

21 ELECTED OFFICIALS COMMENTS

21 ELECTED OFFICIALS COMMENTS (Part 1)

Submission 971 (Mayor Terry O'Connell, July 23, 2020)

San Francisco - San Jose - RECORD #971 DETAIL

Status : Unread
Record Date : 7/23/2020
Interest As : Local Agency
First Name : Ingrid
Last Name : Padilla
Attachments : Brisbane_Extension Request for DEIR Public Review_072220.pdf (1 mb)

Stakeholder Comments/Issues :

Good morning,

Please see attached correspondence from the City of Brisbane's Mayor Terry O'Connell regarding a Public Review Period Extension Request for the San Francisco to San Jose Project Section Draft EIR/EIS.

Best Regards,

[cid:image002.png@01D66001.798AC660]<http://www.brisbaneca.org/>INGRID PADILLA
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CITY OF BRISBANE

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July 22, 2020

SENT VIA E-MAIL

Board of Directors
California High-Speed Rail Authority
770 L Street, Suite 620
Sacramento, CA 95814
boardmembers@hsr.ca.gov

Attn: Draft San Francisco to San Jose Project Section EIR/EIS
Northern California Regional Office
California High-Speed Rail Authority
100 Paseo de San Antonio, Suite 300
San Jose, CA 95113
northern.california@hsr.ca.gov
san francisco_san.jose@hsr.ca.gov

Re: Public Review Period Extension Request for the San Francisco to San Jose Project Section Draft EIR/EIS

Dear High Speed Rail Authority:

971-73

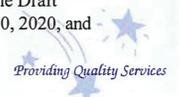
On behalf of the City of Brisbane ("City"), we respectfully request that the California High-Speed Rail Authority ("Authority") extend the public review period for the Draft EIR/EIS prepared for the proposed San Francisco to San Jose Project Section ("Project") to at least Tuesday, September 8, 2020, in order to provide a full 60 days for review of the voluminous administrative record and informed public comment.

The City of Brisbane is one of several stakeholder cities located along the existing Caltrain right-of-way and through which the proposed Project will cut. Further, the Project proposes an approximately 100- to 110-acre maintenance facility, electrical substation, and passing tracks within the City. As such, the Project will have an extraordinary impact on existing and planned residential, commercial, and industrial development within Brisbane.

971-74

The City is appreciative of the opportunity to review and comment upon the Draft EIR/EIS. However, the Draft EIR/EIS was made available to the public on July 10, 2020, and

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Submission 971 (Mayor Terry O'Connell, July 23, 2020) - Continued

971-74

the Notice of Availability identifies August 24, 2020, as the closing date for the public review period. A 45-day public review period is insufficient for an environmental document of this size, a Project of this magnitude, and a community simultaneously limited by the novel coronavirus pandemic. We note that the public review period for the Authority's Burbank to Los Angeles Project Section Draft EIR/EIS was extended to 60 days on these grounds, and request the same opportunity be provided for this Project.

971-75

In support of our request, we point out that while the Draft EIR/EIS was released to the public on July 10, 2020, 14 key technical reports supporting the Draft EIR/EIS were not made available to the public on this date.¹ Instead, interested parties are required to leave a message with the High-Speed Rail "hotline" and wait—in our experience, multiple days—for a response and links to access the reports. While the Project's website states that these technical reports are available at several public libraries in the region, these libraries are currently and indefinitely closed due to the coronavirus pandemic. The technical reports are a necessary component of the Draft EIR/EIS, and without an extension, a full 45-day public review period has not been provided for the full and complete Draft EIR/EIS document inclusive of these reports.

