the associated increase in gate downtime at the grade crossing, the increase in the typical queue of exiting vehicles observed at the curb cut would be expected to be on the order of a fraction of a car length (25 feet). Even assuming that spillback queuing effects from the grade crossing would extend from the curb cut and partially impede ingress and egress at this location for the structure,

motorists attempting to enter or exit the structure would still have the option of using the second entrance at the northwest corner and / or traveling north along the private access road and detouring via Owens Street to exit the area.

Draft SEIS/EIR text revisions regarding access and loading effects of the proposed turnback track can be found on page 2-154 of the Final SEIS/EIR.

Emergency Vehicle Access Effects (pertaining to Impact TR-6 of the SEIS/EIR)

Delays for emergency responders can be expected when safety crossing gates are lowered to allow trains on the turnback track to clear the at-grade crossing with 16th Street. Unlike signalized intersections, where emergency vehicles can preempt traffic and pass through an intersection, emergency responders cannot cross the grade crossings when the gates are down. As a result, emergency access would be hindered. Emergency vehicle response can occur anytime during the day. Nevertheless, AM/PM congestion that may be attributable to gate downtime is important for emergency responders to understand in order to plan their routes. Delays could occur if the emergency response vehicle were actually trying to pass through at the same time as the gates were coming down because of a passing train.

Given the 24 crossings of the at-grade crossing at 16th Street as Caltrain trains move between the Transit Center and the Caltrain railyard, all during off-peak hours, such delays are likely to be rare but not unexpected. Whether such delays are considered significant and could result in “inadequate emergency access,” which is the threshold of significance that has been identified to evaluate the proposed project’s impact on emergency vehicle access and response, is a function of how many and how frequently delays may occur, and whether emergency responders can avoid the gate downtime at 16th Street.

Regarding the first point, Caltrain would not have additional trains crossing 16th Street during peak hours due to the turnback track. As a result, the conclusion of Impact TR-6, which states that emergency vehicles would not be significantly impacted (no adverse effect under NEPA) due to the project, continues to be accurate. With Caltrain train storage at the Transit Center, use of the turnback track would be reduced from up to 40 crossings per day, as reported in the Draft SEIS/EIR, to 24 crossings per day, all during the off-peak hours. The gate downtime of 70 seconds for each train crossing on the turnback track would result in an additional 28 minutes of delay at this intersection spread throughout the non-peak hours of the day. The per-occurrence delay of 70 seconds would be comparable to typical peak hour congestion and comparable to typical automobile delay during one signal cycle at a signalized intersection with high volumes and multiple turning movements. By comparison, Table MR-4 shows the downtime at the 16th Street intersection due to existing and future Caltrain service. These gate downtime estimates are for the peak hours only, and provide an indication of conditions that would exist in 2020 and 2040 regardless of whether there is any turnback track use.

In summary, delays can be expected at the 16th Street at-grade crossing with the turnback track, even under existing conditions. Given this potential, emergency vehicles often identify and use multiple routes depending on the time of day and traffic congestion. Peak period congestion typically does not result in substantial delays because emergency vehicles have the right-of-way and can use multi-lane arterials for access, as well as transit-only lanes or other vehicle-restricted lanes. In addition, emergency response vehicles have way-finding equipment that can help select the fastest route. While the precise schedule for the number of crossings by time of day are not known now, the number of crossings per period of day is known and can be accounted for by the emergency responders.

Table MR-4
Changes to Gate Downtime by AM/PM Peak Hour and Time Horizon (in minutes:seconds)

Existing AM	Existing PM	2020 NP AM	2020 P AM	2020 NP PM	2020 P PM	2040 NP AM	2040 P AM	2040 NP PM	2040 P PM
10:30	8:06	10:30	11:39	8:06	11:38	10:30	11:45	8:06	11:45

Source: PCEP EIR January 2015.

Notes:

Existing AM/PM peak hour reflects gate downtime, derived empirically from Caltrain records, for 2013.

2020 NP AM/PM peak hour and 2040 P AM/PM reflect gate downtime under No Project conditions (i.e., no implementation of electrification project and Positive Train Control).

2020 P AM/PM peak hour and 2040 P AM/PM reflects gate downtime under Project conditions (i.e., implementation of electrification project and Positive Train Control).

The emergency room and urgent care center for the UCSF Children’s Hospital are located at the southern end of the medical center. Access to these facilities is directly from Mariposa Street. Mariposa Street has been improved as part of the UCSF Medical Center Phase 1 development, which greatly improved the access to the emergency room and urgent care facility. As shown in the figure below, emergency vehicles and other persons heading to these facilities can use Mariposa Street as a primary access route now that it has been widened to five lanes and the intersection with Fourth Street has been signalized. Patients, visitors, and employees can use the center left-turn lane on Mariposa Street to gain direct access from the intersection with Fourth Street. The purple lines in the figure indicate that the travel path and length for emergency responders going to the emergency drop-off by crossing Seventh Street and the Caltrain tracks, turning south (right) on Owens Street, and then proceeding east (left) on Mariposa Street to the hospital would be identical for emergency responders turning south (right) onto Mississippi Street if the gates were down, and then east (left) on Mariposa Street to the hospital. In addition, access to the emergency room and urgent care center from I-280 is being enhanced with signalization of the northbound off-ramp at Mariposa Street. With Owens Street now connected to Mariposa Street, there is another access route to the UCSF Medical Center complex from Mariposa Street, relieving the reliance on 16th Street. The added delay during off-peak hours due to the proposed turnback track would, therefore, have a less than significant impact under CEQA (no adverse effect under NEPA) on emergency vehicles because there are alternate routes available.

Notwithstanding the access improvements along Mariposa Street, 16th Street will continue to be used for access to the emergency room and urgent care facility. The planned 22 Fillmore Transit Priority Project will provide transit-only lanes on 16th Street. These lanes are expected to have fewer vehicles than the adjacent automobile lanes and would not have any turn restrictions. These less heavily trafficked transit lanes can be used by emergency vehicles if necessary. Furthermore, drivers must comply with the California Vehicle Code Section 21806 that requires drivers to yield right-of-way to authorized emergency vehicles; drive to the right road curb or edge, stop and remain stopped until the emergency vehicle has passed.

Personnel from the police and fire stations, located at Public Safety Building on Third Street between Mission Rock and China Basin Street can use Third Street and Fourth Street to access the hospital without being affected by the turnback track. Similarly, they can access US 101 and I-280 via Third Street and Fourth Street to Bryant Street without being impacted by the turnback track. Nevertheless, the additional delay of 28 minutes during the course of the day may require emergency vehicles to use access routes other than 16th Street. Alternate routes are available, such as using Missouri, Connecticut or Arkansas Streets to divert from 16th Street to Mariposa Street. Hubbell, Irwin and Carolina Streets can be used to divert from 16th Street to Mission Bay Drive. Therefore, delays on 16th Street would not result in a

significant/adverse impact on emergency response, because the delay would be spread throughout the day and alternate routes are available.



Revisions to Draft SEIS/EIR text regarding emergency vehicle access can be found on pages 2-155 and 2-156 of the Final SEIS/EIR.

Master Response 3 – Localized Circulation Effects associated with the Intercity Bus Facility

Some commenters provided comments about circulation at the east end of the Transit Center in the vicinity of the proposed intercity bus facility. This Master Response also addresses comments regarding traffic flow and circulation, pedestrian and bicycle movements, and ingress and egress for residents, visitors, and others at the Millennium Tower located at 301 Mission Street.

Description of Relevant Facilities

The proposed intercity bus facility would be on land currently occupied by the back (south side) of the 201 Mission office tower, on a block bounded by Mission Street to the north, Howard Street to the south, Main Street to the east, and Beale Street to the west, and constructed above the proposed eastward extension of the Transit Center train box. For the purposes of this discussion, the South of Market street grid has been defined according to standard cardinal directions, with numbered streets (e.g., First Street, Second Street, etc.) and parallel streets defined in the north–south orientation and Market Street, Mission Street, Howard Street, and parallel streets defined in the east–west orientation.

Opposite the proposed intercity bus facility (to the west) across Beale Street, is the Transit Center, which includes a street-level bus plaza. The Transit Center was approved in 2005 and opened in August 2018, although the Transit Center is temporarily closed for repairs. Like the proposed intercity bus facility, the

Transit Center occupies a portion of the block bounded by Mission Street to the north and Howard Street to the south. The bus plaza is on the street level of the Transit Center and extends from Beale Street to the east and Fremont Street to the west. The bus plaza, as part of the Transit Center, is shared by Muni and other transit providers, and has one-way ingress from southbound Beale Street and one-way egress onto northbound Fremont Street.

The Millennium Tower at 301 Mission Street occupies the northern one-third of the block containing the bus plaza, and is northwest of the proposed intercity bus facility. The Millennium Tower features an internal east–west access road that spans the entire length of the southern edge of its site between Fremont and Beale Streets and serves a porte-cochere for the building. This road accommodates two-way vehicle access (ingress and egress) at both Beale Street and Fremont Street.

Relationship of the Intercity Bus Facility to Other Projects and Environmental Documents

The street-level bus plaza is part of the original Transbay Program, which was analyzed in the 2004 FEIS/EIR, approved as part of the Transbay Program in 2005, and is now operational. The Draft SEIS/EIR analyzes proposed changes to the Transbay Program. Because no changes to the bus plaza are proposed, it is not analyzed in the Draft SEIS/EIR. As described in Section 2.2.2 of the 2004 FEIS/EIR, the bus plaza includes a traffic signal to facilitate bus egress from the bus plaza onto Fremont Street.

Comments on the Draft SEIS/EIR to evaluate potential effects on ingress and egress for the Millennium Tower associated with the street-level bus plaza—including requests to estimate the anticipated bus volumes entering and exiting the bus plaza during the AM and PM peak hours; to assess or mitigate the effects of pedestrian traffic generated by the Transit Center on ingress or egress for the Millennium Tower; and to improve access into and out of the Millennium Tower along Fremont Street or Beale Street due to the proximity of the bus plaza—are not relevant to the analysis in the SEIS/EIR because this document examines the effects of the proposed project refinements and new information and new circumstances. The bus plaza is not a project refinement, and is not new information or a changed circumstance, because it has been constructed and is already operating. FTA Standard Operating Procedure No. 17 regarding Re-Evaluations and Supplemental Documents, issued August 2016 by the Office of Planning and Environment, states that impact areas or project elements that are unchanged (as is the case for the bus plaza) do not need to be addressed in a supplemental document. Therefore, no further response is necessary regarding the effects of the bus plaza. As noted above, the street-level bus plaza and the changes to the surrounding streets (e.g., transit-only lanes, changes in lane configurations, and changes in direction of traffic flow) are not a part of the TJPA proposed project that is analyzed in the Draft SEIS/EIR.

The Transit Center District Plan (TCDP), which was approved by the City in 2012, includes changes to the street network in the vicinity of the Transit Center, including several changes associated with the street-level bus plaza. As described in Section II.D of the Transit Center District Plan and Transit Tower Final Environmental Impact Report (Planning Department Case No. 2007.0558E and 2008.0789E; State Clearinghouse No. 2008072073) (Certified May 24, 2012), these changes include new transit-only lanes along Beale Street from Market Street south to the southern edge of the bus plaza and along Fremont Street from Howard Street north to Mission Street, and widened sidewalks along Beale, Main and Spear Streets. To enhance the pedestrian environment and public realm, Objective 3.4 of the Plan emphasizes the importance of streets and sidewalks as the largest component of public open space in the Transit Center District. Key policies to guide attainment of this objective include widening sidewalks by providing space for necessary infrastructure, amenities, and streetscape improvements; facilitating pedestrian circulation by providing sidewalk widths that meet the needs of projected pedestrian volumes and provide a comfortable and safe walking environment (typical sidewalk in the district should be at least 21 feet in width); and extending the Living Streets treatment to create linear plazas along Beale, Main, and Spear Streets (between Folsom and Market Streets). Objective 3.5 restricts curb cuts to

increase pedestrian comfort and safety. Within the district, curb cuts would not be allowed along Mission Street, and discouraged along First and Fremont Streets.

The TJPA's 2004 FEIS/EIR and the City's 2012 Transit Center District Plan and Transit Tower Final Environmental Impact Report considered the effects of these proposed changes in conjunction with other reasonably foreseeable future changes to the transportation network and land use / development patterns in the surrounding area. In particular, the analysis of cumulative impacts described in these documents considers the effects of planned and proposed development projects in Rincon Hill and the Transbay area, as well as other changes. Potential impacts to traffic, transit, bicycle, and pedestrian conditions as a result of these changes were disclosed in these documents, which have already been certified and approved. In particular, the 2004 FEIS/EIR evaluated localized impacts around the Transit Center associated with both the infrastructure and redevelopment components of the Transbay Program, including effects on traffic operations (intersection LOS), transit operations (bus access and circulation), pedestrian conditions (intersection corner and crosswalk LOS), and bicycle conditions, as well as the effects of construction-related activities such as street closures. The 2012 Transit Center District Plan and Transit Tower Final Environmental Impact Report evaluated potential impacts associated with additional changes to land use controls and proposed improvements to the streetscape and multi-modal circulation in the vicinity of the Transit Center, as well as impacts associated with the adjacent Transit Tower development. The analysis evaluated several topics related to transportation and circulation, including impacts to traffic operations (intersection and freeway ramp LOS), transit operations (bus circulation and transit vehicle travel times), pedestrian conditions (sidewalk and intersection corner and crosswalk LOS), and bicycle conditions (bicycle circulation), as well as construction-related impacts.

In contrast, the Draft SEIS/EIR focuses on potential effects specific to the TJPA proposed project, which consists of refinements to the DTX, other transportation improvements such as the proposed intercity bus facility, and adjacent land development such as the potential residential or mixed use development above the intercity bus facility. The Draft SEIS/EIR evaluates the potential impacts associated with the intercity bus facility, which is a separate and independent facility that has been included as a component of the proposed project because it would further the purpose and need to enhance local and regional transit connectivity. The bus operators, including Greyhound, were originally proposed to be at the Transit Center, along with Alameda-Contra Costa Transit District (AC Transit), but due to changes in programming and design at the Transit Center, these bus operators need to be accommodated elsewhere. The proposed intercity bus facility, which is analyzed in this SEIS/EIR, would provide a facility for these operators conveniently linked to the Transit Center.

The following subsections summarize and clarify the analysis in the Draft SEIS/EIR regarding localized circulation effects associated specifically with the intercity bus facility.

Localized Circulation Effects

Bus Activity. Potential localized circulation effects associated with the intercity bus facility would generally be proportional to the amount of bus activity expected at the facility. As described in Section 2.2.2 of the Draft SEIS/EIR, the proposed intercity bus facility would provide berths for 10 buses. The exact number of buses using the terminal will depend on the schedule of HSR services at the Transit Center and other factors. Because existing intercity bus operators at the Transbay Temporary Terminal (Amtrak and Greyhound) have not yet developed specific plans to enhance or modify service in conjunction with the proposed intercity bus facility, a reasonable estimate of up to 10 buses per hour entering and exiting the intercity bus facility during the weekday AM and PM peak hours was assumed, as discussed in Section 3.2, Transportation, of the Draft SEIS/EIR (see Impact TR-1). Assuming bus schedules would be coordinated with the arrival and departure of HSR services at the Transit Center, the level of bus activity would be equivalent to approximately five buses for each combined arrival and departure (assuming two HSR arrivals and departures an hour, as reported by Caltrain in the conceptual

schedules for blended Caltrain and HSR service for the PCEP) or approximately two to three buses for each combined HSR arrival and departure (if HSR service were more frequent at four arrivals and departures an hour).

Traffic Circulation Effects along Beale Street. Bus activity at the proposed intercity bus facility would not result in significant/adverse impacts to traffic circulation along Beale Street, considering the thresholds described in the Draft SEIS/EIR, beginning on page 3.2-12. Bus activity along Beale Street related to the proposed intercity bus facility would consist of buses exiting the facility and turning left (south) onto Beale Street. This movement would not be expected to cause queuing effects (traffic backing up along Beale Street) because buses would be exiting the facility and entering the one-way southbound traffic flow along Beale Street. Under this egress-only design, bus queuing would be confined within the intercity bus facility.

Queuing along Beale Street would potentially be an issue if ingress into the intercity bus facility were provided from Beale Street (which is not proposed), in which case buses would need to yield to bicycles in the adjacent bicycle lane (as proposed under the Public Realm Plan of the TCDP) and pedestrians in the sidewalk crossing the intercity bus facility's driveway entrance. Because the access point along Beale Street would be for egress only, however, there would be no potential for buses to back up and impede traffic along Beale Street and any bus queuing would be confined within the intercity bus facility.

There may be localized circulation effects due to the proximity of the egress from the intercity bus facility to the ingress for the street-level bus plaza, but these effects would be minimal because the intercity bus facility and the street-level bus plaza would be located on opposite sides of Beale Street and buses would be moving in opposing directions (buses would be leaving the intercity bus facility, but entering the street-level bus plaza). Based on the roadway changes proposed under the TCDP and the Third Addendum to the 2004 FEIS/EIR (see description in Table 2-2 of the Draft SEIS/EIR), there would be a total of three travel lanes along Beale Street, which would provide physical separation between these two bus flows and reduce the potential for conflicts and associated effects to traffic circulation along Beale Street.

Net Change in Traffic Activity. While the intercity bus facility would generate some level of bus activity, construction of the above-ground intercity bus facility and below-ground extension of the train box would require the removal of existing automobile parking and office space on three levels of the podium structure of the existing building at 201 Mission Street. The net travel demand during the weekday AM and PM peak hour associated with these various changes, and the resulting effects on intersection LOS at nearby intersections, are minimal.

As summarized in Table 3.4-16 of the Draft SEIS/EIR, construction of the above-ground intercity bus facility and below-ground extension of the train box would require the removal of 48 existing off-street (automobile) parking spaces and the demolition of approximately 10,266 square feet of office space. As shown in Table 3.2-8 of the Draft SEIS/EIR, the proposed adjacent land development at the intercity bus facility would generate less overall travel demand than the existing office use and parking spaces. There would be a net reduction of 10 vehicles during the weekday AM peak hour and 12 vehicles during the weekday PM peak hour from the proposed adjacent land development assuming a residential development, or 9 vehicles during the weekday AM peak hour and 10 vehicles during the weekday PM peak hour assuming an office development.

With the bus activity at the proposed intercity bus facility (up to 10 buses per hour in both the inbound and outbound directions) as described above, the net increase in traffic activity during the weekday AM and PM peak hours would be less than 10 vehicles per hour, because there is already some amount of intercity bus activity in the area associated with Amtrak and Greyhound services. This magnitude of change in traffic activity would have a negligible effect on the existing traffic volumes on the local

roadway network during the weekday AM and PM peak hours, as reported in the Draft SEIS/EIR in Impact TR-1.

Bus Activity Effects on Vehicle Ingress and Egress for Millennium Tower. Based on the assumed bus activity described above, the Millennium Tower could experience some interference at its ingress and egress points as a result of the proposed intercity bus facility. These effects would not result in a significant/adverse effect on traffic operations or create a hazardous condition, however, because the intercity bus facility would be located on the opposite side of Beale Street (east side) from the Millennium Tower (west side), and activity at this proposed facility along Beale Street would consist entirely of buses exiting the facility and continuing onto southbound Beale Street.

As proposed in the TCDP, the segment of Beale Street, from Mission Street south to the southern edge of the street-level bus plaza for the Transit Center, would have two general-purpose travel lanes and one curbside (right-side) transit-only lane, as well as a bicycle lane along the east side of the street (City and County of San Francisco 2011). This lane configuration provides a physical separation of approximately 38 to 40 feet between the two curbs along the east and west side of Beale Street. The Millennium Tower access and proposed intercity bus facility egress would also be offset along the axis of Beale Street, with the latter at least 10 to 20 feet south of the former along Beale Street.

Given the total width and capacity of the roadway (three total travel lanes), the physical separation of the Millennium Tower access and the intercity bus facility egress, and the expected level of bus activity at the intercity bus facility, conflicts would not be expected between these two traffic flows such that ingress and egress for Millennium Tower residents would not be adversely or significantly affected considering the thresholds described in the Draft SEIS/EIR, beginning on page 3.2-12. In general, there would be gaps in traffic flow along Beale Street with sufficient length and frequency to allow for safe egress by Millennium Tower residents and intercity buses without substantial conflicts. The traffic signal at the Mission Street / Beale Street intersection (to the north of these access points) and pedestrian activity in the south crosswalk at this intersection would help to control and create gaps in the oncoming traffic flows from southbound Beale Street and from both directions of Mission Street, respectively.

Physical Changes to Beale Street. The proposed changes to the Transbay Program analyzed in the Draft SEIS/EIR do not include any additional modifications to the roadway configuration (travel lanes, transit-only lanes, bicycle lanes, etc.) along Beale Street, Fremont Street, or any other street near the Millennium Tower that were not already approved by the City in the TCDP. As discussed above, the TCDP includes modifications to the segment of Beale Street adjacent to both the Millennium Tower and the intercity bus facility, resulting in a cross-section that has two travel lanes and one curbside (right-side) transit-only lane. These changes are primarily intended to facilitate access to and from the street-level bus plaza, and are not designed specifically for the proposed intercity bus facility, although they would not preclude bus ingress into and egress out of the intercity bus facility. None of these changes would preclude or modify access for the Millennium Tower along Beale Street. Hence, these changes to the street network to accommodate local circulation around the Transit Center are part of the City's TCDP.

As illustrated in Figure 2-15 of the Draft SEIS/EIR, the proposed intercity bus facility would modify portions of the adjoining sidewalks along the east side of Beale Street and west side of Main Street to accommodate bus turning movements into and out of the facility and provide safe, adequate, ADA compliant pedestrian circulation at the facility. However, no changes to the curb or sidewalk are proposed along the west side of Beale Street or along any section of sidewalk immediately adjacent to the Millennium Tower site other than the changes in the TCDP. As indicated in Figure 2-15, berths at the proposed intercity bus facility would be angled and oriented for bus ingress from Main Street and egress onto Beale Street.

Pedestrian Activity Effects on Vehicle Ingress and Egress for Millennium Tower. Pedestrian activity associated with the proposed intercity bus facility would be expected to consist of passengers primarily transferring between regional and long-haul intercity buses at the facility and connecting modes (primarily Caltrain and HSR, but potentially other transit operators) at the Transit Center. As indicated in Figure 2-15 of the Draft SEIS/EIR, the proposed intercity bus facility would include escalators, elevators, and stairwells to connect to the (below-grade) lower concourse level of the Transit Center, where passengers would have direct access to and from the train platform level. In addition, passengers would be able to connect directly to Bay Area Rapid Transit (BART) and San Francisco Municipal Transportation Agency (Muni) service on Market Street through the proposed underground pedestrian connector, which would link the Transit Center with the BART/Muni Embarcadero Station. For these reasons, the majority of pedestrian activity associated with the intercity bus facility would have little effect on the streets adjacent to or in the immediate vicinity of the intercity bus facility, including any sections of sidewalk adjacent to vehicle ingress or egress points for the Millennium Tower.

Intercity bus facility passengers connecting with services other than BART, Muni Metro, or operators inside the Transit Center would generally represent a minority of the total passenger activity at the proposed intercity bus facility and would not have a significant effect on Millennium Tower access. Passengers transferring between the intercity bus facility and the street-level bus plaza could use a mid-block crosswalk across Beale Street, and would have a negligible effect on vehicle ingress or egress for the Millennium Tower, because the passengers would be crossing south of the Millennium Tower access and would not be using the west sidewalk along Beale Street in front of the Millennium Tower access. Similarly, passengers transferring between the proposed intercity bus facility and other connecting transit—such as surface transit along Mission Street, Market Street, or other streets or underground Muni Metro or BART trains along Market Street—would be expected to use the east side of Beale Street or west side of Main Street (if they did not use the proposed underground pedestrian connector), and, thus would have a minimal effect on the west side of Beale Street, where the vehicle ingress or egress is located for the Millennium Tower.

Based on the above information and clarifications regarding the intercity bus facility, Draft SEIS/EIR text revisions regarding the intercity bus facility can be found on pages 2-96, 2-97, 2-142, 2-144, and 2-150, of the Final SEIS/EIR.

Reference

City and County of San Francisco. 2011. TCDP Transportation Impact Study – Final Report. Prepared by AECOM, September 2011.

Master Response 4 – Cut-and-Cover Construction Description, Impacts, and Mitigation

Multiple comments addressed cut-and-cover construction and the potential impacts that could result from this construction method. This Master Response describes the cut-and-cover construction method in more detail; its potential impacts to a variety of resources; and associated mitigation measures. This information is intended to clarify the sequence/timing and street level effect of the cut-and-cover construction method, and summarize the impacts of cut-and-cover construction and the related mitigation measures, which are discussed throughout the Draft SEIS/EIR by resource topic.

Description of the Cut-and-Cover Construction Method

Cut-and-cover construction is a well-known and widely used construction method for underground transit systems, water supply and wastewater collection and distribution lines, and other below-ground utilities and facilities. The extent of cut-and-cover construction for the Downtown Rail Extension (DTX) is approximately 3,000 feet along Townsend Street, between Sixth Street and Clarence Place, about 700 feet

along Second Street for the widened throat structure, and about 800 feet along Beale Street for the underground BART/Muni pedestrian connector, and was analyzed in the 2004 FEIS/EIR. Design of the DTX advanced to Preliminary Engineering (or roughly 30 percent of final design plans) in 2010 and was based on the 2004 FEIS/EIR, a 2006 Final Tunnel Evaluation Report, and Geotechnical Interpretive Reports for tunnel design and for cut-and-cover design. The segments of the alignment proposed for the cut-and-cover construction method versus a mined tunnel method are based on these studies, and specifically reflect available information on considerations such as the corridor's geology, rock and soil properties, and groundwater data; the depth of construction; and construction cost, schedule, sequencing, and staging. As further investigations and design are performed, the plans for the cut-and-cover versus mined tunnel will be refined. This process of ongoing refinements is typical for large infrastructure projects. As an example, the TJPA prepared a Tunnel Options Study Report dated November 7, 2017, as amended, in cooperation with SFCTA, which has identified feasible options to reduce the extent of cut-and-cover construction that should be studied further in order to examine increasing the extent of the tunneling, as feasible, based on best engineering practice and reasonable cost (see discussion at the end of this Master Response 4).

A description of the cut-and-cover construction method is provided on page 2-8 of the Draft SEIS/EIR. Figure 2-2 indicates where this method is proposed along the DTX alignment, primarily along Townsend Street and along Second Street for the widened throat structure. A more detailed description of the cut-and-cover construction method is provided in Section 5.20, Construction Staging and Methods, of the 2004 FEIS/EIR, which is incorporated by reference into this SEIS/EIR. The summary of cut-and-cover construction, below, relies extensively on information in the 2004 FEIS/EIR.

Concerns about the use of cut-and-cover construction techniques, as expressed in comments on the Draft SEIS/EIR, primarily relate to potential surface disruptions to traffic flow and to pedestrian and bicyclist circulation, loss of access to businesses and residences, and settlement of nearby buildings. The preferred approach to constructing the DTX alignment, including the Fourth and Townsend Station, would be "bottom up;" however, traffic decking would be immediately installed as described below, and the construction would be phased and sequenced in order to permit traffic movements, circulation by bicycles and pedestrians, and property access to resume as quickly as possible. The proposed construction approach involves cutting open the street surface, installing supports to protect the excavated area, and then decking or covering the opening, so that street level activities can be restored and construction can continue.

Prior to construction, which is described step-by-step, below, specific studies and recommendations to avoid or minimize potential impacts with this construction method will be undertaken. They include:

- Traffic control plans to identify truck and equipment movements, construction staging areas, lane closures, detours, directional and safety warnings, means to maintain access to properties, means to allow safe circulation by automobiles, transit vehicles, service and emergency response vehicles, pedestrians, and bicyclists), and construction hours and restrictions.
- Site-specific building surveys to identify the structural integrity of existing buildings adjacent to and over the proposed underground alignment; assessment of building response to tunneling using empirical and numerical modeling methods; as needed development of preconstruction building settlement mitigation methods such as underpinning or compensation grouting; and working with property owners to monitor potential impacts due to dewatering, settlement, soil limitations, and excavation face stability during construction; and recommendations for immediate actions to maintain any movements within predetermined thresholds.
- Pre-construction Business Surveys to identify business usage, delivery/shipping patterns, and critical times of the day or year for business activities, in order to be able to adapt construction to

maintain critical business activities, to provide alternate access routes for customers and service deliveries, and preparation of traffic control and detour plans to maintain access as much as possible.

Each of these studies is prepared in coordination with the appropriate City planning, transportation, building, and engineering departments and agencies so that the recommendations to avoid, minimize, and mitigate impacts are consistent with local regulations and standards. Furthermore, the experience gained by the TJPA during construction of Phase 1 of the Transbay Program, which commenced in 2008, the ongoing monitoring required by the Program's Mitigation Monitoring and Reporting Program, and the input received through the community hotline will inform the TJPA and its contractors on other opportunities to reduce community disruption during Phase 2. During preliminary engineering and final design for Phase 2 of the Transbay Program, which will not occur until further funding is secured, geotechnical investigations, contractor specifications, and many other aspects of project construction will be undertaken, including evaluation of the recommendations from the November 2017 Tunnel Options Study.

The step-by-step process for cut-and-cover construction is summarized below.

- Step 1a – The first step in cut-and-cover construction is to assure support for foundations of buildings adjacent to the excavation and to install monitoring devices in these buildings to track movements. Control of potential movement of adjacent structures is proposed to be accomplished by use of excavation support systems, a common practice in the Bay Area and successfully used for the Muni Metro Turnaround project at the northeast end of Market Street.
- Step 1b – The excavation support system would consist of deep soil mix walls constructed to provide temporary excavation support and to cut off groundwater from seeping into the excavation (#1 in Figure MR-1).
- Step 2a – A shallow cut, or excavation, is made. The walls of the excavation would be supported with internal struts (heavy steel pipes) that would span the excavated area (#2 in Figure MR-1). Groundwater within the excavation would be collected in sumps and pumped to a settling basin before it is disposed in accordance with applicable regulations.
- Step 2b – Lateral trenches would be excavated across the alignment from one sidewall to the other to permit installation of deck beams. These trenches are generally excavated during the nighttime or weekends and covered to permit normal traffic flow during the day. When a sufficient number of deck beams have been installed, a shallow excavation of approximately 8 feet in between the deck beams would be made. This excavation is designed to uncover buried utilities and to provide room for continuing the excavation after the temporary decking is erected.
- Step 2c – As deck beams are installed, the utilities that can remain in the trench area (e.g., telephone, traffic, electric) would be supported in place using the deck beams at the top of the excavation. Sewer lines, likewise, would be hung from the deck beams during the initial excavation stage. Utilities located deeper would be uncovered fully after additional depth of excavation has been accomplished. Sometimes heavy utilities such as large sewer pipes would be supported by an auxiliary set of beams spanning between the side walls rather than hanging them from the deck beams. Supporting the utilities in place avoids potential service interruptions.

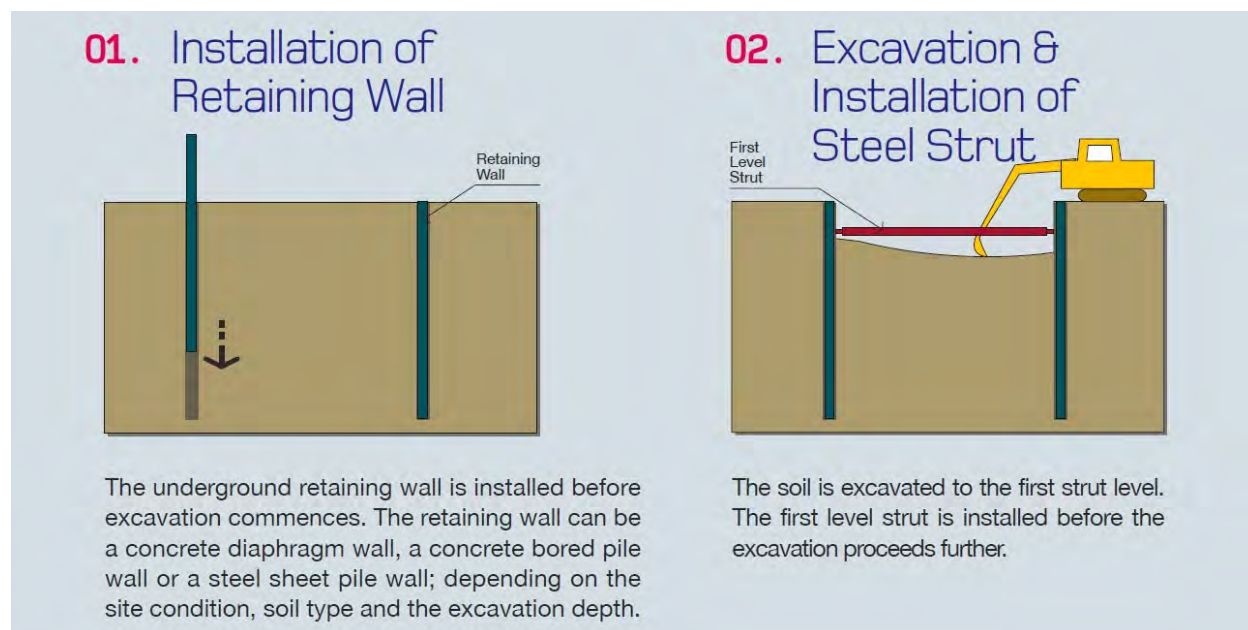


Figure MR-1. Beginning Steps of Cut-and-Cover Construction: Retaining Wall and Strut Installation, and Beginning Excavation (Step 1 and Step 2)

- Step 3 – Decking is then placed on top of the deck beams. It is proposed that the decking be set flush with the existing street and sidewalk levels. Roadway traffic can then be restored while excavation proceeds underneath. Decking at cross-streets would be installed in stages to allow at least half of the existing traffic lanes to be maintained. After installation of the deck, full cross-street traffic could be maintained for the duration of construction.
- Step 4 – Excavation can progress downward with strut installation at appropriate levels, moving down to the installation of the base slab.
- Step 5 – Once the bottom slab is completed, the side walls would be constructed, the temporary struts removed, and the roof slab installed.
- Step 6 – To fully restore permanent street traffic, the temporary decking would be removed, the remainder of cut-and-cover sections would be backfilled, permanent utility lines would be restored, and the permanent street improvements would be installed. With restoration of roadway pavement and vehicular traffic, surface-level work on the project would be completed, and further construction-related activities for subway finishes and equipment installation (e.g., installation of tracks, power, signals, and communication systems) could continue beneath the surface with minimal disruption to street use by vehicles and pedestrians.

Figure MR-2 illustrates Step 3 and shows the temporary road being constructed on the deck beams, allowing traffic flow and circulation on the street to resume. Once the cut is covered by the temporary road (see Figure MR-3), excavation and construction activities would continue beneath the street level. While the shallow excavation, deck beam installation, and temporary road paving occurs, vehicular access, parking, and loading would be impeded to the businesses fronting the street. Pedestrian access would still be available along the sidewalks between the storefronts and the security fencing that would be erected.



Figure MR-2. Photograph of Decking Installation



Figure MR-3. Photograph of Traffic Flow Over Decking While Excavation Continues Below

To minimize disruption to businesses, cut-and-cover construction through intersections can be planned for nighttime work or for weekends. Similarly, cut-and-cover construction along street segments can also be scheduled for the nighttime. In both instances, the decision about the most appropriate time to perform the construction would be based on disturbance to neighbors, access to businesses, traffic and transit circulation, safety, and close coordination among the TJPA, its construction contractor, and City agencies.

The proposed approach to cut-and-cover construction and the sequencing of construction including the decking installation would result in approximately 3 to 4 months of possible impacts to street circulation and access to businesses and other property owners on a given block along Townsend Street. After this period, the temporary road would be in place and circulation and access would resume. The discussion below identifies mitigation measures that would reduce the construction-period impacts.

Impacts and Mitigation Measures Related to Cut-and-Cover Construction

With the cut-and-cover construction method, there would be impacts when installation of the initial deck beams, excavation, and installation of decking occur. Cut-and-cover construction would affect Townsend, Second, and Beale Streets, the property owners, businesses, and residences on those streets, as well as motorists, transit routes, service and emergency vehicles, pedestrians, and bicyclists traveling along, through, and around these streets. Cut-and-cover construction would involve the following temporary impacts: disruption of transportation and circulation, disruption of access to properties, and noise, dust and construction emissions, dewatering, exposure to potential hazardous materials, and possible geotechnical and soil hazards, all of which are disclosed in the construction impact discussions in the Draft SEIS/EIR and the 2004 FEIS/EIR. Mitigation measures were identified in the 2004 FEIS/EIR and adopted and incorporated into the Transbay Program to reduce the impacts due to cut-and-cover construction activities. These mitigation measures, such as the preconstruction studies, including traffic control plans, building surveys, and business surveys, combined with the construction sequencing that restores streets for use while excavation and construction continues below ground, would reduce the intensity and duration of the construction impacts to the extent feasible. These mitigation measures, which are reproduced in Appendix D of the Final SEIS/EIR, were adopted and incorporated into the Transbay Program, and will be implemented as part of the proposed project that is evaluated in the Draft SEIS/EIR.

The following text summarizes transportation, socioeconomic, historic resource, water resource and water quality, geological/soil, noise and vibration, and air quality impacts and related mitigation measures that could result from the cut-and-cover construction method and that are identified in the 2004 FEIS/EIR and the Draft SEIS/EIR. The page citations and impact section numbers, below, refer to the Draft SEIS/EIR unless otherwise noted. The approved mitigation measures from the 2004 FEIS/EIR that would be implemented as part of the proposed project, plus new measures that have been identified from the Draft SEIS/EIR, are provided in Appendices D.1 and D.2 of this Final SEIS/EIR.

Transportation. Transportation-related impacts are analyzed in Impact C-TR-7, beginning on page 3.2-35. Truck trips, construction equipment staging, and cut-and-cover construction activities would disturb traffic movement, circulation by pedestrian, and bicyclists, and transit service. The Draft SEIS/EIR identifies and discusses the mitigation measures previously adopted by the TJPA and incorporated into the Transbay Program to reduce transportation effects from construction activities related to the Transbay Program.

Chief among the measures to reduce transportation impacts is a requirement for the TJPA to prepare and implement a Construction Traffic Management Plan to address local circulation, detours, access to businesses and residences, temporary striping and signage, and other controls to allow traffic to flow safely. Page 3.2-35 provides information regarding the standard procedure to prepare and implement this Construction Traffic Management Plan. The plan requires coordination with, and adherence to applicable regulations of the San Francisco Municipal Transportation Agency, the Department of Parking and

Traffic, and the Department of Public Works. Contractors will be required to comply with the City's Blue Book, which contains regulations for working on City streets (see Mitigation Measure PC 7 from the 2004 FEIS/EIR as well as the DTX Design Criteria, both of which require implementation of this traffic and construction management plan).

In addition, pages 3.2-17 through 3.2-18 identify nine additional pre-construction and construction mitigation measures adopted and incorporated into the Transbay Program. The previously approved pre-construction and construction mitigation measures that will continue to apply to the proposed project involve coordination with the affected community including property owners, local businesses, and residences; inclusion of provisions in construction contracts to require maintenance of driveway access; installation of signage for alternate routes; and providing level decking at the cut-and-cover sections to be flush with the existing street or sidewalk levels. Because these measures are part of the approved Transbay Program, they will be implemented for the proposed project as well. Finally, as described in the earlier description of the cut-and-cover construction method, to minimize disruption to businesses, construction through intersections can be planned for nighttime work or for weekends. Similarly, cut-and-cover construction along street segments can also be scheduled for the nighttime. In both instances, the decision about the most appropriate time to perform the construction would take into consideration disturbance to neighbors, access to businesses, traffic and transit circulation, safety, and input from City agencies. In light of the anticipated construction schedule, possible impacts to street circulation and access to businesses and other property owners on a given block where cut-and-cover construction would occur would last approximately 3 to 4 months.

In summary, because of the City's requirements, the DTX Design Criteria, and the pre-construction and construction mitigation measures in the Draft SEIS/EIR, transportation construction impacts, including impacts to pedestrians and bicycles, of the proposed project would be temporary and less than significant under CEQA and a not adverse effect under NEPA.

Socioeconomic Impacts. Socioeconomic impacts of the proposed project are described in Impact C-SE-6 on page 3.4-27 and would be similar to those identified for the No Action Alternative, as described on page 3.4-16 of the Draft SEIS/EIR. Cut-and-cover construction activities are expected to result in temporary loss of access for businesses, disruption of travel ways, noise, and air emissions that will adversely affect community character, interfere with community cohesion, and will be disruptive to the business community. The Draft SEIS/EIR identifies and discusses the mitigation measures previously adopted by the TJPA and incorporated into the Transbay Program to reduce socioeconomic effects from construction activities related to the Transbay Program. These measures include outreach to businesses to identify alternate routes for customers and deliveries, scheduling construction and choosing construction techniques that can maintain critical business activities, notifying the community of major construction activities, maintaining an information hotline to respond to questions and complaints, cleaning work areas, and maintaining access. Because these measures have been adopted and would be implemented as part of the proposed project, they would mitigate the potential socioeconomic impacts associated with the temporary cut-and-cover construction activities. As a result, Impact C-SE-6 concludes that socioeconomic construction impacts would be less than significant under CEQA and not adverse under NEPA.

Historic and Cultural Resources. Cultural resource and paleontological impacts are analyzed in Impact CR-1, Impact CR-2, and Impact C-CR-4 on pages 3.6-31, 3.6-35, and 3.6-42, respectively. Cut-and-cover construction activities could result in disturbance to unknown archeological and paleontological resources, and could have the potential to damage listed and eligible properties on the National Register of Historic Places and/or the California Register of Historical Resources. The Draft SEIS/EIR identifies and discusses the mitigation measures previously adopted by the TJPA and incorporated into the Transbay Program to reduce effects to historic and archeological resources from construction activities. These measures include treatment of any archeological resources or human remains identified during construction (Mitigation Measures CH 15 through 20), protective measures for historic resources to be

implemented during construction (Mitigation Measure CH 11), and standards and procedures for repairing any inadvertent damaged caused by the project to contributing elements in two historic districts (Mitigation Measure CH 13). Pursuant to the Memorandum of Agreement executed by the TJPA, FTA, FRA, and the State Historic Preservation Officer, among others, the TJPA must prepare new or amended Archaeological Research Design and Treatment Plans for areas that will be subject to ground disturbance and excavation to ensure the protection of archaeological resources uncovered during construction. New-MM-C-CR-4.1 addresses potential impacts to paleontological resources and includes resource education of construction personnel and procedures if any paleontological resources are discovered during construction. With implementation of the approved and proposed measures, construction impacts to historic resources would be less than significant under CEQA and not adverse under NEPA.

Water Resources and Water Quality. Water quality and dewatering discharges are analyzed in Impact C-WQ-6 beginning on page 3.8-23. Cut-and-cover construction activities could result in increased sediment load of stormwater and could promote downward migration of contaminants during construction dewatering activities. Mitigation Measures HMC 2 through HMC 7, previously identified in the 2004 FEIS/EIR and adopted and incorporated into that project, would apply to the proposed project and would be implemented as part of the proposed project. These measures would require appropriate handling of contaminated soil and groundwater, treatment of effluent produced during dewatering to reduce the sediment load and contaminants, designing dewatering to minimize downward migration of contaminants, and covering soils removed during excavation and grading. With these measures, potential construction impacts on water quality would be less than significant under CEQA and not adverse under NEPA.

