

DEPARTMENT OF PUBLIC WORKS
Brad B. Underwood, P.E., L.S., Director

330 W 20th Avenue
San Mateo, CA 94403-1338
Telephone: (650) 522 -7300
Fax: (650) 522-7301
www.cityofsanmateo.org

August 27, 2020

California High Speed Rail Authority
Attn: San Francisco to San Jose Project Section: Draft EIR/EIS
Northern California Regional Office
100 Paseo de San Antonio, Suite 300
San Jose, CA 95113

Re: ***City of San Mateo Comment Letter to the California High Speed Rail Environmental Impact Report – San Francisco to San Jose Section***

Dear California High Speed Rail Authority,

The City of San Mateo has prepared this letter to provide comments on the Draft Environmental Impact Report (EIR) of the San Francisco to San Jose project section of the California High Speed Rail. The City is concerned that the extent of impacts is underestimated, and proposed mitigation measures are insufficient to reduce the impacts to a less than significant level. In many areas, environmental effects are either inappropriately categorized as “not significant” and not mitigated or acknowledged to be significant but then inadequately mitigated. Attached to this letter is the full list of comments (3 pages) from the City regarding the EIR.

Sincerely,

Brad B. Underwood, P.E., L.S.
Director of Public Works

Enclosures

c: Chron/File

CITY OF SAN MATEO COMMENTS

SAN FRANCISCO TO SAN JOSE PROJECT SECTION: DRAFT EIR/EIS

Document Location	City Comment on EIR/EIS
General Comments	The EIR does not adequately evaluate the impacts to existing property in San Mateo associated with Alternative B to determine how the businesses will be affected.
	The EIR does not adequately contemplate Caltrain's planned growth and therefore underestimates the impacts of HSR. The EIR does not adequately evaluate the need for passing tracks and therefore the potential impacts of either alternative.
	The report states that there has been a reduction in the ridership projections from the base data used in the EIR/EIS analysis. The EIR's use of the higher ridership projections results in supposed benefits that allow the project to avoid mitigating project impacts. The EIR is inadequate in that it fails to use accurate ridership projections and overestimates the benefits (e.g., reduced vehicle miles traveled, reduced greenhouse gas [GHG] emissions, reduced energy consumption) from the project.
VOLUME 1 – CHAPTER 3	
3.2- Page 6	The EIR states eight intersections are being affected in a manner inconsistent with the City's General Plan policies. The EIR and its mitigation measures are inadequate because they fail to address the City's General Plan policies.
3.2- Page 6	The project is inconsistent with San Mateo General Plan Policy C 3.6 requiring rail lines be depressed below ground in the downtown. The EIR and its mitigation measures are inadequate because they fail to address the City's General Plan policies.
3.2-16	The EIR Level of Service analysis does not adequately consider future growth in San Mateo by failing to specify which projects are included in the existing conditions.
3.2- Table 3.2-7	The gate down time used for the at-grade crossings in San Mateo is inconsistent with Caltrain's 2040 Business plan. In 2040 Caltrain Business Plan the baseline growth scenario projects an average gate downtime in San Mateo of 16.46 minutes whereas Table 3.2-7 of the EIR assumes 20 minutes. Therefore, the EIR does not adequately address the traffic impacts associated with gate down time caused by HSR, as more detail is needed to understand the difference between the two analyses.
Pg. 3.2-58	The EIR does not adequately explain the limits of underpass extensions, therefore, the temporary and permanent impacts associated with construction of these underpass extensions cannot be determined. Extending the various underpasses in San Mateo could affect local roadway profile needed to maintain vertical clearance, which could

CITY OF SAN MATEO COMMENTS

SAN FRANCISCO TO SAN JOSE PROJECT SECTION: DRAFT EIR/EIS

	impact adjacent businesses further. The EIR does not provide an adequate evaluation of the permanent impacts to local businesses.
Pg. 3.2-96 - TR-MM#1	The listed mitigations are hypothetical and not realistic given the space constraints in the congested urban areas such as near downtown San Mateo. The EIR does not adequately mitigate the project impacts.
3.4 Noise	Noise impacts are inconsistent with San Mateo General Plan. The EIR is inadequate because it fails to address the City's General Plan policies.
Impact NV#5	Construction activity could potentially exceed vibration tolerances which should require vibration monitoring during construction and property assessments prior to construction.
SOCIO#2	Alt B impacts more businesses in San Mateo, also affects aesthetics more due to retaining walls. Who is making the ultimate decision on what Alternative gets chosen?
Pg. S-101, Table - Noise	The EIR does not explain how Alternative B has fewer sensitive noise receptors than Alternative A when other parts of the report mention greater noise in Alternative B caused by more construction activities and longer duration.
Volume 2 – 3.2A Transportation and Data on Intersections	
Table 6	For delay conditions in all scenarios the tabulated delay is capped at 180 seconds, which misrepresents actual delay. The EIR must present the actual delay and not an arbitrary capped value.
	An increase in delay of 0.3 seconds is shown at El Camino Real and 25 th Avenue when comparing Alternative A and B to the No Project even though, there is no at-grade crossing at 25 th Avenue. There is no reason the delay should change at this location.
	Intersection GX43 described is “San Mateo Avenue and Scott Street” does not exist in San Mateo.
	For intersections in the City of San Mateo there appears to be significant LOS impacts. This is not allowed under our general plan policy C2.1 and C2.7. What is the project doing to make sure the project is in compliance with our general plan?
	The intersection of Railroad and 1 st Avenue shows an improvement in LOS, but there is insufficient information in the EIR to identify what generates this improvement.
Constructability Assessment Report	
Pg. 5-1, 5.3 Earthwork	The EIR does not provide enough detail in the embankment work for the passing track in San Mateo for Alternative B to evaluate the extent of impact.

CITY OF SAN MATEO COMMENTS
SAN FRANCISCO TO SAN JOSE PROJECT SECTION: DRAFT EIR/EIS

Pg. 7-1, 7 Construction Staging Areas	It is unclear whether staging areas identified in the document will accommodate worker parking. It is the City's goal to have worker parking managed by the contractor to avoid impacting parking in neighborhoods. Please specify.
Appendix 3.1-A: Parcels Within the HSR Project Footprint	
General Comments	Aerial imagery is significantly out of date and needs to be updated to provide meaningful information regarding changes that have occurred since 2016. Without accurate imagery, it is not possible to evaluate the information provided.
General Comments	Clarify in legend whether areas are existing rights of way or right of way acquisition is still required.
Page 24	It is unclear whether HSR right of way outside Caltrain right of way is already owned by HSR or needs to be acquired. Please clarify.
Page 26	Unclear whether the HSR Permanent Easement is located outside Caltrain right of way is already owned by HSR or needs to be acquired.