971-76

Even for those documents that were made available to the public on July 10, 2020, 45 days is not sufficient for public review. Volume 1 of the Draft EIR/EIS totals an astonishing **1,346 pages, not including any appendices**. There are a further 44 separate appendices included in Volume 2 of the Draft EIR/EIS, as well as the additional 14 technical reports that were not included in Volume 2 and that had to be requested through the hotline.² Further still, Volume 3 of the Draft EIR/EIS includes the preliminary engineering designs for the Project. Finally, the Draft EIR/EIS is a Tier 2 document, relying upon and incorporating not just one, but two separate Tier 1 environmental documents for the statewide high-speed rail system. Both the Final Program EIR/EIS for the California High-Speed Train System and the Final Program EIR/EIS for the Bay Area to Central Valley documents must be reviewed and compared against the Project's Tier 2 Draft EIR/EIS. **This extraordinary amount of information cannot be adequately reviewed in a typical 45-day CEQA review period.**

971-77

Finally, as the Authority is aware, the novel coronavirus pandemic has added immeasurable stress on the State of California and its public agencies. Like most cities throughout the state, the City of Brisbane is currently operating on a constrained and phased re-opening schedule. The City's first and most important priority is to provide services to our residents and businesses as necessitated by the pandemic. Requiring the City and other stakeholders to also provide a detailed review of the massive amount of information associated

¹ Technical reports not made available to the public on July 10, 2020, include the Transportation Technical Report (Dec. 2019), Biological and Aquatic Resources Technical Report (April 2020), Aquatic Resources Delineation Report (April 2020), Watershed Wetland Condition (CRAM) Evaluation Report (Dec. 2019), Preliminary Compensatory Mitigation Plan (May 2020), Hydrology and Water Resources Technical Report (April 2020), Geology, Soils, and Seismicity Technical Report (Dec. 2019), Hazardous Materials and Wastes Technical Report (Dec. 2019) and the Community Impact Assessment (Dec. 2019).

² The appendices and technical reports are not the only reference documents that must be reviewed within the public review period, as countless other documents were relied upon in the Draft EIR/EIS. Notably, Chapter 12 of the Draft EIR/EIS requires nearly 90 pages just to list all the reference documents relied upon in the Draft EIR/EIS.

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971-77

with the Project and its Draft EIR/EIS in only 45 days, during this unprecedented time, is simply infeasible.

Given the above, and in light of the importance of this Project to the City, the region, and the State of California, the City respectfully requests that the public review period be extended to at least Tuesday, September 8, 2020, in order to provide a minimum of 60 days for public comment.

Sincerely,



Terry O'Connell

Mayor

205791628.1

Response to Submission 971 (Mayor Terry O'Connell, July 23, 2020)

971-73

Refer to Standard Response FJ-Response-OUT-1: Public Involvement Process.

In response to agency and stakeholder requests, the Authority extended the comment period to 60 days. The comment did not result in any revisions to the Draft EIR/EIS.

971-74

Refer to Standard Response FJ-Response-OUT-1: Public Involvement Process.

In response to agency and stakeholder requests, the Authority extended the comment period to 60 days. The comment did not result in any revisions to the Draft EIR/EIS.

971-75

Refer to Standard Response FJ-Response-OUT-1: Public Involvement Process.

As noted in the standard response, the Authority extended the comment period to 60 days to address agency and stakeholder requests. The Authority responded to requests for information as quickly as possible and provided the technical reports in electronic format to the commenter upon request. Most requests for documents and information during the public comment period were responded to within two business days. The outreach team created a detailed tracking document to note document requests, track the status of responses, and ensure a timely response. Follow up with requesters was occasionally needed to clarify requests and confirm document transmittal logistics. The comment did not result in any revisions to the Draft EIR/EIS.

971-76

Refer to Standard Response FJ-Response-OUT-1: Public Involvement Process.