Geology, Soils, and Seismicity. Potential settlement and groundwater impacts during excavation are analyzed in Impact C-GE-4, beginning on page 3.9-19. Cut-and-cover construction activities may result in settlement around the excavation zone due to consolidation of soils and to dewatering, which could affect adjacent structures. In addition, for excavations deeper than 25 to 30 feet below ground surface into Young Bay Mud, some heaving and base instability may occur.

All structural components would be designed and built in agreement with the prevailing building codes and standards (such as CBC or ASCE 7); and Mitigation Measures SG 1, SG 2, SG 3, SG 4, and SG 5, previously identified in the 2004 FEIS/EIR and adopted and incorporated into the Transbay Program, would continue to apply and would be implemented as part of the proposed project. These measures are summarized here and included in their entirety in Appendix D of this Final SEIS/EIR.

SG – 1: monitor adjacent buildings for movement and, if movement is detected, take immediate action to control the movement.

SG – 2: apply design measures and utilize pile-supported foundations to mitigate potential settlement of the surface and underground stations.

SG – 3: cut-and-cover portions will require pile supports to minimize non-seismic settlement in soft compressible sediments.

SG – 4: underpin existing buildings, where deemed necessary, to protect existing structures from potential damage that could result from excessive ground movements during construction...design the temporary support system with the objective of controlling ground deformation within small enough levels to avoid damage to adjacent structures...special measures will be implemented such as (1) underpinning, (2) ground improvement, and/or (3) strengthening of existing structures to mitigate the risks.

SG – 5: assure proper design and construction of pile-supported foundations for structures to control potential settlement of the surface; impacts on adjacent structures can be controlled within tolerable limits by proper design and implementation of the excavation shoring systems.

Designers and builders would also comply with the TJPA DTX Design Criteria, which include specific chapters on geotechnical, seismic design, structural, and protection of existing buildings. The project includes detailed design criteria that govern the design and construction of the project. These design criteria are summarized on pages 2-10 and 2-11 of the Draft SEIS/EIR. Chapters 9-12 of the DTX Design Criteria address geotechnical requirements, and protection of existing infrastructure, structures, and tunnels, construction of which can affect adjacent properties due to earth movement or groundwater removal.

Critical to ensuring that nearby buildings and properties are not adversely affected is the instrumentation and monitoring program (described in Section 9.5 of the DTX Design Criteria), which includes details on groundwater measuring devices, ground movement measuring devices, and deformation trigger levels. Additionally, groundwater monitoring wells will be installed around the cut-and-cover excavations to monitor the groundwater levels and ensure that the groundwater drawdown surrounding the excavation does not reach unacceptable levels that could lead to building impacts. The geotechnical design of the project shall be based on the latest edition of accepted standards, codes, and guidelines, at the time of final design (per Section 1.6 of the DTX Design Criteria), including:

- American Railway Engineering and Maintenance-of-Way Association Manual for Railway Engineering;
- American Society of Testing Materials standards;
- Caltrain Engineering Standards;
- Caltrans Highway Design Manual;
- Caltrans Trenching and Shoring Manual;
- City and County of San Francisco (City) Building Code;
- City Department of Public Works Order No. 171,442, Regulations for Excavating and Restoring Streets in San Francisco;
- Federal Highway Administration, Publication Number HI-97-021, Subsurface Investigation; and
- United States Army Corps of Engineers, 2001, Engineer Manual EM 1110-1-1804, Geotechnical Investigations.

Other sections of the DTX Design Criteria provide details on surveys, protective works, and mitigation measures to prevent ground stability impacts on nearby structures. These measures and design criteria were in part formulated to address the potential geotechnical and dewatering impacts associated with excavation and underground construction, including the cut-and-cover method, of the now approved Transbay Program. As a result, the SEIS/EIR concludes that geotechnical construction impacts would be less than significant under CEQA and not adverse under NEPA with the additional mitigation measure recommended to address dewatering.

Impact C-GE-2, concerning potential harm to people or property due to seismic-related ground failure, is considered to be a less-than-significant impact under CEQA and a not adverse effect under NEPA. This significance determination is based on compliance with prevailing state and other building codes and specifications, as described in the analysis of Impact C-GE-2. In addition, Impact C-GE-4 identifies a mitigation measure (New-MM-C-GE-4.1) to control the amount of groundwater at the excavation bottom

and thereby reduce the related potential for ground instability. This mitigation measure is refined in this Final SEIS/EIR to clarify where groundwater controls would apply by various construction methods:

New-MM-C-GE-4.1 Groundwater Control during Construction Dewatering at the Extended Train Box and Transit Center Vent Structures Sites. Groundwater control shall be implemented to reduce ground instability in the construction area, where excavations encroach into the prevailing groundwater table. Groundwater level shall be maintained a minimum of 2 feet or more beneath the bottom of the excavation throughout construction to minimize the potential of base failure due to high seepage gradients.

- For excavations with the cut-and-cover technique, the groundwater level within the footprint of the excavation shall be maintained a minimum of 2 feet or more beneath the bottom of the excavation throughout construction to minimize the potential for failure of the base of the excavation due to high groundwater seepage at construction sites. The groundwater level outside of the excavation footprint shall remain unchanged.
- For excavations with the SEM construction method in rock, groundwater intrusion into the tunnel excavation is expected to be minimal and localized at joints in the rock. Groundwater seeping into the excavation shall be controlled locally by panning and piping channel inflows to sump pumps located in the portal area.
- For excavations with the SEM construction method in soft ground conditions (i.e., sands and clays), the groundwater level shall be locally drawn down to below the bottom of the excavation in order to increase the strength of the ground and reduce potential ground instability.

Although nearby property owners have submitted comments expressing concerns about potential settlement effects on their buildings, these concerns have been evaluated in light of the step-by-step process for investigating and monitoring settlement, the applicable building and safety codes, the previously adopted mitigation measures from the 2004 FEIS/EIR, and New-MM-C-GE-4.1, all summarized above. Based on this evaluation by the TJPA, the above-mentioned protective standards and measures continue to be appropriate, adequate, state-of-the-art, and effective to address potential geotechnical hazards from construction of the proposed project.

Noise and Vibration. Noise and vibration are analyzed in Impact C-NO-3 and Impact C-NO-4, beginning on page 3.12-17. Construction of the proposed project, including cut-and-cover construction activities, would result in temporary increases in ambient noise levels in the project area on an intermittent basis and could also result in impacts due to vibration. Mitigation Measures NoiC 1 through NoiC 6 and VibC 1 through VibC 6, which were adopted and incorporated into the Transbay Program, would continue to apply and would reduce noise and vibration impacts due to the construction of the proposed project. These measures would include noise monitoring, a community liaison program, noise control requirements in construction specifications, vibration monitoring, and restriction of procedures that can be used in vibration-sensitive areas. Occasions may occur when nighttime construction is desirable (e.g., lane restriping in commercial districts where nighttime construction would be less disruptive to businesses in the area) or necessary to avoid unacceptable traffic disruptions. Nighttime construction would require a permit from the City. Nighttime construction that could occur in the urban environment, such as the proposed project area that includes residential land uses, potentially would

increase ambient noise levels by 5 dBA or more and would be considered a significant and unavoidable impact under CEQA and an adverse effect under NEPA.

Future construction activities by the TJPA will incorporate the same noise and vibration control measures and practices in use as part of the current Phase 1 construction, including abatement measures for adjacent properties during nighttime construction activities. In compliance with the 2004 FEIS/EIR Mitigation Monitoring and Reporting Program, Phase I of the Transbay Program includes requirements for a noise and vibration monitoring response plan during construction activities. Noise consultants record, graph, study data, and respond to noise complaints from surrounding properties. Additionally, equipment on site is equipped with alarms. Community outreach with adjacent properties is also an important component of addressing noise issues. As part of community outreach efforts, a community hotline is available for adjacent property owners and residents to register noise complaints. Each complaint is reviewed and addressed by the project construction manager as appropriate. In addition, the community is kept informed of construction activities through mailers, project-specific website updates, regular email notices, and scheduled conference calls with concerned residents and businesses. The same mitigation measures and methods would be used to address potential noise and vibration impacts to help reduce the effect of the proposed project. In addition, the roof slab that would be installed as part of cut-and-cover construction would act as a noise barrier and help reduce construction noise.

Health and Safety. Potential exposure to known hazardous materials is analyzed in Impact C-HZ-4 on page 3.10-20. Emissions and toxic air contaminants are analyzed in Impact C-AQ-5 and Impact C-AQ-6, beginning on page 3.13-18. Dewatering that would be a part of cut-and-cover construction activities could lead to the discovery of contaminated materials in soils or groundwater. Potential construction impacts regarding hazardous materials sites would be less than significant under CEQA and not adverse under NEPA because Mitigation Measures HMC 1 through HMC 8, previously identified in the 2004 FEIS/EIR and adopted and incorporated into the Transbay Program, would apply to the proposed project, and would be implemented as part of the proposed project. These measures would require following Cal/OSHA and local standards, developing a sampling plan, chemical testing of groundwater samples to evaluate requirements for pretreatment prior to discharge, developing a mitigation plan for handling contaminated soil and groundwater prior to construction, designing dewatering systems to minimize downward migration of contaminants, and developing a Worker Health and Safety Plan.

In terms of air quality, cut-and-cover construction activities would result in pollutant emissions from diesel-powered construction equipment, CO emissions from worker vehicles, and fugitive dust or PM₁₀ emissions from ground-disturbing activities. Mitigation Measures AC 1 through 15, previously identified in the 2004 FEIS/EIR and adopted and incorporated into the Transbay Program, would continue to apply and would be implemented as part of the proposed project. These measures would require application of water to the site, minimize use of on-site diesel construction equipment, reduce idling, and require sweeping construction areas daily. New-MM-C-AQ-5.1 would require preparation and implementation of an emissions control plan. With implementation of these measures, potential long-term health impacts or short-term acute or chronic health risks would be less than significant under CEQA and not adverse under NEPA. The impact from generation of regional emissions of criteria pollutants and ozone precursors would likewise be reduced to a less-than-significant level under CEQA and not adverse under NEPA.

Other Construction Methods

In response to comments on the Draft SEIS/EIR regarding the impacts of cut-and-cover construction, the TJPA initiated a Tunnel Options Study to explore the possibility of reducing segments planned for this construction method and constructing those segments instead by different mining methods. The resulting Tunnel Options Study Report was issued on November 7, 2017, and subsequent addenda were completed by March 2018. The report identified some initial possibilities through an evaluation of 11 risk assessment criteria: constructability, ground conditions, groundwater, disruption to/relocation of utilities,

community impact, environmental impacts, safety, procurement/market forces, design, third party coordination, and permit/right of way considerations. Of these 11 identified risk categories, 27 specific risk scenarios were identified along with their potential causes and consequences based on information from the 2007/2008 risk register developed for the baseline option, and input from TJPA's design/cost estimate team. A summary of the risk assessment is in Section 6.3 of the Tunnel Options Study Report, and the full risk assessment analysis is in Appendix F of the Tunnel Options Study Report

The possible construction methods that were recommended for further study in the report are identified below and described in detail in Section 2.4 of this Final SEIS/EIR. All of these methods would reduce the intensity and/or duration of the construction impacts in the identified locations. The selection of the preferred construction method will depend on further evaluation using the aforementioned risk assessment criteria and considerations of the tradeoffs in cost and schedule after the next phase of design, 30 percent Preliminary Engineering, for the proposed project. Until then, each of the construction methods identified below may be implemented by the TJPA.

- **Mined Tunneling at the Howard Street Crossing (at the widened throat structure).** This construction method identified for the Howard Street crossing is the “jacked box pilot tunnel with a pipe canopy.” It could substitute for cut-and-cover construction, which was evaluated in the Draft SEIS/EIR, in a relatively short section of the widened throat structure, extending from the west side of the Second and Howard Street intersection approximately 230 feet eastward along Howard Street and 80 feet across Howard Street.
- **Extending SEM west of Clarence Place (along Townsend Street).** West of Clarence Place at Townsend Street, cut-and-cover construction was evaluated in the Draft SEIS/EIR. In this segment of the alignment between Clarence Place west to the Fourth and Townsend Street Station, approximately 1,200 feet, the SEM construction method could be used instead.
- **Extending SEM west of Clarence Place (along Townsend Street) with Tunnel Boring Machines.** This construction method is similar to the method described above except that tunnel boring machines (TBMs) would also be used to help create the tunnel, rather than cut-and-cover construction assessed in the Draft SEIS/EIR.
- **Use of TBM with SEM between the Intersections of Townsend Street/Clarence Place and Second/Clementina Streets.** This segment was evaluated in the Draft SEIS/EIR using SEM. This option would add the use of TBM similar to the preceding option for the segment west of Clarence Place.

Table MR-5 provides a comparative analysis of these other construction method relative to the construction method evaluated in the Draft SEIS/EIR. In general, Table MR-5 shows that the other construction methods would have fewer impacts over the length of the segment where these methods could be applied. Reduced impacts would be those related to transportation, visual quality, socioeconomics, water quality, geology, noise, and air quality, because there would be less disturbance and construction activity at the street level. However, there are localized areas where construction activities with these other construction methods would be more intense due to the need for additional staging or equipment and material delivery. These localized areas occur typically within the construction staging/work areas already evaluated in the Draft SEIS/EIR. The increased intensity at these locations would not result in new significant impacts or substantially more severe impacts compared to the effects reported in the Draft SEIS/EIR. Moreover, the mitigation measures identified in the 2004 FEIS/EIR and the Draft SEIS/EIR would apply if any of these other construction methods were ultimately implemented.

**Table MR-5
 Other Mining Construction Methods for Selected Segments of the DTX Alignment**

	Mined Tunneling (Jacked Box Tunnel)	SEM	SEM with Tunnel Boring Machine	SEM with Tunnel Boring Machine
Location/Selected Segment	Widened Throat Structure – Howard Street Crossing	Along Townsend from Fourth Street to Clarence Place	Along Townsend from Fourth Street to Clarence Place	Along Townsend and Second from Townsend/Clarence to Second/Clementina
Length	80 feet	1,200 feet	1,200 feet	3,200 feet
Proposed Construction Method Identified in the Draft SEIS/EIR	Cut-and-cover construction	Cut-and-cover construction	Cut-and-cover construction	SEM
Cost Difference (vs. proposed construction method)	+ \$208 million	+ \$104 million	+ \$71 million	- \$26 million
Schedule Difference (vs. proposed construction method)	Negligible	Additional nine months	Three-month reduction in overall schedule	
Additional Construction Work Areas (vs. proposed construction method)	Excavation pits on the north and south sides of Howard Street required, but they would be within the already identified construction staging / work areas proposed for cut-and-cover construction.	Access pits approximately 15-20 feet in diameter and 15-20 feet deep every 300 feet along Townsend Street would be needed for compensation grouting injections, which would involve mixing plant, pumps, and power generators. Access pits would typically be in parking spaces or side alleys to avoid interfering with local traffic and can be decked over when not in use. Additional deliveries would be needed for equipment, materials, and staging; however, they would occur at already identified construction staging/work areas.	Access pits approximately 15-20 feet in diameter and 15-20 feet deep every 300 feet along Townsend Street would be needed for compensation grouting injections, which would involve mixing plant, pumps, and power generators. Access pits would typically be in parking spaces or side alleys to avoid interfering with local traffic and can be decked over when not in use. Additional deliveries would be needed for equipment, materials, and staging; however, they would occur at already identified construction staging/work areas.	
Environmental Topics				
Transportation	These methods would reduce transportation impacts, because construction would occur underground, and the surface disruption for excavation would have limited and localized effects on access to nearby properties. Additionally, due to the reduction in soil materials to be excavated, truck traffic could be reduced by roughly 20 percent.	These methods would reduce transportation impacts, because construction would occur underground, and the surface disruption for excavation, access pits, and grouting equipment would have limited and localized effects on access to nearby properties. Additionally, due to the reduction in excavation materials, truck traffic could be reduced by roughly 20 percent, but would be partially offset by the need	This method would reduce transportation impacts, because construction would occur underground, and the surface disruption for excavation, access pit, and grouting equipment would have limited and localized effects on access to nearby properties. Additionally, due to the reduction in excavation materials, truck traffic would be reduced by roughly 20 percent, but would be partially	Underground construction is already planned for this segment; therefore, impacts would be similar to the proposed SEM construction method. There would likely be additional truck deliveries for equipment, materials, and staging for the tunnel boring machines, but the same mitigation measures identified in the 2004 FEIS/EIR and incorporated as part of the proposed project would apply and reduce effects to not adverse/less than significant.

**Table MR-5
 Other Mining Construction Methods for Selected Segments of the DTX Alignment**

	Mined Tunneling (Jacked Box Tunnel)	SEM	SEM with Tunnel Boring Machine	SEM with Tunnel Boring Machine
	The same mitigation measures adopted as part of the 2004 FEIS/EIR and incorporated as part of the proposed project would apply and reduce effects to not adverse/less than significant.	to deliver materials such as concrete liners for the tunnel. However, construction traffic-related impacts would be expected over a longer period of time due to the longer construction duration. The same mitigation measures adopted as part of the 2004 FEIS/EIR and incorporated as part of the proposed project would apply and reduce effects to not adverse/less than significant.	offset by the need to deliver materials such as concrete liners for the tunnel and for the set-up and equipment required to support the tunnel boring machines. The same mitigation measures adopted as part of the 2004 FEIS/EIR and incorporated as part of the proposed project would apply and reduce effects to not adverse/less than significant.	
Land Use and Planning, Wind, and Shadow	Minor construction land use impacts would be expected, since construction would occur underground and would not alter adjoining uses or activities. Physical disturbances due to loss of access, noise, dust, and other elements that contribute to land use compatibility are discussed under other topics in this table. Although there would be greater construction activity at the Howard Street construction sites under this construction method, land use impacts would be minor because there are relatively few properties along this segment. Similar to the proposed construction method, this method would have no wind or shadow impacts since it would not alter building height or massing.	Minor construction land use impacts would be expected, since construction would occur underground. Physical disturbances due to loss of access, noise, dust, and other elements that contribute to land use compatibility are discussed under other topics in this table. The surface disruption for excavation, access pits, and grouting equipment would be located in the same staging areas that are proposed for cut-and-cover, and would not substantially alter land use impacts at these locations. Over the entire length of the segment, land use impacts would be less than under the cut-and-cover construction method. Similar to the proposed construction method, this method would have no wind or shadow impacts and would not alter building height or massing at the surface.	Underground construction is already planned for this segment; therefore, impacts would be similar to the proposed SEM construction method. The addition of tunnel boring machines would not be expected to alter land use patterns or activities, wind patterns, or shadows.	

**Table MR-5
 Other Mining Construction Methods for Selected Segments of the DTX Alignment**

	Mined Tunneling (Jacked Box Tunnel)	SEM	SEM with Tunnel Boring Machine	SEM with Tunnel Boring Machine
Socioeconomics, Population, and Housing	There would be no difference between the other construction methods and cut-and-cover construction in terms of land acquisition or displacement. However, reducing street-level disruption in the segments proposed for these other construction methods would lessen impacts on property access, loss of on-street parking, and congestion. As a result, these construction methods would reduce the project’s socioeconomic impact compared to the proposed cut-and-cover method. However, the impacts would remain adverse/significant. The same mitigation measures adopted as part of the 2004 FEIS/EIR and incorporated as part of the proposed project would apply and reduce effects to not adverse/less than significant.			Underground construction is already planned for this segment; therefore, impacts would be similar to proposed construction SEM method. The addition of tunnel boring machines would not substantially alter the socioeconomic impacts of SEM alone.
Visual Quality/Aesthetics	Compared to the proposed cut-and-cover construction, these other construction methods would reduce visual impacts at the street level, since construction activities would occur underground, and there would be less surface disturbance, fewer visible street-level staging areas, and less need for construction lighting. The same mitigation measures adopted as part of the 2004 FEIS/EIR and incorporated as part of the proposed project would apply and reduce effects to not adverse/less than significant.			Underground construction is already planned for this segment; therefore, impacts would be similar to the proposed SEM construction method. The addition of tunnel boring machines would not substantially alter the visual impacts of SEM alone.
Historic and Cultural Resources	Similar to cut-and-cover construction activities, this other construction method could result in disturbance to unknown archeological and paleontological resources, and could have the potential to damage listed and eligible properties on the National Register of Historic Places and/or the California Register of Historical Resources. This method would require less excavation, resulting in a slight decrease in the potential to encounter archeological and paleontological resources, but would still require the previously adopted mitigation measures. Therefore, impacts would be similar to the proposed construction method. One benefit of this construction method is that underpinning the	These methods would require less excavation, resulting in a slight decrease in the potential to encounter archeological and paleontological resources. The same mitigation measures adopted as part of the 2004 FEIS/EIR and incorporated as part of the proposed project would apply and reduce effects to not adverse/less than significant.		Underground construction is already planned for this segment; therefore, impacts would be similar to the proposed SEM construction method. The addition of tunnel boring machines would not substantially alter the historic and cultural impacts of SEM alone.

**Table MR-5
 Other Mining Construction Methods for Selected Segments of the DTX Alignment**

	Mined Tunneling (Jacked Box Tunnel)	SEM	SEM with Tunnel Boring Machine	SEM with Tunnel Boring Machine
	property at 589 Howard Street, a contributor to the Second and Howard Street National Register Historic Place District, would be easier, because of the additional structural support provided by this construction method.			
Biological Resources	Construction impacts would be negligible with respect to biological resources and would be similar across all construction methods.			
Water Resources and Water Quality	<p>The difference in ground disturbance and excavated soils materials from the cut-and-cover construction method evaluated in the Draft EIS/EIR would be negligible because of the short segment where this construction method could apply.</p> <p>The same mitigation measures adopted as part of the 2004 FEIS/EIR and incorporated as part of the proposed project would apply. These measures, plus adherence to the measure for groundwater controls, the DTX Design Criteria, and the National Pollutant Discharge Elimination System permit conditions would reduce effects to not adverse/less than significant.</p>	<p>SEM and SEM with TBMs would reduce the amount of ground disturbance and the potential for erosion and water quality impacts compared to cut-and-cover construction. Although this method would result in localized ground disturbance and potential for erosion at sites for the access pits for compensation grouting, the total area of ground disturbance in this segment where these method could be used would be much smaller than for the proposed cut-and-cover method (approximately 1,500 square feet under SEM versus approximately 96,000 square feet under cut-and-cover construction).</p> <p>The same mitigation measures adopted as part of the 2004 FEIS/EIR and incorporated as part of the proposed project would apply. These measures, plus adherence to the measure for groundwater controls, the DTX Design Criteria, and the National Pollutant Discharge Elimination System permit conditions would reduce effects to not adverse/less than significant.</p>		<p>The use of tunnel boring machines with SEM would have negligible additional water quality effects compared to SEM. The entry and exit points for the tunnel boring machines would already be disturbed since they would be the primary construction staging/work areas already identified and evaluated in the 2004 FEIS/EIR.</p> <p>The same mitigation measures adopted as part of the 2004 FEIS/EIR and incorporated as part of the proposed project would apply. These measures, plus adherence to the measure for groundwater controls, the DTX Design Criteria, and the National Pollutant Discharge Elimination System permit conditions would reduce effects to not adverse/less than significant.</p>
Geology, Soils, and Seismicity	<p>The elements of the jacked box tunnel construction method would help support the overlying soil, utilities, streets, and buildings.</p> <p>The further reduction in ground stability impacts that would already be mitigated by measures adopted in the 2004 FEIS/EIR and</p>	<p>SEM would include ground improvement techniques to reduce the potential for settlement; in particular, compensation grouting that would make the ground surrounding the tunnel firmer and thus better able to support utilities and building foundations. This ground</p>	<p>Use of tunnel boring machines with SEM would involve installing liners in the tunnel and result in a tunnel structure (consisting of a center SEM bored tunnel with bored tunnels on either side, created using the tunnel boring machines) which provides additional support to the</p>	<p>Use of tunnel boring machines with SEM would involve installing liners in the tunnel and result in a tunnel structure (consisting of a center SEM bored tunnel with bored tunnels on either side, created using the tunnel boring machines) which provides additional support to the overlying</p>

**Table MR-5
 Other Mining Construction Methods for Selected Segments of the DTX Alignment**

	Mined Tunneling (Jacked Box Tunnel)	SEM	SEM with Tunnel Boring Machine	SEM with Tunnel Boring Machine
	<p>incorporated into the proposed project would be relatively limited because of the few properties in the immediate vicinity of the Howard Street crossing. The 2004 FEIS/EIR measures plus adherence to the DTX Design Criteria and applicable building and safety standards would reduce effects to not adverse/less than significant. As a consequence, this construction method would not result in excessive settlement of ground or structures beyond established and acceptable levels.</p>	<p>improvement technique would further reduce potential settlement impacts for the approximately 20 buildings that face onto Townsend Street in this segment compared to the proposed construction method. Regardless of the construction method for tunnel excavation and construction, all structural components would be designed and built in compliance with the most current prevailing building codes and standards at the time of design; mitigation measures previously identified in the 2004 FEIS/EIR and adopted and incorporated into the proposed project; and the TJPA DTX Design Criteria, which includes specific chapters on geotechnical, seismic design, structural, and protection of existing buildings. As a consequence, this construction method would not result in excessive settlement of ground or structures beyond established and acceptable levels.</p>	<p>overlying soils, utilities, streets, and buildings. Further, this method would also use compensation grouting, reducing the potential for settlement in comparison to the proposed construction method. Regardless of the construction method for tunnel excavation and construction, all structural components would be designed and built in compliance with the most current prevailing building codes and standards at the time of design; mitigation measures previously identified in the 2004 FEIS/EIR and adopted and incorporated into the proposed project; and the TJPA DTX Design Criteria, which includes specific chapters on geotechnical, seismic design, structural, and protection of existing buildings. As a consequence, this construction method would not result in excessive settlement of ground or structures beyond established and acceptable levels.</p>	<p>soils, utilities, streets, and buildings, reducing the potential for ground settlement in comparison to the proposed construction method. Regardless of the construction method for tunnel excavation and construction, all structural components would be designed and built in compliance with the most current prevailing building codes and standards at the time of design; mitigation measures previously identified in the 2004 FEIS/EIR and adopted and incorporated into the proposed project; and the TJPA DTX Design Criteria, which includes specific chapters on geotechnical, seismic design, structural, and protection of existing buildings. As a consequence, this construction method would not result in excessive settlement of ground or structures beyond established and acceptable levels.</p>
Hazardous Materials	<p>Roughly 20% less soil materials would be excavated compared to the proposed cut-and-cover construction, thereby reducing the potential for encountering contaminated soils or groundwater, however, all construction methods are subject to the previously adopted mitigation measures as well as hazardous materials best management practices. Therefore, impacts for these other construction methods would be mitigated to not adverse/less than significant, similar to the proposed cut-and-cover construction method.</p>			<p>Underground construction is already planned for this segment; therefore, impacts would be similar to proposed SEM construction method. The addition of tunnel boring machines would not substantially alter the hazardous materials impacts of SEM alone.</p>
Electromagnetic Fields	<p>Construction impacts would be negligible with respect to electromagnetic fields and would be similar across all construction methods.</p>			

**Table MR-5
 Other Mining Construction Methods for Selected Segments of the DTX Alignment**

	Mined Tunneling (Jacked Box Tunnel)	SEM	SEM with Tunnel Boring Machine	SEM with Tunnel Boring Machine
Noise and Vibration	<p>Noise and vibration impacts would be reduced compared to the proposed cut-and-cover construction method, since construction under this method would be underground. There may be more construction activity and localized noise impacts at the construction sites associated with the delivery and use of equipment and materials associated with this method; however, this activity would occur in the same construction staging/work areas as identified for the cut-and-cover construction method.</p> <p>The same mitigation measures adopted as part of the 2004 FEIS/EIR and incorporated as part of the proposed project would apply. These measures and applicable noise standards and regulations would reduce effects to not adverse/less than significant.</p>	<p>Noise and vibration impacts would be reduced compared to the proposed cut-and-cover construction method, since construction under this method would be underground. There may be more construction activity and localized noise impacts at the construction sites associated with the delivery and use of the grouting equipment and materials associated with this method; however, this activity would occur in the same construction staging/work areas as identified for the cut-and-cover construction method.</p> <p>With the reduction in excavated soil materials to be hauled away, this method would lessen the noise associated with haul trucks; however, this reduction in haul truck trips and the associated noise would be partially offset by the noise from trucks delivering materials such as concrete liners for the tunnel.</p> <p>The same mitigation measures adopted as part of the 2004 FEIS/EIR and incorporated as part of the proposed project would apply. These measures and applicable noise standards and regulations would reduce effects to not adverse/less than significant.</p>	<p>There would be increased activity and noise at the sites where the TBMs access and exit the tunnel; however, over the length of this entire segment, the change in noise and vibration impacts would be reduced compared to the proposed cut-and-cover construction method, since construction under this method would be underground. With the reduction in excavated soil materials to be hauled away, this method would lessen the noise associated with haul trucks; however, this reduction in haul truck trips and the associated noise would be partially offset by the noise from trucks delivering materials such as concrete liners and the equipment required to support the tunnel boring machines.</p> <p>The same mitigation measures adopted as part of the 2004 FEIS/EIR and incorporated as part of the proposed project would apply. These measures and applicable noise standards and regulations would reduce effects to not adverse/less than significant.</p>	<p>Although there may be increased activity and noise at the sites where the TBMs access and exit the tunnel, the change in noise and vibration impacts compared to the proposed SEM construction method would be negligible since the TBM access and exit points would be at construction staging areas proposed to be used for the SEM method and underground construction is already planned for this segment.</p> <p>The same mitigation measures, design criteria, and noise standards and regulations that apply to the proposed SEM construction technique would apply for this other construction method and would reduce effects to not adverse/less than significant.</p>

**Table MR-5
 Other Mining Construction Methods for Selected Segments of the DTX Alignment**

	Mined Tunneling (Jacked Box Tunnel)	SEM	SEM with Tunnel Boring Machine	SEM with Tunnel Boring Machine
Air Quality	Dust and air pollutants would be reduced compared to the proposed cut-and-cover construction method, because there would be less ground disturbance, construction would occur underground, and there would be a reduction in the number of trucks removing excavated soil materials. The same mitigation measures adopted as part of the 2004 FEIS/EIR and incorporated as part of the proposed project would apply. These measures and applicable air quality standards and regulations would reduce effects to not adverse/less than significant.	Dust and air pollutants would be reduced compared to the proposed cut-and-cover construction method, because there would be less ground disturbance and construction would primarily occur underground. Additionally, due to the reduction in excavation materials, truck traffic would be reduced by roughly 20 percent. This reduction in truck trips and associated pollutant emissions would be partially offset by the need to deliver materials such as concrete liners for the tunnel and for the set-up and equipment required to support the tunnel boring machines, if used. The same mitigation measures adopted as part of the 2004 FEIS/EIR and incorporated as part of the proposed project would apply. These measures and applicable air quality standards and regulations would reduce effects to not adverse/less than significant.		Underground construction is already planned for this segment; therefore, impacts would be similar to the proposed SEM construction method. The addition of tunnel boring machines would not substantially alter the air quality impacts of SEM alone.
Greenhouse Gases and Climate Change	Greenhouse gas emissions would be slightly reduced compared to the proposed cut-and-cover construction methods due to the reduction in the number of truck trips needed to haul away the excavated soils. While construction emissions would vary slightly because of different construction equipment, methods, and duration, the proposed project, when taking into consideration the long-term operational effects, would contribute to a projected carbon dioxide (CO2) emissions reduction of 3,375,155 tons per year in the Bay Area. Thus, the change in greenhouse gas emissions compared to the proposed construction method is negligible compared to long-term project-wide greenhouse gas emission reductions.			Underground construction is already planned for this segment; therefore, impacts would be similar to the proposed SEM construction method. The addition of tunnel boring machines would not substantially alter the greenhouse gas impacts of SEM alone.
Public Services, Community Services, and Recreational Facilities	Although these construction methods would reduce the amount of street disruption, traffic plans are required prior to construction, such that access to public facilities and interference with emergency response vehicles would be similar that under cut-and-cover construction. The other construction methods would reduce temporary impacts related to access, noise, and dust that could affect public, community, and recreational activities.			Underground construction is already planned for this segment; therefore, impacts would be similar to the proposed SEM construction method. The addition of tunnel boring machines would not alter the public service impacts of SEM alone.

**Table MR-5
 Other Mining Construction Methods for Selected Segments of the DTX Alignment**

	Mined Tunneling (Jacked Box Tunnel)	SEM	SEM with Tunnel Boring Machine	SEM with Tunnel Boring Machine
Safety and Security	As described above under Transportation and Public Services, these construction methods would reduce street-level impacts such as circulation and emergency response. However, for other safety and security impacts, such as the potential train accidents, passenger well-being on transit, and security risks, these other construction methods would have a negligible difference.		Underground construction is already planned for this segment; therefore, impacts would be similar to the proposed SEM construction method. The addition of tunnel boring machines would not alter the safety impacts of SEM alone.	
Utilities	Compared to the proposed cut-and-cover construction method, this construction method would have less impact to utilities, because it would reduce the amount of underground utilities relocation and the potential for service interruptions.	Compared to the proposed cut-and-cover construction method, these construction methods would have less impact to utilities, because they would reduce the amount of underground utilities relocation and the potential for service interruptions. In addition, because construction would occur underground for most of the length of this segment, at-grade and above-ground utilities could remain in place. Grouting or other ground improvement measures needed in the soft ground conditions of these segments could damage older and brittle utilities, requiring utility relocation, support in place, and settlement monitoring. These measures, however, are already among the mitigation measures adopted in the 2004 FEIS/EIR and incorporated as part of the proposed project.	Underground construction is already planned for this segment; therefore, impacts would be similar to the proposed SEM construction method. The addition of tunnel boring machines would not alter the utility impacts of SEM alone.	
Environmental Justice	The same mitigation measures adopted as part of the 2004 FEIS/EIR and incorporated as part of the proposed project would apply and would reduce construction impacts from the construction method evaluated in the Draft SEIS/EIR to not adverse/less than significant. As a result, the Draft SEIS/EIR identified no disproportionate construction or operation impacts for environmental justice communities. Construction impacts from the other construction methods would generally be less for the segments of the alignments where they could be used. As a result, the other construction methods identified for the segment along Townsend Street would lessen the effects before mitigation to the environmental justice communities south of Townsend Street (Figure 3.18-1); after mitigation, noise impacts would be not adverse/less than significant, and the environmental justice communities south of Townsend Street would not be disproportionately affected.			
Section 4(f)	The SEIS/EIR identifies de minimis impacts to four Section 4(f) resources. One property at 180 Townsend Street would be demolished for a construction staging and permanent ventilation structure. The other construction methods at this location (SEM or SEM with tunnel boring machines) would not alter this Section 4(f) impact. Two properties in the vicinity of the Howard/Second Street intersection (589 Howard Street and 165-173 Second Street) would be used for piles and underpinning with cut-and-cover construction. They are both contributing elements to the Second and Howard Streets District. The other construction method in this segment of the widened throat structure (jacked box tunnel) would still require piles and underpinning for the building at 589 Howard Street, although the tunnel structure with this construction method would provide better support for the building. The Section 4(f) resource at 165-173 Second Street would not be affected by this other construction method. As a result, the other construction method would not alter the Section 4(f) de minimis impacts identified for these properties.			

Table MR-5 Other Mining Construction Methods for Selected Segments of the DTX Alignment				
	Mined Tunneling (Jacked Box Tunnel)	SEM	SEM with Tunnel Boring Machine	SEM with Tunnel Boring Machine
	<p>The cut-and-cover construction method would also have a de minimis impact on the San Francisco Fire Department Auxiliary Water Supply System as a result of possible pipe replacement. The other construction methods may still require such replacement and, therefore, would not alter this Section 4(f) impact.</p> <p>These other construction methods would not substantially impair the features, activities, or attributes of the other Section 4(f) resources identified in this Final SEIS/EIR.</p>			

Individual Responses

The following responses address comments that were submitted in comment letters and on speaker cards received at the public meeting on the Draft SEIS/EIR. Each comment letter and speaker card is reproduced followed immediately by the responses.



United States Department of the Interior

OFFICE OF THE SECRETARY
Office of Environmental Policy and Compliance
Pacific Southwest Region
333 Bush Street, Suite 515
San Francisco, CA 94104

IN REPLY REFER TO:
(ER 15/0715)

Filed Electronically

22 February 2016

Scott Boule
TJPA Legislative Affairs & Community Outreach Manager
201 Mission Street, Suite 2100
San Francisco, CA 94105

Subject: *Supplemental Draft Environmental Impact Statement (SDEIS) and Section 4(f)
Evaluation Transbay Transit Center Program, San Francisco, CA*

Dear Mr. Boule,

The Department of the Interior has received and reviewed the subject document and has no comments to offer.

Thank you for the opportunity to review this project.

Sincerely,

Patricia Sanderson Port
Regional Environmental Officer

cc: OEPC Staff Contact: Carol Braegelmann; (202) 208-6661; Carol_Braegelmann@ios.doi.gov

USDOI-1

**US Department of Interior
February 22, 2016**

USDOI-01 The FTA and TJPA appreciate the Department of Interior's review of the environmental document. No further response is necessary.



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION IX
75 Hawthorne Street
San Francisco, CA 94105

February 29, 2016

Ms. Brenda Perez
Federal Transit Administration, Region IX
90 7th Street, Suite 15-300
San Francisco, CA 94103

Subject: Draft Supplemental Environmental Impact Statement for the Transbay Transit Center Program, San Francisco, California (CEQ #20150361)

Dear Ms. Perez:

The Environmental Protection Agency (EPA) has reviewed the above-referenced document pursuant to the National Environmental Policy Act (NEPA), Council on Environmental Quality (CEQ) regulations (40 CFR Parts 1500-1508), and Section 309 of the Clean Air Act.

We reviewed the previous Draft Environmental Impact Statement for this project and provided comments on December 2, 2002, rating the document LO, *Lack of Objections*. We value the efforts of the Transbay Joint Powers Authority to meet with us during development of this supplemental document and the opportunity to review an administrative draft. We appreciate that our previous comments on the administrative draft related to the potential effects of sea level rise on the project have been addressed. We appreciate TJPA's proposed mitigation measure to prepare a sea level rise adaptation plan that will identify measures that will be taken to protect the project facilities from damage due to potential future flooding in the 2100 time horizon.

EPA is supportive of the project goals of improving public access to bus and rail service and reducing non-transit vehicle usage. We have rated this Draft Supplemental Environmental Impact Statement as LO, *Lack of Objections*. Please see the enclosed *Summary of EPA Rating Definitions* for a description of our rating system.

We appreciate the opportunity to review the document. When the Final EIS is released for public review, please send one CD copy to the address above (mail code: ENF-4-2). If you have any questions, please contact Carolyn Mulvihill, the lead reviewer for this project, at 415-947-3554 or mulvihill.carolyn@epa.gov.

Sincerely,

A handwritten signature in cursive script that reads "Carolyn Mulvihill for".

Connell Dunning, Transportation Team Supervisor
Environmental Review Section

Enclosure: Summary of EPA Rating Definitions

cc: Joyce Oishi, TJPA

SUMMARY OF EPA RATING DEFINITIONS*

This rating system was developed as a means to summarize the U.S. Environmental Protection Agency's (EPA) level of concern with a proposed action. The ratings are a combination of alphabetical categories for evaluation of the environmental impacts of the proposal and numerical categories for evaluation of the adequacy of the Environmental Impact Statement (EIS).

ENVIRONMENTAL IMPACT OF THE ACTION

"LO" (Lack of Objections)

The EPA review has not identified any potential environmental impacts requiring substantive changes to the proposal. The review may have disclosed opportunities for application of mitigation measures that could be accomplished with no more than minor changes to the proposal.

"EC" (Environmental Concerns)

The EPA review has identified environmental impacts that should be avoided in order to fully protect the environment. Corrective measures may require changes to the preferred alternative or application of mitigation measures that can reduce the environmental impact. EPA would like to work with the lead agency to reduce these impacts.

"EO" (Environmental Objections)

The EPA review has identified significant environmental impacts that should be avoided in order to provide adequate protection for the environment. Corrective measures may require substantial changes to the preferred alternative or consideration of some other project alternative (including the no action alternative or a new alternative). EPA intends to work with the lead agency to reduce these impacts.

"EU" (Environmentally Unsatisfactory)

The EPA review has identified adverse environmental impacts that are of sufficient magnitude that they are unsatisfactory from the standpoint of public health or welfare or environmental quality. EPA intends to work with the lead agency to reduce these impacts. If the potentially unsatisfactory impacts are not corrected at the final EIS stage, this proposal will be recommended for referral to the Council on Environmental Quality (CEQ).

ADEQUACY OF THE IMPACT STATEMENT

"Category 1" (Adequate)

EPA believes the draft EIS adequately sets forth the environmental impact(s) of the preferred alternative and those of the alternatives reasonably available to the project or action. No further analysis or data collection is necessary, but the reviewer may suggest the addition of clarifying language or information.

"Category 2" (Insufficient Information)

The draft EIS does not contain sufficient information for EPA to fully assess environmental impacts that should be avoided in order to fully protect the environment, or the EPA reviewer has identified new reasonably available alternatives that are within the spectrum of alternatives analysed in the draft EIS, which could reduce the environmental impacts of the action. The identified additional information, data, analyses, or discussion should be included in the final EIS.

"Category 3" (Inadequate)

EPA does not believe that the draft EIS adequately assesses potentially significant environmental impacts of the action, or the EPA reviewer has identified new, reasonably available alternatives that are outside of the spectrum of alternatives analysed in the draft EIS, which should be analysed in order to reduce the potentially significant environmental impacts. EPA believes that the identified additional information, data, analyses, or discussions are of such a magnitude that they should have full public review at a draft stage. EPA does not believe that the draft EIS is adequate for the purposes of the NEPA and/or Section 309 review, and thus should be formally revised and made available for public comment in a supplemental or revised draft EIS. On the basis of the potential significant impacts involved, this proposal could be a candidate for referral to the CEQ.

*From EPA Manual 1640, Policy and Procedures for the Review of Federal Actions Impacting the Environment

US EPA
February 29, 2016

EPA-01 The FTA and TJPA appreciate the U.S. Environmental Protection Agency's (EPA) review of the environmental document and the acknowledgment that earlier comments from the EPA have been addressed. No further response is necessary.

DEPARTMENT OF TRANSPORTATION

DISTRICT 4

P.O. BOX 23660

OAKLAND, CA 94623-0660

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SCH# 1995063004

Mr. Scott Boule
Legislative Affairs and Outreach Manager
Transbay Joint Powers Authority/Federal Transit Administration
201 Mission Street, Suite 2100
San Francisco, CA 94105

Transbay Transit Center Program – Draft Supplemental Environmental Impact Statement/Environmental Impact Report

Dear Mr. Boule:

Thank you for continuing including the California Department of Transportation (Caltrans) in the environmental review process for the project referenced above. Our comments seek to promote the State's smart mobility goals that support a vibrant economy and build active communities rather than sprawl. We have reviewed the Draft Supplemental Environmental Impact Statement/Environmental Impact Report (SEIS/EIR) and have the following comments to offer. Additional comments may be forthcoming.

