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June 30, 2010

California High Speed Rail Authority
Attn: California High Speed Train
High Speed Rail Program Preliminary Alternatives Analysis for the San
Francisco to San Jose Section
925 L Street, Suite 1425
Sacramento, CA 95814

Subject: City of Menlo Park Comments on the High Speed Rail (HST)
Preliminary Alternatives Analysis for the San Francisco to San Jose
Section

Members of the Authority:

The City of Menlo Park has concerns that the Alternatives Analysis (AA) doesn't have sufficient information to fully evaluate and reach a conclusion on the appropriate alternative(s) to evaluate further in the Environmental Impact Report/Study (EIR/EIS). This additional information is critical in order to analyze the alternates and avoid significant adverse impacts to the Peninsula area from the alignment of the HST.

The City of Menlo Park would continue to be directly affected by the project and the alternatives. Menlo Park has previously expressed its concerns related to the project and new rail activity on either of the two rail lines. The City has the following comments on the AA report:

1. Stacked Alternatives – The AA analyzes a four track system for each alternative, but only analyses a four-track wide configuration. Appendix C of the AA includes cross sections that depict stacked alternatives with the HST below Caltrain with two tracks for each. A more detailed analysis of the stacked alternatives needs to be provided. Stacked alternatives minimize the need to acquire additional right-of-way, for construction and permanent operations. Typical sections STA 12 and STA 13 for example show stacked configurations within Caltrain station areas. This configuration only requires a width of approximately 80 feet, which includes Caltrain boarding platforms. Stacked alternatives have significant potential to reduce right-of-way impacts, and make it easier to maintain Caltrain operations during construction resulting in lower costs. Stacked alternatives should be analyzed at the same level of detail as the four-track wide alternatives included in the AA.

2. Two-Track Alternative – As analysis of the HST systems continues to evolve, Menlo Park urges the HSRA to develop and consider a two-track mainline alternative for the Peninsula Segment. Limitations on the number of

trains that can be accommodated in the Transbay Terminal, more detailed analysis of right-of-way constraints, and questions about ridership projections all suggest the basic assumption to construct a four-track system should be re-examined. A two-track main line alternative could be developed with passing tracks at selected locations and/or sidings at Caltrain stations to provide flexibility for high-speed and express service models. This option clearly has the potential to save billions of dollars and should be seriously considered.

3. Below Grade Option – The below grade trench/cut and cover tunnel indicates that the station in Menlo Park would be approximately 80' below grade. This appears to be dictated by the depth of this option under the San Francisquito Creek. The creek should have been used as the control point and the tracks should rise immediately after to reduce the depth of the tracks and station. The current alignment depicts the tracks going deeper after the creek crossing towards the Menlo Park Station. Also, the depth below the creek is likely much greater than would be necessary, thus exaggerating this issue. This Alternative should be reconfigured to minimize the buried depth, resulting in lower cost and fewer community impacts.

4. Right-of-way – The AA does not state how much of the existing right-of-way will actually be needed, or the amount of additional right-of-way (temporary or permanent) required for each alternative. Also, a cost for the additional right-of-way required for the project needs to be provided. This is a very important consideration for the community to evaluate the feasibility and desirability of the alternatives being considered.

5. Cost Estimates – The cost information for each of the alternatives are not adequately explained. More detailed information that fully captures the full cost of the alternatives needs to be included. This information would take into account all items required for the project such as mitigation measures, easements, right-of-way, easements, temporary costs, etc. The full unit costs for each alternative needs to be provided for a full and adequate review. Several more specific concerns are as follows:

- a. Grade Separation Costs – Subsection 5b has six existing at-grade crossings that will require grade separations. Appendix L of the AA includes estimated costs for grade separations which appear significantly understated. Grade separation costs were included for the at-grade alternatives for both two-track and four-track configurations. The following unit costs were used for each grade separation: 2-lane roadway under four tracks – \$2.76 million, and 2 –lane roadway under two tracks – \$2.03 million. Constructing grade separations with Caltrain in service is a major complication that may have been overlooked in estimating costs. Experience with other Peninsula grade separation projects should be reviewed and the costs updated. It should also be noted that Ravenswood Avenue in Menlo Park is a four-lane roadway. The AA erroneously used the costs for two-lane roadways for all of the crossings in Subsection 5B.
- b. Station Costs – The AA includes a cost of \$15 Million dollars for reconstruction of the Menlo Park Caltrain station regardless of the configuration. This is not a realistic figure as each vertical alignment will have separate and important differences in costs. These figures need to be revised to provide an understanding of the cost differences between each option.

- c. Local Costs – The AA fails to identify if a portion of the costs for any of the alternatives are assumed to be funded from local sources. Since the HSRA’s business plan includes significant amounts of funding from local sources, but does not identify how this money is to be raised, Menlo Park is concerned about impacts to its budget. In order for any community to properly weigh alternatives, local costs - if any, must be disclosed as part of the alternatives analysis process.
- d. Temporary Costs – The AA does not include costs for the temporary elements required during construction. These costs would include, but not limited to, shoofly tracks, temporary bridges, modifications to signals and grade crossing protection.
- e. Right-of-way Costs – The AA includes a qualitative analysis of the right-of-way costs of each option in Table 4-8. It’s not clear how these rankings were developed. The at-grade alternative for example is rated as “highest” for right-of-way costs even though the at-grade alternative has a narrower cross section than some of the other alternatives being considered. More information on right-of-costs are needed.