The Authority has used a tiered environmental review process to support program planning and project decision making for the statewide HSR system. Tiering of environmental documents means addressing a broad program in “Tier 1” environmental documents, then analyzing the details of individual projects within the larger program in subsequent project-specific or “Tier 2” environmental documents. Tiering allows a lead agency to focus on the issue that is ripe for decision at a particular tier. Chapter 1, Project Purpose, Need, and Objectives, of the EIR/EIS explains the history of the statewide HSR system, the Tier 1 decisions, and how the San Francisco to San Jose Project Section builds from and is consistent with those Tier 1 decisions. Chapter 2, Alternatives, of the EIR/EIS provides additional discussion. Consistent with NEPA and CEQA tiering procedures, the notice of availability of the Draft EIR/EIS and the EIR/EIS itself refer to the prior Program EIR/EISs and state that copies of these Tier 1 documents are available upon request or can be reviewed at Authority offices. The Tier 1 documents are available for reference, but are not the subject of the public comment period for the Tier 2 Draft EIR/EIS. The comment did not result in any revisions to the Draft EIR/EIS.

971-77

Refer to Standard Response FJ-Response-OUT-1: Public Involvement Process.

In response to agency and stakeholder requests, the Authority extended the comment period to 60 days. The comment did not result in any revisions to the Draft EIR/EIS.

Submission 972 (Reuben Holober, City of Millbrae, July 23, 2020)

San Francisco - San Jose - RECORD #972 DETAIL

Status : Unread
Record Date : 7/23/2020
Interest As : Local Elected
First Name : Reuben
Last Name : Holober

Stakeholder Comments/Issues :

To Whom it May Concern,

972-69

The High Speed Rail EIR for the San Francisco to San Jose projection section has a 45-day comment period. I would like to formally request that the comment period be extended to 60 days. This extension was recently provided for the San Jose to Merced and Burbank to Los Angeles projection sections. The EIR is very detailed it will take time for cities to adequately respond to the impacts while seeking public and City Council feedback. Additionally, many City Councils recess in August, so it is an inconvenient time for tight deadlines.

Thank you for considering this request.

Reuben D. Holober
Mayor, City of Millbrae

Response to Submission 972 (Reuben Holober, City of Millbrae, July 23, 2020)

972-69

Refer to Standard Response FJ-Response-OUT-1: Public Involvement Process.

The Authority extended the comment period to 60 days in response to agency and stakeholder requests. The comment did not result in any revisions to the Draft EIR/EIS.

21 ELECTED OFFICIALS COMMENTS (Part 2)

Submission 1223 (Gina Papan, City of Millbrae, September 8, 2021)

San Francisco - San Jose - RECORD #1223 DETAIL

Status : Unread
Record Date : 9/9/2021
Interest As : Local Elected
First Name : Gina
Last Name : Papan
Attachments : Gina Papan Letter to CHSRA re Draft SF to SJ Project Section EIREIS.pdf (2 mb)

Stakeholder Comments/Issues :

Hello,

Please see the attached letter on behalf of The City of Millbrae Councilmember Gina Papan.

Thank you and have a great evening.

[cid:image003.png@01D7A4D1.C603B1D0]Eduardo Gonzalez
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 E-Mail: gpapan@ci.millbrae.ca.us

GINA PAPAN
Councilwoman

September 8, 2020

ATTN: Draft San Francisco to San Jose Project Section EIR/EIS
 100 Paseo de San Antonio, Suite 300
 San Jose, CA 95113

Re: City Councilmember Gina Papan's Comments on California High Speed Rail Authority's Revised/Supplemental Draft San Francisco to San Jose Project Section Environmental Impact Report/Supplemental Environmental Impact Statement

Dear California High Speed Rail Authority:

I. Introduction

The City of Millbrae ("City") previously submitted comments on the High Speed Rail Authority's Draft San Francisco to San Jose Project Section Environmental Impact Report/Environmental Impact Statement ("Draft EIR/EIS") in September 2020 (the "September 2020 Letter"). Among other things, the City's September 2020 Letter noted the following:

- The Draft EIR/EIS does not comply with the California Environmental Quality Act because it is not an adequate informational document.
- The Draft EIR/EIS fails to analyze reasonably foreseeable and cumulative environmental impacts related to development near Millbrae Station and as contemplated by the Millbrae Station Area Specific Plan ("MSASP").
- The Draft EIR/EIS does not analyze a range of reasonable alternatives, particularly alternatives for Millbrae Station.

