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March 16, 2020

John Swiecki, AICP
Community Development Director
City of Brisbane
50 Park Place, Brisbane, CA 94005

Subject: Brisbane Baylands Specific Plan Environmental Impact Report (EIR)

Dear Mr. Swiecki:

The Peninsula Corridor Joint Powers Board (JPB) is pleased to provide the following comments on the Notice of Preparation (NOP) for the Brisbane Baylands Specific Plan Environmental Impact Report (EIR). The JPB provided comments in 2014 on the previous environmental review process that was completed by the City, a Program EIR for the Brisbane Baylands General Plan Amendment and Specific Plan. The JPB understands that the City of Brisbane has determined that a new EIR is needed to analyze the environmental effects of the proposed Baylands Specific Plan. This new EIR will build on the informational and analyses that were set forth in the earlier Program EIR with new and updated environmental impact analyses.

The Brisbane Baylands Specific Plan encompasses an area that is bisected in a north-south direction by Caltrain's railroad tracks, and the northern portion of the Specific Plan area includes the Caltrain Bayshore Station. In addition to plans for 2,200 residential units and approximately seven million square feet of commercial uses, the JPB understands that the Brisbane Baylands Specific Plan includes circulation improvements in the area, including improved transit connections to the Caltrain station and two new bridge crossings over the JPB's right-of-way.

The NOP for the Brisbane Bayshore Specific Plan EIR lists the JPB as one of the local and regional agencies whose approval is subsequent to the approval of the Baylands Specific Plan. In particular, it notes that "encroachment permits if construction occurs within right-of-way owned by the Peninsula Corridor Joint Powers Board (Caltrain)". This is correct; all project elements and construction activities that incur over, through, or under the JPB's right-of-way will require coordination and review with the JPB, including but not limited to a wide range of design coordination, engineering review, agreement, and permitting by the JPB. It is also important to note, however, that any of the

proposed transportation improvements that involve or relate to Caltrain will need to be coordinated directly with the JPB, to ensure compliance with JPB standards and plans, as well as agreement on cost and maintenance studies. In particular, the JPB should be directly involved in any future engineering and architectural studies and funding discussions related to the Bayshore Station and station access and egress elements. To that end, we would suggest that the environmental analysis be revised to also list the JPB as an agency that requires interagency cooperation agreements to coordinate and implement improvements to public facilities and infrastructure elements.

In general, the JPB encourages transit-oriented development and investments at stations along the Caltrain corridor that support ridership and enhance mobility and connectivity for all modes of transportation, especially sustainable transportation modes. At this time, we look forward to reviewing environmental analyses that comprehensively address our critical areas of concern with regards to the Brisbane Baylands Specific Plan. This includes but is not limited to the following: Caltrain transit service impacts, including whether changes to Caltrain's existing and future anticipated schedules and operations and the use of the railroad's infrastructure would be required to support projected levels of ridership; bus and shuttle transit access, capacity, and circulation, especially as they relate to station access and egress; pedestrian and bicycle connectivity and facilities, especially as they relate to station access and egress; and auto access and circulation, including private autos, taxis, transportation network companies (Lyft, Uber), and pick-up/drop-off, especially as they relate to station access and egress.

In addition to the issues enumerated above, we note with some concern that there appears to be an ongoing disconnect between the development envisioned in the Brisbane Baylands Specific Plan and the proposed use of a portion of the same area for a future California High Speed Rail Light Maintenance Facility (LMF). The proposed LMF is has been under planning and discussion by HSR for some time and is included in their Draft EIR for the San Francisco to San Jose segment- planned for release and comment this spring. We urge the City of Brisbane and the Authority to continue their work together to ensure a consistent plan for the Baylands site.

Sincerely,



Michelle Bouchard
Chief Operating Officer, Rail