Project Understanding

The proposed project evaluates refinements to the Downtown Rail Extension component of the Transbay Transit Center Program, as well other transportation improvements and land use development opportunities associated with the Transbay Program. The Final EIS/EIR for the Transbay Transit Center Program was certified by the Transbay Joint Powers Authority (TJPA) in 2004 and adopted by the Federal Transit Administration (FTA) in 2005. U.S. Highway 101, Interstate (I-) 280, and I-80 are located within two miles of the project area. The proposed SEIS/EIR project components, including several Phase 2 refinements, may intersect State Right-of-way (ROW) at I-80 and I-280.

Mitigation Responsibility

As the lead agency, the TJPA/FTA is responsible for identifying and ensuring the coordinated implementation of all project mitigation, including any needed improvements to State highways. The project's fair share contribution, financing, scheduling, implementation responsibilities and lead agency monitoring should be fully discussed for all proposed mitigation measures. This

Caltrans-1

information should also be presented in the updated Mitigation Monitoring and Reporting Plan of the environmental document.

Caltrans-1
continued

Project Coordination

We advise you to coordinate with Caltrans' Division of Program & Project Management to discuss design plans and mitigation measures for any Transbay Transit Center Program projects that may affect State facilities and Caltrans' ongoing oversight responsibilities. For further assistance regarding the Transbay Transit Center Program and the active or programmed Caltrans projects in the project's vicinity, please contact Al Lee, Caltrans Regional Project Manager, San Francisco County, at (510) 286-7211.

Caltrans-2

Geologic Seismic & Soil Impacts

Please clarify Impact GE-2 under Section 3.9.4, Summary of Proposed Project Effects/Impacts (SEIS/EIR, pg. 3.9-22). We recommend the item be changed to "Seismic-Related and non-Seismic Ground Failure (Less than Significant)."

Caltrans-3

Please clarify Impact C-GE-5 (Construction-Soil Erosion) under Section 3.9.4, Summary of Proposed Project Effects/Impacts and Table S-2 (pg. 3.9-22 and pg. S-23). Although the proposed project would not result in substantial soil erosion as the report states, "It requires implementation of the Erosion and Sedimentation Control Plan (ESCP) and Erosion Control Best Management Practices (BMPs) to result in no adverse effect/less than significant impact (pg. 3.9-21)." We recommend the result be changed to less than significant with mitigation.

Caltrans-4

Structural Impacts

Please clarify if the SEIS/EIR's proposed modifications will affect any existing structure within the state highway system. All project level activities affecting structures must be authorized with an encroachment permit. We request the SEIS/EIR ensure any project level activities are planned and designed so that safety and the structural operational integrity of the state highway system bridges and structures are not compromised.

Caltrans-5

Adjacent Land Development

Regarding additional development potential at the vent structure sites and intercity bus facility, the SEIS/EIR states, "as more detailed plans evolve for future development, they may require additional environmental review pursuant to CEQA (pg. 2-40)." All potentially significant project-specific and cumulatively considerable environmental impacts should be fully consistent with the significant impacts identified in the 2004 FEIS/FEIR and applicable local transportation plans and programs. There should be no new "peculiar" significant impacts unique to a proposed project, which concurs with CEQA Guidelines Section 15183. Given the proximity to state facilities, any potential safety issues for all road users from adjacent land development projects should be identified and fully mitigated.

Caltrans-6

Mr. Scott Boule, Transbay Joint Powers Authority/Federal Transit Administration
February 3, 2016
Page 3

We encourage the SEIS/EIR to identify any transportation impact fees associated with future development within the Transbay Transit Center District, and the applicability towards the City of San Francisco's Transportation Sustainability Program. We encourage a sufficient allocation of fair share contributions toward multi-modal improvements and regional transportation projects.

Caltrans-6
continued

Transportation Management Plan (TMP)

If it is determined that traffic restrictions and detours are needed on or affecting state highways, a TMP or construction traffic impact study may be required of the TJPA/FTA for approval by Caltrans prior to construction. TMP's must be prepared in accordance with Caltrans' *Manual on Uniform Traffic Control Devices*. Further information is available for download at the following web address: <http://www.dot.ca.gov/hq/traffops/engineering/mutcd/pdf/camutcd2014/Part6.pdf>.

Caltrans-7

Encroachment Permit

Please be advised that any work or traffic control that encroaches onto the State ROW requires an encroachment permit that is issued by Caltrans. Traffic-related mitigation measures should be incorporated into the construction plans prior to the encroachment permit process. To apply, a completed encroachment permit application, environmental documentation, and five (5) sets of plans clearly indicating State ROW must be submitted to the following address: David Salladay, District Office Chief, Office of Permits, California Department of Transportation, District 4, P.O. Box 23660, Oakland, CA 94623-0660. See the following website for more information: <http://www.dot.ca.gov/hq/traffops/developserv/permits>.

Caltrans-8

Please provide our office with copies of any proposed further actions regarding this project. We would appreciate the opportunity to review and comment on any changes related to this transportation project where it affects State facilities.

Caltrans-9

Should you have any questions regarding this letter or seek additional information, please contact Sherie George at (510) 286-5535 or sherie.george@dot.ca.gov.

Sincerely,



PATRICIA MAURICE
District Branch Chief
Local Development - Intergovernmental Review

c: State Clearinghouse

California Department of Transportation District 4 (Caltrans)
February 3, 2016

Caltrans-01 The TJPA, in coordination with the FTA, acknowledges that it will be responsible for mitigating project-related adverse effects and cumulative effects, when the project's contribution is cumulatively considerable as required by CEQA. The Draft SEIS/EIR did not identify any needed improvements to State highways or facilities that are owned or managed by California Department of Transportation (Caltrans) as a result of constructing or operating the proposed project.

As described in Chapter 2 of the Draft SEIS/EIR (Project Alternatives), the location, nature, and extent of the refinements to the previously approved Transbay Program are localized, relatively small modifications to the approved Transbay Program components, and not located near State highway facilities. Figure 2-6 of the Draft SEIS/EIR shows that there are four locations where a proposed project component would be in the vicinity of a State highway (within 300 feet): a tunnel segment and construction staging area at Second and Harrison Streets near I-80; use of the AC Transit bus parking area under I-80 for public parking in off hours; the underground tunnel stub box near the I-280 off-ramp at Sixth Street; and the turnback track and MOW track paralleling Seventh Street and under I-280.

In each of these four instances, the proposed project component would not directly affect the State highways. The tunnel segment on Second Street and the tunnel stub box within the Caltrain railyard are both underground and therefore would not interfere with movement on, or access to, State facilities. Furthermore, the tunnel segment on Second Street would pass under the freeway within the Second Street right-of-way and therefore would not affect the I-80 foundations and support columns, which are outside of the Second Street right-of-way.

The off-hour parking and the additional tracks along Seventh Street would both be beneath existing elevated highway facilities but would require little or no ground disturbance. The proposed parking component would involve striping the AC Transit bus parking facility and installation of a space for parking lot attendants. These changes would be made to improvements that have already been environmentally reviewed and approved as part of the Transbay Program, and would not involve any additional earthwork. The additional tracks along Seventh Street would involve installing railroad tracks within the Caltrain right-of-way and modifying the at-grade crossing with 16th Street. This installation would involve limited grading to about 3 feet below the existing ground surface for the track bed. The intersection modifications would involve reconstruction of the curbs, sidewalks, and roadways and relocation of signals. The turnback track would replace the MOW track that already exists on the east side of the Caltrain mainline tracks.

Because these elements of the project would not alter or affect Caltrans facilities or operations, they would not result in significant/adverse impacts on Caltrans facilities and no additional mitigation, other than the mitigation measures identified in the SEIS/EIR or previously adopted and incorporated into the Transbay Program, are required. Nevertheless, TJPA will coordinate with Caltrans during the next phase of design to review the project design in relationship to State highway facilities.

California Department of Transportation District 4 (Caltrans)

February 3, 2016

- Caltrans-02 The TJPA values Caltrans as a partner and will continue to coordinate with Caltrans, as has been the case during Phase 1 planning and construction. Such collaboration is anticipated during the next phase of design and prior to construction.
- Caltrans-03 The text immediately following Impact GE-2 explains that the various ground failure hazards discussed under Impact GE-2 are those triggered by a seismic event. The figures that illustrate potential liquefaction, settlement, and lateral spreading (Figure 3.9-4, Figure 3.9-5, and Figure 3.9-6, respectively) reflect hazards induced by earthquakes. Because these hazards, as described, are seismically related, the summary impact description of Impact GE-2 will remain as presented in the Draft SEIS/EIR. Regardless of whether these potential hazards result from seismic or non-seismic origins, the impacts are considered less than significant under CEQA (no adverse effect under NEPA), because the proposed project will be constructed in compliance with all applicable building codes and standards, as well as the mitigation measures from the 2004 certified EIR for the Transbay Program (which are reproduced and attached to this Final SEIS/EIR as Appendix D).
- Caltrans-04 The preparation of an erosion and sediment control plan and the implementation of erosion control Best Management Practices are requirements specified by the City's Construction Site Runoff Control Ordinance (Ord. 260-13). Because they are regulatory requirements of general applicability that apply to the proposed project, these measures must be implemented as part of complying with applicable laws, ordinances, and regulations. Thus, there is no need to consider or refer to the Erosion and Sedimentation Control Plan and Best Management Practices as "mitigation measures." Because no mitigation measures are required beyond compliance with the existing regulatory framework, the significance determination will remain as presented in the Draft SEIS/EIR (i.e., No Adverse Effect/Less-than-Significant Impact).
- Caltrans-05 The proposed project components described in Chapter 2, Project Alternatives, of the Draft SEIS/EIR will not affect any existing structure within the State highway system. Please see response to Comment Caltrans-01.
- Caltrans-06 The proposed project is not being evaluated pursuant to Section 15183 of the State CEQA Guidelines, which allows proposed projects to be exempt from CEQA provided that they are substantially consistent with the previously approved EIR for a community plan, General Plan, or zoning. Rather, this Draft SEIS/EIR examines potential adjacent land development proposals, and their associated effects, compared to the land development that would occur were the proposed project not implemented. At the site of the intercity bus facility and the Second/Harrison vent structure, the applicable plans are the TCDP and the 2004 Transbay Program, respectively. For the adjacent land development site at the Third and Townsend vent structure site, the applicable plan is the Central South of Market (Central SoMa) Plan. Because portions of each of these sites would be needed for facilities required by DTX, the full development potential of the site, according to the relevant plan, would not be

California Department of Transportation District 4 (Caltrans)
February 3, 2016

realized and the amount of development and the related impacts would be less than attributed to these three sites in their respective plan and environmental review documents. As described on page 2-40 of the Draft SEIS/EIR, the potential future development of the vent structure sites and intercity bus facility for uses other than transportation is part of the proposed project subject to CEQA review. However, this adjacent land development would not be under FTA's jurisdiction, and therefore is not considered as part of the proposed NEPA action, but is evaluated as a secondary or indirect effect under NEPA.

It should be noted that the analysis of adjacent land development and its potential environmental effects was included at the request of the City. The analysis in this Draft SEIS/EIR for these sites is a program-level review based on assumed development programs that comply with City zoning and applicable area plans. All future development that may occur at the adjacent land sites would be subject to further environmental review by the City. Consequently, development fees and other mitigation requirements will be the responsibility of parties seeking to develop these sites in the future. Please also see response to Comment Caltrans-01.

Caltrans-07 Thank you for the information regarding the need and standards for a Transportation Management Plan. The TJPA will continue to coordinate with Caltrans during the next phase of design to review the Transportation Management Plan prior to construction.

Caltrans-08 The TJPA will provide the appropriate information to the Caltrans Office of Permits when it is timely to seek an encroachment permit. Thank you for the website link to obtain further details.

Caltrans-09 TJPA will continue to consult with Caltrans and share plans as they may affect State highway facilities.

DEPARTMENT OF TRANSPORTATION

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OAKLAND, CA 94623-0660
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February 25, 2016

SF080094
SF-80-PM 5.56
SCH# 1995063004

Mr. Scott Boule
Legislative Affairs and Outreach Manager
Transbay Joint Powers Authority/Federal Transit Administration
201 Mission Street, Suite 2100
San Francisco, CA 94105

Transbay Transit Center Program – Draft Supplemental Environmental Impact Statement/Environmental Impact Report – Additional Comments

Dear Mr. Boule:

Thank you for continuing to include the California Department of Transportation (Caltrans) in the environmental review process for the project referenced above. Our comments seek to promote the State’s smart mobility goals that support a vibrant economy and build active communities rather than sprawl. In addition to Caltrans’ letter dated February 3, 2016, we have reviewed the Draft Supplemental Environmental Impact Statement/Environmental Impact Report (SEIS/EIR) and have the following supplemental comments to offer.

Structural Impacts

- Please confirm the document addresses any impacts on the nearby Caltrans structures; i.e., bridges. The local agency bridges are also under Caltrans routing inspection programs and any project impacts on these bridges should be fully addressed. Caltrans-A1
- Ensure Caltrans is provided the opportunity to review the complete structural plans including any geological investigations and their impact on the nearby bridges. Caltrans-A2
- Proposed alternatives include construction of piles, installed deep in the ground and the removal of the ground several feet below the surface. This may have direct impact on the bridges. A proposal of vibration and stress monitor systems may be required and should be proposed for the construction duration. Caltrans-A3
- Tunnels under any public roads, especially under the State Highway System, requires mandated routing inspection by Caltrans engineers. The Caltrans Office of Structure Caltrans-A4

Mr. Scott Boule, Transbay Joint Powers Authority/Federal Transit Administration
February 25, 2016
Page 2

Maintenance and Investigations Support should be contacted to obtain the necessary identification numbers, called bridge numbers, and these numbers should be printed on the construction plans. For more information regarding the Office of Structure Maintenance and Investigations Support, please contact Mr. Kenneth R. Brown, Branch Chief, Supervising Bridge Engineer, at (510) 286-0932.

Caltrans-A4
continued

- Caltrans may require a design that is based on Caltrans' structural design codes and specifications for the structures under any public road. These code requirements are needed for the proper rating of structures and prevent restriction of heavier vehicles using the surface roadways.
- The District Office for Headquarters' Division of Maintenance, Structure Maintenance and Investigations Support, is responsible for inspection of all toll bridges in Bay Area. As-Built Plans of Caltrans and many local agency bridges may also be obtained through this office.

Caltrans-A5

Caltrans-A6

Please provide our office with copies of any proposed further actions regarding this project. We would appreciate the opportunity to review and comment on any changes related to this transportation project where it affects State facilities.

Caltrans-A7

Should you have any questions regarding this letter or seek additional information, please contact Sherie George at (510) 286-5535 or sherie.george@dot.ca.gov.

Sincerely,



PATRICIA MAURICE
District Branch Chief
Local Development - Intergovernmental Review

c: State Clearinghouse

California Department of Transportation District 4 (Caltrans)
February 25, 2016

- Caltrans A-01 The proposed project is not expected to affect Caltrans structures, and the Draft SEIS/EIR did not include any potential impacts to such structures since none were identified. As explained in the response to Comment Caltrans-01, the impacts of the proposed project are anticipated to be negligible. Nevertheless, the TJPA will continue to engage and consult with Caltrans to assure that the agency has the opportunity to review and comment on the project. Please see response to Comment Caltrans-01.
- Caltrans A-02 As stated in the response to Comment Caltrans A-01, the TJPA will continue to coordinate with Caltrans during the design of the project concerning State facilities. In particular, as requested by the commenter, the TJPA will share its structural plans and geotechnical investigations when proposed construction and facilities would be near a Caltrans bridge.
- Caltrans A-03 Please refer to responses to Comment Caltrans A-01 and Comment Caltrans A-02. As necessary, the TJPA will coordinate with Caltrans to protect bridges from the effects of construction and operation of the proposed project. At this level of design, no significant/adverse direct or indirect impacts to Caltrans bridges have been identified.
- Caltrans A-04 Thank you for this contact information. The Caltrans Office of Structure Maintenance and Investigations Support will be contacted regarding tunneling under public roads and the need for routing inspection by Caltrans engineers.
- Caltrans A-05 The TJPA is aware of and familiar with Caltrans design standards and manuals. The design criteria for the DTX and the proposed project refinements include the following Caltrans codes and specifications:
- Caltrans Standard Plans and Specifications
 - Caltrans Highway Design Manual
 - Caltrans Bridge Design Specifications
 - Caltrans Amendments to the AASHTO LRFD Bridge Design Specifications
 - Caltrans Trenching and Shoring Manual
- Further consultation with Caltrans is anticipated during the next phase of design and prior to construction as indicated in the prior responses.
- Caltrans A-06 The TJPA appreciates the availability of the as-built plans and looks forward to collaborating with the Caltrans Office of Structure Maintenance and Investigations Support.
- Caltrans A-07 The TJPA will continue to consult with Caltrans and share plans as they may affect State highway facilities as indicated in the prior responses.



EDMUND G. BROWN JR.
GOVERNOR

STATE OF CALIFORNIA
GOVERNOR'S OFFICE *of* PLANNING AND RESEARCH
STATE CLEARINGHOUSE AND PLANNING UNIT



KEN ALEX
DIRECTOR

February 4, 2016

Scott Boule
Transbay Joint Powers Authority/Federal Transit Administrative
201 Mission Street, Suite 2100
San Francisco, CA 94105

Subject: Supplemental EIS/EIR for the Transbay Transit Center Program
SCH#: 1995063004

Dear Scott Boule:

The State Clearinghouse submitted the above named Supplemental EIR to selected state agencies for review. On the enclosed Document Details Report please note that the Clearinghouse has listed the state agencies that reviewed your document. The review period closed on February 3, 2016, and the comments from the responding agency (ies) is (are) enclosed. If this comment package is not in order, please notify the State Clearinghouse immediately. Please refer to the project's ten-digit State Clearinghouse number in future correspondence so that we may respond promptly.

Please note that Section 21104(c) of the California Public Resources Code states that:

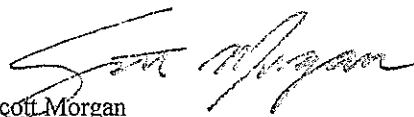
"A responsible or other public agency shall only make substantive comments regarding those activities involved in a project which are within an area of expertise of the agency or which are required to be carried out or approved by the agency. Those comments shall be supported by specific documentation."

These comments are forwarded for use in preparing your final environmental document. Should you need more information or clarification of the enclosed comments, we recommend that you contact the commenting agency directly.

This letter acknowledges that you have complied with the State Clearinghouse review requirements for draft environmental documents, pursuant to the California Environmental Quality Act. Please contact the State Clearinghouse at (916) 445-0613 if you have any questions regarding the environmental review process.

SCH-01

Sincerely,


Scott Morgan
Director, State Clearinghouse

Enclosures
cc: Resources Agency

**Document Details Report
State Clearinghouse Data Base**

SCH# 1995063004
Project Title Supplemental EIS/EIR for the Transbay Transit Center Program
Lead Agency Transbay Joint Powers Authority

Type SIR Supplemental EIR
Description The proposed project consists of refinements to the previously approved Downtown Rail Extension (DTX) that was evaluated in a 2004 Final EIS/EIR and subsequently modified through six addenda between 2006 and 2011. The DTX will extend rail service 1.3 miles underground from the current northern Caltrain terminus at Fourth and Kings Streets into the new Transit Center (currently under construction) and will also provide a northern terminus for future high speed trains in downtown SF.

Lead Agency Contact

Name Scott Boule
Agency Transbay Joint Powers Authority/Federal Transit Administrative
Phone 415-597-4620 **Fax**
email
Address 201 Mission Street, Suite 2100
City San Francisco **State** CA **Zip** 94105

Project Location

County San Francisco
City San Francisco
Region
Lat / Long 37° 47' 10.87" N / 122° 23' 51.82" W
Cross Streets Main Street, Second Street, Seventh Street, Townsend Street, Minna Street, Natoma Street
Parcel No. Multiple

Township	Range	Section	Base

Proximity to:

Highways Hwy 101, 280
Airports
Railways Caltrain, Muni Metro
Waterways San Francisco Bay
Schools
Land Use Mixed

Project Issues Aesthetic/Visual; Air Quality; Archaeologic-Historic; Biological Resources; Drainage/Absorption; Economics/Jobs; Fiscal Impacts; Flood Plain/Flooding; Geologic/Seismic; Noise; Population/Housing Balance; Public Services; Recreation/Parks; Schools/Universities; Sewer Capacity; Soil Erosion/Compaction/Grading; Solid Waste; Toxic/Hazardous; Traffic/Circulation; Vegetation; Water Quality; Water Supply; Landuse; Cumulative Effects

Reviewing Agencies Resources Agency; Department of Fish and Wildlife, Region 3; Office of Historic Preservation; Department of Parks and Recreation; Department of Water Resources; San Francisco Bay Conservation and Development Commission; Caltrans, Division of Aeronautics; California Highway Patrol; Caltrans, District 4; Air Resources Board, Transportation Projects; Regional Water Quality Control Board, Region 2; Department of Toxic Substances Control; Native American Heritage Commission; Public Utilities Commission; State Lands Commission

Date Received 12/21/2015 **Start of Review** 12/21/2015 **End of Review** 02/03/2016

~~STATE OF CALIFORNIA—CALIFORNIA STATE TRANSPORTATION AGENCY~~

EDMUND G. BROWN Jr., Governor

DEPARTMENT OF TRANSPORTATION

DISTRICT 4

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OAKLAND, CA 94623-0660

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Governor's Office of Planning & Research

FEB 03 2016

February 3, 2016

STATE CLEARINGHOUSE

SF080094

SF-80-PM 5.56

SCH# 1995063004

Mr. Scott Boule

Legislative Affairs and Outreach Manager

Transbay Joint Powers Authority/Federal Transit Administration

201 Mission Street, Suite 2100

San Francisco, CA 94105

Transbay Transit Center Program – Draft Supplemental Environmental Impact Statement/Environmental Impact Report

Dear Mr. Boule:

Thank you for continuing including the California Department of Transportation (Caltrans) in the environmental review process for the project referenced above. Our comments seek to promote the State's smart mobility goals that support a vibrant economy and build active communities rather than sprawl. We have reviewed the Draft Supplemental Environmental Impact Statement/Environmental Impact Report (SEIS/EIR) and have the following comments to offer. Additional comments may be forthcoming.

Project Understanding

The proposed project evaluates refinements to the Downtown Rail Extension component of the Transbay Transit Center Program, as well other transportation improvements and land use development opportunities associated with the Transbay Program. The Final EIS/EIR for the Transbay Transit Center Program was certified by the Transbay Joint Powers Authority (TJPA) in 2004 and adopted by the Federal Transit Administration (FTA) in 2005. U.S. Highway 101, Interstate (I-) 280, and I-80 are located within two miles of the project area. The proposed SEIS/EIR project components, including several Phase 2 refinements, may intersect State Right-of-way (ROW) at I-80 and I-280.

Mitigation Responsibility

As the lead agency, the TJPA/FTA is responsible for identifying and ensuring the coordinated implementation of all project mitigation, including any needed improvements to State highways. The project's fair share contribution, financing, scheduling, implementation responsibilities and lead agency monitoring should be fully discussed for all proposed mitigation measures. This

Mr. Scott Boule, Transbay Joint Powers Authority/Federal Transit Administration
February 3, 2016
Page 2

information should also be presented in the updated Mitigation Monitoring and Reporting Plan of the environmental document.

Project Coordination

We advise you to coordinate with Caltrans' Division of Program & Project Management to discuss design plans and mitigation measures for any Transbay Transit Center Program projects that may affect State facilities and Caltrans' ongoing oversight responsibilities. For further assistance regarding the Transbay Transit Center Program and the active or programmed Caltrans projects in the project's vicinity, please contact Al Lee, Caltrans Regional Project Manager, San Francisco County, at (510) 286-7211.

Geologic Seismic & Soil Impacts

Please clarify Impact GE-2 under Section 3.9.4, Summary of Proposed Project Effects/Impacts (SEIS/EIR, pg. 3.9-22). We recommend the item be changed to "Seismic-Related and non-Seismic Ground Failure (Less than Significant)."

Please clarify Impact C-GE-5 (Construction-Soil Erosion) under Section 3.9.4, Summary of Proposed Project Effects/Impacts and Table S-2 (pg. 3.9-22 and pg. S-23). Although the proposed project would not result in substantial soil erosion as the report states, "It requires implementation of the Erosion and Sedimentation Control Plan (ESCP) and Erosion Control Best Management Practices (BMPs) to result in no adverse effect/less than significant impact (pg. 3.9-21)." We recommend the result be changed to less than significant with mitigation.

Structural Impacts

Please clarify if the SEIS/EIR's proposed modifications will affect any existing structure within the state highway system. All project level activities affecting structures must be authorized with an encroachment permit. We request the SEIS/EIR ensure any project level activities are planned and designed so that safety and the structural operational integrity of the state highway system bridges and structures are not compromised.

Adjacent Land Development

Regarding additional development potential at the vent structure sites and intercity bus facility, the SEIS/EIR states, "as more detailed plans evolve for future development, they may require additional environmental review pursuant to CEQA (pg. 2-40)." All potentially significant project-specific and cumulatively considerable environmental impacts should be fully consistent with the significant impacts identified in the 2004 FEIS/FEIR and applicable local transportation plans and programs. There should be no new "peculiar" significant impacts unique to a proposed project, which concurs with CEQA Guidelines Section 15183. Given the proximity to state facilities, any potential safety issues for all road users from adjacent land development projects should be identified and fully mitigated.

Mr. Scott Boule, Transbay Joint Powers Authority/Federal Transit Administration
February 3, 2016
Page 3

We encourage the SEIS/EIR to identify any transportation impact fees associated with future development within the Transbay Transit Center District, and the applicability towards the City of San Francisco's Transportation Sustainability Program. We encourage a sufficient allocation of fair share contributions toward multi-modal improvements and regional transportation projects.

Transportation Management Plan (TMP)

If it is determined that traffic restrictions and detours are needed on or affecting state highways, a TMP or construction traffic impact study may be required of the TJPA/FTA for approval by Caltrans prior to construction. TMP's must be prepared in accordance with Caltrans' *Manual on Uniform Traffic Control Devices*. Further information is available for download at the following web address: <http://www.dot.ca.gov/hq/traffops/engineering/mutcd/pdf/camutcd2014/Part6.pdf>.

Encroachment Permit

Please be advised that any work or traffic control that encroaches onto the State ROW requires an encroachment permit that is issued by Caltrans. Traffic-related mitigation measures should be incorporated into the construction plans prior to the encroachment permit process. To apply, a completed encroachment permit application, environmental documentation, and five (5) sets of plans clearly indicating State ROW must be submitted to the following address: David Salladay, District Office Chief, Office of Permits, California Department of Transportation, District 4, P.O. Box 23660, Oakland, CA 94623-0660. See the following website for more information: <http://www.dot.ca.gov/hq/traffops/developserv/permits>.

Please provide our office with copies of any proposed further actions regarding this project. We would appreciate the opportunity to review and comment on any changes related to this transportation project where it affects State facilities.

Should you have any questions regarding this letter or seek additional information, please contact Sherie George at (510) 286-5535 or sherie.george@dot.ca.gov.

Sincerely,



PATRICIA MAURICE
District Branch Chief
Local Development - Intergovernmental Review

c: State Clearinghouse

**California Governor's Office of Planning and Research, State Clearinghouse and Planning Unit
February 4, 2016**

SCH-01 Thank you for providing this letter acknowledging the TJPA's fulfillment of its CEQA responsibilities for noticing and distributing the Draft SEIS/EIR. The attachment containing comments from Caltrans was received separately and coded as comment letter "Caltrans-01." Responses to those comments can be found under that comment letter.



Campus Planning

Lori Yamauchi
Associate Vice Chancellor
654 Minnesota Street
2nd Floor, Box 0286
San Francisco, CA 94143-0286
Tel: (415) 476-2911
Fax: (415) 476-9478

February 29, 2016

Brenda Perez
Federal Transit Administration, Region 9
90 7th Street, Suite 15-300
San Francisco, CA 94103-6701

Via email to Brenda.Perez@dot.gov

**RE: Comments on Transbay Transit Center Program Draft Supplemental
EIS/EIR (DRAFT SEIS/EIR)**

Dear Ms. Perez:

The University of California, San Francisco (UCSF) has reviewed the Draft Supplemental EIS/EIR (Draft SEIS/EIR) for the proposed Transbay Terminal/Caltrain Downtown Extension (DTX)/Redevelopment Project (the "Transbay Program"). Our comments, discussed below, are focused on one specific component of the project refinements to the DTX, the additional trackwork south of the Caltrain railyard proposed at 16th and Seventh Streets (as described in the last paragraph on page 2-30 the Draft SEIS/EIR and illustrated in Figure 2-14).

UCSF's Mission Bay campus and Medical Center, which includes Children's, Women's, and Cancer Hospitals is located along 16th Street, just east of the proposed turnback and maintenance of way tracks. Driven by its commitment to patient care and public safety, UCSF's primary goal is to ensure that patients, patient visitors, patient care workers, as well as emergency vehicles, have 24/7 unimpeded access to its Mission Bay hospitals.

After review of the Draft SEIS/EIR, UCSF is concerned that the project as proposed would have potential impacts on the UCSF Mission Bay campus and Medical Center, the greater Mission Bay area and its environs, and that the project would impede access to UCSF's Medical Center at Mission Bay by our patients, patient visitors, patient care workers, and emergency vehicles.

A. Transportation Impacts of the Proposed Additional Trackwork South of the Railyard Have Not Been Adequately Addressed

UCSF believes that the Draft SEIS/EIR does not adequately analyze the implications and impact of implementing the additional trackwork south of the Caltrain railyard under Impact TR-1 and disagrees with the conclusion that impacts to TR-1 would be less than significant.

UCSF-1

On page 3.2-18, the Draft SEIS/EIR, concludes that with implementation of the proposed mitigation measure, Impact TR-1 would be less than significant. Impact TR-1 states, “The proposed project would not result in levels of service that would exceed the City’s threshold for acceptable operations or result in localized circulation and access effects (No Adverse Effect/Less-than-Significant Impact with Mitigation)”. UCSF believes that additional evaluation, analysis and confirmation is needed in order to reach the conclusion that impacts would be less than significant.

We believe the Draft SEIS/EIR uses obsolete traffic data which undermines both the resulting analysis and impact conclusion. The Draft SEIS/EIR is silent on the Warriors Event Center and Mixed-Use Development project that is proposed at 16th and Third Street. The Warriors Event Center and Mixed-Use Development SEIR was certified in November 2015. The transportation analysis in the Draft SEIS/EIR does not take into account the effects of an event at the Arena. Information and analysis from the Event Center SEIR should be considered in the Draft SEIS/EIR.

UCSF-2

There is also no analysis in the Draft SEIS/EIR of the intersection of 16th and Seventh Streets; instead it relies on the transportation analyses that was conducted in 2013 for the Peninsula Corridor Electrification Project (PCEP) EIR. We believe the analysis of this particular intersection (16th and Seventh) is based on data that are no longer valid, because the PCEP EIR did not account for the implementation of transit-only lanes on 16th Street, which are part of the City of San Francisco’s Transit Effectiveness Project (TEP), also known as Muni Forward.

UCSF-3

Although the assumption in the PCEP EIR that 16th Street would contain two travel lanes in each direction was appropriate at that time; once the City’s Final EIR for the TEP was certified by the Planning Commission in March of 2014,¹ the City directed that projects, including the Warriors Event Center Project, assume transit-only lanes on 16th Street for both existing and cumulative conditions. Since the Draft SEIS/EIR did not conduct new analysis and relied solely on the PCEP EIR, the stated LOS, impacts and conclusions do not take into account the planned transit-only lanes on 16th Street. Additional analysis should be conducted for the proposed project to account for one less travel lane for both the eastbound and westbound approaches.

The Draft SEIS/EIR proposed a new mitigation measure, *MM-TR-1.1* to mitigate impact TR-1. The mitigation measure states that “Changes to the PCEP overhead catenary system (OCS) and specialty trackwork will be undertaken by the TJPA to allow Caltrain to continue its operations at the level of service defined in the PCEP EIR”. As noted in the SEIS/EIR, the objective of the measure is to bring

UCSF-4

¹ The TEP components have been renamed by the San Francisco MTA as Muni Forward.

traffic conditions back to those represented in the PCEP EIR after implementation of the proposed mitigation measure. However, the future traffic conditions projected in the PCEP EIR are no longer accurate and would be worse as a result of Muni Forward. The future LOS at the 16th and Seventh Streets intersection will likely be worse than what was expected and concluded in the PCEP EIR and relied upon in the current Transbay Draft SEIS/EIR, since the LOS values estimated in the PCEP EIR assumed two travel lanes on 16th Street in each direction. Therefore, additional analysis would need to be conducted to account for the planned changes to 16th Street. In addition, some of the mitigation measures that were described in the PCEP EIR might no longer be appropriate or effective given that the traffic condition is worse than what was previously assumed in the PCEP EIR. If a proper analysis was conducted, it would likely demonstrate that traffic condition is worse than reported in the PCEP EIR. As an example, the PCEP EIR concluded LOS D during the PM peak while the Warriors SEIR concluded LOS E during the PM peak.

UCSF-4
Continued

Furthermore, *MM-TR-1.1* is not a legally adequate mitigation measure as defined by CEQA and appears to defer analysis to a later date, which is generally permissible under CEQA only if there is a firm commitment to achieve a performance standard and the proposed measures are capable of meeting that standard, which is not the case with *MM-TR-1.1*. "An EIR shall describe feasible mitigation measures which could minimize significant adverse impacts..." CEQA Guidelines section 15126.4(a)(1). "Mitigation measures must be fully enforceable through permit conditions, agreements, or other legally-binding instruments." CEQA Guidelines sections 15126.4(a)(2).

UCSF-5

MM-TR-1.1 suggests that TJPA will coordinate with the City to implement changes to the signal timing to satisfy the City's LOS signalized intersection standards for impacts caused by the turnback and maintenance of way tracks operations. However, it is unclear what exactly would be implemented, the effectiveness of this measure, and whether it would in fact reduce impacts to less-than-significant levels. Since the analysis relied on obsolete data, it is unclear how the changes in signal operations would mitigate the impact. When it is unclear whether a potential mitigation measure would minimize significant adverse impacts, that impact should be deemed significant. Therefore, the conclusion in the Draft SEIS/EIR is flawed.

For the reasons stated above, UCSF request that the TJPA develop and consider feasible alternatives for the turnback and maintenance of way tracks. If there are no feasible alternatives, UCSF requests that the use of the turnback and maintenance of way tracks be prohibited during AM and PM-peak hours to reduce impacts should the additional analysis determine significant transportation impacts.

UCSF-6

Other transportation analysis inadequacies include the following:

On page 3.2-23, in the last paragraph, it is unclear how by maintaining the City's LOS standards, impacts to pedestrian and bicycle circulation would be reduced. The City does not have LOS standards for pedestrian and bicycle circulation.

UCSF-7

On page 3.2-28, it is unclear how the Draft SEIS/EIR concludes that the additional trackwork south of the Caltrain railyard would have no effects/impacts on transit operations and service absent any analysis that could support the conclusion.

UCSF-7
Continued

B. Impacts on Emergency Vehicle Access Have Not Been Adequately Addressed

Access to UCSF Medical Center at Mission Bay is from 16th Street, just east of the proposed turnback and maintenance of way tracks. Emergency vehicle access to UCSF's Children Hospital is located on Mariposa and Fourth Streets. Since the opening of the hospitals in February 2015, UCSF Mission Bay emergency department averages 82 monthly 911 ambulance calls, and about 100 intra-facility and non-affiliated transport calls per month. The number of Code 3 transport (when sirens are in use) average five per month. The Draft SEIS/EIR offers no analysis or data to support its conclusion that the additional trackwork south of the Caltrain railyard will not interfere with emergency access to UCSF. We believe the additional delays associated with the operations of the turnback and maintenance of way tracks would impact patient access to our Medical Center and emergency vehicle access to the emergency room.

UCSF-8

On page 3.2-34, the Draft SEIS/EIR concludes that the proposed project would not result in inadequate emergency access and states that emergency vehicles would have the right-of way and often use multi-lane major arterials for access. While emergency vehicles do have the right-of-way, this is not an accurate statement at railroad crossings, where trains have the priority. Please discuss the other multi-lane arterials that are in close proximity and could provide access to the UCSF Medical Center.

UCSF-9

On Page 3.15-16, the Draft SEIS/EIR states that "... emergency services vehicles use multiple routes... such as Mariposa Street and Mission Bay Drive that could provide alternate east-west access for emergency vehicles." Mission Bay Drive is located between Hooper and Channel Streets and is not shown on Figure 2-14 in the SEIS/EIR; it is unclear if the proposed maintenance of way track would traverse Mission Bay Drive. However, it is likely that the Mission Bay Drive crossing would be affected since the gates will likely be down at this location if the gates are down at 16th Street. Therefore, emergency vehicles using Mission Bay Drive as an east-west street would also be affected by the delays associated with the additional gate down time. This leaves Mariposa Street as the only east-west access for emergency vehicles. UCSF believes this would result in inadequate access for emergency vehicles accessing the Mission Bay area and UCSF's emergency room.

UCSF-10

As stated on page 13.11-150 of the Warriors Event Center Final EIR, Responses to Comments document, "... with implementation of the planned 22 Fillmore Transit Priority Project, transit-only lanes will be implemented on 16th Street west of Third Street, and emergency vehicles (i.e., Police Department and Fire Department vehicles and ambulances) will be permitted use of the transit-only lanes. " However, with the additional delays and gate down time associated with the operation of the turnback and maintenance of way tracks, it limits the ability for emergency vehicles to bypass the congestion along 16th Street by using the transit-only lanes. UCSF believes the potential increase in emergency response time has not been adequately addressed.

UCSF-11

Given that the Draft SEIS/EIR uses obsolete traffic data, please confirm or provide additional analysis to support the less-than-significant conclusions reached for emergency access (Impact TR-6) and emergency service response time (Impact PS-1).

UCSF-12

C. Potential Impacts to UCSF's Shuttle Service

UCSF's shuttle system provides service for UCSF between all primary campus sites, select secondary sites and public transit. The service is available to UCSF students, faculty, staff, patients and visitors. On average, nearly 7,500 people ride the shuttle daily.

There are currently five routes that cross the tracks at 16th and Seventh Streets. On average, each route has two inbound/outbound trips per hour. That is approximately 20 crossings an hour with additional frequency on several routes during the peak periods. The additional delays and gate down times associated with the operation of the turnback and maintenance of way tracks would compromise UCSF's ability to transport students, faculty, staff, patients and visitors on a consistent schedule. UCSF's shuttle service provides critical support to our campus and medical center operations. The additional potential delays to an already congested area would render UCSF's shuttle service unreliable, and this is unacceptable to UCSF.

UCSF-13

D. Electromagnetic Fields

The Draft SEIS/EIR concludes that electromagnetic interference (EMI) levels could disturb or disrupt operations of sensitive electric equipment and includes *New MM-EF-1.1* to evaluate the electromagnetic interference (EMI) during final project design of the turnback track.

On page 3.11-7, *New MM-EF-1.1*, we request that the site-specific EMI analysis be conducted in coordination with UCSF (minimum of 60-day notice) prior to the testing and commissioning period for the proposed project.

UCSF-14

On page 3.11-8, please confirm that if EMI levels would result in disturbance to sensitive electric equipment, the TJPA will be responsible for the cost of the additional strategies identified, specifically relating to the passive engineering controls (e.g., shielding with metallic materials at the medical facility where excessive EMI levels are projected.)

E. Alternatives

Given the inadequacy of the transportation analysis, UCSF believes the proposed additional trackwork south of the railyard could have significant unavoidable impact. Accordingly, CEQA alternatives for this project component must be developed, analyzed and considered. CEQA forbids a lead agency from approving a project that would result in significant environmental impacts if feasible alternatives exist that would substantially lessen the environmental impacts of the proposed project.

UCSF-15

F. Other Issues

On page 3.2-21, 1650 Owens Street is not on the UCSF campus.

UCSF-16

On page 3.2-21, the Draft SEIS/EIR states that trains using the turnback and maintenance of way tracks would require the crossing gate at 16th Street to be lowered twice for 70 seconds each time (a total of 140 seconds). On page 3.12-14, the Draft SEIS/EIR notes that trains would travel at much slower speed (15 mph) on this portion of the track. Based on observations under current conditions during routine revenue train service, the average gate down time at the 16th Street crossing for one train is approximately 60 seconds; the average gate down time when there are trains crossing in both directions is approximately 130 seconds. Please confirm that the estimated 70 second gate down time is accurate when trains are estimated to travel at 15 mph on the proposed tracks.

UCSF-17

In Figure 3.2-1, the additional trackwork south of the railyard (Label 8) and the AC Transit bus storage facility (Label 12) are identified at the wrong locations.

UCSF-18

Finally, there is no discussion of construction impacts or construction traffic management for the additional trackwork south of the Caltrain railyard. Please include a discussion of the potential construction impacts of this component of the project.

UCSF-19

Should you have any questions regarding these comments, please contact me at (415) 476-8312.

Sincerely,



Lori Yamauchi, Associate Vice Chancellor

University of California San Francisco
February 29, 2016

- UCSF-01 Because traffic impacts are most critical during AM/PM peak hours, the City's Transportation Impact Guidelines require study of intersections for these commute periods. Commute period existing conditions at the intersection of 16th, Seventh, and Mississippi Street accordingly are described in the Draft SEIS/EIR. The level of service and average delays for this intersection have been updated to reflect more current information from the Subsequent EIR for Golden State Warriors Event Center and Mixed-Use Development at Mission Bay Blocks 29-32 (Warriors Arena project) that was certified in December 2015; see Master Response 2 and Section 2.7 of this Final SEIS/EIR. While existing and future operations at this intersection would experience unacceptable levels of service and delays during the AM/PM peak hours, the proposed project, specifically the turnback track, would neither contribute new trips nor impede traffic during the critical commute peak hours at this intersection. As explained in Master Response 2, Caltrain has confirmed that it will not use the turnback track during the AM and PM peak hours. As a result, the traffic impacts of this proposed project component, as described in Impact TR-1, would be less than significant under CEQA and not adverse under NEPA. Master Response 2 further explains that within the longer AM/PM peak periods (7:30 a.m. to 9:30 a.m. and 4:30 p.m. to 6:30 p.m.), there would be no use of the turnback track during the AM peak period, but there could be two crossings between 4:00 p.m. and 4:30 p.m., at the start of the PM peak period but before the start of the PM peak hour. Each crossing would last about 70 seconds, which is equivalent to the duration of a complete signal cycle.
- The impact analysis in Impact TR-1 includes a discussion of possible use of the turnback track during the AM/PM peak hours, if Caltrain proposes to modify its operating plan in the future. Under this future scenario, Caltrain and TJPA would be required by New-MM-TR-1.1 to conduct an analysis of traffic and train operations and implement mitigation measures, as necessary, to achieve a performance standard established by New-MM-TR-1.1. Please see the response to Comment UCSF-05 for additional details regarding this mitigation measure.
- UCSF-02 As explained in the response to Comment UCSF-01, information from the Warriors Arena project has been incorporated into this Final SEIS/EIR. The traffic data from that project's EIR show existing conditions in the PM peak hour at the 16th/Seventh/Mississippi Street intersection to be worse than identified in the Draft SEIS/EIR for the proposed project; future AM/PM peak hour traffic conditions at this intersection in both the Draft SEIS/EIR and the Warriors Arena project EIR are reported to be LOS F. Local street and intersection operations in 2040 would be especially congested with activities at the Warriors Event Center and would be compounded further if there were also a baseball game at nearby AT&T park. Information from the Warriors Arena project EIR has been added to this Final SEIS/EIR in Section 2.7 to update existing intersection LOS conditions at 16th and Seventh Streets; identify traffic impacts from other projects, including the Warriors Event Center; and further describe impacts to 16th Street from the proposed project. The response to Comment UCSF-01 further explains that Caltrain has committed not to use the turnback track during the critical AM/PM peak hour commute times (7:30 a.m. to 8:30 a.m. and 4:30 p.m. to 5:30 p.m., respectively) because Caltrain's

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proposed schedule at the Transit Center does not require the use of the turnback track during these peak hours, and because it would avoid impacts to peak hour traffic. As stated in response to Comment UCSF-01 above, there would be no crossings during the AM peak period; however, there may be one to two crossings at the beginning of the PM peak period (before the peak hour starts at 4:30 p.m.). Assuming conservatively that two crossings occurred at the beginning of the PM peak period, the total delay would be up to 140 seconds (70 seconds for each crossing), which would be equivalent to two signal cycles/crossings at the intersection. Consequently, the proposed project would not contribute substantially to future traffic congestion along 16th Street during the critical peak commute times, and the less-than-significant impact conclusion of the project's traffic effect as reported in the Draft SEIS/EIR would remain accurate.