6. Construction – The AA does not provide information on how each alternative would be constructed. This information is critical to understand the need to shoofly tracks, length of construction, viability of construction, impacts to Caltrain and the overall impacts to the community. The construction of the project would create many impacts within the City of Menlo Park. The construction of shoofly tracks, traffic diversion, construction noise, etc. should be clearly stated. The construction impacts and duration should be considered as part of the selection of the alternatives, since the construction will be of much longer duration than typical construction projects. These are not temporary impacts, but impacts that will affect residents and business for an extended period. The impact of the shoofly tracks on adjacent properties needs to be clearly analyzed and stated in the document including any mitigation measures. The shoofly tracks will likely affect traffic patterns, create additional noise for many residents and require acquisition of property. The affect of the construction on businesses needs to be clearly analyzed, both physical and financial. Many businesses cannot remain closed for extended periods and still remain viable. The affect on the businesses could create an economic impact on the City.

7. Temporary Easements – The need for any temporary easements for construction are not identified in the AA. This information needs to be provided.

8. Noise and vibration – The AA does not include any noise or vibration analysis for the alternatives. This information is crucial to understand and fully evaluate the alternatives. 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 adversely affect the residential character of the community.

9. Land Use after Construction – The various options should indicate the type of land use that may be available along the corridor within the train right-of-way after the rail is constructed. A below grade option or tunnel may allow the land to include such uses as linear parks, pedestrian and bicycle paths, bus rapid transit corridors, multi-unit housing, commercial development, etc. as a park or open space. Also, how will the adjacent land owner be affected for each option after construction? Some options have

less impact than others. Also, the air rights above a completely underground system could be sold to help offset the cost of the system with this alternative.

10. Freight - Menlo Park is concerned about freight traffic using Caltrain mainline 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 potential increase in freight is not only related to Caltrain's discussions with freight, but a function of the HST project due to amenities proposed as part of the HST project. The diesel engines currently used by freight create problems for many of the alternatives including the raised alternative with increase emissions affecting a larger number of residents. The diesel engines should be replaced with electric engines to mitigate these impacts. A short-haul operator of rail freight that uses electrified locomotives could provide a solution to the current locomotives.

11. Local Roadways – How will local roadways be affected by each of the options? This data is not included in the AA report. In many of the alternatives, local roadway access will be affected such as Alma and Merrill Streets immediately adjacent to the Caltrain station. These affects need to be clearly documented to fully evaluate the AA report.

12. Tunnel Width - The clearance dimensions to the walls in the trench and cut and cover tunnel sections seem excessive especially when compared to the deep tunnel section. Using the same dimensions as the tunnel clearances each cell could be 20' (Appendix C page 11 CCB-7-1) wide instead of 25'-6" (Appendix C page 7 CCB-1). The center walls are usually only 1' thick in typical subways, not the 3' shown in the AA report.

13. Caltrain Operation during construction – The AA report does not indicate the operational plan for Caltrain during construction. Each alternative has its own set of unique challenges during construction and their viability. This information needs to be provided including the location of any temporary tracks and/or easements as described in comments 5 and 6 above.

14. Station Design – The preliminary design of modifications to existing Caltrain stations is not included in the AA report. The design including the length, width, required pedestrian crossings, etc. needs to be provided in the report. The width of many of the alternatives will create a significant impact on the area surrounding the station including a historical structure. This information needs to be provided for an adequate review of the alternatives. Some alternatives would appear to severely reduce existing parking near the Caltrain station. Given Caltrain's plans for enhanced service, more parking should be planned as part of the project.

15. 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 AA report does not provide adequate information on the overall heights and locations of the electric power poles, transformers, and lines. This detailed information needs to be used to analyze the impacts associated with electrification of the system for all vertical and horizontal alignments including visual, tree impacts, etc. The same information should be provided for signal, control equipment, and lines.

16. Ventilation – The AA does not provide information related to the vent shafts and vent structures necessary for the underground options. The width, location, noise impacts, and aesthetics need to be provided.

17. Evaluations Measures – The Evaluation measures starting on page 4-47 for each of the alternatives and categories are very subjective in nature. The details for each of the evaluations measures should be provided for a full analysis. Also, a more objective set of criteria should be used for the evaluation. This criteria should be reviewed and approved by the cities affected the alternatives.

18. US 101 Corridor – The AA report provides very limited information about use of the US 101 corridor and the I-280 corridor for HST. More detailed information similar to the information for the Caltrain corridor should be provided in the AA report. This information would help evaluate the best corridor for the project with the least impacts to the communities.

Finally, the City of Menlo Park would reiterate the concerns raised above and the fact that further information is necessary in order to make an informed decision on the appropriate alternative for HST in Menlo Park. While we understand the conceptual nature of the AA report, we wish to bring to your attention specific issues of the City of Menlo Park that are not adequately addressed. These concerns need to be addressed in order to have an accurate understanding of the alternatives and to fully evaluate the pros and cons of each alternative. Therefore, it is incumbent on the Authority to provide a complete and more comprehensive analysis of the alternatives within the AA report.

The City expects to have these items addressed as part of the supplement or final Alternatives Analysis. The City will continue to participate in the overall EIR/EIS process to review any impacts and proposed mitigation measures within Menlo Park.

Sincerely,



Richard Cline
Mayor

Cc:

Members of the Menlo Park City Council
Curt Pringle, High Speed Rail Authority Board Chairperson
Tom Umberg, High Speed Rail Authority Board Vice-Chairperson
Quentin Kopp, High Speed Rail Authority Board Member
Fran Florez, High Speed Rail Authority Board Member
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