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April 3, 2009

California High Speed Rail Authority
Attn: California High Speed Train
Bay Area High Speed Rail EIR/EIS Notice of Preparation
925 L Street, Suite 1425
Sacramento, CA 95814

Subject: City of Menlo Park Comments on the Scope of the EIR/EIS for the San Francisco to San Jose Segment of the High Speed Train

Members of the Authority:

Thank you for the opportunity to provide comments on the Scope of the Environmental Impact Report/Environmental Impact Study (EIR/EIS) for the San Francisco to San Jose segment of the High Speed Train (HST) system.

The City of Menlo Park is concerned about the impacts to the community and wants to find the best way to minimize those impacts. The following information should be analyzed in the EIR/EIS to make a determination on the best way to construct the project on the Peninsula:

1. Grade Separation Alternatives - The EIR/EIS needs to evaluate all grade separate options within Menlo Park including a full trench, partial trench, tunnel, full elevated, and split alternatives. Grade separations on the Caltrain mainline will create impacts because of the constrained nature of the development in Menlo Park as well as the presence of the historical Menlo Park Train Station Depot building. One likely alternative for grade separation would include raising the tracks. This particular alternative has another unique issue of creating a "wall effect" within the community and dividing the City. A trench or tunnel alternative would significantly lessen the impacts in the City. (The tunnel alternative could utilize the air rights above the system to offset the cost of the system.) The tunneling option needs to include all tracks on the corridor underground including the Caltrain/Freight system.

2. Economic Impacts - Evaluate the economic impacts caused to any businesses that may be disrupted during construction and ongoing operation of higher train volumes. This analysis should be performed for each alternative and factored into the evaluation process. The analysis should include the temporary construction impacts as well as long term permanent impacts.

3. Trackage Alternatives - Evaluate various trackage alternatives including two, three, and four sets of tracks and including a mixed Caltrain/High Speed Rail System. Identify whether fewer sets of tracks would eliminate the need to grade

separate every crossing. Could some crossings utilize other enhanced safety measures such as four-quadrant gates?

4. Electrification – The appearance of overhead electric power supply for the trains, including the wires, supporting poles, mast arms and insulations, is a matter of significant concern. Also, the electrification system should be compatible with the proposed Caltrain electrification such that two systems do not need to be constructed and maintained. The visual impacts of the electrification system should be clearly analyzed and mitigated. Also, the impacts to trees and other landscaping needs to be analyzed. As an alternative to overhead electrified lines, the use of a third rail type system should be analyzed. This type of system could reduce impacts substantially.

5. Noise and vibration mitigation – The additional noise and vibration caused by the HST needs to be clearly stated and addressed. Any noise and/or vibration impacts need to be mitigated as part of the project. Such measures should be included as integral components of the project. These measures should not create other impacts such as construction of a sound wall that might divide the City and affect the neighborhood feel of the community. Also, evaluate noise impacts and how noise levels would vary with different vertical track alignments (i.e. tunnel, trench, track at grade, elevated track), number of tracks and consider methods to reduce those impacts.

The noise and vibration analysis should be conducted within and specific to the City of Menlo Park. This analysis should include understandable measures of current noise and vibration levels in the area and projected noise and vibration levels after introduction of the HSR system.

Both the decibel level and frequency/duration of noises coming from increased rail traffic should be characterized over a typical 24 hour period. The noise evaluation should consider how noise levels will vary at different distances from the tracks so that those potentially impacted can understand how they would be affected.

6. Visual Impacts - Analyze how visual impacts would vary with different vertical track alignments and sub-options such as berm, wall, pillars, and an open-type structure for raised tracks, number of tracks, electricification and identify ways to reduce visual impacts to the community.

7. Construction Techniques - Analyze construction techniques that reduce impacts to the community and avoid the need for temporary tracks during construction including top-down construction of grade separations and tunneling.

8. Property Take Reduction - Evaluate all options and construction methods to reduce the need for additional right-of-way and property takes and impacts with reasonable assumptions especially when determining whether a full take is required instead of a much smaller portion of the property.

9. Property Value - Analyze the impact to real property values near the rail due to more frequent rail traffic and increased noise, visual impacts and vibration levels from changes in the vertical track alignment and number of tracks. The use of a tunnel and air rights above the tunnel could have a positive effect on property values. This scenario should be analyzed in the EIR/EIS.

10. Freight – Menlo Park is concerned about freight traffic and its impact on residents and traffic in the area. Since the rail lines will be grade separated, which allows for faster train times and reduced vehicular and pedestrian conflicts, the lines would be more easily suited for freight traffic. This may lead to increased freight traffic on rail lines that currently have minimal freight traffic. The EIR/EIS should analyze this issue and evaluate ways to reduce the freight traffic as part of the mitigation for the project. Also, the EIR/EIS should evaluate the elimination of freight service on the Peninsula as a potential mitigation measure to reduce noise, vibration and increase safety of the rail system. The elimination of freight traffic on the rail line could increase design flexibility with the potential for significant impact reductions and cost savings.

11. Caltrain Service - Evaluate the impacts (either positive or negative) on current Caltrain service and its ability to provide improved service (i.e. more frequent stops at the Menlo Park station.)

12. Traffic Impacts - Analyze traffic impacts to City streets impacted during construction, and specifically identify any streets that would be detoured, reduced in capacity or closed during construction or permanently as part of the project. This should include an analysis of additional roadway traffic due to the development and subsequent operation of the High Speed Train and a mid-peninsula rail stop (i.e. Palo Alto or Redwood City). Traffic impacts in Menlo Park should be analyzed using the City's Traffic Impact Analysis Guidelines.