UCSF-03

Please see the responses to Comments UCSF-01 and UCSF-02 regarding the use of data from the 2015 Warriors Arena project EIR to evaluate the proposed project's traffic impacts at the intersection of 16th, Seventh, and Mississippi Streets. In addition, the Transit Effectiveness Project/Muni Forward, specifically the transit priority project for the 22 Fillmore bus along 16th Street, is discussed in the Draft SEIS/EIR under Impact CU-TR-9 in Section 3.2, Transportation. The Peninsula Corridor Electrification Project EIR (PCEP EIR), which was certified in January 2015 and provides much of the background, context, and analysis used in the Draft SEIS/EIR to assess the proposed project's impacts at this intersection, evaluates the effects on the 22 Fillmore bus in Chapter 4 of the PCEP EIR. As explained in Master Responses 1 and 2, the 22 Fillmore Transit Priority Project would convert existing automobile lanes on 16th Street to transit-only lanes, thereby reducing the capacity of this street to accommodate future automobile traffic. Text has been added to the Final SEIS/EIR in Section 2.7 to update existing conditions related to transit on 16th Street; identify traffic impacts from other projects, including the transit-only lanes created by the 22 Fillmore Transit Priority Project; and describe updated information pertinent to the analysis of proposed project impacts to 16th and Seventh Streets.

Use of the turnback track as part of the proposed project would neither add to future automobile volumes nor affect traffic operations during the AM/PM peak hours. As a result, further analysis of this intersection's geometry, operations, and level of service would not result in a different significance conclusion for traffic impacts than was presented in the Draft SEIS/EIR.

UCSF-04

Mitigation Measure New-MM-TR-1.1 was identified in the Draft SEIS/EIR, because of an assumption that Caltrain would use the proposed turnback track during the AM/PM peak hours. As explained in Master Response 2, two substantive changes have been confirmed by Caltrain that alter the assumed use of the turnback track at the 16th/Seventh Street intersection. One change is to allow Caltrain trains to be stored at the Transit Center, which would significantly reduce the number of daily crossings of 16th Street. The second change is a commitment by Caltrain to not use the turnback track during the AM/PM peak hours (7:30 a.m. to 8:30 a.m. and 4:30 p.m. to 5:30 p.m.) because Caltrain's proposed schedule at the Transit Center does not require the use of the turnback track during these peak hours, and because it

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would avoid impacts to peak hour traffic. As a result, even if existing or future conditions at this intersection during the AM/PM peak hours are worse as reported in the other EIRs such as the Warriors Arena project EIR, the proposed project would not contribute to the delays since use of the turnback track would occur during off-peak hours.

UCSF-05

The discussion of Impact TR-1 discloses a number of other changes that will occur at the intersection of 16th, Seventh, and Mississippi Streets prior to implementation of the proposed project. Specifically, the introduction of Caltrain's electrification program will introduce changes and modifications to this intersection's configuration and signaling. Additional changes are also planned as part of the SFMTA's 22 Fillmore Transit Priority Project, the Mission Bay South Redevelopment Plan, the UCSF Long Range Development Plan, and the Warriors Arena project. Depending on when the proposed project is approved, funded, and designed, any number of changes to the street network and intersections may have been implemented or programmed. Furthermore, as explained in Master Response 2, Caltrain has committed not to use the turnback track that crosses 16th Street during the AM/PM peak hours. Based on Caltrain's operational and scheduling plans, there would be no impact on the intersection's level of service during the AM/PM peak hours and mitigation would not be required. Nevertheless, this Final SEIS/EIR conservatively assumes that Caltrain may decide to alter its operations in the future in a manner that could involve use of the turnback track during the critical commute hours. Under this scenario, mitigation for traffic impacts at the at-grade crossing would be required. However, given the uncertainties mentioned above, a mitigation required for the proposed project cannot be detailed at this time, because the intersection configuration and signal timing will be modified by other projects in the vicinity, and the conditions at the time of proposed project implementation should be the basis for effective mitigation. "[W]hen, for practical reasons, mitigation measures cannot be fully formulated at the time of project approval, the lead agency may commit itself to devising them at a later time, provided the measures are required to *'satisfy specific performance criteria articulated at the time of project approval.'*" (*Sacramento Old City Assn. v. City Council (1991) 229 Cal.App.3d 1011, 1028-1029*, [original italics].)

Mitigation Measure New-MM-TR-1.1, as updated in this Final SEIS/EIR, establishes a feasible performance standard, lists feasible actions and improvements to accomplish the standard, and the TJPA is committed to implementing the measure(s) if necessary in the future. This updated mitigation measure meets the requirements of the CEQA Guidelines, which state "Formulation of mitigation measures should not be deferred until some future time. However, measures may specify performance standards which would mitigate the significant effect of the project and which may be accomplished in more than one specified way." (CEQA Guidelines, § 15126.4, subd. (a)(1)(B).) New-MM-TR-1.1 is, therefore, an adequate mitigation measure and does not improperly defer analysis and mitigation to a later date. Based on this mitigation measure, traffic impacts along 16th Street from use of the turnback track, should it be required in the future, would be less than significant/not adverse.

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UCSF-06 Because the turnback and MOW tracks would not result in significant traffic impacts, as explained in the previous responses, there is no CEQA requirement to explore other feasible alternatives. The commenter's request not to use the turnback track during the AM/PM peak hours is reflected in Caltrain's updated schedule and service plans, as detailed in Master Response 2.

UCSF-07 This Final SEIS/EIR replaces the portions of Mitigation Measure New-MM-TR-1.1 that mention pedestrian and bicycle safety and moves those portions into Mitigation Measure New-MM-TR-3.1. New-MM-TR-3.1 addressed potentially significant pedestrian and bicycle CEQA impacts (adverse effect under NEPA). The purpose of this mitigation measure is to enable pedestrian and bicyclists to cross safely the widened stretch of Seventh Street, the Caltrain mainline tracks, and the turnback track. The new mitigation measure contains a performance standard to address safe pedestrian and bicycle crossing of the widened intersection.

Potential transit impacts associated with the turnback track are addressed primarily in the Draft SEIS/EIR under Impact TR-1 (change in traffic operations), Impact TR-2 (change in transit demand), and Impact C-TR-7 (temporary impacts during construction). As described in the Draft SEIS/EIR in Impact TR-2, the proposed project would not substantially alter transit demand for Muni services; however, operation of the turnback track could interfere with planned 22 Fillmore electric trolley bus operations. Construction-related impacts are acknowledged and would be addressed by a Construction Traffic Management Plan that is required by the City and the DTX Design Criteria.

As identified above and in Impact TR-2, one of the key impacts of the turnback track relates to interference with bus service along 16th Street, and specifically the realigned 22-Fillmore extension onto 16th Street when Caltrain is electrified and the turnback track becomes operational. The additional gate downtime due to the turnback track is 28 minutes over the course of the entire day, none of which would occur during the critical AM/PM peak hours. The 70 seconds of gate downtime per occurrence would be comparable to typical automobile delay during one signal cycle at a signalized intersection with heavy traffic volumes and multiple turning movements. As a result, there would be some interference to Muni schedules; however, the 22 Fillmore bus operates throughout the day, and it is expected that the TJPA, Caltrain, and Muni can coordinate and adjust transit schedules to minimize the effect on transit passengers. The installation of the overhead catenary lines that would serve Muni's 22-Fillmore and Caltrain poses another potential concern, also identified in Impact TR-2. As explained in the discussion in the Draft SEIS/EIR (see page 3.2-28), TJPA will pay for necessary modifications to the lines or the equipment to avoid conflicts between the two overhead lines, based on discussions among the Peninsula Corridor Joint Powers Board, SFMTA, and CPUC.

The two feasible technical solutions from the PCEP EIR mitigation measure TRA-CUMUL-2 are identified below and would be effective at reducing the conflict between the overhead lines to less than significant:

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1. Installation of a track-mounted transponder that automatically communicates with special on-board equipment to open the main circuit breaker and preclude current from reaching the car.
 - As a Caltrain consist (train) approaches the 16th Street crossing, the engineer would reduce the power draw and the track-mounted transponder would instruct the individual car to open its main breaker. Power drawn from pantographs outside the “zero-power zone” will allow the train to move through the crossing without slowing down. After clearing the crossing, the main breaker will close, and the power draw can be ramped up again.
 - Electric Trolley Buses will operate normally at the crossing, as the collector poles glide along the contact wires up to 6” above the 25kV Caltrain OCS wires. Buses will encounter a roughly 6-foot-long (the width of the Caltrain pantograph) non-energized portion of contact wire at the crossing of each track, but can coast through that gap on a continuous wire structure. This type of movement is a part of normal operations in San Francisco.
 - This type of OCS wire structure has been used previously in Seattle and in Europe.
2. Installation of a vacuum circuit breaker (VCB), which removes the requirement for special on-board equipment.
 - The VCB solution has only been available for about 15 years and has not been implemented on a large scale yet. This solution has been utilized in newer installations in China.

UCSF-08

The FTA and TJPA appreciate the information regarding the number of emergency vehicles accessing the UCSF Medical Center at Mission Bay. This information describes an average of about 2.7 911 ambulance calls and about 0.2 Code 3 transports per day. Gate downtime associated with use of the turnback track could increase delays for these emergency responders if the gates were lowered at the times ambulances and other transport vehicles are actually traveling to or from the medical center. As such, there could be some interference with access to the medical center and the emergency room. As explained in detail in Master Response 2, use of the turnback track would total 28 minutes spread throughout the day and there are alternate routes for emergency vehicles when the crossing gates are down and queues form on 16th Street. Text has been added to the Final SEIS/EIR in Section 2.7 to include additional information regarding emergency vehicle access to UCSF. Based on the limited number of times that interference with emergency access could occur, the limited delay with each occurrence of gate downtime (70 seconds), the availability of alternate routes, and the availability of way-finding equipment on most emergency response vehicles, the proposed project impact on emergency access would be less than significant, as reported in the Draft SEIS/EIR.

UCSF-09

Please see the response to Comment UCSF-08 and Master Response 2, regarding alternate access routes to the medical center if the 16th Street access is not available due to use of the proposed turnback track during the off-peak hours.

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- UCSF-10 The turnback track would not cross Mission Bay Drive, and, thus, use of the turnback track would have a less-than-significant impact under CEQA (no adverse effect under NEPA) on this east/west street serving Mission Bay and the UCSF medical facilities. As explained above in response to Comment UCSF-08, based on the limited number of times that interference with emergency access could occur, the limited delay with each occurrence of gate downtime (70 seconds), the availability of alternate routes, and the availability of way-finding equipment on most emergency response vehicles, the proposed project impact on emergency access would be less than significant, as reported in the Draft SEIS/EIR. More information regarding traffic impacts to Mission Bay Drive can be found in Master Response 2.
- UCSF-11 The commenter is correct that emergency vehicles using transit-only lanes planned for 16th Street would be prevented from crossing the Caltrain mainline and Seventh Street when the crossing gates are lowered. Please see response to Comment UCSF-08 and Master Response 2, which explain that the less-than-significant impact conclusion for emergency vehicle access results from the limited number of times that interference with emergency access could occur, the limited delay with each occurrence of gate downtime (70 seconds), the availability of alternate routes, and the availability of way-finding equipment on most emergency response vehicles.
- UCSF-12 No additional Caltrain trains would cross 16th Street during peak hours due to the turnback track. As a result, the conclusion of Impact TR-6, which states that emergency vehicles would not be significantly impacted (no adverse effect under NEPA) due to the project, continues to be accurate. Please see Master Response 2 and the response to Comment UCSF-08, which provide information on emergency access and emergency service response time. Text has been added to the Final SEIS/EIR in Section 2.7 to update existing intersection LOS conditions at 16th and Seventh Streets based on the Warriors Arena project EIR and future transit improvements on 16th Street.
- UCSF-13 The proposed turnback track would cause delay for UCSF shuttles that serve the medical facilities outside of the AM and PM peak hours. The additional gate downtime at 16th Street throughout an entire day amounts to 28 minutes, with no gate downtime during the AM and PM peak hours. The delay of 70 seconds per train crossing of 16th Street would be comparable to normal automobile delay during one signal cycle at a signalized intersection with heavy traffic volumes and multiple turning movements. As a result, it is recognized that potential delays could affect the reliability of the UCSF shuttle system, but this is an existing condition with current Caltrain service and the incremental change due to use of the turnback track would be less than significant.
- UCSF-14 The commenter's request for the TJPA to coordinate with UCSF during the final project design is agreed to. If electromagnetic interference (EMI) levels would result in disturbance to electronic medical equipment, the TJPA would be responsible for

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the cost of additional strategies identified as explained in New-MM-EF-1.1 on page 3.11-7 of the Draft SEIS/EIR. New-MM-EF-1.1 identifies a step-by-step process that seeks to avoid and mitigate impacts to UCSF medical equipment. Appropriate controls that the TJPA can implement, if necessary, early during final design include design revisions to the DTX facilities that minimize arcing and radiation of radio frequency energy.

UCSF-15

The purpose of the turnback track is to enable Caltrain vehicles to transfer between the Caltrain railyard and the Transit Center. Please see the preceding responses to UCSF comments (especially to UCSF-01, UCSF-04 through UCSF-08) and Master Response 2, which present updated operational information from Caltrain that substantially reduces the number of crossings of 16th Street each day and further discussion of the less-than-significant/not adverse transportation impacts from the additional trackwork south of the Caltrain railyard.

In response to comments that other alternatives be considered pursuant to CEQA, including the possibility of a grade separation, where the rail service would be reconstructed below 16th Street, the PCEP FEIR explained that construction of a grade separation would be prohibitively expensive, would require a substantial amount of time and resources to design and evaluate, and would unnecessarily delay the environmental benefits that would occur with project implementation. The reasons cited in the Caltrain PCEP EIR are relevant to the TJPA proposed project as well. Constructing the additional trackwork below grade would only make sense if Caltrain were also below grade. At this point, there is no indication that Caltrain has plans to alter the current plans to enter and depart the railyard using at-grade tracks, as is currently done. Furthermore, there are no significant/adverse traffic impacts associated with the proposed at-grade crossing of the turnback track, based on the updated storage assumptions and operating parameters information from Caltrain. As a result, there is no CEQA-based requirement to consider alternatives that substantially lessen the project's significant impacts, since none has been identified, while also attaining most of basic objectives of the project.

UCSF-16

The Draft SEIS/EIR text has been revised in response to the commenter's information about properties not on the UCSF campus as shown on page 2-135 of the Final SEIS/EIR.

UCSF-17

Trains using the turnback track would travel at 15 mph and would require a gate downtime of 70 seconds for each movement, as reported in the Draft SEIS/EIR.

UCSF-18

The referenced labels (8 and 12) are in the correct locations to identify these proposed project components. Label 8 is shown along Seventh Street, where the additional trackwork would be installed. Label 12 is shown at I-80 between Second and Third Streets, where the AC Transit bus storage facility is proposed. No revision to the Draft SEIS/EIR is necessary.

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UCSF-19

The additional tracks along Seventh Street would involve installing railroad tracks within the Caltrain right-of-way and modifying the at-grade crossing with 16th Street. This installation would involve limited grading to about 3 feet below the existing ground surface for the track bed and then laying track on the track bed for a length of approximately 1,400 feet, between Hubbell Street and Mariposa Street. The intersection modifications would involve reconstruction of the curbs, sidewalks, and roadways and relocation of signals at one intersection at 16th/Seventh/Mississippi Streets. Page 3.2-35 discusses construction impacts from the additional trackwork, including this text: “Other improvements, such as the additional trackwork south of the Caltrain railyard, the taxi staging area, bicycle/controlled vehicle ramp, and AC Transit bus storage facility parking, were not included in the 2004 FEIS/EIR and would involve minimal construction equipment, materials, and crews and for considerably shorter durations than the other project components. The disruption to the transportation system for these proposed project components would be minor compared to the impacts identified for the Transbay Program in the 2004 FEIS/EIR.”

The 2004 FEIS/EIR analyzed impacts for cut-and-cover and tunnel construction over 1.3 miles; extensive excavation for, and construction of, the Transit Center and the underground Fourth and Townsend Station; demolition of the former Transbay Terminal and its connections to I-80; and construction of the Temporary Terminal and a new bridge between the Transit Center and I-80. The extent of construction, its duration, and need for heavy equipment, truck trips, and construction crews all address a program much larger, more complicated, and lengthier than the currently proposed project components. This comparison is not intended to suggest that the proposed turnback track would not result in localized construction impacts, because there would be disruption. The comparison is relevant, however, because the mitigation measures identified for the construction impacts of the Transbay Program were adopted and incorporated as part of the Transbay Program and are included as part of the proposed project. Therefore, construction impacts would be mitigated to the degree feasible using the same measures that are being implemented in construction of Phase 1. The impacts and mitigation measures related to cut-and-cover construction activities are also described in Master Response 4.

Regarding construction traffic impacts in particular, construction traffic management is discussed on page 3.2-36 of the Draft SEIS/EIR. Mitigation Measure PC 7 and others identified in the 2004 MMRP (included in this Final SEIS/EIR as Appendix D) have been incorporated into the proposed project and will require preparation of a traffic management plan and other measures to address construction impacts. These previously approved mitigation measures and new mitigation measures identified in the Final SEIS/EIR have been defined in accordance with CEQ NEPA regulations at 40 CFR Section 1508.20 and State CEQA Guidelines Section 15126.4. In addition, CEQ guidance governing environmental mitigation commitments recognizes that some measures will necessarily be implemented by other jurisdictions, but, to be effective, there must be sufficient legal authorities and resources to perform or ensure the performance of the mitigation and the measure must lower the level of impacts so that they are not significant (see January 14, 2011 CEQ memorandum on Appropriate Use of Mitigation and Monitoring and Clarifying the Appropriate Use of Mitigated Findings of No Significant Impact). The performance standards that have been

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included in the Final SEIS/EIR would be implemented by the City, TJPA, Caltrain, and/or the CPUC.



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February 29, 2016

Mr. Scott Boule
Legislative Affairs and Community Outreach Manager
201 Mission Street, Suite 2100
San Francisco, CA 94105

Re: Transbay Joint Powers Authority's Transbay Transit Center Draft Supplemental Environmental Impact Statement / Environmental Impact Report

Dear Mr. Boule:

Caltrain-1

Thank you for the opportunity to review the Transbay Joint Powers Authority's (TJPA) Transbay Transit Center Draft Supplemental Environmental Impact Statement / Environmental Impact Report (Draft SEIS/EIR). The Peninsula Corridor Joint Powers Board (JPB) is supportive of the Transbay Program and congratulates the TJPA on completing the Draft SEIS/EIR which is an important project milestone.

The Transbay Program is a visionary and transformative plan to reshape an area of the city of San Francisco near the downtown and financial core. The program was developed to: improve public access to bus and rail services, modernize the Transbay Terminal and improve service, reduce non-transit vehicle usage, and alleviate blight and revitalize the Transbay Terminal area. The interrelated improvements and plans intended to make this vision a reality were approved in 2004 and 2005 by the U.S. Department of Transportation, Federal Transit Administration (FTA); the City and County of San Francisco (City); the JPB; and the San Francisco Redevelopment Agency (now known as the San Francisco Office of Community Investment and Infrastructure).

We have completed staff's review of the Draft SEIS/EIR as it relates to the Peninsula Corridor Electrification Project (PCEP) and future Caltrain service to the TTC. We focused on ensuring consistency of information with the PCEP FEIR certified by the JPB in January 2015. The PCEP will electrify the Caltrain system from the 4th and King to Tamien station and provides electric commuter service as well as high speed rail service in the future. The PCEP is targeted for construction starting in 2016 with commuter revenue service targeted for 2020. We have no further comments on the Transbay Transit Center Draft SEIS/EIR.

We look forward to continued coordination between the PCEP and the Transbay Transit Center Projects. Please contact Stacy Cocks at cocks@samtrans.com or (650) 508-6207 if you have any questions.

Sincerely,

Elizabeth Scanlon
Manager, Caltrain Planning

Copy: Michael Burns, Interim Chief Officer, Caltrain Modernization Program
Stacy Cocks, Principal Planner, Caltrain Modernization Program

PENINSULA CORRIDOR JOINT POWERS BOARD
1250 San Carlos Ave. – P.O. Box 3006
San Carlos, CA 94070-1306 650.508.6269

**Caltrain (SamTrans)
February 29, 2016**

Caltrain-01 The FTA and TJPA appreciate Caltrain’s review of the environmental document and the opportunity to collaborate with Caltrain as a participating agency. No further response is necessary.



SAN FRANCISCO PLANNING DEPARTMENT

February 29, 2016

Ms. Brenda Perez
Federal Transit Administration, Region 9
90 7th Street, Suite 15-300
San Francisco, CA 94103-6701

Mr. Scott Boule, Legislative Affairs and Community Outreach Manager
Transbay Joint Powers Authority
201 Mission Street, Suite 2100
San Francisco, CA 94105

Re: Transbay Transit Center Program
Draft SEIS/R Comments

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Dear Ms. Perez and Mr. Boule:

The City and County of San Francisco (City) appreciates the opportunity to provide comment on this important document. However, as you will see below, we find the Transbay Transit Center Program Draft Subsequent Environmental Impact Statement/Environmental Impact Report (Draft SEIS/R) to be lacking in several areas.

The Transbay Joint Powers Authority (TJPA) as Lead Agency and the City as a Responsible Agency under CEQA agreed to work together to allow for City staff to review and comment on Administrative Draft SEIS/R documents in order to ensure that the published Draft SEIS/R would contain the information that the City deems necessary to allow for informed decision making by local and other governmental agencies. We did begin that cooperative working arrangement in 2014. The TJPA did share an Administrative Draft (August 2014) document with City staff, and we provided detailed comments on the inadequacies of the Administrative Draft document, and pointed out areas where further analysis, information and revisions would be required before the document should be published.

It was our understanding and expectation that the TJPA would share with City staff any subsequent Administrative Draft documents prior to publication of the Draft SEIS/R for public comment so that we could provide you with any additional comments and concerns. The TJPA did not include the City in any subsequent round of review.

Consequently, in our capacity as a Responsible Agency for the SEIS/R, we were surprised to see substantive changes to the proposed project that have been added since the TJPA last consulted with us. These changes, including the turnback track and maintenance-of-way track east of Seventh Street, information on the vent and emergency egress structures, the widened throat structure, and the trainbox extension/intercity bus facility, raise significant concerns about the level of analysis for a variety of environmental impacts, mitigation measures, and other aspects of environmental review. The environmental analysis of traffic and transit impacts, including emergency access to the UCSF hospitals and transit operations on the 16th Street corridor; noise and vibration;

CCSF-01

CCSF-02

CCSF-03

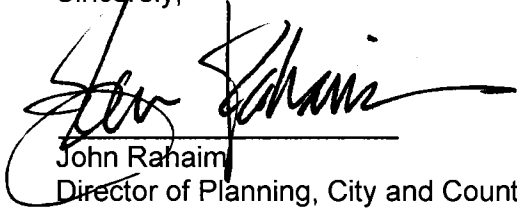
and visual impacts related to the vent structures are particularly troubling. We also are concerned that the Draft SEIS/R does not adequately address changes related to both private and public project proposals in the vicinity of TJPA's project elements as well as include analysis of more recent environmentally cleared projects by a host of governmental agencies. In addition, with the February 2016 release of the California High Speed Rail Authority (CHSRA) Business Draft Plan, CHSRA has determined that it will be accelerating the link in the northern portion of the State. With this modification, it is essential to understand the high speed rail needs and operations throughout the entire Draft SEIS/R document.

CCSF-04

CCSF-05

Under the circumstances, the City urges you to meet with us at your earliest convenience so that we can more fully present our concerns and work cooperatively with you to ensure that they are properly addressed.

Sincerely,



John Rahaim
Director of Planning, City and County of San Francisco

cc:

FTA Region 9; Leslie T. Rogers, Regional Administrator
SF Mayor's Office; Gillian Gillett, Director of Transportation Policy
SF County Transportation Authority; Tilly Chang, Executive Director
SF Department of Public Works; Mohammed Nuru, Director
SF Municipal Transportation Agency; Ed Reiskin, Director of Transportation
SF Office of Economic and Work Force Development; Ken Rich, Director of Development
SF Office of Community Investment and Infrastructure; Tiffany Bohee, Director



TRANSBAY JOINT POWERS AUTHORITY

Maria Ayerdi-Kaplan • Executive Director

March 7, 2016

Mr. John Rahaim
Director of Planning, City and County of San Francisco
San Francisco Planning Department
1650 Mission Street, Suite 400
San Francisco, CA 94103

Dear Mr. Rahaim,

Thank you for taking the time to provide comments on the TJPA and Federal Transit Administration's (FTA) Draft Supplemental Environmental Impact Statement/Environmental Impact Report (SEIS/EIR). The lead agencies will be providing responses to the City's comments on environmental issues in the Final SEIS/EIR, but we would like to respond sooner to some of the City's other comments.

The TJPA is disappointed to learn that the City finds some aspects of the Draft SEIS/EIR to be lacking, inasmuch as the TJPA and FTA coordinated in good faith with the City throughout the process of preparing the Draft SEIS/EIR. This coordination effort involved numerous meetings over a two-year period between Planning staff and the TJPA, and with FTA both in San Francisco and in Washington D.C., with Planning staff concerning all aspects of the proposed changes to the approved Transbay Program.

The City is a responsible agency for purposes of the California Environmental Quality Act (CEQA) and a participating agency for purposes of the National Environmental Policy Act (NEPA). The CEQA responsible agency role involves receiving the notices of preparation and of scoping meetings (CEQA Guidelines § 15082(a)-(c)), consulting with the lead agency (CEQA Guidelines §§ 15086(a)(1) and 15096(b)), attending meetings with the lead agency (CEQA Guidelines § 15096(c)) and commenting on the draft EIR (CEQA Guidelines §§ 15086(c)-(d) and 15096(d)). The NEPA participating agency role involves participating in the NEPA process, especially with regard to the scope of the environmental document, including providing input on the purpose and need statement, range of alternatives, methodologies, environmental and socio-economic impacts. (SAFETEA-LU Environmental Review Process: Final Guidance (Nov. 15, 2006) at Question 22; 23 U.S.C. § 139.) Similar to CEQA, the NEPA participating agency role involves consultation and opportunities to identify issues, receipt of notice of hearings, (23 CFR § 771.111(a) and (d).)

Neither CEQA nor NEPA require sharing administrative draft environmental documents with responsible or participating agencies. Nevertheless, the lead agencies also took the unusual step, as a courtesy, of providing the Administrative Draft SEIS/EIR to the City for review prior to releasing the Draft SEIS/EIR. The lead agencies are appreciative for the City's comments, which were of great assistance in preparing the Draft SEIS/EIR. The City's comments e-mailed on October 17, 2014, did not request further administrative drafts, however, but looked forward to publication of the Draft SEIS/EIR and to successful completion of the project.

This ongoing coordination involved the other cooperation, participating and responsible agencies as well, such as Caltrain, the California High Speed Rail Authority (CHSRA), the Federal Railroad Administration, and the FTA. During the time between receipt of comments on the Administrative Draft and publication of the Draft SEIS/EIR, the lead agencies worked to incorporate changes in response to the participating and cooperating agencies' comments, including the City's comments. Thereafter, the Draft SEIS/EIR was circulated from December 24, 2015 through February 29, 2016, which is more than the maximum amount of time provided for by law,¹ and which provided ample opportunity for public review and comment. A public meeting to receive public comments was held on February 10, 2016.

With regard to the turnback and maintenance-of-way (MOW) tracks in the Caltrain right-of-way along Seventh Street, these improvements were added to the project scope in February 2015 following consultation with and at the request of Caltrain, which is why they were not discussed in the August 2014 Administrative Draft SEIS/EIR. Nevertheless, they were discussed in concept with the City prior to the release of the Draft SEIS/EIR at meetings with the FTA as recently as December 18 (prior to the release of the Draft SEIS/EIR). In addition, the turnback/MOW tracks scope was discussed at length, and its costs evaluated during the MTC Phase 2 Cost Review, which included City staff at the highest level as well as staff from SFCTA.

With regard to the ventilation and emergency egress structures, the widened throat structure, and the trainbox extension/intercity bus facility, these items were all fully covered and included in the Notice of Preparation and in the Administrative Draft SEIS/EIR that was sent to the City, and as acknowledged by Planning's staff October 17, 2014, comments on the Administrative Draft (see email from Elizabeth Purl to TJPA). Changes in the document since the City's review of the Administrative SEIS/EIR were made by the lead agencies in response to the reviewers' comments, including the City's comments, which were taken into account in preparing the Draft SEIS/EIR.

Regarding the environmental analysis of traffic and transit impacts on the 16th Street corridor, the Draft SEIS/SEIR relied on the analysis in the certified Peninsula Corridor Electrification Program EIR. As part of the lead agencies' responses to comments on the Draft SEIS/EIR, we will review these analyses again to ensure that they are properly addressed.

The ventilation structures are to be co-located either with development, as suggested by the City at meetings with the San Francisco Redevelopment Agency/Office of Community Investment and Infrastructure (OCII), or with the stations themselves. It has always been the TJPA's assumption that the ventilation structures would be coordinated with the development and the stations (e.g., through similar facades/living walls/other design features) to ensure that they do

¹ Under Department of Transportation NEPA regulations, the comment period on a Draft EIS is "not fewer than 45 days nor more than 60 days . . . unless another period is established in accordance with 23 U.S.C. 139(g)(2)(A)." 23 CFR § 771.123(i). 23 U.S.C. Section 139(g)(2)(A) requires either (i) agreement among the lead and all participating agencies to extend, or (ii) "good cause." Pursuant to CEQA Guidelines Section 15150(a), "[t]he public review period for a draft EIR should not be less than 30 days nor longer than 60 days except in unusual circumstances." When the draft EIR is sent to the State Clearinghouse (which is true for most EIRs), "the public review period shall not be less than 45 days . . ." unless the State Clearinghouse agrees to a shorter period not less than 30 days. *Id.*

not cause negative visual impacts on the streetscape. From the City's comment, it would appear as though this assumption was not clearly stated in the Draft SEIS/EIR. We appreciate this comment and will work to make the TJPA's goals for the aesthetics of the ventilation structures clearer in the Final SEIS/EIR.

We appreciate the City's comments regarding the incorporation of recently environmentally-cleared projects. As with all documents of the size and scope of the Draft SEIS/EIR, there are likely to be projects that are environmentally-cleared during the preparation of the document. Please provide us with a list of projects that the City believes should be covered, and we will review them with the FTA to determine if they should be incorporated into the SEIS/EIR.

Thank you for your comment about the newly released (February 18, 2016) CHSRA Business Plan, which the lead agencies will review to determine if any aspects would change the conclusions in the SEIS/EIR. CHSRA operations and needs will be addressed by CHSRA in an EIR that is currently anticipated to be completed by CHSRA in late 2017.

We look forward to meeting with you to discuss the City's comments on the Draft SEIS/EIR, and to continue working with the City to produce the Final SEIS/EIR, and to working cooperatively in the future through final design and implementation of the project. Please let us know a good date and time to meet.

Sincerely,

A handwritten signature in black ink that reads "B.R. Dykes". The signature is written in a cursive style and is positioned above a horizontal line.

Brian Dykes
TJPA Principal Engineer

cc: Maria Ayerdi-Kaplan, Scott Boule, Mark Zabaneh, Meghan Murphy (TJPA/PMPC), Brenda Perez (FTA), Gillian Gillett (SF Mayor's Office), Tilly Chang (SFCTA), Mohammed Nuru (SFDPW), Ed Reiskin (SFMTA), Ken Rich (SF Office of Economic and Work Force Development), Tiffany Bohee (SF Office of Community Investment and Infrastructure)

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CCSF-01 The FTA and TJPA provided the Administrative Draft SEIS/EIR to the City for review prior to release of the Draft SEIS/EIR and conferred with City staff on several occasions to discuss the proposed project and the impact assessment. Input from the City was incorporated into the Draft SEIS/EIR that was released, particularly with respect to the vent structures, the preservation of the building at 165-173 Second Street, and development opportunities at sites to be acquired for DTX facilities that could also accommodate other uses consistent with City plans and zoning.

The only proposed project component that was not discussed in the Administrative Draft SEIS/EIR reviewed by the City was the additional trackwork south of the Caltrain railyard. This project component was added to the environmental document in February 2015, based on comments by Caltrain in its review of the Administrative Draft SEIS/EIR. Caltrain identified the need for the turnback track and the MOW track to be included in the Draft SEIS/EIR, rather than as part of Caltrain and/or CHSRA environmental documents. This is why the City did not see a description or an analysis of this proposed project component in the August 2014 Administrative Draft SEIS/EIR. Nevertheless, this additional trackwork was discussed at meetings attended by City staff prior to the release of the Draft SEIS/EIR.

All other proposed project components that the City identifies as being substantive changes (e.g., the ventilation and emergency egress structures, the widened throat structure, and the train box extension/ intercity bus facility) were fully covered and included in the Notice of Preparation and the August 2014 Administrative Draft SEIS/EIR provided to the City for review and comment. Changes to the document since the City's review of the Administrative Draft SEIS/EIR were made by the TJPA and the FTA in response to the reviewers' comments, including the City's comments.

CCSF-02 The project description contained in the Administrative Draft SEIS/EIR disclosed available information regarding the vent and emergency egress structures, the widened throat structure, and the train box extension/intercity bus facility. These proposed project components have been included as part of the project description, and changes to these components and their assessment were made primarily to respond to comments from the participating agencies. In fact, during the response to comments on the Administrative Draft SEIS/EIR, each of these features was modified to address comments by the City. For example, more details regarding the height, massing, louvers, and design standards for the vent and emergency structures were provided, including the addition of elevations and visual simulations; discussions with the City regarding the widened throat structure allowed the historic building at 171 Second Street to be preserved by underpinning; and adjacent land development was presented and evaluated at sites where the DTX facilities would not require full use of the property, such as over the train box extension and the intercity bus facility.

As explained in response to Comment CCSF-01, above, in its comments on the Administrative Draft SEIS/EIR, Caltrain identified the need to evaluate the turnback track and MOW track as part of the proposed project. As with the City's comments, the FTA and TJPA modified the project description and scope of analysis in response to input from all participating agencies prior to issuing the Draft SEIS/EIR for public

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review. This project component was added to the project description, and it is discussed in each of the resource/issue sections of Chapter 3 of the Draft SEIS/EIR.

CCSF-03

Traffic and transit impacts, including effects on emergency access, are analyzed in Section 3.2, noise and vibration impacts are analyzed in Section 3.12, and visual quality/aesthetic impacts are analyzed Section 3.5 of the SEIS/EIR. The transportation impact evaluation is consistent with the City and County of San Francisco Planning Department's Transportation Impact Analysis Guidelines for Environmental Review (2002) (Transportation Guidelines). Appendix C of the Final SEIS/EIR contains a Transportation Analysis Supplement, which describes the methodology and key assumptions used in the SEIS/EIR transportation analysis and provides technical outputs used in the analysis.

Please also see Master Response 2 regarding traffic and transit effects along the 16th Street corridor. The only proposed project component that crosses a local City street at grade and could affect emergency responders is the proposed turnback track that would cross 16th Street. The gate downtime of 70 seconds for each train crossing on the turnback track would result in an additional 28 minutes of delay at this intersection spread throughout the non-peak hours of the day. The project would have a less-than-significant impact for vehicular traffic, because 28 minutes spread throughout the day, but not during peak hours, would result in some delays but would not affect critical commute periods.

In terms of effects to bus service, the discussion of Impact TR-2 in the Draft SEIS/EIR (p. 3.2-28) describes the TJPA's commitment to pay for necessary modifications to the overhead catenary system to avoid conflicts between the overhead wires of the 22 Fillmore electric trolley bus and of the electrified Caltrain trains that may result from implementation of the turnback track. There are currently 317 scheduled trips of the 22 Fillmore bus throughout the day, with a relatively small percentage affected during the off-peak hours when the turnback track is anticipated to operate. The delay of 70 seconds per crossing of 16th Street would be comparable to typical automobile delay during one signal cycle at a signalized intersection with high volumes and multiple turning movements. Given the projected number of Caltrain trains (up to 114 per day) and potential high-speed trains that could operate along the existing mainline, the additional delays due to use of the turnback track would not be cumulatively considerable.

Regarding emergency access, Master Response 2 identifies alternative routes to UCSF Benioff Children's Hospital other than 16th Street. The other streets that provide access to UCSF are Mariposa (grade separated with no track crossing), Mission Bay/Owens, and others traversing the east side of Mission Bay. These routes will continue to provide adequate access for emergency vehicles to UCSF during additional gate downtimes resulting from use of the turnback track, and comparable or better trip times to 16th Street based upon the location of the emergency room access. Police and firefighting response also would be available from the new Mission Bay Public Safety Building (at Third Street and Mission Rock) without crossing Seventh Street and the Caltrain mainline. In addition, the planned 22 Fillmore Transit Priority Project will provide transit-only lanes on 16th Street.

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These lanes are expected to have fewer automobiles than the adjacent automobile lanes and would not have any turn restrictions. These less heavily trafficked transit lanes can be used by emergency vehicles if necessary. Additional information regarding impacts to emergency access can be found on pages 2-155 and 2-156 of the Final SEIS/EIR. The analysis of noise and vibration uses the FTA's Transit Noise and Vibration Impact Assessment methodology and thresholds, and examines the change in ambient noise and vibration levels based on background levels and the affected land uses.

The visual analysis undertaken for the SEIS/EIR is comparable to analyses prepared for other projects in San Francisco; i.e., the project's visibility was considered from key vantage points, its potential to substantially block views of scenic resources was evaluated, and its potential to detract from the visual quality of the setting was described. A requirement that the design of the ventilation structures be coordinated with the existing and planned development is included in the DTX Design Criteria (see page 2-27 of the Draft SEIS/EIR). Additionally, the environmental commitments located at the end of Appendix D.2 and Table S-2 specifically call for coordination between the TJPA and the San Francisco Planning Department to develop context-sensitive design solutions for the ventilation structures. It should be understood that environmental documents for large transit projects, like the DTX and its refinements, are typically performed at the 30 percent design stage. This level of design provides sufficient information to understand the height, mass, and bulk, along with other details presented in the elevations and plans in Chapter 2. During final design, details about the architecture, materials, and refined massing will be undertaken. The DTX Design Criteria require the TJPA and its contractors to coordinate with the City during final design when these details and specifications are developed and can respond to the surrounding development context, design, and features.

CCSF-04

Please see Master Response 1, which provides a description of private and public projects and plans in the vicinity of the proposed project that have been approved or for which review was begun after the Notice of Preparation was issued for the proposed project in April 2013. Information from these projects and their environmental documents has been added to this Final SEIS/EIR as relevant. In addition, Master Response 2 addresses the implication of these plans and projects on the proposed project's impacts. The projects referenced in Master Response 1 have the following effects in general: increased development/activities that result in more traffic at 16th Street, decreased automobile capacity along the 16th Street corridor as existing auto travel lanes are converted to transit-only lanes, and increased transit reliability as travel lanes are converted to dedicated transit lanes. The overall resulting cumulative traffic effect would be significant, which is the same conclusion presented in the Draft SEIS/EIR under Impact CU-TR-8. The project's contribution to cumulative traffic would be less than cumulatively considerable under CEQA, however. Further details regarding this significance conclusion are available in Master Response 2 and in the updated transportation section, which is included as Section 2.7 of this Final SEIS/EIR.

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CCSF-05 Bringing HSR service to the Transit Center is one of the primary objectives of the Transbay Program, and is thus considered in the environmental analysis of the Program, including this SEIS/EIR.

The CHSRA Business Plan sets forth the basic principles and roadmap for delivering and implementing HSR service throughout the State. Key to the 2014 Business Plan is completion of Phase 1, between the Transit Center in San Francisco and Los Angeles/Anaheim by 2029, and a recognition that HSR should be part of a larger integrated rail system, including blended operations with Caltrain in northern California and with Metrolink in southern California.

The Draft 2016 High-Speed Rail Business Plan was released in February 2016 for public comment, after the December 28, 2015 publication date of the Draft SEIS/EIR for the proposed project (California High-Speed Rail Authority 2016 [February]. Draft 2016 Business Plan, available at: http://www.hsr.ca.gov/About/Business_Plans/Draft_2016_Business_Plan.html). The Final Plan was adopted by the CHSRA Board of Directors on April 28, 2016. The 2016 Business Plan maintains the 2029 target for Phase 1, as well as the intent to blend operations with existing commuter rail services. As noted in the comment, however, it modifies the sequencing of individual segments. Whereas the 2014 Business Plan emphasized the connection from the Central Valley to the Los Angeles Basin as the initial operating segment, the 2016 Business Plan changes the initial operating segment to the Central Valley to Silicon Valley (San Jose) line.

The 2016 Business Plan also advocates for extending the initial operating segment to provide a one-seat ride between San Francisco and Bakersfield as soon as possible. With initial investments, operation of HSR trains along the existing Caltrain corridor to the Fourth and King Station could occur as early as 2025. By 2029, the 2016 Business Plan anticipates completion of the DTX and HSR service extending to the Transit Center.

The Federal Railroad Administration (FRA) prepared a Reevaluation of the 2004 FEIS/EIR of the Transbay Program, for purposes of satisfying NEPA environmental review specific to HSR trains operating along the DTX alignment and terminating at the Transit Center. As the federal lead agency for the HSR service, the FRA and the local lead agency, the CHSRA, have the responsibility to describe the needs, operations, and effects of HSR service and facilities. This environmental analysis is underway.

February 29, 2016

Ms. Brenda Perez
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Mr. Scott Boule
Legislative Affairs and Community Outreach Manager
Transbay Joint Powers Authority
201 Mission Street, Suite 2100
San Francisco, CA 94105
SEIS.EIR@transbaycenter.org

Subject: San Francisco County Transportation Authority's comments on the
Transbay Transit Center Supplemental EIS/EIR

Dear Ms. Perez and Mr. Boule,

Thanks for the opportunity to review and comment on the subject document. The Transbay Transit Center Program is one of the signature projects in the Prop K Expenditure Plan and an important project for furthering transportation in San Francisco. We look forward to the day in which both phases of the project are in service.

In the interest of having the strongest and most comprehensive environmental document, we offer the following comments:

- SFCTA-01 1. Cover: Please include attribution as required by Section H.4.a of the Transportation Authority's Standard Grant Agreement.
- SFCTA-02 2. Table S-1, page S-5: One of the elements of the proposed project is to extend the train box to accommodate HSR. As we have stated many times before, this is a \$200+ million solution to a problem that can be easily resolved by a simple ticketing software modification. It is the desire of the California High-Speed-Rail Authority (CHSRA) to have a fully straight platform to accommodate a double eight-train consist, for a total of 16 cars. The platforms as currently designed are only long enough to accommodate 14 cars, which means that the last two cars would be on a curve instead of a straight track. In contrast with commuter rail, high-speed service operates on an assigned-seat basis, which happens at the time of ticket purchase. Adopting a simple ticket-vending software modification could prevent passengers terminating at Transbay from purchasing assigned seats within the last two cars. This simple rule would allow those passengers to alight at a straight platform from the remaining 14 cars. Of note is that high-speed trains all over the world operate on curved platforms and that, in the end, it is unclear whether CHSRA will operate double consists, since the projected ridership does not seem to warrant it.



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- SFCTA-03 3. Page S-5: Surface-level trackwork south of the Caltrain Yard is a new component that was included without notification or input from City agencies and not included in the Notice of Preparation.
- SFCTA-04 4. Section S5, Page S-11: Under Significant and Unavoidable Construction Activities/Noise, the document states that noise impacts are unavoidable, especially at night, but does not identify the measures that will be taken to minimize the effect. For example, what type of activities (e.g. steel-on-steel, standard backup alarms) or construction equipment will be prevented from operating at night to minimize or eliminate noise impacts.
- SFCTA-05 5. Table S-2, Impact TR1: states that there will not be any adverse effects on transportation, but it appears that the traffic analysis for the 16th Street intersection has not been conducted to an appropriate level of detail. The proposed turnback tracks will increase gate-down time at the intersection, which is already at LOS E, and analysis done by Caltrain indicates that the LOS will be reduced to F once electrified service is implemented. The TJPA document states that if the level of service does not meet service levels, TJPA will implements any changes required. Where will the funds for those changes come from?
- SFCTA-06 6. Table S2, Impact C-SE-6: states that the proposed project would have no adverse effect nor result in significant temporary socioeconomic impacts associated with construction. That has not been our experience in projects where cut-and-cover construction is utilized, where socioeconomic impacts have been indeed significant.
- SFCTA-07 7. Table S2, Impact TR3, page S-15: States that there will be no adverse effects on sidewalk overcrowding. The prescribed construction technique to be performed on Townsend and 2th Streets will narrow sidewalks and in other instances will temporarily close sidewalks. Sidewalk impacts need to be clearly identified and studied further.
- SFCTA-08 8. Table S2, Impacts TR4 and TR5, page S-15: states that there will be no impact to bicycles and business loading even though the prescribed construction techniques on Townsend Street are very surface-disruptive. The blocks on Townsend Street are long and cut-an-cover excavation will take up curb-to-curb, and in some instances also affect sidewalk. How will the businesses be serviced during construction? Impacts to bicycle and business's loading need to be further studied.
- SFCTA-09 9. Table S2, Impact C-TR-7, page S-15: States no adverse effects on existing surrounding transportation network and that no additional mitigations are needed. It states that there will be a "temporary impact" to install a cut-and-cover station underneath the Muni Metro's T-Line that will be operating on 4th Street. This will not be a simple task. Please clearly identify impact durations, construction phasing and sequencing approaches to minimize impacts to the T-Line ridership. Please identify the mitigations being proposed to address the temporary transit impacts. A memorandum of understanding needs to be entered into with the SFMTA prior to environmental clearance, to assure that impacts to transit ridership are minimized and that the SFMTA be reimbursed for all construction accommodation expenses and potential damage to its infrastructure experienced during station construction.
- SFCTA-10 10. Table S-2 C-GE4, page S-22: States no adverse effects to adjacent properties, although it identifies groundwater table drawdown and the potential for subsidence. The mitigation approach is vague and needs to be expanded. Are temporary easements identified to provide access during surface or sub-surface settlements? The alignment is being proposed underneath existing structures. How will the settlement of structures with limited physical access during construction be addressed? Please identify all easements required to protect the existing adjacent buildings.

- SFCTA-11 11. Table S-2 Impact C-GE-4: The mitigation measures to address settlements and damage to buildings and other properties should include a thorough survey of pre-existing conditions, an instrumentation program to monitor activity, and a comprehensive compensation grouting program.
- SFCTA-12 12. Section 1.2.2, Refinements: Mentions, “offer additional opportunities for parking” as a project objective. It is not evident what part of the project achieves this goal. The statement should say that the AC transit bus storage facility will be used for public parking during off hours and/or event parking. It is not until page 2-36 that this information is provided.
- SFCTA-13 13. Section 1.2.3, Purpose and Need: First paragraph of page 1-6 states that there will be dedicated tracks and platform edges for HSR and Caltrain. Last year, Caltrain and HSR reached an agreement under which they will use a common platform height of 51 inches to allow for platform sharing.
- SFCTA-14 14. Section 1.2.3 Purpose and Need, page 1-8: The text mentions that the project will address the need for additional parking. See comment 12 above.
- SFCTA-15 15. Section 2.2.1, page 2-8 DTX Construction Methods – Cut and Cover: The document states that the final selection of the excavation approach and sequence on Townsend Street is dependent on others, e.g. city approved traffic control plans, contractor preference, etc. The environmental impacts of each excavation approach identified within the document have very different environmental impacts to the residents and businesses along Townsend Street. The station construction approach has a direct relationship to the amount of off-street laydown and staging areas that are identified to support construction. The construction approach on Townsend Street needs to be clearly identified now, so that the businesses and residents on Townsend Street can better understand the environmental impacts, and their duration, that they will be experiencing.
- SFCTA-16 16. Section 2.2.1, page 2-10: first paragraph states that because the geology is fractured rock it is not suitable for TBM. That statement is incorrect. An EPBM can routinely handle various degrees of fractured rock and was used successfully on the Central Subway with similar geology.
- SFCTA-17 17. Section 2.2.1, page 2-13: The description of the Lower Concourse does not include Greyhound operations mentioned subsequently on the second paragraph of page 2-15.
- SFCTA-18 18. Section 2.2.1 DTX construction methods, general: The section is generic and lacks specificity. The identification of construction techniques and approaches will significantly improve or degrade the temporary construction impacts to the businesses and residences along Second and Townsend Streets. Suggest that a joint construction committee be formed to include the Federal Transit Administration and the City of San Francisco together with the project team. This committee will study the construction approaches presented, evaluate the impacts in detail and suggest an approach and proposed mitigations to be included within this Draft Environmental Document.
- SFCTA-19 19. Section 2.2.1 DTX construction methods, general: A holiday work moratorium between Thanksgiving and New Year’s Day is required within city blocks that contain street frontage occupied by businesses in excess of 50%. The amount of businesses on Townsend Street will qualify it for the moratorium, which requires that the street be fully restored over the holiday season. Please explain how this requirement will be accomplished with the prescribed cut-and-cover construction method. These impacts need to be clearly identified and studied further.
- SFCTA-20 20. Page 2-32 shows the maintenance of way and the turnback tracks south of the current project limits, but the document does not appear to mention that the project limits will be extended under this proposal.

- SFCTA-21 21. Section 2.2.2. By increasing gate-down time, the proposed maintenance of way and turnback tracks will exacerbate the conditions at both Mission Bay Drive (still shown on Figure 2-14 as Channel St., its previous name) and 16th St. (which is operating at LOS E) crossings. These intersections will have to be grade separated, and the City of San Francisco has made it very clear that depressing 16th and Mission Bay Drive Streets is not acceptable. Therefore, the proposed tracks will have to be built underground, not as grade.
- SFCTA-22 22. Section 2.2.2: The proposed project and specifically the Tunnel Stub Box, Maintenance of Way Track, and Turnback Track, do not appear to take into consideration the timing and spatial relationship with the High-Speed Rail program. It appears to assume that the DTX will be built before HSR, when the real possibility exists that HSR will be built first, or at least concurrently. Based on the proposed CHSRA's 2016 Business Plan, high-speed service will be coming to San Jose and on to San Francisco, by means of the Peninsula Blended System, in 2025. The implications of this timing need to be evaluated so that the project execution will not result in sunk costs for elements that will end up not used or removed.
- SFCTA-23 23. Page 2-23: the last paragraph states that the turnback and maintenance of way tracks will be built after Caltrain has electrified the system "and would require (1) relocation of the PCEP overhead catenary system(OCS) along the main tracks and modifications to specialty trackwork elements, such as control points, switches, and signals, and (2) avoiding interference between the 600-volt direct current OCS for the electric trolley buses(ETB) at 16th Street and the 25 kVA alternating current OCS for the proposed project and the PCEP. TJPA has committed to pay for these modifications." Since Caltrain would have only recently built the OCS and specialty trackwork, the timing for implementation seems ill conceived. In addition to the costs for modifications there will be the sunk costs of the initial installation costs of that infrastructure. TJPA should develop a more cost-effective integrated implementation approach.
- SFCTA-24 24. Page 2-38: Figure 2-18 is upside down.
- SFCTA-25 25. Page 2-39: Figure 2-19b shows the Underground Pedestrian Connector to BART as cut-and-cover. We cannot find evidence that an analysis of impacts to Beale Street and its businesses has been conducted. This appears to be the only place in the document where cut-and-cover for this element is mentioned.
- SFCTA-26 26. Page 2-41, next to last paragraph, states that design will take three years and construction seven years, which appears long. TJPA needs to investigate and implement contracting strategies that will accelerate implementation.
- SFCTA-27 27. Table 2-5, page 2-45: Second to last paragraph states that a portion of the CBS building will be demolished to build the throat structure. TJPA should explore alternative techniques that would eliminate the need for partial demolition. See also comment 30.
- SFCTA-28 28. Page 2-48: The description of tunnel box construction indicates that 300,000 cubic yards of soil will be removed and 200,000 yards of backfill will be imported. In other words, the prescribed excavation method will unnecessarily offhaul and import significantly more soil through congested streets than is actually required to construct the tunnel box. TJPA should explore construction methods other than cut-and-cover, to minimize environmental impacts, such as SEM.
- SFCTA-29 29. Page 2-48 Tunnel Construction: States that the Sequential Excavation Method (SEM) is a modification of the New Austrian Tunneling Method (NATM). These terms are used synonymously and interchangeably in the industry. Please explain the alluded modifications.

- SFCTA-30 30. Table 2-7, page 2-51, Alternatives that were Considered and Rejected: For “Widened Throat Structure” the alternative description reads “Remove portion of the building over widened throat structure”. The reasons for rejection state that the alternative was rejected because of “adverse effect under NEPA and significant unavoidable impact under CEQA” and “risk of inadvertent damage or loss of integrity during reconstruction phase”. This previously rejected alternative is exactly what is now being proposed for the CBS building (see comment 27). What has changed? These impacts need to be clearly identified and studied further.
- SFCTA-31 31. Table 3.1-1 the table of foreseeable projects considered in the cumulative impact analysis does not include High-Speed Rail, which will be one of the end users of the facility.

Please let us know if you wish to discuss these comments with our staff.

Cordially,



Maria Lombardo
Chief Deputy Director

cc: Chair Wiener, Com. Kim
G. Gillett – Mayor’s Office
E. Reiskin, – SFMTA
J. Rahaim – SF Planning
M. Nuru -- SFDPW
TC, EC, LZ, ALF

San Francisco County Transportation Authority
February 29, 2016

SFCTA-01 When Proposition K funds are secured for this project, the TJPA will adhere to the requirements of Section H.4 of the Transportation Authority's Standard Grant Agreement.

SFCTA-02 An agreement was made between the FRA, CHSRA, Caltrain, and the TJPA to extend the train box. The extension of the train box was made necessary by the requirements of the CHSRA that the full length of the CHSRA trains be on tangent platforms. The TJPA has obtained variances from CHSRA for a number of issues; however, the tangent platforms were a CHSRA requirement and the FRA is in agreement with CHSRA on this issue. The suggestion by the commenter to modify the ticketing software so that the last two cars could be on a curve (enabling shorter tangent platforms) and not require the extended train box is a feature over which the TJPA does not have jurisdiction. Changes to HSR operations, including the ticketing systems, would need to be evaluated and addressed by the CHSRA.

The proposal to extend the train box to the east is undergoing environmental review as part of this SEIS/EIR. A decision by the TJPA and other agencies to advance this project component could only occur after the Final EIR has been certified by the TJPA and a Record of Decision (ROD) has been issued by the FTA. Should the CHSRA change its design and operational requirements and specifications, the agencies would then evaluate whether the train box extension could be removed, although ventilation requirements would need to be met in some other way on the east end of the Transit Center.

SFCTA-03 FTA and TJPA shared the administrative draft document with City Environmental Planning and Office of Community Investment and Infrastructure (OCII) and conferred with staff on several occasions to discuss the proposed project and the impact assessment. Input from the City and OCII was incorporated into the Draft SEIS/EIR that was released, particularly with respect to the vent structures, the preservation of the building at 165-173 Second Street, and development opportunities at sites to be acquired for DTX facilities that could also accommodate other uses consistent with City plans and zoning.

It is common and expected in large major infrastructure projects that the need for refinements and new features may be discovered during the development of the project design. In this case, the need for a turnback track was identified when Caltrain reviewed the Administrative Draft SEIS/EIR as a participating agency at the same time that City Environmental Planning and OCII were afforded an opportunity to review and comment on the administrative draft. Caltrain identified the need for the turnback track and the MOW track to be included in the Draft SEIS/EIR, rather than as part of Caltrain and/or CHSRA environmental documents. This is why the City did not see a description or an analysis of this proposed project component in the Administrative Draft SEIS/EIR. Accordingly, in response to Caltrain's comments, the scope of the environmental review was changed to analyze this project component in the Draft SEIS/EIR.

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The track work for the turnback track would take place within the existing Caltrain right-of-way (it would follow the alignment of the existing MOW track on the east side of the Caltrain mainline tracks), would minimally disturb the ground surface, would add track underneath I-280 adjacent to existing Caltrain tracks, and would be used regularly but not during peak commute hours. Information in the Draft SEIS/EIR did not assume Caltrain trains would be stored at the Transit Center. This update to storage assumptions and operating parameters is presented in Master Response 2. The decision by Caltrain to reduce the number of crossings throughout the day and schedule crossings only during off-peak hours follows further review by Caltrain of its storage assumptions and operating parameters, which anticipates trains being stored at the Transit Center. This information takes into account a typical Caltrain schedule and includes the maximum number of trips per day using the turnback track in order to present a conservative analysis of potential impacts. Although this information results in a less-than-significant traffic impact, an Improvement Measure (New-I-TR-1.1 Traffic Improvement and Adaptive Management Plan) has been added in this Final SEIS/EIR that calls for a traffic improvement and adaptive management plan, including monitoring future operations, to address the intersections of 7th Street/Mission Bay Drive and 16th Street/Mississippi Street/7th Street. If the future schedule is proposed to be modified by Caltrain and require use of the turnback track during the AM/PM peak hours, New-MM-TR-1.1 as revised would address this potential scenario. In addition to Chapter 2 of the Final SEIS/EIR, please see Appendix D.1, Section 19 TR-Transportation, of the Final SEIS/EIR for a list of all transportation-related mitigation measures that are included as part of the project.

The additional trackwork south of the Caltrain railyard is fully described in the Project Alternatives chapter (Chapter 2) and evaluated throughout the Draft SEIS/EIR for all resource sections. The Draft SEIS/EIR was circulated for more than 60 days, from December 28, 2015 through February 29, 2016, which is more than the maximum amount of time provided for in the CEQA Guidelines and NEPA regulations. Pursuant to CEQA Guidelines Section 15150(a), the public review period for a draft EIR “should not be less than 30 days nor longer than 60 days except in unusual circumstances”), and pursuant to 23 CFR Section 771.123(i), period of review on a draft EIS shall be “not fewer than 45 days nor more than 60 days” unless another period is established pursuant to a statute that requires “good cause” and agreement among the lead and all participating agencies). The public and other public agencies have been given ample opportunity to review and comment on this proposed project component.

SFCTA-04

Future construction activities by the TJPA will incorporate the same noise and vibration control measures and practices in use as part of the current Phase 1 construction. TJPA has gone to great lengths to address noise impacts to adjacent properties during nighttime construction activities. In compliance with the 2004 FEIS/EIR Mitigation Monitoring and Reporting Program (MMRP), Phase 1 of the Transbay Program includes requirements for a noise and vibration monitoring response plan during construction activities. Noise consultants record, graph, study data, and respond to noise complaints from surrounding properties. Additionally, equipment on site is equipped with ambient sensitive alarms. Community outreach with adjacent properties is also an important component of addressing noise issues.

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As part of community outreach effort, a community hotline is available for adjacent property owners and residents to raise noise complaints. Each complaint is reviewed and addressed by the construction manager as appropriate. Furthermore, the community is kept informed of construction activities through mailers, project-specific website updates, regular email notices, and scheduled conference calls with concerned residents and businesses.

These previously approved mitigation measures in the 2004 MMRP and new mitigation measures identified in the Final SEIS/EIR have been defined in accordance with CEQ NEPA regulations at 40 CFR Section 1508.20 and State CEQA Guidelines Section 15126.4. In addition, CEQ guidance governing environmental mitigation commitments recognizes that some measures will necessarily be implemented by other jurisdictions, but, to be effective, there must be sufficient legal authorities and resources to perform or ensure the performance of the mitigation and the measure must lower the level of impacts so that they are not significant (see January 14, 2011 CEQ memorandum on Appropriate Use of Mitigation and Monitoring and Clarifying the Appropriate Use of Mitigated Findings of No Significant Impact). The performance standards that have been refined in the Final SEIS/EIR would be implemented by the City, TJPA, and the CPUC. Please see Appendix D.1, Sections 4 through 7, of the Final SEIS/EIR for a list of all noise- and vibration-related mitigation measures that are included as part of the project.

SFCTA-05

Please see Master Response 2, which evaluates the project's effects on traffic operations at the 16th and Seventh Street intersection. The PCEP Final EIR identified significant impacts at the intersection of 16th and Seventh Streets. The PCEP impacts would result in LOS F during the AM peak hour and in LOS E during the PM peak hour in 2020. The down gate time associated with the number of Caltrain trains passing this intersection will add about 1 minute during the AM peak hour and about 3.5 minutes during the PM peak hour to total gate downtime. This information is discussed in the Draft SEIS/EIR on page 3.2-23. It is further explained in the Draft SEIS/EIR that the mitigation measures identified in the PCEP EIR and adopted by Caltrain would reduce this significant impact to less than significant.

The Draft SEIS/EIR concluded that the proposed refinements to the Transbay Program would worsen those conditions and add to the delays experienced by motorists. The Draft SEIS/EIR acknowledges the additional significant impact under CEQA (adverse effect under NEPA) resulting from the proposed turnback track, and identified a new mitigation measure (New MM-TR-1.1) that is described on page 3.2-24 of the Draft SEIS/EIR.

As stated in response to Comment SFCTA-03, Master Response 2 contains updated information regarding the use of the turnback track, including a commitment by Caltrain not to use the turnback track during the AM/PM peak hours (7:30 a.m. to 8:30 a.m. and 4:30 p.m. to 5:30 p.m.) because Caltrain's proposed schedule at the Transit Center does not require the use of the turnback track during these peak hours and because it would avoid impacts to peak hour traffic. There would be 24 train crossings per day during off-peak hours that would affect travel by all modes across 16th Street. Gate downtime for these crossings is estimated to be about 70 seconds per

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occurrence for a total of 28 minutes each day. The project would have a less-than-significant/not adverse impact for automobiles, because 28 minutes spread throughout the day, but not during peak hours, would result in some delays but would not affect the critical commute period. Master Response 2 further explains there would be no crossings during the longer AM peak period (from 7:30 a.m. to 9:30 a.m.); however, there may be one to two crossings at the beginning of the PM peak period between 4:00 p.m. and 4:30 p.m. (before the PM peak hour starts at 4:30 p.m.). Assuming conservatively that two crossings occurred at the beginning of the PM peak period, the total delay would be up to 140 seconds (70 seconds for each crossing).

The delay of 70 seconds per crossing of 16th Street would be comparable to typical automobile delay during one signal cycle at a signalized intersection with high volumes and multiple turning movements. In the future, given the projected number of Caltrain trains (up to 114 per day) and potential high-speed trains (up to 106 trains per day) that could operate along the existing mainline, the additional delays due to use of the turnback track would not be cumulatively considerable. Nevertheless, an Improvement Measure (New-I-TR-1.1 Traffic Improvement and Adaptive Management Plan), calling for a traffic management and adaptive management plan has been added in this Final SEIS/EIR that would further reduce this less-than-significant impact. The Improvement Measure also includes a provision for monitoring the effectiveness of traffic signal and other intersection modifications. Furthermore, if Caltrain in the future needed to modify its current service and operational plans and require use of the turnback track during the AM/PM peak hours, New-MM-TR-1.1 has been revised to account for this potential future scenario, and the impact would remain less than significant. Text revisions describing these changes are presented on pages 2-135, 2-138, 2-139, 2-140, and 2-141 of the Final SEIS/EIR.

As part of the revisions to New-MM-TR-1.1, the portions pertaining to pedestrian and bicycle crossings have been included in a new mitigation measure, New-MM-TR-3.1, which also contains a performance standard for the safe crossing of the intersection by pedestrians and bicyclists (see Master Response 2), the tasks that need to be accomplished, the list of possible means of accomplishing the performance standard, and the TJPA's commitment to accomplish the stated performance standard. In addition to Chapter 2 of the Final SEIS/EIR, please see Appendix D.1, Section 19 TR-Transportation, of the Final SEIS/EIR for a list of all transportation-related mitigation measures that are included as part of the project.

SFCTA-06

The Draft SEIS/EIR is a supplemental environmental document that has been prepared to determine whether the proposed changes to Phase 2 of the approved Transbay Program may result in significant adverse effects, and whether new information since approval of the program in 2005 would result in significant environmental impacts not previously evaluated. Impact areas or project elements that are unchanged do not need to be addressed in the supplemental document, but instead can be incorporated by reference and the document itself should focus on the environmental impacts that have changed because of the project changes. The 2004 FEIS/EIR identified a number of impacts that contribute to socioeconomic effects of temporary construction. As described on page 3.4-16 of the Draft SEIS/EIR, which summarizes the effects of the Transbay Program, the cut-and-cover construction

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activities are expected to result in loss of access for businesses, disruption of travel ways, noise, and air emissions that will adversely affect community character, interfere with community cohesion, and be disruptive to the business community. The Draft SEIS/EIR identifies and discusses seven mitigation measures previously adopted by the TJPA and incorporated into the Transbay Program to reduce socioeconomic effects from construction activities related to the Transbay Program. This is particularly noteworthy because these measures are, therefore, part of the current proposed project. Because they have been adopted and would be implemented in conjunction with the proposed project, they would mitigate the potential socioeconomic impacts associated with the proposed project. It is for this reason that the conclusion for Impact C-SE-6 is No Adverse Effect/Less-than-Significant Impact. Please see Appendices D.1 and D.2 of the Final SEIS/EIR for a list of all mitigation measures that are included as part of the project. Please see also Master Response 4 for information regarding cut-and-cover construction activities, impacts, and mitigation.

SFCTA-07

Impact TR-3 describes long-term operational effects of the proposed project, and not the cut-and-cover construction techniques that would be used during construction. Along Townsend Street, the proposed project includes a realigned Fourth and Townsend Street Station and related vent and emergency egress structures. Page 3.2-29 specifically notes that pedestrian access would be altered and that preliminary cost estimates for the proposed project includes up to \$25 million to mitigate construction-related impacts on existing Caltrain support facilities, such as pedestrian access.

Impact C-TR-7 addresses construction impacts, including those resulting from cut-and-cover activities. It is noted on page 3.2-25 that the impacts, particularly those along Townsend Street, were previously evaluated in the 2004 FEIS/EIR. The current Draft SEIS/EIR examines those impacts in light of the proposed project changes, which involve realigning the Fourth and Townsend Station to accommodate requests by the City. Pages 3.2-16 through 3.2-18 of the Draft SEIS/EIR identify seven pedestrian circulation mitigation measures and another nine pre-construction and construction mitigation measures from the 2004 FEIS/EIR that were adopted and incorporated into the Transbay Program. Therefore, the proposed project with these measures included as part of the project would reduce construction and operational pedestrian impacts to less than significant under CEQA (no adverse effect under NEPA). Please see Appendix D.1, Sections 13 through 15, of the Final SEIS/EIR for a list of all pedestrian, pre-construction, and general construction mitigation measures that are included as part of the project. Please see also Master Response 4 regarding cut-and-cover construction activities, impacts, and mitigation.

SFCTA-08

Impact TR-2 concerns transit demand effects of the proposed project and is unrelated to bicycle circulation or service vehicles and loading zones. However, Impact TR-4 and Impact TR-5 do address bicycle accessibility and parking/loading demand during project operations. The proposed project would not adversely affect bicycle circulation or business operations due to loading restrictions under long-term operations. This general summary of Impact TR-4 and Impact TR-5 notwithstanding,

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page 3.2-31 specifically identifies how bicycle parking and access at the existing Caltrain Fourth and King Station would be disturbed. As explained in response to Comment SFCTA-07, potential impacts, such as loss of pedestrian and bicycle access, have been discussed with Caltrain and up to \$25 million is included in the preliminary cost estimate to mitigate such effects.

Construction-related effects on bicycle circulation and parking are addressed in Impact C-TR-7. The TJPA will prepare and implement a Construction Traffic Management Plan to address local circulation, detours, access to businesses and residences, temporary striping and signage, and other controls to allow traffic to flow safely. Contractors would be required to comply with the City's Blue Book, which contains regulations for working on City streets. Page 3.2-36 reports that lane and sidewalk closures are subject to review and approval by the Department of Public Works and the Interdepartmental Staff Committee on Traffic and Transportation. As a result of these requirements and the pedestrian, pre-construction, and construction mitigation measures summarized on pages 3.2-16 through 3.2-18 of the Draft SEIS/EIR, construction impacts on bicycles and parking would be less than significant under CEQA (no adverse effect under NEPA). Please see Appendix D.1, Sections 13 through 15, of the Final SEIS/EIR for a list of all pedestrian, pre-construction, and general construction mitigation measures that are included as part of the project. Please see also Master Response 4 regarding the approach and phasing of the construction activities to restore local circulation and access for properties as quickly as possible.

SFCTA-09

As noted by the commenter, the underground Fourth and Townsend Station would be constructed underneath the Muni Metro T-Line that will operate along Fourth Street. A temporary bridge structure would be built to support the Muni T line during construction of the underground station and alignment, similar to how the roads crossing the Transit Center excavation were supported. The roads crossing the Transit Center excavation were only out of service for one long weekend each.

It is expected that continued coordination and a Memorandum of Understanding (MOU), or similar agreement, with SFMTA will be necessary to identify the phasing, sequencing, and timing for construction that works for both agencies, and minimizes both delays to construction of the DTX including the underground station and disruption to T-Line operations. This coordination, agreement, and resulting actions between affected parties are typical of the design process, and would be undertaken as part of final design and prior to construction. Coordination and the MOU, covering items such as actions, responsibilities, and costs, with SFTA regarding the T-line are specifically included in the list of environmental commitments for the project at the end of Appendix D.2 and Table S-2 in the Final SEIS/EIR.

It is noted that the threshold of significance for transit is consistent with the City's guidelines, and examines whether the proposed project would result in increases in transit ridership beyond the capacity of the transit operator or whether the proposed project would result in a substantial increase in delays or operating costs for transit facilities and services. As explained in the preceding paragraph, the TJPA will

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continue to coordinate with SFMTA and others as the design advances to reduce disruption to Muni operations to the extent feasible.

SFCTA-10 Impact C-GE-2, concerning potential harm to people or property due to seismic-related ground failure, is considered to be a no adverse effect/less-than-significant impact. This significance determination is made in part because of compliance with prevailing state and other building codes and specifications as described in the analysis after the Impact C-GE-2 summary impact statement. More specifically in regard to the suggestions from the commenter, the project includes detailed design criteria that govern the design and construction of the project. These design criteria are summarized on pages 2-10 and 2-11 of the Draft SEIS/EIR. Chapters 9-12 address geotechnical requirements, protection of existing infrastructure, structures, and tunnels, each of which can affect adjacent properties due to earth movement or groundwater removal. Critical to ensuring that nearby buildings and properties are not adversely affected is the instrumentation and monitoring program (described in Section 9.5), which includes details on groundwater measuring devices, ground movement measuring devices, and deformation trigger levels.

Other sections of the DTX Design Criteria provide details on surveys, protective works, and mitigation measures to address impacts from ground instability. The option of using grouting is discussed in Mitigation Measure SG 4 from the 2004 FEIS/EIR, which has been incorporated and included as part of the current proposed project, and in New-I-GE-2.1 on page 3.9-15 of the Draft SEIS/EIR. Please see Master Response 4 regarding cut-and-cover construction techniques, as well as preconstruction building surveys to minimize impacts to structures adjacent to construction.

SFCTA-11 Please refer to the response to Comment SFCTA-10 above and Master Response 4, regarding mitigation measures to address settlement and damage to buildings and other properties.

SFCTA-12 The intent of Chapter 1 is to describe the overall Purpose and Need for the proposed project and to identify the project objectives as required by CEQA. The project components that fulfill these objectives are not described until Chapter 2, Project Description. This convention and presentation of information is common in environmental documents. None of the other project objectives in Section 1.2.2 identifies the particular project component that fulfills the objectives. Accordingly, no text changes are proposed in response to this comment.

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SFCTA-13 Caltrain and CHSRA have not completed a written/formal agreement on common level boarding heights. They expect to complete this effort once Caltrain vehicle procurement is complete. In light of being able to share tracks and platforms, pending future agreement among the operators, the Draft SEIS/EIR text was revised as shown on page 2-34 of the Final SEIS/EIR.

SFCTA-14 Please refer to response to Comment SFCTA-12, regarding the purpose and need text about additional parking.

SFCTA-15 The excavation approach and sequence on Townsend Street are within the purview of the construction contractor; therefore, the Draft SEIS/EIR presents a “worst case scenario” for analyzing impacts. The assessment in the Draft SEIS/EIR is based on a level of design sufficient to identify the general extent, duration, and intensity of construction activities. As the design advances, opportunities to further reduce construction impacts and the duration of these impacts will be explored. It is also important to understand that the mitigation measures that were adopted as part of the 2004 FEIS/EIR (see Appendix D of this Final SEIS/EIR, where the Transbay Program MMRP is reproduced in its entirety) were previously adopted and incorporated into the Transbay Program and are part of the proposed project. These previously approved mitigation measures and new mitigation measures identified in the Final SEIS/EIR have been defined in accordance with CEQ NEPA regulations at 40 CFR Section 1508.20 and State CEQA Guidelines Section 15126.4. In addition, CEQ guidance governing environmental mitigation commitments recognizes that some measures will necessarily be implemented by other jurisdictions, but, to be effective, there must be sufficient legal authorities and resources to perform or ensure the performance of the mitigation and the measure must lower the level of impacts so that they are not significant (see January 14, 2011 CEQ memorandum on Appropriate Use of Mitigation and Monitoring and Clarifying the Appropriate Use of Mitigated Findings of No Significant Impact).

The performance standards that have been refined in the Final SEIS/EIR would be implemented by the City, TJPA, and the CPUC. As a result, the construction-related impacts to circulation, pedestrian/bicyclist circulation, and accessibility for local businesses and residents due to construction along Townsend Street will be mitigated to a less-than-significant level under CEQA (no adverse effect under NEPA). Please refer to the responses to Comments SFCTA-05, 06, 07, and 08 for further details regarding construction impacts along Townsend Street and the mitigation measures that are now included as part of the proposed project. Appendices D.1 and D.2 of the Final SEIS/EIR contain a list of all mitigation measures that are included as part of the project. Please see also Master Response 4 regarding cut-and-cover construction method, impacts, and mitigation measures. Chapter 2 and Master Response 4 of this Final SEIS/EIR also include consideration of other construction methods that could reduce the impacts of cut-and-cover construction. Selection of the preferred construction methods would be made after 30 percent Preliminary Engineering design for the proposed project is completed, and an evaluation of costs, risks, schedule, land use, and environmental factors has been performed.

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- SFCTA-16 In response to the comment regarding tunnel construction in areas with fractured rock, text in the Draft SEIS/EIR was updated as shown on page 2-41 of the Final SEIS/EIR.
- SFCTA-17 In response to the comment regarding the Lower Concourse, text in the Draft SEIS/EIR was updated as shown on page 2-46 of the Final SEIS/EIR.
- SFCTA-18 The 2004 FEIS/EIR contains an explanation of construction techniques and activities associated with implementation of the Transbay Program (see pages 5-158 to 5-184). The Draft SEIS/EIR analyzes the proposed changes to the Transbay Program and supplements and augments the analysis in the FEIS/EIR with regard to construction of the proposed changes. Accordingly, the information presented in the Draft SEIS/EIR provides additional information regarding construction staging areas for the proposed project activities, the overall construction schedule for the DTX, and the construction sequencing or phasing of the proposed project components within that larger construction schedule. None of the proposed project components addressed in the current Draft SEIS/EIR would involve new construction along Second or Townsend Streets that was not previously analyzed in the 2004 FEIS/EIR. As explained in prior responses to this comment letter, the mitigation measures to address temporary construction impacts identified in the 2004 FEIS/EIR were adopted and incorporated into the Transbay Program, and will be implemented as part of the proposed project, and will reduce impacts on Second and Townsend Streets and elsewhere to a less-than-significant level under CEQA (no adverse effect under NEPA). Please see Appendices D.1 and D.2 of the Final SEIS/EIR for a list of all mitigation measures that are included as part of the project, as well as Master Response 4 regarding cut-and-cover construction methods, impacts, and mitigation. Chapter 2 and Master Response 4 of this Final SEIS/EIR also include consideration of other construction methods that could reduce the impacts of cut-and-cover construction.
- SFCTA-19 The level of detail sought by the SFCTA is important and will need to be addressed as the next phase of design advances. Page 3.2-35 of the Draft SEIS/EIR provides information regarding the standard procedure to prepare and implement a “Construction Traffic Management Plan.” Details regarding a holiday work moratorium and other features to maintain access for businesses and residences and to enable local circulation are typically included in these plans. Mitigation Measure PC 7 from the 2004 FEIS/EIR and the approved DTX Design Criteria both require consideration and implementation of traffic and construction management plans. One method to observe the holiday work moratorium, for example, is to place traffic decking to restore the street and preserve access for businesses. Such temporary accommodations are commonplace and expected to be implemented by the TJPA as necessary during the construction period.
- SFCTA-20 In response to the comment regarding the extent of the project limits taking into account the additional trackwork south of the Caltrain railyard, text in the Draft SEIS/EIR was updated to clarify the project limits as shown on page 2-40 of the Final SEIS/EIR.

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- SFCTA-21 Neither the turnback track nor the MOW track would cross Mission Bay Drive. The additional trackwork south of the Caltrain railyard would not have a significant/adverse effect on Mission Bay Drive, because the train operations from this trackwork would not interrupt traffic flows along this street.
- The discussion of Impact TR-1.1 in the Draft SEIS/EIR identified a potentially significant impact requiring mitigation because the use of the turnback track would interfere with traffic movement and operations along 16th Street. Based on updated storage assumptions and operating parameters by Caltrain that are described in Master Response 2, the turnback track would not be used during the AM/PM peak hours and the number of train crossings would be substantially reduced from the 40 per day identified in the Draft SEIS/EIR to 24 per day. As a result, there would no longer be a potentially significant traffic impact and no requirement for New-MM-TR-1.1. Nevertheless, this Final SEIS/EIR includes an Improvement Measure (New-I-TR-1.1 Traffic Improvement and Adaptive Management Plan) that calls for a traffic improvement and adaptive management plan and future monitoring of traffic operations to further reduce traffic impacts at the intersections of 7th Street/Mission Bay Drive and 16th Street/Mississippi Street/7th Street. Furthermore, this Final SEIS/EIR conservatively considers a scenario in which Caltrain decides to change its operation plan in order to use the turnback track during the critical commute periods. In order to address this future scenario, mitigation measure New-MM-TR-1.1 has been updated and would reduce this potential impact to a less-than-significant level. The mitigation measure has been refined to provide more details on the performance standard defined to reduce the impact and to identify feasible actions and improvements that could achieve the standard. This new analysis and revised mitigation measure are included in Section 2.7 of this Final SEIS/EIR. Because the turnback and MOW tracks would not result in significant traffic impacts, as explained in the previous responses, there is no CEQA requirement to explore other feasible alternatives to address the 16th Street crossing.
- SFCTA-22 The CHSRA program does not include building a grade separation tunnel. The proposed tunnel stub allows for a future connection to such a tunnel should one be constructed. The MOW and turnback track are for Caltrain operations and are needed regardless of the timeline for the HSR service. If funding is identified for the DTX, it could be built and available for HSR service to the Transit Center.
- SFCTA-23 The TJPA will work with Caltrain to develop an approach that works for Caltrain operations, and potentially result in cost savings from an integrated implementation approach. Caltrain's PCEP EIR was certified in January 2015, the PCEP has already been approved, and the PCEP is targeted for completion in 2020 and is expected to be operational when the proposed project is constructed. As a result, the Draft SEIS/EIR treats the electrification program as reasonably foreseeable.
- SFCTA-24 The figure's orientation is consistent with other figures presented in landscape format. As a result, Figure 2-18 is not changed in response to this comment.

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SFCTA-25 The 2004 FEIS/EIR contains a description of cut-and-cover construction techniques and their temporary disruption to circulation, businesses, and residences, and impacts on socioeconomics, air quality, and noise. The 2004 FEIS/EIR also evaluated an underground pedestrian connector below Fremont Street. A number of mitigation measures were identified in the 2004 FEIS/EIR to reduce the disruption created by cut-and-cover construction activities (see responses to Comment SFCTA-15 and Comment SFCTA-18). These mitigation measures, which are reproduced in Appendix D of this Final SEIS/EIR, were adopted and incorporated into the Transbay Program, and will be implemented as part of the proposed project that is evaluated in the Draft SEIS/EIR. The effects, in general, of the previous underground connector along Fremont Street and the proposed relocation to Beale Street, are virtually identical. Please see Master Response 4 regarding cut-and-cover construction activities, impacts, and mitigation.

While the Draft SEIS/EIR analyzes the effects of construction activities for the proposed project as a whole, where there are particular impacts associated with the underground pedestrian connector, the Draft SEIS/EIR identifies those effects. To assist the commenter in better understanding the effects that would apply to the underground pedestrian connector, please see the following:

- Traffic-related impacts for the underground pedestrian connector are analyzed in Impact C-TR-7, beginning on page 3.2-35;
- Socioeconomic impacts are described for the entire proposed project in Impact C-SE-6 on page 3.4-27;
- Cultural resource and paleontological impacts are analyzed in Impact CR-1, Impact CR-2, and Impact C-CR-4 on pages 3.6-31, 3.6-35, and 3.6-42, respectively;
- Biological impacts, particularly for nearby nesting birds, are analyzed in Impact C-BR-1, beginning on page 3.7-8;
- Water quality and dewatering discharges are analyzed in Impact C-WQ-6, beginning on page 3.8-23;
- Potential settlement during excavation is analyzed in Impact C-GE-4, beginning on page 3.9-19;
- Potential exposure to known hazardous materials is analyzed in Impact C-HZ-4 on page 3.10-20;
- Noise and vibration during the construction period are analyzed in Impact C-NO-3 and Impact C-NO-4, beginning on page 3.12-17;
- Emissions and toxic air contaminants generated during construction activities are analyzed in Impact C-AQ-5 and Impact C-AQ-6, beginning on page 3.13-18;

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- Impacts to emergency response and access to parks and community facilities during construction are analyzed in Impact C-PS-3 on page 3.15-17; and
- Impacts to underground utilities are analyzed in Impact C-UT-7 on page 3.17-12.

SFCTA-26 The Transbay Program, as refined by the proposed project, is a high priority regional transportation investment and any opportunity to accelerate the project would be welcomed. For the purposes of the environmental analysis, lengthier phase durations were used to conservatively portray the potential construction-related impacts. It is possible that some contract packages can run concurrently with the final design, which would accelerate implementation.

SFCTA-27 The TJPA reviewed curve adjustments to the throat structure through an iterative design process to minimize impacts to the surrounding buildings. These evaluations by TJPA began after the 2004 FEIS/EIR and the Transbay Program were approved, and were initiated to determine impacts of new HSR design requirements for curve radii. Based on these reviews, the TJPA approached the CHSRA and requested a design variance from the minimum curve radius to reduce the impacts to properties. The TJPA was granted a variance from CHSRA's design requirements consisting of tighter track curves, which would have the benefit of affecting fewer properties, and avoiding some properties that were identified as historic in the 2004 FEIS/EIR, as described below. The widened throat structure would accommodate this smaller curve radius and is one of the proposed project components. Its impacts are analyzed in this SEIS/EIS, along with the potential impacts of all other proposed project components.

As described on page 1-7 of the Draft SEIS/EIR, had the TJPA not obtained the variance the curvature of tracks would have affected eight additional properties on Second Street, including a 35-story office tower. The proposed curve analyzed in this SEIS/EIR would affect fewer properties than the curve that complies with CHSRA design specifications without the variance, and would allow for high-speed trains to enter the Transit Center on a curve approved by the FRA and the CHSRA, meet the operational (speed) and maintenance (standard crossovers, reduced wear on the rails) needs of the system, and reduce wheel noise by smoothing the curve so that the wheels do not grind against the rails.

SFCTA-28 The tunnel stub would be excavated primarily in Bay Mud, which is a very soft clay material with a high water concentration. It also runs underneath the U-wall for a portion of the tunnel stub segment, which would require excavation from the surface and tiedown piles. Cut-and-cover construction is the necessary construction method with the configuration of the tunnel stub and the depth of the excavation. Other methods, such as the Sequential Excavation Method identified in the comment, would be infeasible due to the soft ground conditions and the shallow nature of the excavation.

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SFCTA-29 New Austrian Tunneling Method (NATM) is a type of Sequential Excavation Method (SEM) in which soil is excavated in a specific order from the tunnel face. For the DTX, the SEM method being proposed includes fewer “drifts” than in NATM. The number of drifts was analyzed using numerical models to determine that they would perform as needed for the DTX tunnel.