13. Funding – The project intends to use State General Obligation bonds to fund the project. This funding method would create a long-term financial obligation that could impact existing State programs. A detailed cost/benefit and fiscal impact analysis should be provided for the project. Also, additional funding sources should be sought to share the costs of the project. The cost of the project and its impact on other projects in the area need to be analyzed in the EIR/EIS.

14. Pedestrian and Bicycle Traffic – The EIR/EIS should include an analysis of the impact on Pedestrians and Bicycle Traffic including, but not limited to, noise, vibration, reduction in crossings. The use of a trench or tunnel could improve the ability for pedestrians to cross the tracks. The City of Menlo Park's Bicycle Development Plan includes a Bicycle/Pedestrian undercrossing of the rail line. This undercrossing should be analyzed and included as part of the project.

15. Rail Right-of-Way – The required right-of-way for the rail project needs to be clearly indicated for each of the alternatives considered as part of the EIR/EIS.

16. Tree Impacts – The impact on trees needs to be clearly analyzed in the environmental documents. These impacts may include trimming or removal. The removal and/or trimming of trees will create visual, noise, and climate change impacts. All of these impacts and any other impacts need to be clearly analyzed and mitigated.

17. Wildlife – The EIR/EIS should analyzed the impacts on wildlife in the area including, but not limited to, the impact on migration of these animals across the tracks.

18. Climate Change – The EIR/EIS should analyze the impact on the climate change. This analysis should be conducted for the construction of the project and subsequent operation of the system.

19. San Francisquito Creek – The current rail system crosses the San Francisquito Creek at the Menlo Park border with Palo Alto. Potential impacts to the creek's flow capacity or the stability of its banks should be evaluated.

20. Grade of the Track – The analysis should evaluate the use of a steeper slope on the tracks instead of a 1% limitation. The existing train sets including freight can use a slope of greater than 1%. The increased slope may reduce the number of impacts and open up the possibilities for other options to be analyzed.

21. Historic Structures – The Train Station in Menlo Park is a Historic Structure and could be severely impacted by the project. The EIR/EIS should analyze this issue and find ways to reduce and/or eliminate the impacts to these important buildings. Other Historic Structures that are on the Federal and State Registries or are eligible to be listed on the registries should be analyzed in the EIR/EIS.

22. Air Quality – The HSR system will have an effect on air quality and health near the rail. The speed of the train will create additional dust and other particulates blowing in the air. Also the construction equipment used to build the system will have an impact on air quality. The EIR/EIS should evaluate these impacts and recommend any necessary mitigation measures.

23. Caltrain Connectivity – The EIR/EIS should include an analysis of the option to reduce the number of High Speed Trains directly to San Francisco by integrating with the Caltrain System. This hybrid –type system could run as a High Speed Train from Los Angeles to San Jose with limited stops, then convert to an express or Baby Bullet type service along the Peninsula. This service would provide increased passenger usage along the Peninsula, potentially reduce impacts, such as reducing the number of tracks, and provide better integration with existing services. The hybrid-type system should be analyzed, but not limited to, the following options:

- Some High Speed trains terminate in San Jose, then allow passengers transfer to regional transit systems such as Caltrain, BART, VTA buses, etc.
- All High Speed trains travel to San Francisco, but some travel at slower speeds along the Peninsula (i.e. 79 MPH)
- A combination of the options above where High Speed Rail trains that continue up the Caltrain corridor do so at speeds not exceeding the Caltrain services.

24. Increased Travel Time - The EIR/EIS should analyze varying levels of increase to the travel time requirements from Los Angeles to San Francisco. The option of increasing the required time from the 2 hours and 40 minutes would potentially allow other design options to be considered and reduce the impacts from the system as well as provide a potentially significant cost savings for the project.

25. Project-Level Environmental Analysis Guidelines – The City of Menlo Park became aware that a new document providing analysis guidelines and significance thresholds for the EIR/EIS was recently added to the HSR Authority website. The public process that developed this document is unclear. The document should be reviewed through a public process that allows communities to review and provide comments as well as incorporating local guidelines, thresholds, and requirements.

26. Electromagnetic Interference (EMI) – The EIR/EIS should analyze the potential impacts of EMI from the proposed catenary system. The type of interference can affect electronic devices in the area, radio, televisions, etc. Any potential impact and mitigation measures should be clearly identified for project and each option and alternative.

The City of Menlo Park would expect the Authority to consider all of these comments when developing the draft EIR/EIS. The High Speed Rail Authority has indicated that a Scoping Report for the EIR/EIS will be prepared prior to initiation of the EIR/EIS. The City of Menlo Park would encourage this approach and would like to be involved in finalizing the scope of the documents, especially in reviewing and finalizing the alternatives that will be analyzed. Also, the City would like to work collaboratively to develop optimal urban design alternatives that will be included in the scope of the EIR/EIS.

Finally, the City of Menlo Park appreciates the opportunity to provide input on the Scope of the EIR/EIS for the San Francisco to San Jose Segment High Speed Train System. The City looks forward to participating in the EIR/EIS process to review any impacts and proposed mitigation measures within Menlo Park. As previously noted, the City of Menlo Park cannot declare itself in support of the project until the issues described above have been carefully evaluated and addressed through the evaluation and design process.

Sincerely,

Heyward Robinson
Mayor

Cc: Members of the City Council
Quentin Kopp, High Speed Rail Authority Board Chairperson
Fran Florez, High Speed Rail Authority Board Vice-Chairperson
Donna Andrews, High Speed Rail Authority Board Member
David Crane, High Speed Rail Authority Board Member
Rod Diridon, High Speed Rail Authority Board Member
Kirk Lindsey, High Speed Rail Authority Board Member
Curt Pringle, High Speed Rail Authority Board Member
Lynn Schenk, High Speed Rail Authority Board Member
Tom Stapleton, High Speed Rail Authority Board Member
City Manager
City Attorney
Director of Public Works