SFCTA-30 There is an important difference between the effects associated with demolishing and reconstructing the building at 589 Howard and with 235 Second Street. The building at 589 Howard is identified in the National Register of Historic Places (NRHP) as 1D, a contributor to a district or multi-resource property (i.e., the Second and Howard Streets NRHP Historic District). As explained on page 3.6-35 of the Draft SEIS/EIR, demolition of the northwest portion of 589 Howard Street would constitute a direct adverse impact on a historic property. In Appendix G.2 of the Draft SEIS/EIR, further details are provided regarding the steps required to avoid an adverse effect under Section 106 of the National Historic Preservation Act. These steps include underpinning the building and complying with Stipulation III of the Memorandum of Agreement that was signed in June 2004 by the FTA, the California State Historic Preservation Officer, the TJPA, the City and County of San Francisco, the Peninsula Corridor Joint Powers Board, and Caltrans. That Stipulation requires the TJPA, in consultation with owners of historic properties immediately adjoining Transbay Program construction sites, to develop and implement measures to protect historic properties; consult with the State Historic Preservation Officer to document the historic properties prior to taking any action that could adversely affect these properties; and repair any damage to a historic property that results from the undertaking in accordance with the Secretary of the Interior’s Standards for Rehabilitation.

Unlike 589 Howard Street, the building at 235 Second Street is not a historic property or a contributor to a historic district. As a result, the environmental consequences of possible partial demolition of a portion of this building would not be the same as partial demolition of 589 Howard Street.

SFCTA-31 One of the primary objectives of the Transbay Program is to bring HSR service directly to the Transit Center: see, e.g., 2004 FEIS/EIR, Sections 1.2.4.5, 2.2.3.4, 3.1.5.8; and Second Addendum to FEIS/EIR (2007). The FRA, which is the federal lead agency for HSR, is a cooperating agency with FTA on this SEIS/EIR and has been involved in the document’s preparation. The proposed project is intended to accommodate both DTX and HSR, and it is clear throughout this analysis and the 2010 FRA Reevaluation that the use of the proposed project, including the below-ground facilities from Fourth and King to the Transit Center and the train box, to accommodate the HSR project has been considered part of the proposed project and is included in the analysis.

Nevertheless, although HSR service to San Francisco terminating at the Transit Center is an integral part of the Transbay Program, the business plan for bringing service to San Francisco has been added to the list of cumulative projects in

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Chapter 3, Table 3.1-1 as Project Number 43. In response to this comment, edits to Table 3.1-1 in the Draft SEIS/EIR were made and can be found on page 2-108 of the Final SEIS/EIR.

From: Bruce Agid <bruce.h.agid@gmail.com>
Sent: Monday, February 29, 2016 5:43 PM
To: brenda.perez@dot.gov
Cc: SEIS EIR
Subject: Comments on TJPA SEIS

Follow Up Flag: Follow up
Flag Status: Flagged

Brenda,

After reviewing the section on Additional Trackwork south of the Caltrain Railyard pages S-5 and in more detail on pages 2-30 through 2-34, I would like to submit the following concerns which will have an environmental impact on the immediate and surrounding area.

It states:

The proposed project would include additional trackwork in the existing Caltrain right-of-way, south of Caltrain railyard and along Seventh Street (see Figure 2-14). The first improvement would be a turnback track, which would be required for Caltrain to move trains between the Caltrain railyard and the Transbay Transit Center when not in use or when maintenance is required. Trains would be moved to the Caltrain railyard, and the turnback track would be needed for this movement. The turnback track would be constructed at-grade on the east side of the existing mainline tracks from Hubbell Street on the north, extending southward for approximately 1,400 feet under the elevated Interstate 280 freeway across 16th Street, and terminating at Mariposa Street. Trains from the Caltrain railyard would travel south along the track lead, onto the mainline track, and onto the turnback track (at Hubbell Street). Trains would continue along the turnback track, crossing 16th Street at-grade, until Mariposa Street. Trains then would proceed north, back along the turnback track and would transition onto the mainline heading towards the Transit Center. The same movements would be followed in reverse to move trains from the Transit Center to the Caltrain railyard.

The second track improvement is an MOW storage track. This track would be constructed on the west side of the main tracks from Hooper Street on the north and would extend southward to Daggett Street for approximately 850 feet. The MOW storage track would be used for equipment storage, needed for railway maintenance.

Construction of the turnback track and MOW storage track is expected to occur after the PCEP, which is scheduled for implementation in 2020/2021, and would require: (1) relocation of the PCEP overhead catenary system (OCS) along the main tracks and modifications to specialty trackwork elements, such as control points, switches, and signals, and (2) avoiding interference between the 600-volt direct current OCS for the electric trolley

buses (ETB) at 16th Street and the 25 kVA alternating current OCS for the proposed project and the PCEP. TJPA has committed to pay for these modifications.

Operating plans for Caltrain service to the Transit Center still are being defined, and will vary based on service levels and overnight train storage assumptions at the Transit Center. Consistent with the Caltrain peak hour service levels analyzed in the cumulative conditions in the PCEP EIR (Peninsula Corridor Joint Powers Board 2015), the turnback track could be used between 10 to 40 crossings per day over 16th Street. Because the trains would be moved to the Transit Center for the first runs from the Transit Center and to the railyard for storage and/or maintenance after a run, few of the at-grade crossings along the turnback track are expected during the AM and PM peak periods (7 a.m. to 9 a.m. and 4 p.m. to 6 p.m.). The total time to move trains between the Caltrain railyard and the below-grade station at Fourth and Townsend is estimated to be approximately 10 minutes. Trains would cross 16th Street at-grade as they do currently for routine revenue service. During each crossing, the crossing gate at 16th Street would be lowered for 70 seconds (60 seconds for the train to cross and 10 seconds to raise and lower the crossing gate) to move the train to the end of the turnback track, and another 70 seconds to move the train north, back toward the mainline).

Comments: Based on this.... the concern lies in the 70 seconds the crossing gate would be lowered between 10 to 40 times a day. This means somewhere between an additional 12 and 47 minutes a day at both Mission Bay Blvd and 16th Street. This crossing gate time down will be added to the time down as it stands today with additional time down based on the increased service of Caltrain (based on electrification) and the addition of high-speed rail. With that said, there will be considerable impacts on accessibility both in and out of Mission Bay for residents, visitors, employees through these Western corridors. In addition, with the accessibility degraded to the West, increased traffic congestion will be experienced through the Northern and Southern traffic corridors. Also with the addition of the MOW storage track (I could not find the estimated use of this track) there will be additional impacts of the crossing gate down at Mission Bay Blvd.

Agid-1

Thank you for the opportunity to provide this input!

Bruce Agid
300 Berry St. Unit 1301
San Francisco, Ca. 94158

Bruce Agid
February 29, 2016

Agid-01

Please see Master Response 2, regarding the project's effects on traffic operations along 16th and Seventh Streets, as well as the project's impacts on congestion, traffic delay, and local circulation. The number of at-grade crossings of 16th Street due to use of the turnback track would be substantially reduced from the crossings reported in the Draft SEIS/EIR, based on updated storage assumptions and operating parameters by Caltrain that are described in Master Response 2 and that agency's commitment not to use the turnback track during the AM/PM peak hours (7:30 a.m. to 8:30 a.m. and 4:30 p.m. to 5:30 p.m.) because Caltrain's proposed schedule at the Transit Center does not require the use of the turnback track during these peak hours and because it would avoid impacts to peak hour traffic. Master Response 2 also explains that there would be no crossings during the longer AM peak period (7:30 a.m. to 9:30 p.m.); however, there may be one to two crossings at the beginning of the PM peak period between 4:00 p.m. and 4:30 p.m. (before the PM peak hour starts at 4:30 p.m.). Assuming conservatively that two crossings occurred at the beginning of the PM peak period, the total delay would be up to 140 seconds (70 seconds for each crossing), which would be equivalent to two signal cycles/crossings at the intersection.

Neither the turnback track nor the MOW track would cross Mission Bay Drive. As a result, the additional trackwork south of the Caltrain railyard would not have a significant/adverse effect on traffic flows along Mission Bay Drive.

Although the updated Caltrain operating parameters would result in a less-than-significant traffic impact, this Final SEIS/EIR includes an Improvement Measure (New-I-TR-1.1 Traffic Improvement and Adaptive Management Plan) that calls for a traffic improvement and adaptive management plan and future monitoring of traffic operations at the intersections of 7th Street/Mission Bay Drive and 16th Street/Mississippi Street/7th Street.



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Margo N. Bradish
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February 26, 2016

VIA E-MAIL

Transbay Joint Powers Authority
201 Mission Street, Suite 2100
San Francisco, CA 94105
Attn: Scott Boule

Federal Transit Administration
Region 9
90 7th Street, Suite 15-300
San Francisco, CA 94103-6701
Attn: Brenda Perez

Re: Comments on Transbay Transit Center Program Draft Supplemental
Environmental Impact Statement/Environmental Impact Report

Dear Mr. Boule and Ms. Perez:

Cox, Castle & Nicholson LLP represents Alexandria Real Estate Equities (“ARE”). ARE appreciates the opportunity to provide comments on the Transbay Joint Powers Authority’s (“TJPA”) Transbay Transit Center Program Draft Supplemental Environmental Impact Statement/Environmental Impact Report (“SEIS/SEIR”). ARE is the owner of the commercial office/laboratory building located at 1700 Owens Street and of the parking garage located at 1670 Owens Street (collectively, the “ARE Properties”) at Mission Bay South in San Francisco. These two ARE properties are located in close proximity to the “Additional Trackwork South of the Caltrain Railyard” project (the “Project”) component described in the SEIS/SEIR.

Background

The ARE Properties are located in the Mission Bay South Redevelopment Plan (the “Plan”) area. The purpose of the Plan is to promote biotechnology and life science uses with other commercial, office, retail, and residential uses in a vibrant urban community. To further this purpose, the Plan identifies the ARE Properties for commercial/industrial uses, such as light industrial, industrial or chemical research or testing laboratories, medical research and biotechnical research facilities, experimental laboratories, as well as various office uses. (Plan, § 302.3.) 1700 Owens provides approximately 157,000 square feet of first-class office and

laboratory space to largely life sciences and biotechnology users that provide jobs, innovative technologies, and a diverse and dynamic economic base for the Mission Bay South community. The parking garage at 1670 Owens Street provides much needed parking to users at 1700 Owens Street and other nearby businesses. These uses further the core purpose of the Plan and its policies.

As identified in the SEIS/SEIR, the proposed project would cause queuing in front of the service entry to 1700 Owens Street and one of the vehicle entries to 1670 Owens Street, which would interfere with business operations at these facilities contrary to the purpose of the Plan. The tenants of the 1700 Owens Street building include primarily life science biotechnology users who require multiple deliveries and pickup of potentially hazardous chemicals and pickup of potentially hazardous waste. In addition to impeding the business operations of these tenants, the queuing caused by the proposed project would impact the ability of tenants to receive and dispose of such chemicals and/or waste, thereby exacerbating risks to the health and safety of the overall Mission Bay community.

As described in more detail below, the Project will result in potentially significant traffic impacts from vehicle queuing that will restrict local circulation and restrict access to the ARE Properties. This impact has not been adequately analyzed or mitigated. With this unmitigated impact, the Project is inconsistent with several policies of the Mission Bay South Redevelopment Plan and the City of San Francisco's General.

1. Factual Errors

The SEIS/SEIR incorrectly states that 1700 Owens Street and the "parking garage behind 1650 Owens Street" (the address for which is actually 1670 Owens Street) are "on the UCSF Campus." (SEIS/SEIR, p. 3.2-21.) In fact, the properties west of Owens Street are not part of the UCSF Campus, and ARE owns the ARE Properties. This information should be corrected in the Final SEIS/SEIR.

CCN-01

2. Transportation Impacts.

The analysis of transportation impacts in the SEIS/SEIR is inadequate under both the National Environmental Policy Act ("NEPA") and the California Environmental Quality Act ("CEQA").

a. Localized Circulation and Access Impacts and Traffic Hazards Resulting from Traffic Delay

CCN-02

The San Francisco Transportation Impact Analysis Guidelines for Environmental Review ("TIA Guidelines") require the SEIS/SEIR to assess whether the project would cause major traffic hazards, and whether the project would create potentially hazardous conditions for

bicyclists or otherwise substantially interfere with bicycle accessibility to the project site and adjoining area, which includes the ARE Properties.

Impact TR-1 states that “[t]he proposed project would not result in levels of service that would exceed the City’s threshold for acceptable operations or result in localized circulation and access effects.” (SEIS/SEIR, p. 3.2-18.) The SEIS/SEIR concludes “No Adverse Effect/Less-than-Significant with Mitigation.” Unfortunately, the SEIR/SEIS lacks sufficient information to support this conclusion.

CCN-02
Continued

The SEIS/SEIR acknowledges that Impact TR-1 could be significant. As a result of the Project, the SEIS/SEIR provides that “[p]otential queuing [may occur] at the service entry of the 1700 Owens Street building and the parking garage behind 1650 Owens Street [1670 Owens Street].” (SEIS/SEIR, p. 3.2-21.) The SEIS/SEIR discloses that an additional delay of 140 seconds at the 16th Street/7th Street intersection would occur in the weekday AM and PM peak hours, which “could result in deterioration in the operation of the [] intersection, traffic circulation effects along 16th Street east to Owens Street, and potential additional safety risks for pedestrians crossing the widened street.” (*Id.*) The extent of the impacts to access at the ARE Properties, however, is not sufficiently evaluated.

The queuing along 16th Street towards Owens Street may create a hazardous condition to vehicles, bicyclists, and pedestrians resulting from the additional vehicle congestion and conflicts between vehicles turning in and out of the ARE Properties. The SEIS/SEIR should fully evaluate this impact.

b. Mitigation of Impact TR-1

As acknowledged in the SEIS/SEIR, the project could result in deterioration of operations at the 16th Street/7th Street intersection and traffic circulation on 16th Street toward Owens Street. (SEIS/SEIR, p. 3.2-23.) To mitigate the potentially significant impacts to levels of service and local circulation and access along 16th Street at 7th Street, the Caltrain/turnback tracks, and Owens Street, mitigation measure MM-TR-1.1 requires “further traffic analysis . . . to evaluate traffic, pedestrian, and bicycle operations” and provides that “TJPA will coordinate with the City and will be responsible for implementing changes . . . for impacts.” (SEIS/SEIR, p. 3.2-24.) This measure defers mitigation to future studies, without providing any criteria or performance standards for mitigation of circulation and access impacts, and without providing any evidence to assess whether mitigation is feasible. Even if it is feasible to achieve the LOS standards with implementation of mitigation, it is not clear that the mitigation also would reduce impacts related to queuing on 16th Street. The mitigation, therefore, is inadequate under CEQA and does not satisfy the required “hard look” under NEPA. Thus, the conclusion of “No Adverse Effect/Less-than-Significant with Mitigation” is unsupported. The SEIR/SEIS should identify feasible mitigation to address access and circulation impacts associated with the ARE Properties.

CCN-03

3. Hazardous Materials

The SEIS/SEIR is required to evaluate whether the proposed project would create a significant hazard to the public or the environment through the routine transport, use, or disposal of hazardous materials or wastes, or through the accidental release of hazardous materials. The SEIS/SEIR concludes that this impact would be less than significant. (SEIS/SEIR, p. 3.10-17.) The analysis in the SEIS/SEIR, however, fails to evaluate the Project's potential to exacerbate impacts related to existing conditions.

CCN-04

Tenants at 1700 Owens Street regularly require the delivery and removal of hazardous chemicals and waste. Traffic queuing in front of the only service access at 1700 Owens Street that will be caused by the Project will exacerbate the potential for accidental release of hazardous materials resulting from their routine transport, because the queuing could restrict delivery truck access and increase the potential for conflicts between delivery vehicles and pedestrians, bicyclists, and other vehicles. The SEIS/SEIR should analyze these potential impacts and identify adequate mitigation.

4. Land Use

The Project would conflict with several adopted policies, plans, or programs regarding public transit, bicycle or pedestrian facilities, and intended to improve the performance or safety of such facilities. The SEIS/SEIR does not adequately evaluate the Project's inconsistency with these plans and policies.

The Land Use and Planning analysis in the SEIS/SEIR does not include the Mission Bay South Redevelopment Plan as part of the regulatory background. The Project with respect to the ARE Properties is in conflict with several policies and objectives of the Plan intended to prevent traffic impacts, hazardous conditions, and to protect public health and safety. One of the primary objectives of the Plan is to “[facilitat[e] emerging commercial-industrial sectors including those expected to emerge or expand due to their proximity to the UCSF new site, such as research and development, bio-technical research, [] and related light industrial, through *improvement of transportation access to commercial and industrial areas* [and] *improvement of safety within the Plan Area.*” (Plan, § 103, ¶ I [emphasis added].) Objective 9 of the Plan provides for “[e]stablish[ing] a street system, which is consistent in function and design with the character and use of adjacent land and efficient traffic flow.” Objective 11 states that the Plan area should “[p]rovide for the safe and convenient use of the bicycle as a means of transportation and recreation,” and Objective 12 states that the Plan area should “[p]rovide for convenient, safe, and pleasant pedestrian circulation.”

CCN-05

Similarly, the Project is inconsistent with several policies and objectives of the General Plan and of the Transit Center District Plan intended to increase traffic safety, with special attention to hazards to pedestrians and bicyclists. General Plan Transportation Policy 1.2 states that safety for pedestrians should be given priority where conflicts exist with other modes

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Brenda Perez
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Page 5

of transportation, and Policy 27.3 provides that conflicts to bicyclists on all City streets should be removed. Policy 19.2 of the General Plan is intended to promote increased traffic safety, with special attention to hazards that could cause personal injury. In the Transit Center District Plan, Objectives 4.34 through 4.37 are intended to avoid impacts to circulation and access, and to pedestrian and bicyclist safety within the district. These policies require projects within the district to design streets to “improve safety and attractiveness for all road users,” and to “facilitate improved circulation within the district for local destinations.”

CCN-05
Continued

As discussed above, the Project could have potentially significant circulation and access impacts at the ARE Properties. The Project could increase traffic conflicts between delivery vehicles and bicyclists, pedestrians, and other vehicles, and could exacerbate the potential for release of hazardous materials thereby risking public safety. As a result, the project conflicts with the policies and plans listed above that are intended to address these environmental impacts. The SEIS/SEIR should identify these policy conflicts and identify and mitigate the related impacts that may result from the Project.

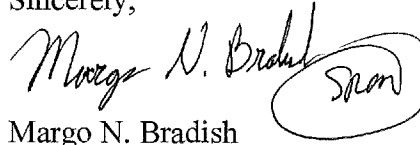
5. Recirculation

The SEIS/SEIR should be revised to analyze and mitigate the potentially significant impacts identified above. If mitigation is not feasible, then the SEIS/SEIR must identify these impacts as significant and unavoidable. With the addition of this required information, the SEIS/SEIR should be recirculated for additional public review and comment. Failure to recirculate the SEIS/SEIR would deprive the public of a meaningful opportunity to comment on this new information.

CCN-06

We look forward to working with TJPA to revise the SEIS/SEIR to address the concerns identified in this letter. Please do not hesitate to contact me with any questions regarding this letter.

Sincerely,

A handwritten signature in black ink that reads "Margo N. Bradish". The signature is written in a cursive style. To the right of the signature, the word "Sponsor" is written in a smaller, simpler font and is enclosed within a hand-drawn oval.

Margo N. Bradish

cc: Mr. Stephen Richardson, ARE
Mr. David S. Meyer, Esq.
leaselegal

MNB/SRM
099999\7493683v7

Cox, Castle & Nicholson, LLP
February 26, 2016

CCN-01 In response to the comments regarding incorrect addresses, text in the Draft SEIS/EIR was updated as shown on page 2-135 of the Final SEIS/EIR.

CCN-02 The transportation analysis was completed in accordance with NEPA's "hard look" standard as follows. It incorporates by reference and builds on the analysis in the 2004 FEIS/EIR, 2010 FRA Reevaluation, and 2012 TCDP EIR. The transportation analyses in these documents adhere to and are consistent with the Transportation Research Board's Highway Capacity Manual and the City's Transportation Impact Analysis Guidelines for Environmental Review. Aspects of transportation, including automobile, pedestrian, bicyclist, transit, parking/loading, emergency access, and construction, were evaluated as appropriate for this supplemental analysis. Section 3.2.3 of the Draft SEIS/EIR summarizes the methodological approach to identifying potential impacts and conforms to the City's guidelines for transportation impact analysis. The analysis focuses on the AM/PM peak hours, because it is during these critical hours that the transportation network is most heavily congested, and impacts due to a proposed project would be most severe. Appendix C of this Final SEIS/EIR contains a Transportation Analysis Supplement, which describes the methodology and key assumptions used in the SEIS/EIR transportation analysis and provides technical outputs used in the analysis.

Based on the evaluation of the potential impacts due to alteration of the transportation facilities and their operations, the Draft SEIS/EIR in Impact TR-1 identified potentially adverse/significant effects associated with use of the proposed turnback track that would cross 16th Street at grade, largely due to the assumption at that time that the turnback track would be used during the AM/PM peak hours. Adverse effects under NEPA and significant impacts under CEQA were identified in the Draft SEIS/EIR for traffic operations at the intersection (see Impact TR-1) and for bicycle and pedestrian circulation in the vicinity (see Impact TR-3 and Impact TR-4). Transit, parking, service vehicle loading, and emergency access were also examined to provide a thorough and hard look at transportation impacts. These latter components of the transportation system would be affected by the proposed project, but the effects were determined to be not adverse or less than significant. Based on the conservative assumptions made for the transportation analysis, which resulted in an adverse/significant impact, Mitigation Measure TR-1.1 was identified in the Draft SEIS/EIR.

The analysis and documentation of existing and future conditions in the project vicinity, particularly along 16th Street, have been clarified in this Final SEIS/EIR taking into account comments received on the Draft SEIS/EIR. This information describes how other plans and projects define the cumulative context for the proposed project. Please see Master Response 2, regarding the project's effects on traffic operations along 16th and Seventh Streets, as well as the project's impacts on congestion, traffic delay, and local circulation, including loading access to local businesses. The number of at-grade crossings of 16th Street due to use of the turnback track would be substantially reduced from the estimate presented in the Draft SEIS, based on updated storage assumptions and operating parameters by Caltrain that are described in Master Response 2 and that agency's commitment not to use the

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turnback track during the AM/PM peak hours (7:30 a.m. to 8:30 a.m. and 4:30 p.m. to 5:30 p.m.) because Caltrain's proposed schedule at the Transit Center does not require the use of the turnback track during these peak hours, and because it would avoid impacts to peak hour traffic. As explained above, these hours represent the period when the transportation network is most heavily used, and the commitment by Caltrain eliminates potential delays to traffic conditions from the turnback track during these hours. Master Response 2 also explains that there would be no crossings during the longer AM peak period (7:30 a.m. to 9:30 a.m.); however, there may be one to two crossings at the beginning of the PM peak period between 4:00 p.m. and 4:30 p.m. (before the PM peak hour starts at 4:30 p.m.). Assuming conservatively that two crossings occurred at the beginning of the PM peak period, the total delay would be up to 140 seconds (70 seconds for each crossing), which would be equivalent to two signal cycles/crossings at the intersection. While this would add to local traffic delays, it would not be a substantial addition to local congestion or traffic queues along 16th Street waiting to cross the tracks and Seventh Street. Thus, the traffic impact at 16th Street would be not adverse/less than significant. This conclusion about the traffic impact reflects the additional information obtained and considered during the review of the Draft SEIS/EIR.

Although the evidence indicates that there would be no adverse/less-than-significant impacts associated with the turnback track, this Final SEIS/EIR includes an Improvement Measure (New-I-TR-1.1 Traffic Improvement and Adaptive Management Plan) that calls for a traffic improvement and adaptive management plan and monitoring future traffic operations of the intersections of 7th Street/Mission Bay Drive and 16th Street/Mississippi Street/7th Street. Furthermore, the FTA and TJPA have retained a revised version of New-MM-TR-1.1 in this Final SEIS/EIR to account for the possibility that Caltrain could propose, in the future, to modify its current service and operational plans and require use of the turnback track during the AM/PM peak hours. The revised New-MM-TR-1.1 requires that TJPA, in conjunction with Caltrain, evaluate and mitigate the effects of use of the turnback track during the peak period, before such use occurs. Specific measures must satisfy a performance standard that would reduce potential traffic impacts to a less-than-significant level under CEQA (no adverse effect under NEPA).

CCN-03

Please see Master Response 2, regarding the project's effects on traffic operations along 16th and Seventh Streets, as well as the project's impacts on congestion, traffic delay, and local circulation, including loading access to local businesses. The analysis in the Draft SEIS/EIR took a hard look at the project's effects on traffic operations along 16th and Seventh Streets and traffic circulation on 16th Street towards Owens Street. As discussed in the preceding response, the Draft SEIS/EIR identified adverse effects under NEPA and significant impacts under CEQA for traffic operations at the intersection and for bicycle and pedestrian circulation in the vicinity. Transit, parking, service vehicle loading, and emergency access were also examined to provide a comprehensive discussion of transportation impacts as described in the Draft SEIS/EIR in Section 3.2 Transportation.

The analysis under Impact TR-1 acknowledges other changes that will occur at the intersection prior to implementation of the proposed project. Specifically, the

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introduction of Caltrain's electrification program will introduce changes and modifications to this intersection's configuration and signaling. Additional changes to the transportation network are planned as part of the SFMTA's 22 Fillmore Transit Priority Project and improvements included as part of the approved Warriors Arena project and the UCSF LRDP for Mission Bay. Possible future traffic impacts at 16th and Seventh/Caltrain tracks are acknowledged in the event that Caltrain's schedule might change in the future to involve use of the turnback track. When this possibility might occur is uncertain. As a result, the mitigation required for the proposed project cannot be detailed at this time, because the intersection configuration and signal timing will be modified from existing conditions, and it is uncertain at this time what modifications may be appropriate when and if Caltrain considers revisions to use of the turnback track. "[W]hen, for practical reasons, mitigation measures cannot be fully formulated at the time of project approval, the lead agency may commit itself to devising them at a later time, provided the measures are required to 'satisfy specific performance criteria articulated at the time of project approval.'" (*Sacramento Old City Assn. v. City Council (1991) 229 Cal.App.3d 1011, 1028-1029* [original italics].) Master Response 2 explains the underlying assumptions for traffic conditions along 16th Street, the methodology for determining changes to these conditions, and the effects of the proposed project. Despite the evidence received in response to the Draft SEIS/EIR that there would be no adverse/less-than-significant impacts associated with the turnback track, this Final SEIS/EIR includes an Improvement Measure (New-I-TR-1.1 Traffic Improvement and Adaptive Management Plan) that calls for a traffic improvement and adaptive management plan and future monitoring of traffic operations at the intersections of 7th Street/Mission Bay Drive and 16th Street/Mississippi Street/7th Street. Additionally, the FTA and TJPA have retained a revised version of New-MM-TR-1, as explained in the preceding response.

As explained in Master Response 2, as part of the revisions to New-MM-TR-1.1, the portions of New-MM-TR-1.1 pertaining to pedestrian and bicycle crossings have been included in a new mitigation measure, New-MM-TR-3.1. This mitigation measure, recognizing that specifics and details are not possible at this time for the reasons cited in the previous paragraph, defines a performance standard for safe pedestrian and bicycle crossings of the proposed turnback track, the tasks that need to be accomplished, the various means of accomplishing the performance standard, and the TJPA's commitment to accomplish the stated performance standard. This new mitigation measure meets the CEQ guidance for measures that are measurable, viable, and enforceable. CEQA Guidelines, which state "Formulation of mitigation measures should not be deferred until some future time. However, measures may specify performance standards which would mitigate the significant effect of the project and which may be accomplished in more than one specified way" (see CEQA Guidelines, Section 15126.4, subd. (a)(1)(B)). In addition, CEQ guidance governing environmental mitigation commitments recognizes that some measures will necessarily be implemented by other jurisdictions, but, to be effective, there must be sufficient legal authorities and resources to perform or ensure the performance of the mitigation and the measure must lower the level of impacts so that they are not significant (see January 14, 2011 CEQ memorandum on Appropriate Use of Mitigation and Monitoring and Clarifying the Appropriate Use of Mitigated Findings of No Significant Impact). The performance standards that have been included in the

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Final SEIS/EIR (and reproduced below) would be implemented by the City, TJPA, Caltrain and/or the CPUC.

- The performance standard to be achieved by New-MM-TR-1.1 is the following: If the traffic/train operation analysis shows that the traffic delays attributable to the gate downtime during the AM/PM peak hours would increase at Seventh/Mississippi Street or at Owens Street (already operating at LOS E and F) such that the overall intersection v/c ratio would worsen by more than 10 percent (i.e., a v/c ratio increase of more than 0.10), then improvements shall be implemented so the resulting v/c ratio is no greater than 10 percent above the v/c ratio without use of the turnback track during the AM/PM peak hours.
- The performance standard to be achieved by New-MM-TR-3.1 is the following: At the time of final design, TJPA shall determine the then-current overall time required by pedestrians and bicyclists traveling along 16th Street to cross the Seventh Street/Mississippi Street intersection, the Caltrain mainline tracks, and the turnback track, and the TJPA shall coordinate with Caltrain, the California Public Utilities Commission, and the City to identify the changes to the intersection and grade crossing warning devices, including signal timing, that are needed to provide the additional time to safely cross the widened intersection that results from the construction of the turnback track.

Therefore, the SEIS/EIR has taken a hard look at traffic operations along 16th and Seventh Streets and has concluded that the impacts will be less than significant/no adverse effect with mitigation. The improvement measure/environmental commitment identifies a mechanism to monitor traffic conditions and to adapt the future traffic improvements, if necessary, to conditions at such time as additional intersection improvements may be needed. Pursuant to both CEQA and NEPA, those future improvements may require further environmental review, depending on their potential to result in new or substantially more severe significant impacts.

FTA and the TJPA will assure implementation of the committed mitigation measures included in the SEIS/EIR and in the ROD as required pursuant to 23 CFR 771.109(b), All reasonable means to avoid and minimize the adverse effects of the proposed project have been adopted, and they include, but are not limited to, all commitments for further consultation on specific issues. The mitigation commitments from the Final SEIS/EIR are also presented in the MMRP (see Appendix D.2 to this Final SEIS/EIR) to ensure fulfillment of all environmental and related commitments.

CCN-04

The proposed project would not involve the routine transport, use or disposal of hazardous materials, and, thus, would not pose a significant hazard to the public or the environment. With regard to these activities of others in the vicinity of the proposed project, such activities would be subject to the regulations identified in Section 3.10, Hazardous Materials, of the SEIS/EIR, beginning on page 3.10-9, and including, in particular, the federal Hazardous Materials Transportation Act, the Emergency Planning and Community Right to Know Act, and the San Francisco

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Department of Public Health requirements to prepare Hazardous Materials Business Plans. There is no substantial evidence that the proposed project would create a hazard or interfere with service access, for the reasons described in the Draft SEIS/SEIR (Section 3.2, Transportation) and as further explained in Master Response 2, which describes a substantial reduction in the number of trains using the proposed turnback track and, hence, the queues associated with crossings. Service vehicle drivers would be expected to exercise safe driving practices, and increases in traffic volumes that could occur from any number of reasons from construction, to changes to the street network, to modifications to transit, pedestrian, or bicycle routes, and to additional development would not be a reasonable basis upon which to speculate that there would be increased public risks from accidental releases of hazardous materials.

As explained in Master Response 1, the proposed 22 Fillmore Transit Priority Lane project, once implemented, would remove automobile travel from one lane of 16th Street, east of Seventh Street. This change in local circulation would occur prior to completion of the proposed project and would be expected to result in queuing along westbound 16th Street at the intersection with the Caltrain right-of-way and Seventh Street. In addition, as explained in Master Response 2, the Warriors Arena project would increase traffic volumes along the 16th Street corridor. The TEP EIR for the SFMTA improvements to transit service, including the changes to the 22 Fillmore, was certified in March 2014 and reports that the intersection of 16th and Seventh Streets could be significantly impacted (i.e., operate at an unacceptable LOS) depending which improvements are implemented for this route (see Impact TR-28, Impact TR-32, Impact TR-36). The Warriors Arena Project EIR likewise reported unacceptable levels of service at the intersection of 16th and Seventh Streets. The changes in the lanes along 16th Street due to the 22 Fillmore project and the increased development due to the Warriors project will have a significant effect on traffic queues with or without the proposed project. The additional delays due to the turnback track, which will total about 28 minutes over the course of the entire day but only during the off-peak hours, would not be considered a substantial change to local circulation and service vehicle access.

CCN-05

The Transbay Project does not conflict or impede attainment of the policies identified by the commenter. Regarding Transportation Objective 9 of the Mission Bay South Redevelopment Plan, the proposed project would not conflict with establishing a street system because the additional trackwork in the Mission Bay South area would not prevent development of a street system. As noted in Master Response 1, a description of the Mission Bay South Redevelopment Plan has been added to the Final SEIS/EIR. With regard to TCDP objectives 4.34 through 4.37 related to traffic flow, safety and circulation, the proposed project's impacts on traffic flow and circulation are discussed in Impact TR-1 and Master Response 2. The proposed project would not hinder accomplishment of the TCDP objectives.

Regarding Transportation Objectives 11 and 12 in the Mission Bay South Redevelopment Plan, General Plan Transportation Policies 1.2, 19.2, and 27.3, all of which pertain to safety, the proposed project would not result in significant pedestrian or bicycle conflicts or safety issues as described in Impacts TR-3 and 4 and Master

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Response 2. In addition, the proposed project would not affect pedestrian circulation and would support use of bicycles for transportation. Regarding Redevelopment Project Objective I of the Mission Bay South Redevelopment Plan to improve transportation access to commercial and industrial areas and improve safety within the Plan area, the proposed project would not result in significant transportation access or safety issues as described in Impacts TR-1, 3 and 4 and Master Response 2 and, therefore, would not impede accomplishment of this objective. Although the proposed trackwork would cross pedestrian and bicycling facilities in the Mission Bay South area at the Seventh/16th Street intersection, the additional trackwork south of the Caltrain railyard would not alter these facilities, but would increase crossing time by up to 15 seconds (see pages 3.2-30 and 3.2-32 of the Draft SEIS/EIR).

Mitigation Measure New-MM-TR-1.1 in the Draft SEIS/EIR would change the signal timing at the Seventh/16th Street intersection and would require other intersection modifications that would reduce potential effects on pedestrians and bicyclists by providing sufficient time for pedestrians and bicyclists to completely cross the widened crossing and by avoiding the creation of potentially hazardous conditions for pedestrians or bicyclists. As explained in Master Response 2, New-MM-TR-1.1 would be revised based on new information from Caltrain on the use of the turnback track. As part of the revisions to New-MM-TR-1.1, the portions of New-MM-TR-1.1 pertaining to pedestrian and bicycle crossings have been included in a new mitigation measure, New-MM-TR-3.1, which also contains a performance standard for the safe crossing of the intersection by pedestrians and bicyclists, the tasks that need to be accomplished, the list of possible means of accomplishing the performance standard, and the TJPA's commitment to accomplish the stated performance standard.

In light of the above discussion, the proposed project components, particularly the additional trackwork south of the Caltrain railyard, would not have significant environmental effects on pedestrian and bicycle movements, and local circulation and would be consistent with policies and objective of the General Plan, TCDP, and Mission Bay South Redevelopment Plan. The EIRs for both the TEP and the Warriors Arena project examined the effects on pedestrian, bicycle, or loading in this same stretch of 16th Street, and did not identify significant/adverse pedestrian, bicycle, or loading impacts. The proposed project would not alter those conclusions. Please see Master Response 2, regarding proposed project transportation impacts.

CCN-06

No "significant new information," as defined in Section 15088.5(a)(1)-(4) of the State CEQA Guidelines, has been presented in response to this or other comments; therefore, recirculation of the Draft SEIS/EIR is not required. Similarly, the comments or responses presented in this appendix do not warrant a supplemental NEPA document or recirculation of the Draft SEIS/EIR pursuant to 23 CFR 771.130 and the Council on Environmental Quality guidance found in 40 CFR 1502.9 and 1506.3, since:

- Changes to the proposed project would not result in significant environmental impacts that were not previously evaluated or the proposed project is

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substantially the same as that covered by the original environmental impact statement, or

- New information or new circumstances relevant to environmental concerns and bearing on the proposed project or its impacts would not result in significant environmental impacts not previously evaluated.

FTA will issue the Final EIS for a 30-day public review before releasing its Record of Decision.



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VIA HAND DELIVERY AND E-MAIL

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RE: Comments on Draft Supplemental Environmental Impact Statement/Environmental Impact Report for the Transbay Transit Center Program prepared by the U.S. Department of Transportation Federal Transit Administration (the “FTA”), the U.S. Department of Transportation Federal Railroad Administration (the “FRA”) and the Transbay Joint Powers Authority (“TJPA”) dated December 15, 2015 (“2015 DSEIS/EIR”)

Dear Ms. Perez and Mr. Boule:

Our law firm represents The Millennium Tower Association (hereinafter referred to as “Millennium Association”), the homeowner’s association for residents of the Millennium Tower located at 301 Mission Street.

We submit this letter on behalf of Millennium Association as comments on the 2015 DSEIS/EIR. We request that FTA, FRA and TJPA (collectively, the “Lead Agencies”) provide a written response to the comments raised in this letter in compliance with the National Environmental Policy Act (“NEPA”) and the California Environmental Quality Act (“CEQA”).

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Generally speaking, Millennium Association has three concerns. First, Millennium Association is concerned about circulation impacts that will inhibit ingress and egress from the Millennium Tower. The proposed project will exacerbate vehicular and pedestrian circulation on Fremont, Mission and Beale Streets, resulting in congestion and delays. Second, the proposed project will worsen air quality and generate increased noise in the area. Vehicle emissions from Greyhound, Amtrak and other vehicles traveling to and from, and idling at, the Intercity Bus Facility will emit harmful pollutants that pose increased risks to Millennium Tower's residents. In addition, operations at the Intercity Bus Facility will result in increased noise that will impact the residents of Millennium Tower throughout the day and night. Third, Millennium Association believes that the environmental review process and analysis of the proposed development above the Intercity Bus Facility has suffered because the project description and scope of the development above the Intercity Bus Facility is not stable and definite. As a result, Millennium Association believes the proposed Intercity Bus Facility and related development should be abandoned by TJPA until a clear, well defined project is proposed. Instead, intercity bus transit should continue to circulate through the bus deck level of the Transbay Transit Center. The land above the train box extension, if approved, should be put to another compatible land use for the area consistent with the City's newly adopted Transit Center District Plan.

As you know, Millennium Association has sought information from the TJPA to better understand the project's impacts on the Millennium Tower and the day-to-day lives of its residents. The Board and residents have appreciated very much its interactions with TJPA staff and are thankful for their hard work. In that spirit, the Millennium Association desires to continue to work cooperatively to find solutions to its concerns. Thus, this letter is not a criticism of the professionals working on the 2015 DSEIS/EIR; rather, it is submitted to help the Lead Agencies improve the environmental document and the Transbay Transit Center Program as a whole.

The 2015 DSEIS/EIS makes substantial changes to the project described in the certified *Final Environmental Impact Statement/Environmental Impact Report and Section 4(f) Evaluation for the Transbay Terminal/Caltrain Downtown Extension/Redevelopment Project in the City and County of San Francisco* dated March 2004 (SCH No. 95062004) and its addenda (hereinafter, collectively, the "2004 FEIS/EIR"). In addition, the 2015 DSEIS/EIR identifies new information of substantial importance to the implementation of the whole of the Transbay Transit Center Program. (See, e.g., 2015 DSEIS/EIR at page S-4, S-8, S-9). "If a subsequent or supplemental EIR is necessary, . . . the state CEQA Guidelines require that the later EIR receive the same circulation and review as the initial EIR. (CEQA Guidelines, §§ 15162, 15163; see *Mira Monte Homeowners Assn. v. County of Ventura* (1985) 165 Cal.App.3d 357, 362, fn. 7, 363; *Sutter Sensible Planning, Inc. v. Board of Supervisors* (1981) 122 Cal.App.3d 813, 822)."



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(*Concerned Citizens of Costa Mesa, Inc. v. 32nd Dist. Agricultural Assn.* (1986) 42 Cal.3d 929, 936.)

This letter identifies several areas where the 2015 DSEIS/EIR does not comply with NEPA and/or CEQA, particularly with respect to environmental impacts and mitigation measures that affect residents of the Millennium Tower. We request that the Lead Agencies address the concerns raised by this letter and recirculate the supplemental environmental impact statement and environmental impact report. The proposed project described in the 2015 DSEIS/EIR should not proceed without the Lead Agencies' improving the environmental analysis of the DSEIS/EIR and studying additional feasible alternatives and mitigation.

1. THE 2015 DSEIS/EIR'S TRANSPORTATION ANALYSIS DOES NOT COMPLY WITH CEQA AND NEPA.

Before raising more specific comments on the 2015 DSEIS/EIR's transportation analysis, two general comments should be raised. First, the 2015 DSEIS/EIR describes proposed changes to the Transbay Transit Center Program that will affect streets, sidewalks and intersections in the vicinity of the Millennium Tower. Those changes include (i) a new Intercity Bus Facility with "future land development above" located between Beale and Main Streets and Mission and Howard Streets, (ii) new Taxi Station Areas located between Beale and Main Streets and Mission and Howard Streets, (iii) a BART/MUNI underground pedestrian connector under Beale Street instead of Fremont Street, and (iv) extension of the Transit Center's train box from Beale Street to Main Street. These project changes will result in circulation impacts during construction activities that are expected to last several years. There will also be significant environmental impacts to sidewalks, streets and intersections from the project's permanent operations/changes.

While the 2015 DSEIS/EIR describes these physical changes with varying levels of detail, the document fails to list the permits and other approvals that will be required to implement the changes to the approved project. Identification of these future discretionary actions by public agencies are essential to the purposes and requirements of CEQA and NEPA, as both decision-makers and the public need to know how the Lead Agencies intend to use the 2015 DSEIS/EIR. (CEQA Guidelines 15124(d)(1)(B).) For example, are the Lead Agencies seeking only general plan and zoning level approval for the proposed project? Then, greater latitude is given in the environmental impact analysis because further environmental review is anticipated. We doubt, though, that the Lead Agencies intended only a "programmatic"-level environmental document at this stage in the project's history (with the exception of the proposed

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residential and commercial development). Instead, it appears the Lead Agencies are seeking “project level” approval, requiring greater attention to the environmental analysis, mitigation measures and feasible alternatives. Without an identification of the specific permits, permit modifications and approvals being sought from lead and responsible agencies for the proposed project, the public and decision-makers are at a loss as to which lens to view the project.

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The second general comment pertains to how the 2015 DSEIS/EIR analyzes new information of substantial importance now available since adoption of the 2004 FEIR/EIS. Perhaps the most significant new information that affects the Millennium Tower is the City and County of San Francisco’s (“City”) recent adoption of amendments to its general plan, planning code and zoning map as part of the Transit Center District Plan (the “TCDP”). The TCDP establishes land use regulations for approximately 145 acres in the vicinity of the Transbay Center project. The TCDP authorizes an additional 2.2 million square feet of office space, more than 800 residential units, more than 800 additional hotel rooms and other land use changes. These finalized and anticipated land use changes were not known at the time of the 2004 FEIS/EIR and this new information is of substantial importance to the Transbay Transit Center Program and vicinity.

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The DSEIS/EIR must evaluate “new information, which was not known and could not have been known at the time the environmental impact report was certified as complete[.]” (Public Resources Code section 21166.) If “the project” will have significant environmental effects in light of new information not evaluated in the prior EIR, the environmental impacts must be disclosed to the public and analyzed. (CEQA Guidelines section 15162(a)(3)(A).) Notice that this analysis requires a review of the whole of the project, not just the changes. Changes to the project are dealt with under a different analytic framework. (CEQA Guidelines 15162(a)(1) (“Significant changes are proposed in the project . . .”) and CEQA Guidelines 15162(a)(2) (“Significant changes occur with respect to the circumstances under which the project is undertaken . . .”).) “The question under Public Resources Code section 21166 and Guidelines 15162 is whether changes in a project *or its surrounding circumstances* introduce new significant environmental impacts.” (*Save Our Neighborhood v. Lishman* (2006) 140 Cal.App.4th 1288 (emphasis added).) The 2015 DSEIS/EIR’s shortcoming is that it does not conduct a close analysis of the environmental impacts of the substantial new development permitted by the Transit Center District Plan in the immediate vicinity of the Transit Center. The DSEIS/EIR is required to evaluate how the Transit Center project itself could adopt new mitigation measures to avoid or lessen the environmental effects of the additional new vehicular, transit, pedestrian, and bicycle trips to and from the Transit Center.

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The SEIS/EIR cannot take the narrow view that it need only analyze the incremental environmental impacts of the changes to the approved project. The 2015 DSEIS/EIR is now

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seeking a new discretionary approval; therefore, the whole of the project must be viewed in light of the new information to determine whether additional mitigation measures are required to reduce the impact of implementing the whole of the project on the environment. If new information shows that significant effects previously examined will be substantially more severe than shown in the prior EIR, that information must be disclosed and analyzed. (CEQA Guidelines 15162(a)(3)(B).) If new information shows mitigation measures or alternatives previously found not to be feasible and would substantially reduce one or more significant effects of the project, but the Lead Agencies decline to adopt the mitigation measure or alternative, the mitigation measures and alternatives previously rejected must be analyzed anew. (CEQA Guidelines 15162(a)(3)(C).) If new information shows mitigation measures or alternatives which are considerably different from those analyzed in the previous EIR would substantially reduce one or more significant effects on the environment, but the Lead Agencies decline to adopt the mitigation measure or alternative, the different mitigation measures or alternatives must be analyzed anew. (CEQA Guidelines 15162(a)(3)(D).) The 2015 DSEIS/EIR needs to be revised with these principles in mind. Alternatives previously considered in the 2004 FEIS/EIR must be reviewed in light of the new information. New feasible alternatives must be analyzed on their environmental merits. Potential mitigation measures must be evaluated to mitigate impacts in the Transit Center District. The single new mitigation measure adopted to address transportation impacts does not even address the Transit Center District area. CEQA and NEPA require the Lead Agencies to do more.

A. The 2015 DSEIS/EIR Improperly Appears to Use the 2004 FEIS/EIR as the “Baseline” for Environmental Analysis of both the Proposed Project and the “No Action” Alternative.

CEQA requires that the baseline for environmental analysis be established upon physical conditions that exist on the date the notice of preparation is published. (CEQA Guidelines 15125(a)). The 2015 DSEIS/EIR does not describe the existing physical conditions in detail, particularly when it comes to existing neighboring land uses and current traffic conditions. The document should tell the reader the calendar dates when the traffic counts were conducted and what days of the week and times the traffic counts were conducted. Traffic generating physical changes in the immediate vicinity of the Transit Center, such as the increased number of tech companies bringing workers to businesses in the South of Market area, is not explored. For example, since 2008, business practices in the South of Market area has rapidly changed so that the density of workers per square foot of commercial office space has dramatically increased. Some of these changes are reflected in the socio-economic, population and housing data in Section 3.4 of the 2015 DSEIS/EIR, but that data is not clearly applied to the transportation context nor is it clear that the data presented reflects the data most near in time to the issuance of the notice of preparation.

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In addition to those general comments, the Millennium Association is concerned about more localized impacts that should be more fully explored in the DSEIS/EIR. Because of the physical proximity of the Millennium Tower's driveways to the Transit Center's bus plaza entrance on Beale Street and exit on Fremont Street, some description and diagram of the physical conditions in that immediate vicinity should be included for purposes of meaningful analysis. The physical conditions would also include the existing layout of the Millennium Tower, which had not been fully constructed at the time of certification of the 2004 FEIS/EIR, as well as typical traffic patterns of vehicles entering and exiting the Millennium Tower on Fremont Street and Beale Street.

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B. The 2015 DSEIS/EIR's Failure to Include or Adequately Refer to the Data Sources for Its Transportation Impact Analysis Fails to Comply with the Mandates of NEPA and CEQA.

NEPA and CEQA require that public agencies "show their work" when performing environmental analysis so that the public and decision-makers can evaluate the raw traffic data supporting the conclusions set forth in an environmental impact statement or environmental impact report. The Transportation section of the 2015 DSEIS/EIR is based on statements regarding transit, traffic and parking (including during construction) that are conclusory and unsupported by evidence as they relate to streets, sidewalks and intersections in the vicinity of the Millennium Tower. The 2015 DSEIS/EIR fails to include a copy of the supporting traffic study or the supporting traffic data in its appendices. On June 13, 2013, Erik Alm, District Branch Chief, Local Development, of the California Department of Transportation asked the TJPA to "ensure that a Traffic Impact Study (TIS) is prepared" providing specific information. (See 2015 DSEIS/EIR, Appendix A, Supplemental EIS/EIR Public Scoping, Written Comments). Unfortunately, the 2015 DSEIS/EIR does not provide the requested information, including, without limitation:

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- "[T]raffic impacts in terms of trip . . . distribution and assignment." Millennium Association also has an interest in understanding this information. The SEIS/EIR should show trip distribution and assignment for Market Street (from First to Main Street), Mission Street (from First to Main Street), Howard Street (from First to Main Street), Main Street (from Market to Folsom Street), Beale Street (from Market to Folsom Street) and Fremont Street (from Market to Folsom Street).
- "[T]he study should clearly show the percentage of project trips assigned to State facilities." It appears impacts to I-80 and I-280 have not been analyzed in the 2015 SEIS/EIR.



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- “Current Average Daily Traffic (ADT)” . . . volumes on all significantly affected streets, highway systems and intersections.” Total ADT is not disclosed in the Transbay 2015 SEIS/EIR for any streets or intersections -- even the 12 study intersections. Average weekday, AM Peak, PM Peak and weekend traffic volumes on should be shown on Market Street (from First to Main Street), Mission Street (from First to Main Street), Howard Street (from First to Main Street), Main Street (from Market to Folsom Street), Beale Street (from Market to Folsom Street) and Fremont Street (from Market to Folsom Street). In addition, due to the existence of the bus plaza, the SEIS/EIR should include anticipated bus traffic volumes entering the Transbay Bus Plaza during AM and PM peak hours on the streets listed in this paragraph.
- “AM and PM peak hour volumes on *all significantly affected streets, highway systems and intersections*” (emphasis added). In Millennium Association’s view NEPA and CEQA require the Lead Agencies to study additional streets and street intersections as provided above. The final SEIS/EIR should also disclose the extent to which stacking of buses will occur on the Beale Street travel lane closest to 301 Mission Street as those buses await entry into the bus plaza. The traffic study should determine whether bus stacking on Beale Street will occur during the AM or PM peak on Beale Street, taking into account the number of buses that can line up in each lane of the bus plaza, the anticipated amount of time that buses will stop in the bus plaza and the anticipated time buses will wait for signals to change on Fremont Street so that buses may exit the bus plaza. In addition, the final SEIS/EIR should include any potential delays to buses entering the bus plaza from Beale Street that are caused by pedestrians crossing on the Beale Street sidewalk in front of the bus plaza. This is particularly relevant during the time when the BART/MUNI pedestrian tunnel on Beale Street is not yet constructed and operational. The 2015 DEIS/EIR states that “approximately 7,720 pedestrians during the weekday midday peak hour and 9,500 pedestrians during the weekday PM peak hour would use this connector,” which would suggest that such a large number of pedestrians will be walking down Fremont or Beale Street to get to the Transit Center prior to its construction, potentially blocking ingress or egress driveways to the Millennium Tower. (See 2015 DEIS/EIR, Page 3.2-31)
- “[S]chematic illustrations and level of service (LOS) analysis for the following scenarios: (1) existing, (2) existing plus project, (3) cumulative and (4) cumulative plus project for the roadways and intersections in the project area.” No schematic illustrations of vehicular traffic have been provided in the 2015 DSEIS/EIR. Of particular concern to Millennium Association is the lack of schematic illustrations of bus trips approaching and departing from the Transbay Transit Center’s bus plaza and the proposed Intercity Bus

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Facility. The final SEIS/EIR needs to include diagrams that show the following information pertaining to Fremont and Beale Streets between Market Street and Folsom Street: (i) each traffic lane, (ii) which lanes will be dedicated for bus only traffic, taxi only traffic, bicycle only traffic, or are available for vehicles and bicyclists generally, (iii) how vehicular ingress and egress from the Millennium Tower is anticipated to flow from Fremont and Beale Streets, (iv) how ingress and egress from the Intercity Bus Facility will occur from Beale and Main Streets, and (v) any modified curbs to accommodate the turning radius of buses on Fremont, Beale and Main Streets between Mission and Howard Streets. This analysis would be prepared for each of the four scenarios proposed by Mr. Alm and now reaffirmed by the Millennium Association in this letter.

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The Lead Agencies' failure to include in the 2015 DSEIS/EIR a copy of the Traffic Impact Study that responds to the requests of the California Department of Transportation in this project of statewide and regional significance does not comply with CEQA or NEPA. The additional circulation data requested will help the DEIS/EIR serve its informational purpose and help the Lead Agencies determine the environmental baseline for analysis. Without the requested data, the DEIS/EIS does not adequately describe the present environmental conditions, mitigation measures cannot be adequately designed, and alternatives cannot be fairly studied.

C. Operations Were Apparently Analyzed At Only Four Intersections in the Vicinity of the Transit Center for the Proposed Project, Which Is Inadequate to Analyze Existing-Plus-Project Conditions and 2040 Cumulative Conditions of the Proposed Project

The Lead Agencies' decision to study only four intersection operations in the vicinity of the Transit Center deprives the public and decision-makers of meaningful information upon which to evaluate the merits of the project and determine the scope of additional mitigation measures. The 2015 DSEIS/EIR's must disclose the criteria used *to select* these four intersections as well as the criteria used *to exclude* other intersections from its analysis.

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The Final Environmental Impact Report for the Transit Center District Plan and Transit Tower certified on May 24, 2012 (State Clearinghouse No. 2008072073) (referred to herein as the "TCDP Final EIR") identifies numerous intersections that will experience significant and unavoidable impacts, as Beale/Folsom Streets, Fremont/Howard Streets, Main/Howard Streets, First/Market Streets, Fremont/Market/Front Streets, Beale/Market/Davis/Pine Streets, and First/Mission Streets. (See TCDP Final EIR, at pp. S-10 through S-14.) The environmental impacts of the Transbay Transit Center Program, as modified, on these intersections must be studied and feasible mitigation adopted to avoid or reduce the environmental effects at these intersections. If mitigation is not feasible, then the SEIS/EIR must say why.



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D. Circulation Impacts to the Millennium Tower are not addressed in the Transportation Analysis and Reasonable Alternatives to Mitigate the Impacts of the Transit Center Project Have Not Been Explored.

The Transbay 2015 DSEIS/EIR fails to specifically address impacts on ingress and egress to the Millennium Tower. In particular, the DSEIS/EIR's Transportation analysis has at least two major failures in this respect:

- The Transportation Analysis fails to disclose and propose mitigation for pedestrian traffic flow to the Transbay Center at Beale Street and Fremont Street and its effect on vehicular ingress and egress at the Millennium Tower. This impact will particularly be felt prior to the construction of the BART/MUNI Underground Pedestrian Connector on Beale Street. The DSEIS/EIR cannot serve its purpose as an informational document without considering as a feasible mitigation measure the designation of "Keep Clear" zones on Fremont Street and Beale Street in front of the entry/exit driveways to the Millennium Tower. The DSEIS/EIR should also consider the feasibility of using traffic control personnel to manage bus flows down Beale Street and Fremont Street to ensure that buses do not stack during AM and PM Peak hours. The SEIS/EIR should evaluate the feasibility of using traffic control personnel to ensure that pedestrian flows on Beale Street and Fremont Street do not inhibit vehicular ingress and egress from the Millennium Tower.
- The Transportation Analysis fails to propose a feasible mitigation measure for the transportation impacts occurring during the construction of the BART/MUNI Underground Pedestrian Connector on Beale Street. It appears this construction may occur in one or more travel lanes on Beale Street and/or in the sidewalk adjacent to the Millennium Tower on Beale Street. If so, construction of the BART/MUNI Underground Pedestrian Connector may block the Beale Street entrance to the Millennium Tower and impede access to the bus plaza on Beale Street. Since this project is expected to last approximately 2 years, additional information should be included now in a revised DSEIS/EIR about vehicular, pedestrian and bicycle traffic flows on Beale Street and other surrounding streets during construction. Feasible mitigation measures should be evaluated and determined for the construction related project impacts on circulation, including on-site traffic control personnel, "Keep Clear" zones, and two-way access to the Millennium Tower on Fremont Street when Beale Street is totally unavailable.

NEPA and CEQA require the Lead Agencies explore appropriate mitigation measures not already included in the proposed action or alternatives. (*See, e.g.*, 40 C.F.R. section 1501.14.)

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“An EIR shall describe feasible mitigation measures which could minimize significant adverse impacts[.]” (CEQA Guidelines section 15126.4(a)(1).) “Mitigation measures must be fully enforceable through permit conditions, agreements, or other legally-binding instruments.” (CEQA Guidelines, sections 15126.4(a)(2).) The DEIS/EIR must consider ways of minimizing significant adverse impacts to circulation on Beale and Fremont Streets and any final mitigation measures must be fully enforceable.

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Continued

E. The Transportation Analysis Fails to Take Into Account Pedestrian Trips Between the Transbay Transit Center and the Intercity Bus Facility.

Persons arriving on Greyhound, Amtrak and other long-haul buses will cross Beale Street to get to the Transit Center. While the diagram on page 2-35 appears to show access from the ground surface of the Intercity Bus Facility to the lower concourses of the Transit Center by elevator and stairs, long-haul travelers may need help with wayfinding, otherwise they will likely cross Beale Street for transit connections. A mitigation measure should be included to manage pedestrian traffic flow between the Transit Center and the Intercity Bus Facility, if approved. We note that the design of the Intercity Bus Facility is also stated to be “conceptual” in the 2015 DSEIS/EIR, reducing the utility of the diagram on page 2-35 to the public and decision-makers. This is an example of how the indefinite project description affects the environmental analysis.

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2. THE 2015 DSEIS/EIR FAILS TO FULLY DISCLOSE THE CIRCULATION IMPACTS OF CONSTRUCTION OF THE UNDERGROUND PEDESTRIAN CONNECTOR ON INGRESS AND EGRESS TO THE MILLENNIUM TOWER, AS WELL AS THE IMPACT ON CIRCULATION ON LOCAL STREETS.

The 2015 DSEIS/EIR provides that the underground pedestrian connector tunnel would be constructed with “cut-and-cover” techniques. (2015 DSEIS/EIR, Page 2-28) As mentioned above, for the DSEIS/EIR to appropriately function as an informational document disclosing the environmental effects of the proposed project, the DSEIS/EIR must set forth the potential environmental effects on vehicular, pedestrian and bicycle circulation that will be caused by the construction of the Beale Street pedestrian connector between the Transit Center and BART/MUNI on Market Street. In addition, the impacts on ingress and egress from the Millennium Tower must be disclosed, including mitigation measures to address the ingress/egress issues.

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3. THE ALTERNATIVES ANALYSIS DOES NOT IDENTIFY OTHER FEASIBLE ALTERNATIVES TO THE INTERCITY BUS FACILITY.

CEQA requires that the 2015 DSEIS/EIR identify feasible alternatives that could avoid or substantially lessen a proposed project's environmental effects. (Public Resources Code section 21002, 21002.1(a), 21000(b)(4), 21150.) NEPA requires an agency to "rigorously explore and objectively evaluate all reasonable alternatives, and for alternatives which were eliminated from study, briefly discuss the reasons for their being eliminated." (*See, e.g.*, 40 C.F.R. section 1502.14.) The 2015 DSEIS/EIR only offers the "no action" alternative and does not offer or even analyze other feasible or reasonable alternatives to the Intercity Bus Facility. The Lead Agencies' approach does not comply with NEPA or CEQA.

The Lead Agencies should consider whether the environmental impacts of the proposed Intercity Bus Facility would be avoided or reduced if:

- The project set forth in the First Addendum was pursued by the Lead Agencies, which calls for Greyhound operations to be located on the Lower Concourse level of the Transit Center. This alternative would include other long haul operators, such as Amtrak.
- Greyhound, Amtrak and other long haul operators could be located on the bus deck of the Transit Center.
- Greyhound, Amtrak and other long haul operators could be located on the street level bus plaza of the Transit Center.

The 2015 DSEIS/EIR lacks an environmental analysis of the merits of these feasible alternatives to the Intercity Bus Facility. While each environmental factor in the SEIS/EIR should be considered, the alternatives analysis should particularly focus on circulation (vehicular, transit, pedestrian, and bicycle), air quality and noise impacts from an operational and construction standpoint. One additional factor that is absent from the 2015 DSEIS/EIR is the current and anticipated routes of travel for the Greyhound and Amtrak buses. Will the use of the Intercity Bus Facility require additional miles travelled by buses versus the alternatives described above? To what extent will the use the Intercity Bus Facility versus the other alternatives affect traffic patterns on other streets as they come from long-haul destinations from the East Bay routes across the Bay Bridge, or from the South or North Bay? The lack of this information in the current document shows that it is not adequate for CEQA and NEPA purposes.

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4. THE AIR QUALITY ANALYSIS DOES NOT ADEQUATELY DISCLOSE THE SIGNIFICANT ENVIRONMENTAL IMPACTS ON AIR QUALITY THAT WILL OCCUR IF THE PROPOSED INTERCITY BUS FACILITY IS CONSTRUCTED AND OPERATED AS PROPOSED.

A. Legal Background

The 2015 DSEIS/EIR must provide decision-makers with information that enables them to make a decision that intelligently takes into account the environmental consequences of the proposed project. When the proposed project being evaluated describes a specific proposal like the Intercity Bus Facility, greater detail in analysis is required. (CEQA Guidelines section 15146(a).) Specific data should be presented when it is necessary for a meaningful analysis of a significant impact. (*Berkeley Keep Jets Over the Bay Comm. v. Board of Port Comm'rs* (2001) 91 Cal.App.4th 1344, 1381.) An EIR must provide a reasoned response to comments requesting that further studies be undertaken when those comments contain evidence indicating that a further study is necessary to evaluate a significant impact. (*Ibid.*) If the final SEIR fails to provide reasoned responses to criticism of the environmental analysis, the EIR can be found legally inadequate. (*Flanders Found. v City of Carmel-by-the-Sea* (2012) 202 Cal.App.4th 603, 616; *California Oak Found. v City of Santa Clarita* (2005) 133 Cal.App.4th 1219.)

B. The Meteorological Data and Assumptions In the Transbay 2015 DSEIS/EIR Do Not Comply with CEQA and NEPA.

The Air Quality section of the 2015 DSEIS/EIR describes the meteorology of the proposed project by referencing average wind speeds at the San Francisco International Airport, more than 10 miles from the proposed project. (2015 DSEIS/EIR, Page 3.13-1) While the project is in a low-lying topography, the assumed "constant marine air movement" at the proposed project cannot be said to be the same or even similar to the conditions experienced at the San Francisco International Airport. This is particularly true of the existing conditions plus cumulative analysis, which should take into consideration the density and intensity of land uses which will impact wind speed. CEQA and NEPA require that the Lead Agencies base their analysis on data and assumptions that are reasonable and appropriate to analyze impacts at the site of the proposed project.

C. Air Quality Data Used by the Transbay 2015 DSEIS/EIR Does Not Comply with CEQA and NEPA.

Ambient Air Quality Data was apparently based on data from collected at the Arkansas Street monitoring station, located at 10 Arkansas Street, San Francisco, Calif. (the "Arkansas

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Street Monitoring Station”). (2015 DSEIS/EIR, Page 3.13-1) The Arkansas Street Monitoring Station is located more than 1.25 miles from the proposed Intercity Bus Facility.

The U.S. Environmental Protection Agency maintains information on ambient air quality monitoring programs, monitoring methods, quality assurance and control procedures and federal regulations related to ambient air quality monitoring. (See <http://www3.epa.gov/ttn/amtic/>) Best practices for air quality monitoring require more than the use of remote air quality stations. The Lead Agencies can do better to accurately quantify the air quality impacts at the vicinity of the Transbay Transit Center and the Intercity Bus Facility.

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Continued

4. THE PROPOSED RESIDENTIAL AND COMMERCIAL DEVELOPMENT ABOVE THE INTERCITY BUS FACILITY SHOULD BE REMOVED FROM THE PROPOSED PROJECT.

The residential or commercial development on top of the Intercity Bus Facility should not be included in the scope of the proposed project. The so-called “adjacent land development” discussion does not comply with the procedural safeguards provided in NEPA and CEQA. The scope of the proposed new development is lacking in sufficient detail for environmental analysis.

A. The Inclusion of the Residential or Commercial Development Above the Intercity Bus Facility Did Not Comply with NEPA’s or CEQA’s Procedures.

The proposed residential or commercial development was not included in the project’s notice of preparation and was apparently not discussed at the SEIS/EIR public scoping meetings or in written comments on the scope of the project. As a result, the project should be excluded from consideration in the final SEIS/EIR and should not be considered for approval by the Lead Agencies.

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The Notice of Preparation for the 2015 DSEIS/EIR dated April 23, 2013 (hereinafter, the “NOP”) does not mention any proposed residential or commercial development above the Intercity Bus Facility. The NOP only mentions a potential Intercity Bus Facility as potential development above the train box extension. As a result, public agencies and interested persons that may have influenced the scope of the DSEIS/EIR on this new project were not given the opportunity to do so. (Public Resources Code section 21080.4(a); CEQA Guidelines section 15375.) The absence of the commercial/residential component deprived governmental agencies and the public of the ability to make a “meaningful response” to the NOP. (CEQA Guidelines 15082(a)(1).)

The presentation given at the Public Scoping Meeting for the Supplement EIS/EIR on Tuesday, May 14, 2013 from 5:30-7:30 appears not to have included any discussion of a



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proposed residential or commercial development on top of the Intercity Bus Facility. The presentation materials are silent on the issue. None of the speaker cards mention the proposal and none of the summaries of scoping meeting verbal comments mention the issue. Finally, none of the written scoping comments included in Attachment C to the Transbay 2015 DSEIS/EIR discussed proposed commercial or residential development on top of the Intercity Bus Facility.

FR-17
Continued

The unexpected inclusion of a residential or office component to the project has precluded meaningful scoping for analysis. The residential and office component should be withdrawn. If the City desires to study the site for potential residential or commercial development, then the City or a proposed developer should come forward with a specific proposal.

The proposed residential use raises environmental justice concerns under NEPA, CEQA and the City and County of San Francisco’s Sustainability Plan. If the proposed residential use is determined to be a single room residential use, environmental justice communities may experience harmful environmental effects, such as air quality and noise impacts. While the 2015 DSEIS/EIR seeks to mitigate some of these impacts with air filtration and ventilation requirements, as well as maintenance plans, environmental justice communities may still be at risk. (2015 DSEIS/EIR, Page 3.13-17) The requirement that buyers/renters be provided a disclosure regarding hazardous emissions that are “designed to remove 80 percent of outdoor particulate matter” and that occupants “will be informed of the proper use of the installed air filtration system” puts unnecessary burdens on environmental justice communities. In addition, the 2015 DSEIS/EIR fails to analyze the potential impacts on residential occupants of noise and vibration from (i) the Intercity Bus Facility (including engine starts and idling, air brake engagement/release, and back up alarms), (ii) the Transit Center bus plaza, (iii) the extended train box, and (iv) street noise from Beale and Main Streets.

FR-18

FR-19

B. The scope of the proposed new residential or commercial development is lacking in sufficient detail for environmental analysis.

An accurate, stable and finite project description is an essential prerequisite to an informative and legally sufficient EIR. (*County of Inyo v. City of Los Angeles* (1977) 71 Cal.App.3d 185, 192.) An EIR must be “prepared with a sufficient degree of analysis to provide decision-makers with information which enables them to make a decision which intelligently takes into account environmental consequences.” (*Dry Creek Citizens Coalition v. County of Tulare* (1999) 70 Cal.App.4th 20, 26.) A commercial office building and a single room occupancy residential building are two very different types of land uses, suggesting a project description that is unstable and undefined (rather than finite).

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The CEQA Guidelines require “a general description of the project’s technical, economic, and environmental characteristics, considering the principal engineering proposals if any and supporting public service facilities.” (CEQA Guidelines section 15124(c).) How the building above the Intercity Bus Facility will be constructed to mitigate air quality dangers involving particulate matter for a commercial use is not discussed at all, nor are there any engineering or technical studies provided in the 2015 DSEIS/EIR to study such impacts. Indeed, we believe a fair argument can be made that the 2015 DSEIS/EIR has failed to study the air quality impacts of proposed commercial development above the Intercity Bus Facility.

FR-21

State regulations also require “a list of permits and other approvals required to implement the project.” (CEQA Guidelines section 15125(d)(1)(B).) No list of permits is provided for the proposed commercial or residential uses.

FR-22

As stated above, noise and vibration impacts on the additional land development has not been analyzed – whether residential or commercial – arising from the Intercity Bus Facility, traffic entering and passing through the Transit Center bus plaza, as well as street noise from Beale and Main Streets.

FR-23

CONCLUSION

As an informational document, the 2015 DSEIS/EIR needs much further work to meet the needs of the public and decision-makers. Transportation impacts are not fully analyzed in light of proposed changes to the project and new information. Additional air quality data should be collected in the vicinity of the Transit Center and assumptions should be reevaluated. The Intercity Bus Facility and alternatives to its location should be evaluated from an environmental standpoint, as required by CEQA and NEPA. Finally, new development proposed above the Intercity Bus Facility is not ready for evaluation and raises environmental and environmental justice concerns.

If a private developer proposed 45,000 square feet of new development immediately adjacent to the Transbay Transit Center, we feel confident that the TJPA and the City and County of San Francisco would demand much greater detail about the proposed project for environmental review purposes. The public should expect nothing less from the Lead Agencies.

FR-24

The Lead Agencies should focus on the most critical transit project modifications, such as the refinements to the DTX and the BART/MUNI underground pedestrian connector, which will help the Lead Agencies achieve their vision of a world-class transit hub.

Millennium Association desires to work collaboratively with the Lead Agencies in resolving the issues identified in this letter. Together, we believe we can design thoughtful

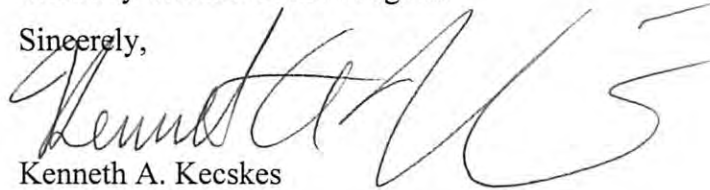


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measures that that will better mitigate the transportation, air quality and noise impacts of the Transbay Transit Center Program.

Sincerely,



Kenneth A. Kecskes

KAK/en

Cc: Members of the Board, The Millennium Tower Association

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FR-01 The SEIS/EIR supplements the previously approved 2004 FEIS/EIR for the Transbay Program. Page 1-28 of the 2004 FEIS/EIR includes Table 1.2-4, which summarizes the permits and approvals that would be needed for the Transbay Program, including the DTX as refined by the current proposed project. For the benefit of the commenter, Table 1.2-4 from the 2004 FEIS/EIR has been updated for the proposed project and is presented below.

Table FR-01 Permits and Approvals to be Required for the Proposed Project	
Agency	Approval or Permit
State Water Resources Control Board/Regional Water Quality Control Board	General Construction Activity Stormwater Permit
California Public Utilities Commission	Permits required for public safety considerations of underground Caltrain Extension and Terminal.
San Francisco Bureau of Environmental Health	Permit required for drilling or other subsurface exploration.
San Francisco Department of Public Works	Approval required for construction in public rights-of-way. Batch Industrial Wastewater Discharge Permit required for dewatering effluent discharge to the combined sewer system providing the quality of the effluent meets the NPDES General Permit discharge standards. Article 20 of San Francisco Municipal Code requires preparation of a Site Mitigation Plan if soil sampling and analysis indicate presence of hazardous waste in soil subject to construction disturbance.
San Francisco Municipal Transportation Agency	Approval required for municipal public transit realignments, surface street changes, traffic operation changes, traffic control measures, and on-street parking changes.
San Francisco Board of Supervisors	Approvals required for use of City rights-of-way.
San Francisco County Transportation Authority	Review and inclusion of the project in the Countywide Transportation Plan and Capital Improvement Program of the Congestion Management Program for San Francisco.

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As depicted in Table 2-3 of the Draft SEIS/EIR (see page 2-21), the proposed project consists of three components:

- DTX Refinements
- Other Transportation System Improvements
- Adjacent Land Development

The first two components, DTX Refinements and Other Transportation System Improvements, have been evaluated at a project level with the expectation that, upon completion of the CEQA and NEPA environmental review processes, the project will advance to final design and then construction.

The third component of the proposed project, Adjacent Land Development, is treated differently under CEQA and NEPA. This component consists of potential future development of remainder sites adjacent to portions of the project. Pursuant to CEQA, this project component is analyzed at a program level. The reason for this level of analysis of potential future land development is explained on page 2-40 of the Draft SEIS/EIR: “The assumptions regarding the future potential development are highly conceptual and only suggest possible land uses and development intensities consistent with applicable City plans and zoning.” The project refinements do not include plans for future development of the adjacent sites, and no development applications for these sites have been filed. The inclusion of this third component is necessary to provide full disclosure of the potential for future development of portions of the sites that will be acquired by the TJPA for transportation purposes. These potential impacts are analyzed at the level of detail appropriate to the level of the detail of the potential future projects. Under NEPA, the Adjacent Land Development is not a part of the proposed action but is considered to be an indirect effect of the first two components of the project, because future development of the portions of the site that are not needed for DTX is a consequence of TJPA’s acquisition and use of only a portion of the site and is reasonably foreseeable, although the effects from the adjacent land development would occur later in time from those of the proposed project. The land use approval process and any subsequent development would not be under FTA’s jurisdiction. This distinction among the project components is clearly identified in the Draft SEIS/EIR (see the footnote in Table 2-3 on page 2-21 and the first full paragraph on page 2-40).

In early coordination meetings with the City, the TJPA was asked to create conceptual development programs for the portions of project sites that might not be needed entirely for transportation purposes, using existing development policies and regulations. This request provided the basis for the use, floor area, and intensity assumptions for the adjacent land development (see pages 2-40 and 2-41). The Draft SEIS/EIR recognizes that future development applications for these sites may require further project-level environmental review by the City. The potential development above the proposed intercity bus facility may be eligible for a Community Plan Exemption depending on its conformance and consistency with the TCDP. That determination will be made in the future by the City when a development application is filed. The Draft SEIS/EIR appropriately considers the adjacent land development as

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a project component for CEQA purposes, and analyzes it at a program level consistent with the conceptual nature of the potential future development. Under NEPA, the potential development is an indirect effect of the intercity bus facility and is evaluated as such for the reasons stated in the preceding paragraph.

FR-02

The Transbay Program, which was approved in 2004, contained a redevelopment component that called for an areawide change in the land uses and development intensities surrounding the Transit Center. That redevelopment plan was followed by the TCDP, which was adopted in 2012, and land uses and improvements in the private and public realms in the TCDP area are now governed by the TCDP. The TCDP encompasses much of the previously approved redevelopment plan component of the Transbay Program. The impacts due to land uses that would be allowed under the proposed TCDP were analyzed in the TCDP EIR, which was certified by the City on May 24, 2012. The TCDP EIR analyzed the impacts of implementing the TCDP, including the additional development, changes in circulation, and public open space enhancements, and the City adopted mitigation measures to reduce or avoid significant impacts.

The TCDP is fully acknowledged in the Draft SEIS/EIR, including in Chapter 1 (Purpose and Need) on page 1-8 and in Chapter 2 (Project Alternatives) on page 2-17 and in Figure 2-4 (Street Modifications from the TCDP and the Transbay Redevelopment) and Figure 2-5 (TCDP Area and Transbay Program Redevelopment Plan Area). The development and improvements provided for by the TCDP are recognized as changes to the environmental setting that would occur whether or not the Transbay Program refinements are approved. In addition, the traffic analysis of the proposed project presented in Section 3.2, Transportation, of the Draft SEIS/EIR is based on the City's CHAMP traffic model for future conditions, which includes the land uses, development intensities, and circulation improvements that would occur due to buildout of the TCDP. Therefore, the traffic analysis in Section 3.2 of this SEIS/EIR also accounts for the development envisioned in the TCDP. Further discussion of the TCDP's inclusion in the transportation analysis is found in Appendix C of this Final SEIS/EIR.

The TCDP updates and largely supersedes one of the original components of the Transbay Program – the redevelopment plan. Accordingly, the SEIS/EIR takes the development of the TCDP into account, because it represents an important change to the circumstances under which the proposed project would be implemented. Specifically, the SEIS/EIR acknowledges the development and circulation changes associated with the TCDP as part of the future conditions. To the extent that there are specific development projects under consideration by the City, they are recognized in Table 3.1-1 and Figure 3.1-1 of the Draft SEIS/EIR as part of the cumulative conditions. This treatment of the TCDP and its relationship to effects identified in the Draft SEIS/EIR is explained on pages 2-7 and 2-17 and on page 3.1-5 of the Draft SEIS/EIR. Therefore, the adoption of the TCDP in 2012, following approval of the Transbay Program by the City in 2004 and by FTA in 2005, is fully accounted for in the SEIS/EIR and updates the previous analyses of the Redevelopment Plan in the 2004 SEIS/EIR.

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FR-03 Please see response to Comment FR-02, regarding the consideration of the TCDP in the analysis of impacts in the SEIS/EIR.

The Draft SEIS/EIR also evaluates the proposed project's consistency with applicable, adopted plans and policies. This assessment, with respect to the TCDP, is presented in Impact LU-2, beginning on page 3.3-18 of the Draft SEIS/EIR. The Draft SEIS/EIR also properly uses the TCDP to provide a cumulative context for the proposed project (see page 3.1-5 of the Draft SEIS/EIR).

The discussion of the TCDP in the Draft SEIS/EIR acknowledges that the policy and regulatory basis for land use development in the project vicinity is different than when the 2004 FEIS/EIR was approved, and identifies the TCDP as one of the reasons that the Draft SEIS/EIR was prepared. The adoption of the TCDP created a change in the circumstances under which the originally approved Transbay Program would be implemented. Accordingly, this was a consideration in the decision by FTA and TJPA to prepare a supplemental EIS/EIR. (See 40 CFR Section 1502.9(c)(1)(ii) of the CEQ NEPA regulations and 23 CFR Section 771.130; see also State CEQA Guidelines at Section 15162.)

A supplemental EIS or EIR should focus on the environmental impacts that have changed because of the project changes or because of new information or new circumstances (see FTA Standard Operating Procedure No. 17 regarding Re-Evaluations and Supplemental Documents, issued August 2016 by the Office of Planning and Environment). Importantly, the above-cited provisions require that the proposed project, as modified, be evaluated in the context of new circumstances and new information, and that the resulting impacts are compared to the impacts identified from the previously approved environmental document. The proposed project consists of refinements to Phase 2 of the previously approved Transbay Program and other transportation improvements that enhance connectivity and satisfy the purpose and need of the Transbay Program. As stated above, buildout of the TCDP therefore has been properly recognized as part of the future conditions, and the transportation impacts of new vehicular, transit, pedestrian, and bicycle trips resulting from the proposed project are identified in Section 3.2 of the Draft SEIS/EIR (updated and reprinted as Section 2.7 in this Final SEIS/EIR) and include the land use, development intensities, and circulation changes that would have a bearing on the proposed project's environmental concerns and impacts.

The SEIS/EIR examined the impacts of the proposed refinements in comparison to existing and future cumulative conditions, which include the TCDP. The only potentially significant transportation impact identified in the Draft SEIS/EIR is associated with the operation of additional trackwork in the existing right-of-way south of the Caltrain railyard. Transportation impacts in the immediate vicinity of the Transit Center were found to be less than significant, in part because previously adopted mitigation measures in the 2004 FEIS/EIR are incorporated into the Transbay Program and will be implemented along with the proposed project.

Other new circumstances, including but not limited to area demographics reflecting more current census information, and proposed changes to the transportation

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network, have all been incorporated into the analysis of the proposed project. The most current floodmaps have been used to identify where sea-level rise could affect the proposed project, as well as the approved Transbay Program. Potential impacts not previously described in the 2004 FEIS/EIR are reported in the Draft SEIS/EIR (see Impact WQ-4 and Impact WQ-9). Updated population data reflecting the 2010 census have been used to identify environmental justice communities and to discuss disproportionately high and adverse effects on low-income and minority populations. Future 2040 baseline land use and transportation conditions are based on the SF Model, which is the San Francisco County Transportation Authority's travel demand forecasting tool and used in analyzing changes to transportation conditions as a result of new public and private projects (see more detailed description in Section 3.2.3 of the Draft SEIS/EIR), which accounts for the DTX, high-speed rail, and the area plans of the City.

For each of the environmental topics covered in Chapter 3 of the Draft SEIS/EIR, information was collected and presented in the "Affected Environment" section to recognize new circumstances or conditions that could have a bearing on the project's impact. Examples of the new information gathered to assess the impacts of the proposed project include, but is not limited to:

- Traffic and pedestrian counts where project components would be expected to alter traffic and pedestrian circulation;
- Visual reconnaissance and photo documentation to illustrate where project components could affect scenic views/vistas and scenic resources;
- Revisions to the Area of Potential Effects to account for historic resources that could be affected by the proposed project;
- Database searches for sensitive biological resources and field surveys to identify locations of mature trees that could be disturbed by project construction and operations;
- Database searches for areas of known environmental contamination that could pose health and safety risks for the public, the environment, or workers during construction of the project; and
- Traffic noise maps from the City to document the day/night noise levels along City streets.

The following table explains the relationship of new information and new circumstances pertinent to the Transbay Program and to the analysis in the SEIS/EIR. The table demonstrates that new circumstances would not change the significance conclusions in the 2004 FEIS/EIR except as analyzed in this SEIS/EIR, and that there is no new information and there are no new circumstances relevant to the environmental impacts of the Transbay Program that have not been taken account of and assessed in this SEIS/EIR.

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Transbay Program Components	Status	Effect of New Circumstances on 2004 EIS/EIR conclusions
Transit Center		
<ul style="list-style-type: none"> Transbay Terminal 	Completed	Not applicable
<ul style="list-style-type: none"> Phase 1: Transit Center 	Opened in August 2018, though temporarily closed for repairs	Not applicable
<ul style="list-style-type: none"> Phase 2: Below grade improvements 	Pending funding	Improvements are underground and are not affected by nor affect conditions above ground. The impacts due to Caltrain and high-speed rail service were updated in the 2010 Federal Railroad Administration Reevaluation of the 2004 FEIS/EIR, and which specifically updated the 2004 FEIS/EIR traffic analysis and considered greenhouse gas emissions. In addition, impacts of the Caltrain extension are included in the TCDP EIR that was certified in 2012. The results of these environmental documents are reported in the Draft SEIS/EIR and taken account of in the analysis of impacts (see particularly pages 3.2-15 and 3.2-16 regarding transportation).
DTX		
<ul style="list-style-type: none"> Alignment and Construction Method 	Pending funding	No change to proposed underground alignment involving cut-and-cover and mined tunnel construction. Long-term operational impacts would not change due to new circumstances; temporary construction impacts would continue to result in substantial traffic delays. Other construction methods are discussed in Chapter 2 and Master Response 4 of this Final SEIS/EIR to reduce construction-related

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		transportation, circulation, socioeconomics, noise, and air quality impacts.
<ul style="list-style-type: none"> • Fourth and Townsend Station 	Superseded by the proposed project	Impacts of the realigned station are evaluated in the SEIS/EIR, which considers new circumstances, including the proposed Central SoMa Plan.
<ul style="list-style-type: none"> • Vent Structures / Emergency Exits 	Superseded by the proposed project	Impacts of the vent structures are evaluated in the SEIS/EIR, which considers new circumstances, including the potential for nearby residential development.
<ul style="list-style-type: none"> • U-Wall at Caltrain railyard 	Pending funding	No change to proposed transition structure for trains to move between at-grade and below-ground segments. This component is located entirely within the Caltrain railyard, and TJPA and Caltrain have coordinated on how the entire DTX component could affect Caltrain. These impacts are documented in the Peninsula Corridor Electrification Project EIR, certified in 2015. Long-term operational impacts of this project component would not change due to new circumstances; temporary construction impacts would continue to result in substantial traffic delays on surrounding streets.
<ul style="list-style-type: none"> • Underground Pedestrian Connector 	Superseded by the proposed project	Impacts of the connector are evaluated in the SEIS/EIR, which considers new circumstances, including the TCDP.
Redevelopment Plan		
<ul style="list-style-type: none"> • Land use and circulation changes 	Largely superseded by the TCDP	Impacts of the TCDP are analyzed in an EIR certified by the City in 2012. The land use and circulation changes in this plan are taken account of in the SEIS/EIR, including in the transportation analysis.

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FR-04 The proposed discretionary action and approval is not for Phase 2 of the Transbay Program (primarily the DTX), but for refinements or revisions to the previously approved Transbay Program. These refinements to the previously approved Transbay Program are described in Section 2.2.2 of the Draft SEIS/EIR. The changes to the Transbay Program, along with changes in circumstances under which the approved program would be implemented (e.g., the City's adoption of the TCDP), were the reasons why FTA and TJPA prepared the SEIS/EIR, pursuant to CEQA Guidelines Section 15162 and 23 CFR Section 771.130(a), and 40 CFR Section 15209(c).

Accordingly, the analysis in the SEIS/EIR considers how the proposed refinements may affect the impact conclusions of the prior environmental documentation for the Transbay Program, which consists of the 2004 FEIS/EIR, as updated by six addenda. It is important and necessary for public disclosure to assess whether the proposed project (changes in the Transbay Program) would be consistent with or alter the significance conclusions identified in the 2004 FEIS/EIR, as noted by the commenter citing CEQA Guidelines Section 15162(a)(3)(B). Pursuant to NEPA, the supplemental analysis should examine significant new circumstances or information relevant to environmental concerns and bearing on the proposed action or its impact (40 CFR Section 1502.9(c)(1)(ii) of the CEQ NEPA regulations and 23 CFR Section 771.130). Thus, the proposed project is compared to existing conditions, and not just the incremental impacts of the changes to the approved Transbay Program. The preparation of the SEIS/EIR is consistent with 23 CFR 771.130(f) which states that a supplemental EIS may be required to address issues of limited scope, such as the extent of proposed mitigation of the evaluation of location or design variations for a limited portion of the overall project.

The comment discusses the TCDP; however, the City's TCDP is different from the Transbay Program. Please see responses to Comment FR-02 and Comment FR-03 regarding the evaluation of the proposed project and the impacts of the proposed changes to the Transbay Program; comparison of the proposed project refinements to the previously identified impacts of the approved Transbay Program; and the requirements of CEQA and NEPA to consider the impacts of the proposed project in light of new information and new circumstances.

The proposed Transbay Program project refinements are described in Section 2.2.2, Proposed Project, of the Draft SEIS/EIR, beginning on page 2-17. The principal components comprising the proposed project are modifications to the previously approved DTX project, additional transportation improvements in the vicinity of the Transit Center, and adjacent land development. See also Figure 2-6 of the Draft SEIS/EIR on page 2-22. With regard to the adequacy of the 2004 Final SEIS/EIR mitigation measures, please see the revisions to mitigation measures CH 11 to include 165-173 Second Street in the table of historic properties during construction, and revisions to CH 12 to remove 165-173 Second Street from the list of sites that need to be recorded. In addition, new mitigation measures are proposed to lessen or avoid the significant environmental effects under CEQA and adverse effects under NEPA of the proposed project refinements (see list below).

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New Mitigation Measures:

- New-MM-TR-1.1 Modify Signal Operations at the 16th Street Intersection with Seventh Street/Mississippi Street, the Caltrain tracks, and Owens Street
- New-MM-TR-3.1 Modify 16th Street Intersection with the Caltrain and turnback track to provide a safe crossing for pedestrians and bicyclists
- New-MM-C-CR-4.1 Minimize Potential Impacts to Paleontological Resources
- New-MM-C-BR-1.1 Require Pre-Construction Bird Surveys
- New-MM-WQ-4.1 Modify DTX Design Criteria to Avoid Flood Hazards
- New-MM-CU-WQ-9.1 Prepare a Sea-Level Rise Adaptation Plan
- New-MM-C-GE-4.1 Groundwater Control during Construction
- New-MM-EF-1.1 Evaluate EMI Effects on Nearby Medical Facilities during Final Design of the Additional Trackwork South of the Caltrain Railyard
- New-MM-NO-1.1 Design Ventilation Shaft to Avoid Noise Effects on Nearby Uses
- New-MM-AQ-3.1 Equip Diesel Generators with Applicable Tiered Emissions Standards
- New-MM-AQ-3.2 Require and Implement Ventilation Plans for Proposed Residential Land Development
- New-MM-C-AQ-5.1 Prepare and Implement an Emissions Plan

There is no substantial evidence that additional mitigation measures are required.

FR-05

The No Action Alternative describes conditions in the absence of the proposed project. Under the No Action Alternative, the proposed project would not be approved, and the TJPA would continue to implement the Transbay Program as previously approved, which consists of the project that was adopted following the certification of the Final EIR in 2004 and the issuance of the ROD in 2005 as revised by minor modifications reviewed in six addenda to the 2004 EIS/EIR. The effects of implementing the No Action Alternative/Transbay Program are summarized from the 2004 FEIS/EIR. As required by NEPA, the No Action Alternative is a baseline to which the proposed action is compared. The effects of the No Action Alternative and a comparison to the proposed project are described for every environmental and socioeconomic issue area discussed in Chapter 3 of the Draft SEIS/EIR. In addition, as described below, the proposed project is compared to existing conditions at the time the NOP was issued, as required by CEQA.

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The impacts of the proposed project, which includes refinements to the approved Transbay Program, are compared to existing conditions. As a result, each of the resource topics contains a description of the “Affected Environment,” and provides baseline information against which to measure impacts. For example, the transportation section presents 2013 intersection levels of service and pedestrian counts; the land use and aesthetic sections describe the existing built environment, land uses, and scenic views; the socioeconomics, population, and housing section uses the most current 2010 census data and 2012 American Community Survey estimates; and the water resources and water quality section provides 2013 flood mapping.

In terms of traffic-related impacts, most of the proposed project components, like the extended train box, the widened throat structure, the ventilation structures, the rock dowels for tunnel construction, and the tunnel stub box, are not trip generators; i.e., they would not result in new trips. On the other hand, several of the proposed project components, like the underground pedestrian connector, the public parking use of the AC Transit bus parking facility, and the adjacent land development, have the potential to result in changes to the local circulation. In these instances, existing baseline information (pedestrian counts and traffic counts) was collected in 2012 when the environmental review effort commenced. The impacts of the proposed project were analyzed compared to these conditions. In the case of the adjacent land development, where existing land uses would be displaced, the trips associated with the displaced uses were subtracted from the trip generated by the adjacent development, resulting in a net trip generation from the project site.

Contrary to the comment, the 2004 FEIS/EIR was not used as the baseline to determine impacts from the proposed project. However, the impacts of the proposed project are compared to those identified in the 2004 FEIS/EIR to inform the public and public agencies whether the proposed project would result in new impacts not previously addressed, substantially more severe significant impacts previously reported, or introduce new mitigation measures not previously required of the approved Transbay Program. This comparative summary is provided for each resource topic at the end of each section in Chapter 3 (Affected Environment, Consequences, and Mitigation Measures).

FR-06 Please see Master Response 3, regarding the effects of the proposed project, specifically the intercity bus facility, on local circulation. The effects of the bus plaza that was included in the 2004 FEIS/EIR as amended by subsequent addenda are not addressed in the Draft SEIS/EIR, since that facility has already been environmentally reviewed pursuant to CEQA and NEPA and is not a part of the proposed project.

FR-07 The entire traffic analysis, including traffic and pedestrian counts, existing levels of services at key intersections, and trip generation, is discussed in Section 3.2, Transportation, of the Draft SEIS/EIR. As a result, there is no separate traffic study; the Draft SEIS/EIR contains the traffic study. In response to this comment, a Transportation Analysis Supplement memorandum has been included in the Final SEIS/EIR as Appendix C, which describes the methodology and key assumptions

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used in the SEIS/EIR transportation analysis and provides technical outputs used in the analysis. The commenter is correct that, during the scoping period, Caltrans requested a Traffic Impact Study. The letter from Caltrans received during the scoping period asks for details on trip generation, distribution, and assignment; average daily traffic volumes, LOS analysis, and cumulative traffic analyses. However, because Caltrans' jurisdiction is specific to State highway facilities, including the mainline freeways and on- and off-ramps, the Caltrans letter states, "The Supplemental Environmental Impact Statement/Environmental Impact Report (SEIS/EIR) should include a comparison of impacts between the previously approved environmental documents and the proposed update *on State highway facilities* in the vicinity of the project site." (emphasis added) The responses to the comment letter from Caltrans dated February 3, 2016, clarify that no State highway facilities would be affected by the proposed project and, thus, no additional traffic study was provided to Caltrans. Please see response to Comment Caltrans-01.

As explained in the introduction to the analysis of Impact TR-1, beginning on page 3.2-18 of the Draft SEIS/EIR, many of the proposed project components would not result in any change to travel demand, modifications to roadway or intersection configurations, or substantial changes to intersection levels of service. The proposed project components that would have a potential to affect the transportation system were evaluated and include the adjacent land development at the vent structure sites, the additional trackwork south of the Caltrain railyard, the intercity bus facility, the taxi staging area, the bicycle/controlled vehicle ramp, the AC Transit bus storage parking facility, and the underground pedestrian connector. Data were collected in the vicinity of these project components to identify traffic and pedestrian baseline conditions that could be affected.

The analysis in Section 3.2 of the Draft SEIS/EIR did precisely as requested by Caltrans and evaluated transportation facilities/intersections in proximity to the proposed project components and the potential for a given component to affect intersection operations (see page 3.2-3). The methodology used to assess impacts of the proposed project is explained beginning on page 3.2-13 of the Draft SEIS/EIR and has been further clarified in the Final SEIS/EIR in Section 2.7. The analysis builds on and incorporates by reference the analysis in the 2004 FEIS/EIR, 2010 FRA Reevaluation, and 2012 TCDP EIR. The transportation analyses in these documents adhere to and are consistent with the Transportation Research Board's Highway Capacity Manual and the City's Transportation Impact Analysis Guidelines for Environmental Review, CEQA Guidelines, and NEPA. The changes due to the proposed project are compared to the existing conditions at the time the environmental review commenced, and the changes due to the proposed project were compared to the standards and thresholds appropriate for the TJPA and the City pursuant to CEQA and for FTA pursuant to NEPA. The existing conditions in 2013 did not include changes to development from the then-recently approved TCDP or other changes from projects constructed since then, because those projects and changes were not yet part of the existing conditions baseline for the SEIS/EIR. Future implementation of these plans and improvements is reasonably foreseeable, however, and were, therefore, appropriately considered as part of the future cumulative baseline of year 2040.

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The existing-plus-project analysis demonstrates that the changes in the proposed project components that would generate trips (e.g., the components involving adjacent land development) would result in less trip generation than the existing uses that would be displaced (see Table 3.2-6 and Table 3.2-7) and, therefore, the impacts would be less than under existing conditions. As such, these components would have no effect on traffic conditions under CEQA and NEPA because they result in *fewer* trips on local streets, even if volumes on those streets have changed substantially since the analysis was completed in 2013. The 2040 cumulative analysis in the SEIS/EIR accounts for development and transportation improvements in the TCDP, the DTX, high-speed rail service, and other projects and plans that would contribute to transportation conditions in the vicinity of the Transit Center.

Please also see Master Response 3, which further examines the transportation effects in the vicinity of the proposed intercity bus facility, and particularly circulation issues along Beale Street for motorists and pedestrians. Master Response 3 specifically addresses changes to Beale Street and whether traffic would be expected to back up north of the intercity bus facility and the bus plaza due to bus ingress and egress.

FR-08

Please refer to response to Comment FR-07, which explains the rationale for selecting study intersections and the methodology for evaluating the project's effects on the transportation network. The commenter identifies seven intersections identified in the TCDP EIR in the immediate vicinity of the Millennium Tower projected to experience significant and unavoidable impacts (Beale/Folsom, Fremont/Howard, Main/Howard, First/Market, Fremont/Market/Front, Beale/Market/Davis/Pine, and First/Mission. The Final Traffic Impact Study (TIS) for the TCDP reports that five of these identified intersections would experience significant and unavoidable impacts (Main/Howard and Beale/Market/Davis/Pine are not included in Table 120: 2030 Baseline plus Project Conditions – Intersection Impacts and Mitigation). The TCDP EIR and the supporting TIS assumed that the DTX was included as part of the future baseline in 2030. Thus, the transportation effects reported in the TCDP EIR account for the TCDP development and the Transbay Program. The components of the proposed project in the vicinity of the Millennium Tower include several components that would not contribute trips to the surface streets or pose long-term impacts (i.e., the extended train box, the widened throat structure, and the ventilation structures at the Transit Center). However, there are proposed project components that could affect nearby intersections and they were evaluated in the SEIS/EIR (the taxi staging areas, the bicycle/controlled vehicle ramp, the underground pedestrian connector, the intercity bus facility, and the adjacent land development at the intercity bus facility site). The TCDP EIR intersections reported to experience significant and unavoidable impacts would only marginally be affected, if at all, by the proposed project.

- Taxi staging areas - Provision of 31 taxi loading spaces would displace on-street parking and loading spaces, which would involve some redistribution of trips around the transit center. The designation of curb space for these 31 spaces would attract additional vehicles through this intersection as taxis arrive and depart from the Transit Center, but would not substantially worsen the operations at these intersections that are projected to be unacceptable in the TCDP EIR.

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- Bicycle/controlled vehicle ramp – This refinement would introduce additional bicycle circulation along Howard Street where the ramp would enter and exit the transit center. The increase in bicycles along this street and in the general vicinity would affect local intersections, but the increased accessibility for bicyclists is considered a positive effect of the proposed project since it creates greater opportunities to connect to transit services and to reduce the number of travelers that might otherwise seek to drive and park near the Transit Center.
- Underground pedestrian connector – This refinement would remove pedestrian traffic from the surface streets and thus would not worsen intersection operations from the levels of service reported in the 2004 FEIS/EIR or the TCDP EIR.
- Intercity bus facility – Negligible trip generation of maximum of 10 buses entering and departing during AM/PM peak hours, a portion of which would travel through the intersections projected to operate at unacceptable levels in the TCDP EIR. This limited number of buses would not substantially worsen intersection operations at the nearby intersections.

The analysis for Impact TR-1 provides the public with the information to understand the effects of the proposed project. Neither NEPA nor CEQA requires re-analysis of the entire Transbay Program; this would undermine the reason for doing a subsequent and supplemental environmental analysis – to evaluate the project changes and new circumstances that could affect the project or its impacts. FTA Standard Operating Procedure No. 17 regarding Re-Evaluations and Supplemental Documents, issued August 2016 by the Office of Planning and Environment, states that impact areas or project elements that are unchanged do not need to be addressed in a supplemental document. The Transbay Program was evaluated and the EIR was certified and a ROD published in 2004 and 2005, respectively. The 2010 FRA Reevaluation examined the combined effects of the TCDP and High-Speed Rail service to the Transit Center and determined that the 2004 FEIS/EIR for the Transbay Program adequately addressed potential effects. FTA's and TJPA's duty to provide public information and disclose potential transportation impacts has been fulfilled by the Draft SEIS/EIR, the documents incorporated by reference, these responses to comments, and the updated SEIS/EIR chapters and sections included in this Final SEIS/EIR.

FR-09 Please see Master Response 3, which addresses local circulation around the intercity bus facility and ingress/egress to businesses and residents in the vicinity.

FR-10 The 2004 FEIS/EIR contained an extensive description of cut-and-cover construction techniques and their temporary disruption to circulation, businesses, and residences, and impacts on socioeconomics, air quality, and noise. The 2004 FEIS/EIR also evaluated an underground pedestrian connector that would run below Fremont Street. A number of mitigation measures were identified in the 2004 FEIS/EIR to reduce the disruption created by cut-and-cover construction activities. Page 3.2-35 of the Draft

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SEIS/EIR provides information regarding the standard procedure to prepare and implement a “Construction Traffic Management Plan.” Details regarding features to maintain access for businesses and residences and to enable local circulation are typically included in these plans. Mitigation Measure PC 7 from the 2004 FEIS/EIR and the approved DTX Design Criteria both require consideration and implementation of traffic and construction management plans. Pages 3.2-16 through 3.2-18 of the Draft SEIS/EIR identify seven pedestrian circulation mitigation measures, and another nine pre-construction and construction mitigation measures adopted as part of the 2004 FEIS/EIR. Those measures, as reproduced in Appendix D of this Final SEIS/EIR, have been adopted and are incorporated and included in the proposed project that is evaluated in the Draft SEIS/EIR. The construction traffic management plan requires coordination with, and adherence to applicable regulations of, the San Francisco Municipal Transportation Agency, the Department of Parking and Traffic, and the Department of Public Works. The previously approved pre-construction and construction mitigation measures that will continue to apply to the proposed project also involve coordination with the affected community including property owners, local businesses, and residences. Please see Master Response 4 regarding cut-and-cover construction activities, impacts, and mitigation. The effects, in general, of the previous underground connector along Fremont Street and the proposed refinement along Beale Street, are virtually identical and the mitigation measures previously adopted would apply to the underground pedestrian connector under Beale Street.

FR-11 Previously approved mitigation measures in the 2004 MMRP and new mitigation measures identified in the Final SEIS/EIR have been defined in accordance with CEQ NEPA regulations at 40 CFR Section 1508.20 and State CEQA Guidelines Section 15126.4. In addition, CEQ guidance governing environmental mitigation commitments recognizes that some measures will necessarily be implemented by other jurisdictions, but, to be effective, there must be sufficient legal authorities and resources to perform or ensure the performance of the mitigation and the measure must lower the level of impacts so that they are not significant (see January 14, 2011 CEQ memorandum on Appropriate Use of Mitigation and Monitoring and Clarifying the Appropriate Use of Mitigated Findings of No Significant Impact). The performance standards that have been identified in the Final SEIS/EIR would be implemented by the City, TJPA, Caltrain, and/or the CPUC. The feasible mitigation measures included in the MMRP for the 2004 Transbay Program, as well as additional mitigation measures identified in the Draft SEIS/EIR and cited in response to Comment FR-10, have been incorporated and included as part of the proposed project. These mitigation measures collectively reduce circulation impacts on Beale Street.

FR-12 Please see Master Response 3, regarding pedestrian trips between the Transit Center and the intercity bus facility.

Regarding the description of the intercity bus facility and the utility of the diagram on page 2-35, both NEPA and CEQA guidelines and regulations require that environmental analysis of a proposed project be initiated sufficiently early to allow

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the public and public agencies to be informed about a project's impacts and to allow for changes to be made to the project. Pursuant to NEPA (40 CFR 1502.5), the preparation of environmental reviews shall occur as close as possible to the time an agency begins developing or is presented with a proposal so that the environmental review will serve as an important contribution to the decision making process. Pursuant to CEQA (State CEQA Guidelines, Section 15004(b)), EIRs and negative declarations should be prepared early enough to allow environmental considerations to influence project design and yet late enough to provide meaningful information for environmental review.

The FTA requires that environmental review be performed during project development and prior to final engineering and design. Project designs at the project development phase are typically at approximately 30 percent of the final design that will be used as the basis for construction.

In light of the above directives, it is meaningful and relevant that the intercity bus facility is analyzed and its impacts evaluated as part of the SEIS/EIR. While identified as being "conceptual," the basic program parameters for the intercity bus facility have been defined, such as the approximate height and scale of the building, the number of bus berths, the ingress and egress for buses, and the connections between the intercity bus facility and the Transit Center. These project features are defined in sufficient detail to allow for environmental review and provide the public and public agencies an opportunity to affect its design. Suggestions by the commenter for wayfinding, signage, and other methods of communicating and orienting future transit passengers are precisely the type of input desired from the environmental review process, and these details will be developed during the detailed and final engineering and design phases, as the project advances. During these subsequent design phases, the TJPA will coordinate with relevant City agencies and departments, such as the San Francisco Municipal Transportation Agency, City Planning, the Department of Parking and Traffic, the Department of Public Works, and the Department of Building Inspection.

FR-13

The 2004 FEIS/EIR contains a description of cut-and-cover construction techniques and their temporary disruption to circulation, businesses, and residences, and impacts on socioeconomics, air quality, and noise. The 2004 FEIS/EIR also evaluated an underground pedestrian connector below Fremont Street. A number of mitigation measures were identified in the 2004 FEIS/EIR to reduce the disruption created by cut-and-cover construction activities (see earlier responses to Comment FR-10). These mitigation measures, which are reproduced in Appendix D of this Final SEIS/EIR, were adopted and incorporated into the Transbay Program, and will be implemented as part of the proposed project that is evaluated in the Draft SEIS/EIR. The effects, in general, of the previous underground connector along Fremont Street and the proposed relocation to Beale Street, are virtually identical. Please see Master Response 4 regarding cut-and-cover construction activities, impacts and mitigation.

While the Draft SEIS/EIR analyzes the effects of construction activities for the proposed project as a whole, if there are particular impacts associated with the underground pedestrian connector, the Draft SEIS/EIR also identifies those effects.

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To assist the commenter in better understanding the effects that would apply to the underground pedestrian connector, please see the following:

- Traffic-related impacts for the underground pedestrian connector are analyzed in Impact C-TR-7, beginning on page 3.2-35;
- Socioeconomic impacts are analyzed for the entire proposed project in Impact C-SE-6 on page 3.4-27;
- Cultural resource and paleontological impacts are analyzed in Impact CR-1, Impact CR-2, and Impact C-CR-4 on pages 3.6-31, 3.6-35, and 3.6-42, respectively;
- Biological impacts, particularly for nearby nesting birds, are analyzed in Impact C-BR-1, beginning on page 3.7-8;
- Water quality and dewatering discharges are analyzed in Impact C-WQ-6, beginning on page 3.8-23;
- Potential settlement during excavation is analyzed in Impact C-GE-4, beginning on page 3.9-19;
- Potential exposure to known hazardous materials is analyzed in Impact C-HZ-4 on page 3.10-20;
- Noise and vibration during the construction period are analyzed in Impact C-NO-3 and Impact C-NO-4, beginning on page 3.12-17;
- Emissions and toxic air contaminants generated during construction activities are analyzed in Impact C-AQ-5 and Impact C-AQ-6, beginning on page 3.13-18;
- Impacts to emergency response and access to parks and community facilities during construction are analyzed in Impact C-PS-3 on page 3.15-17; and
- Impacts to underground utilities are analyzed in Impact C-UT-7 on page 3.17-12.

Please refer to response to Comment FR-10, which explains the circulation and access effects of construction activities. Mitigation measures, included in the MMRP for the 2004 Transbay Program have been incorporated and included as part of the proposed project. These measures, which are now part of the proposed project, plus additional mitigation measures identified in the Draft SEIS/EIR would collectively reduce circulation impacts on Beale and Fremont Streets.

FR-14

The commenter identifies two alternative locations for the intercity bus facility that are not feasible under CEQA or reasonable under NEPA. Long-haul, intercity bus service would not be feasible under CEQA or reasonable under NEPA on the Lower Concourse level of the Transit Center, because that space is planned for retail uses, ticketing uses, and bicycle storage. Furthermore, vulnerability assessments indicate

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that use of this area would present security concerns, and the space would not enable buses to turn around. As a result, use of the Lower Concourse for long-haul bus operators planned for the intercity bus facility would be unreasonable and infeasible. Likewise, use of the Bus Deck level would not be feasible under CEQA or reasonable under NEPA. In the near term, the Bus Deck would be used by various long-haul bus operators. However, when demand increases for AC Transit to connect with Caltrain and future HSR service, the berths and curb space on the Bus Deck would not be available for private operators. The proposed intercity bus facility allows private operators to connect conveniently to the Transit Center that would be used by a number of public transit systems, such as SF Muni, AC Transit, Golden Gate Transit, SamTrans, Caltrain, and BART. The proposed site would also be available since it would be acquired by TJPA for the extended train box, and alternate sites in this portion of the City would be in limited supply and/or extremely expensive. Alternative sites in the vicinity of the Transit Center would be costly due to land acquisition, could result in displacement of businesses and adverse economic / fiscal effects if the selected site is occupied, and would be less able to meet the project's purpose and need, which include enhanced connectivity, because the facility would not be directly connected to the Transit Center. The preparation of the SEIS/EIR is consistent with 23 CFR 771.130(f) which states that a supplemental EIS may be required to address issues of limited scope, such as the extent of proposed mitigation of the evaluation of location or design variations for a limited portion of the overall project.

FR-15 Future routes to/from the intercity bus facility will be determined by the City and the operators based on the locations at which passenger pick-up/drop-off would be convenient and compatible with other transportation needs by automobiles, transit, bicyclists, and pedestrians. The street improvements and revisions proposed by the TCDP are primary determinants in the flow of traffic, including how these long-haul bus operators would circulate in the vicinity of the Transit Center. Because the original location for these bus operators was in the Transit Center and the proposed location, the intercity bus facility, is across the street from the Transit Center, it is reasonable to expect that the change in vehicle miles traveled between the original location and the proposed intercity bus facility would be negligible.

FR-16 It is the industry standard to use metrological and monitoring data provided by the local air quality agency, which in this case is the Bay Area Air Quality Management District (BAAQMD). The BAAQMD and the California Air Resources Board (CARB) maintain a network of air quality monitoring stations. Data from these stations are used by Lead Agencies to establish existing air quality conditions. Lead Agencies, other than air quality agencies such as the BAAQMD and CARB, do not have the experience or staff to establish monitoring protocols and maintain the long-term monitoring process that is required to measure air quality conditions. As discussed on page 3.13-1 of the Draft SEIS/EIR, the Arkansas Street Monitoring Station is the monitoring station closest to the project site that best represents local air quality conditions.

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The Arkansas Street Monitoring Station is located approximately 1.25 miles (approximately 2 kilometers) from the intercity bus facility. The EPA specifies that this monitoring station has a measurement scale of 500 meters to 5 kilometers (<https://www3.epa.gov/airdata>). The project is located within the distance specified by the EPA for the Arkansas Street Monitoring Station. Therefore, the measurements provided in the Draft SEIS/EIR accurately characterize air quality conditions for the project.

The language cited from page 3.13-1 of the Draft SEIS/EIR establishes regional meteorological conditions that affect air quality in the San Francisco Bay Area Air Basin (SFBAAB). The regional wind speed, temperature, and rain averages are provided for contextual and informational purposes, but are not necessary for the impact analysis. The dispersion modeling discussed on page 3.13-16 of the Draft SEIS/EIR utilized wind speed and direction data from the Mission Bay Meteorological Station. This station is 1.3 miles from the project, and is the nearest BAAQMD meteorological station to the project.

FR-17

As explained in response to Comment FR-01, the addition of non-transportation uses, and specifically “adjacent land development” as part of the proposed project, was requested by the City during meetings to discuss the scope and analysis of the environmental document. In addition, because this land would be considered surplus by the TJPA after construction and would be made available for private development, failure to consider and evaluate the effects of this potential development would not satisfy CEQA’s requirement to examine the whole of the action. Specifically, the adjacent land development is linked to the proposed project, is considered a reasonably foreseeable consequence of the project, and has a potential to result in significant effects.

The Draft SEIS/EIR was circulated for more than 60 days, from December 28, 2015 through February 29, 2016, which is more than the maximum amount of time provided for in the CEQA Guidelines and NEPA regulations. Pursuant to CEQA Guidelines Section 15150(a), the public review period for a draft EIR “should not be less than 30 days nor longer than 60 days except in unusual circumstances”), and pursuant to 23 CFR Section 771.123(i), the period of review for return of comments on a draft EIS shall be “not fewer than 45 days nor more than 60 days” unless another period is established pursuant to a statute that requires “good cause” and agreement among the lead and all participating agencies). The public and other public agencies have been given ample opportunity to review and comment on this proposed project component.

FR-18

The prospect that future residents of the development above the intercity bus facility would be considered an environmental justice population is speculative. The Draft SEIS/EIR examines two land use options for this site, consistent with the applicable land use plan (the TCDP). One of those options is a commercial use, including retail and office uses, and no residential uses. The second option involves residential uses, but the minority and income composition of future occupants cannot be determined at

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this point, although it is recognized that the TJPA and OCII are committed to affordable housing.

A detailed Environmental Justice assessment was included in Section 3.18 of the Draft SEIS/EIR. The intercity bus facility would be located in Census Tract 615. Tables 3.18-1 and 3.18-2 show that Census Tract 615 has low-income and minority households within it. Because the City, OCII, and the TJPA are supportive of creating affordable housing opportunities, it is conceivable that future residents could be low income. Nevertheless, residential development standards, noise abatement control measures, and ventilation system design would reduce noise and air emissions associated with proximity to the intercity bus facility, and additional CEQA mitigation measures could be identified during project-level review if the future adjacent land development included residential uses.

Air quality and noise impacts on this adjacent land development site, should it be developed for residential uses, are disclosed in the Draft SEIS/EIR. Air quality and toxic air contaminant exposure is addressed in the discussion of Impact AQ-3, beginning on page 3.13-15 of the Draft SEIS/EIR. Construction-related impacts from proposed project components, including the intercity bus facility, are covered under Impact C-AQ-5 and Impact C-AQ-6, beginning on page 3.13-18. Noise impacts are evaluated in Impact NO-1, beginning on page 3.12-4; vibration impacts are analyzed in Impact NO-2, and construction effects are presented in Impact C-NO-3 and Impact C-NO-4 for noise and vibration, respectively, beginning on page 3.12-17 of the Draft SEIS/EIR. Further analysis of noise impacts for residents above the intercity bus facility is described below in response to Comment FR-19.

FR-19

Please see response to Comment FR-18, above, regarding the potential noise and vibration impacts for possible future residents above the intercity bus facility as described in the Draft SEIS/EIR.

Additional analyses have been completed to determine if new residences above the intercity bus facility would be affected by noise generated by activity associated with that facility. The methodology used to assess potential impacts was based on FTA guidance for bus transit facilities, as discussed on page 3.12-14 of the Draft SEIS/EIR. The FTA requires that the potential impact on residential land uses be characterized using the 24-hour day-night noise level (L_{dn}) noise metric. Average hourly daytime (7 a.m. to 10 p.m.) and nighttime (10 p.m. to 7 a.m.) bus volumes were calculated to estimate the L_{dn} . It is anticipated that hourly bus volumes at the intercity bus facility would average 2.7 during daytime hours and 1.3 during nighttime hours. The existing noise level near the project site was assumed to be similar to the noise level at Millennium Tower, which was identified as 114 feet from the intercity bus facility. The existing L_{dn} at Millennium Tower was identified as approximately 70 A-weighted decibels (dBA). The analysis assumed a 50-foot distance from bus activity to the new residences. The L_{dn} associated with the intercity bus facility would be approximately 61 dBA. Based on these noise levels, the intercity bus facility would increase the L_{dn} at new residences by less than 1 dBA, which would not exceed FTA impact criteria. Therefore, the intercity bus facility would not generate an adverse/significant impact for this new noise sensitive

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receptor. Regarding the bus plaza, this component of the Transbay Program, which is now operational, has not changed from what was approved in previous environmental documentation. As shown in Figure 2-3b on page 2-12 of the Draft SEIS/EIR, the bus plaza would be located below the bus deck and park. Activity would be internal to the project and underneath two levels of other land uses. It is not anticipated that activity at the bus plaza would be audible at the potential new residences above the intercity bus facility.

Regarding the extended train box, as discussed on page 3.12-14 of the Draft SEIS/EIR, activity associated with the train box would be subterranean and would not generate street-level noise. There is no potential for train box activity to expose potential new residences above the intercity bus facility to increased noise levels.

Regarding street noise, as stated on page 3.12-2 of the Draft SEIS/EIR, existing noise levels for much of the project area are at the upper level considered acceptable by the City for residential uses (70 decibels [dB]). The adjacent development would be constructed to current Title 24 standards, including insulation and window features. Title 24 (Part 2, Volume 1) of the California Code of Regulations requires that interior noise levels attributable to exterior noise sources have a L_{dn} of 45 or less in any habitable room. According to the Federal Highway Administration document Traffic Noise: Analysis and Abatement Guidance (2011), typical building construction (e.g., single-glazed windows) provides a minimum noise reduction of approximately 25 dBA. Using this minimum noise level reduction, the resulting interior noise level would be 45 dB L_{dn} and consistent with regulatory requirements. In addition, it is anticipated that the state-of-art adjacent development would be constructed to exceed current Title 24 requirements, and with materials that exceed the minimum noise reduction associated with single-glazed windows.

The potential new residences above the intercity bus facility would not be exposed to excessive vibration. It is common for transit-oriented development to be constructed over bus plazas and other transit features. The adjacent land development has not been designed or engineered. At that time, engineers will be required to design a building that is structurally sound and not affected by vibration. In addition, trains arriving and departing within the extended train box would be traveling at very low speeds (e.g., less than 10 miles per hour [mph]). When assessing vibration levels, the FTA Transit Noise and Vibration Impact Assessment (2018) guidelines recommends adjusting predicted vibration levels starting at 20 mph (Table 10-1). Speeds lower than 20 mph are generally not considered capable of generating vibration impacts.

FR-20 Please see responses to Comment FR-01 and Comment FR-17, regarding the need to consider the adjacent land development component of the proposed project and the level of specificity for the analysis.

FR-21 The BAAQMD generally defines a sensitive receptor as a facility or land use that houses or attracts three sectors of the population that are particularly sensitive to the effects of air pollutants—children, the elderly, and people with illnesses. Examples of sensitive receptors include residential areas, schools, and hospitals. Commercial

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developments have not been identified as sensitive air quality receptors by the Lead Agency or the BAAQMD, and no further air quality analysis is required for this potential land use above the intercity bus facility.

FR-22 Please see Comment FR-01, regarding the permits and approvals required for the proposed project.

FR-23 Please see response to Comment FR-19 regarding noise and vibration levels at the adjacent land use development related to the intercity bus facility, the Transit Center Bus Plaza, and street noise from Beale and Main Streets.

FR-24 Please see responses to Comments FR-01, FR-07, FR-09, and FR-10 regarding transportation impacts; response to Comment FR-16 regarding air quality data; response to Comment FR-14 regarding the intercity bus facility and its alternatives; and responses to Comments FR-17, FR-18, FR-20, and FR-21 regarding development above the intercity bus facility and future environmental justice communities.

From: Linda Protiva <lprotiva@icloud.com>
Sent: Monday, February 29, 2016 11:48 PM
To: SEIS EIR
Subject: Attention Scott Boule: Inner City Bus Facility

Follow Up Flag: Follow up
Flag Status: Flagged

My husband and I live at 301 Mission St. We have several concerns about the plan to increase the transbay terminal by building an additional facility across the street (Beale) and having buses park outside in a parking area on the north side of the proposed new Inner City Bus Facility. Our concerns are the following:

1. We were told that the lanes have to be widened for buses to turn west into the Transbay Terminal. Right now there are four lanes on Beale (with one lane blocked temporarily due to construction). If you increase the width of the right turn lane for buses entering the terminal, we will be down to less than three full lanes. Then if you do the same thing for the new Inner City Bus Facility and widen the lane to accommodate the buses turning in to the terminal parking area, we will be down to effectively 1 1/2 lanes plus or minus. We use Beale when we exit the building to drive south. Now, without any proposed lane widening, it is difficult to pull out onto Beale making the necessary sharp right turn. It will become even more difficult next year once the transbay terminal opens for buses.

Then, later if you add a widened driveway for buses to turn left from Beale into the proposed Inner City Bus Facility parking area, it could become impossible to exit onto Beale from the Millennium driveway during rush hour.

I would suggest you consider installing traffic signals for exiting vehicles on both sides of the Millennium driveways. On Fremont St there is even a bigger problem for those exiting the Millennium and trying within 100ft to cross three lanes of oncoming traffic in order to go west on Mission St. We have had several close calls trying to do this. And next year you plan to have buses pull out from 2 exits of the terminal onto Fremont.

2. We don't accurately know yet how the additional numbers of pedestrians, taxis, cyclists, commuters, workforce, sightseers and buses will impact our area. Can't this project be held up until we have a chance to experience the impact of all the development in this area? The traffic, both foot traffic and vehicular, is already terrible and for the next couple years we need to see if it becomes even worse before we go ahead adding still more buildings, and bringing in even more people. Let's see if the transbay terminal will prove to be adequate for buses once it is in use negating the need for the additional Inner City Bus Facility.

Could there be another place to locate the Inner City Bus Facility rather than Beale? A place where you have enough room to accommodate parked buses, taxis dropping off travelers, and with plenty of room for large buses to enter and exit without adding problems to an already highly developed area?

3. Would it be asking too much for yet another green space in place of the additional bus facility for all those living in this high density neighborhood? This could be filled with more trees to help clean the air, and areas to walk our dogs, and grass and park benches to enjoy? Surely our area demands these amenities more than other areas with less mixed use and crowded conditions and traffic.

Thank you for considering my concerns.

Linda Protiva
lprotiva@comcast.com
650-465-2616

Linda Protiva
February 29, 2016

Protiva-01 Please see Master Response 3, regarding the effects of the intercity bus facility, specifically regarding traffic along Beale Street. The intercity bus facility would be located on the opposite side of Beale Street (east side) from the Millennium Tower (west side), and activity at the intercity bus facility along Beale Street would consist entirely of buses exiting the facility and continuing onto southbound Beale Street. There would be no left turns from Beale Street into the intercity bus facility; the only ingress to the intercity bus facility would be from Main Street. Given the total width and capacity of Beale Street (three total travel lanes), the physical separation of the Millennium Tower access and the intercity bus facility egress, and the expected low level of bus activity at the intercity bus facility, conflicts would not be expected between these two traffic flows such that ingress and egress for Millennium Tower residents would be significantly affected.

The proposed project would not involve components that would affect traffic flows along Fremont Street or affect Millennium Tower residents' movement along this street. Changes to Fremont Street between Market and Howard Streets were included as part of the TCDP that was adopted by the City in 2012.

Protiva-02 While the commenter's request to wait for more detailed transit user information is noted, the proposed project in the Draft SEIS/EIR is needed to support continued transportation needs in the region, conform to updated design specifications from the CHSRA, and meet an ever-increasing need for transportation improvements in this area of San Francisco; therefore, environmental review is required at this time. Like all proposed projects that may have a significant effect on the environment, major, complex infrastructure projects, such as the proposed refinements to the Transbay Program, require environmental review early in the project delivery process to ensure the project can stay physically and financially viable in the environment it is planned to benefit. The analysis in the Draft SEIS/EIR provides information relevant to understanding the potentially significant impacts of the project refinements using best available methodologies and information. The mitigation measures identified in the 2004 FEIS/EIR would apply to the new facilities of the proposed project, and they have been incorporated and included in this project.

In terms of the approval process and the status of the proposed intercity bus facility, the proposal to construct this facility is undergoing environmental review as part of the project analyzed in this SEIS/EIR. A decision by the TJPA and other agencies to advance this project component could only occur after the Final EIR has been certified by the TJPA and a ROD has been issued by the FTA.

Linda Protiva
February 29, 2016

Protiva-03 Other locations to accommodate long-haul, intercity bus operators were previously considered. Alternative locations included a second bus deck and the lower concourse within the Transit Center. The elimination of the second bus deck was analyzed in the first addendum to the 2004 FEIS/EIR in 2006. The one remaining Bus Deck level is planned to be used by AC Transit, and future space requirements do not allow private operators to share this space. The first addendum proposed that Greyhound be relocated to the lower concourse of the Transit Center. Subsequent design and planning of the Transit Center has resulted in the need to identify another location. The proposal to locate the intercity bus facility over the train box is included as part of the proposed project. This site is consistent with the project's purpose and need to foster connectivity with other transit services at the Transit Center and takes advantage of land that would be owned by the TJPA.

Other locations for this facility would need to be close to the Transit Center to meet the purpose and need for a highly interconnected transit hub. Other sites of a comparable size to the proposed intercity bus facility near the Transit Center would likely be already developed or planned for development under the TCDP. As a result, such alternate sites may require displacement of existing uses or require substantial funds to acquire the property, which would make them more impactful and more costly than the proposed site. Section 2.5, Table 2-7 of this Final SEIS/EIR summarizes the other locations for the intercity bus facility that were considered and the reasons for their rejection.

Protiva-04 Please see response to Comment Protiva-03 for a description of why the intercity bus facility is proposed to be located above the train box. Regarding additional open space in the vicinity, open space has been identified in the TCDP at numerous locations within the Plan area (see figure below from the TCDP). Open space near the Millennium Tower includes the City Park at the top level of the Transit Center, Mission Square, and Transbay Park.





February 24, 2016

Scott Boule, Legislative Affairs and Community Outreach Manager
Transbay Joint Powers Authority (TJPA)

SEIS.EIR@transbaycenter.org

201 Mission Street, Suite 2100
San Francisco, CA 94105

RE: LYFT COMMENTS FOR TRANSBAY PROGRAM DRAFT SUPPLEMENTAL EIS / EIR

To the Transbay Joint Powers Authority,

On behalf of Lyft, the San Francisco-based ridesharing company providing a community-powered platform that connects neighbors who need rides with neighbors who can provide rides all on a mobile-based application, please find enclosed the following comments in response to the Transbay Program's draft supplemental Environmental Impact Statement and Environmental Impact Report.

As a leading connector for our communities to friendly, safe, and affordable transportation options via an innovative, on-demand model, Lyft respectfully requests that in addition to the proposed taxi staging areas at the Transbay Transit Center, the Federal Transit Administration in partnership with the Federal Railroad Administration and the Transbay Joint Powers Authority please also provide an unambiguous inclusion for Transportation Network Companies (TNC) to have curb access integrated into the plan detailed by the Draft Supplemental Environmental Impact Statement and Environmental Impact Report.

As it stands now, it is our understanding that the proposed taxi staging area – curbside passenger loading and unloading spaces for taxis – would be provided along the south side of Minna Street between First and Second Streets, along the north side of New Natoma Street between Beale and Main Streets, and along the west side of Main Street between New Natoma and Howard Streets. We implore the TJPA and its Federal partners to include TNC curb space for passenger pickups and drop-offs as a component of the Transbay Program design process.

According to recent studies, in every city around the country where Lyft currently operates, major transit stations are among our top pickup and drop-off sites, including the [#1 category of Lyft destination nationally in 2015](#). A key focus of the company, Lyft emphasizes quality first-mile / last-mile transportation options in partnership with public transit agencies to promote greater connectivity, enabling residents to utilize transit to reach their destinations.

Our continued dedication to further link neighborhoods to transit via accessible first-mile / last-mile options supports the pedestrian safety goals adopted by the City & County of San Francisco's commitment to [Vision Zero](#), building better and safer streets, educating the public on traffic safety, enforcing traffic laws, and adopting policy changes to reach zero traffic deaths in San Francisco by 2024. Lyft's ability to work with local and regional transit authorities to fulfill first-mile / last-mile neighborhood rides also falls in-line with the City & County of San Francisco's [Transit First policy](#).

Lyft-1

Regionally, over 20% of Lyft rides in the Bay Area start or end at train stations, which will ultimately reinforce the Transbay Transit Center as the multimodal showpiece for a region where first-mile / last-mile rides will likely become increasingly popular. We know that thousands of Lyft passengers will choose to get dropped off and picked up at the new Transbay Transit Center every day as they use Lyft to connect to transit options, so it will be critical for station design to include dedicated curb space to accommodate this activity. Designated curb space for TNC pickups and drop-offs will help protect pedestrians and encourage vehicle safety, reduce disruptions to traffic flow on busy streets surrounding the station, and ensure seamless connections for residents using public transit.

Lyft, in [partnership](#) with Livable City and in coordination with SFMTA, Caltrain and other agencies and stakeholders were chosen as the recipient of the [Just Transit SF](#) grant. Administered by the 11th Hour Project, a program of the Schmidt Family Foundation, the grant will allow us to immediately begin work to reduce the dangerous congestion at San Francisco's Caltrain Depot. Livable City and Lyft are partnering to streamline multiple modes of transportation at the Caltrain depot by designating loading zones with signage, curb-loading markings, and in-app prompts for taxi and rideshare riders and drivers alike. This partnership provides a roadmap for coordination analogous with the curb access TNC's should also enjoy at the Transbay Transit Center.

Furthermore, Lyft would be willing to customize the passenger experience to optimize for pickups and dropoffs at the Transbay Transit Center. In the app itself, we can communicate with users where to go, and direct them to dedicated pickup locations at curb space approved by the Transbay Joint Powers Authority. By implementing these capabilities, we can improve the safety, efficiency, and experience for travelers connecting at the Center.

Altogether, Lyft feels that we have the unique opportunity to come together across sectors at the onset of the planning process to get this legacy project right for the people of San Francisco and the Bay Area as a region. As a multi-year commitment and an investment in the future, the Transbay Transit Center will steward interconnectivity as the most technologically state of the art multimodal hub in the world, keep our region economically competitive, pioneer 21st Century transit solutions, and ensure that everyone gets where they need to go with equitable, world-class transportation options for all.

Thank you for consideration of these comments.

With warm regards,



Tommy Hayes
Transportation Policy Manager
Lyft

Lyft
February 24, 2016

Lyft-01 The use of the street curbs by Lyft and other transportation network companies is not regulated by the TJPA. Opportunities for Lyft to pick-up and drop-off passengers at the Transit Center should be discussed with the SFMTA.