Unfortunately, the High Speed Rail Authority's Revised Draft San Francisco to San Jose Project Section Environmental Impact Report/Supplemental Environmental Impact Statement ("RDEIR/SEIS") contains the same flaws as the Draft EIR/EIS and simply adds a few more.

This letter sets forth the general comments on the RDEIR/SEIS for consideration by the High-Speed Rail Authority ("Authority").

II. The RDEIR/SEIS is still not an adequate informational document under CEQA.

As stated in the City's September 2020 Letter, the California Environmental Quality Act (Public Resources Code §§ 21000 et seq., "CEQA") and accompanying Guidelines (California

1223-2800

1223-2799

Submission 1223 (Gina Papan, City of Milbrae, September 8, 2021) - Continued

1223-2799 Code of Regulations Title 14, Division 6, Chapter 3, §§ 15000 et seq.) require an environmental impact report to be an "informational document." (CEQA Guidelines § 15121.) The purpose of an EIR is to *inform public agency decisionmakers and the public generally* about the significant environmental effects of a project, identify possible ways to minimize the significant effects, and describe reasonable alternatives to the project. (*Ibid.*) The City further noted that the Draft EIR/EIS was so voluminous, internally inconsistent, and unfocused on the San Francisco to San Jose segment (the "Project"), that it could not qualify as the type of "informational document."

Aside from minor changes to references and appendices, the RDEIR/SEIS revised *just two* sections of the Draft EIR/EIS (section 3.7 [Biological and Aquatic Resources], and section 3.18 [Cumulative Impacts]), and *added one* more (section 3.20 [Millbrae Station Reduced Site Plan Design Variant]). The RDEIR/SEIS still does not address the fact that the environmental document is still *thousands of pages long* with a "summary" that is *over a hundred pages*. The revised document still does not contain any straightforward explanation of the Project impacts within the City or in the other cities through which the Project passes.¹

1223-2802 The RDEIR/SEIS does not include a new, succinct summary of impacts. Nor does it include any changes that would rectify the voluminous document's problems. For example, the City's September 2020 Letter noted that a member of the public owning property near Millbrae Station would have to locate three separate pieces of information spread across the thousands of pages in order to determine whether the Project was going to be located on, or require an easement through, that person's property. The RDEIR/SEIS does not address - let alone cure - the Draft EIR/EIS's inadequacies. It does not fulfill its CEQA-mandated purpose to be an informational document, nor does it "adequately apprise all interested parties of the true scope of the project for intelligent weighing of the environmental consequences of the project," and is therefore inadequate as a matter of law. (*Communities for a Better Environment v. City of Richmond* (2010) 184 Cal.App.4th 70, 82-83.)

1223-2803 **III. The RDEIR/SEIR's new section 3.20 fails to provide the "reasonable range of alternatives" required by CEQA.**

Seemingly in response to the City's September 2020 Letter's comments regarding the Draft EIR/EIS's lack of analysis of a reasonable range of alternatives, the RDEIR/SEIR adds section 3.20, entitled "Millbrae Station Reduced Site Plan Design Variant." While this new section might be considered a step in the right direction, it is still fatally flawed and does not provide the "reasonable range of alternatives" that CEQA requires.

CEQA mandates that an EIR analyze a "reasonable range of alternatives" that would accomplish most of the basic objectives of the Project but could avoid or substantially lessen one or more of its significant impacts. (See CEQA Guidelines section 15126.6.) As stated in the City's September 2020 Letter, the Project consists only of the railway segment running from San Francisco to San Jose, yet the Draft EIR/EIS spends the bulk of its analysis describing the many

1223-2801 ¹ In fact, there does not appear to be a single map depicting all such cities in the voluminous Draft EIR/EIS or RDEIR/SEIS. Figure S-2 does not identify Millbrae other than by reference to the Millbrae-SFO Station, and does not include Atherton.

program-wide alternatives. It does not provide *any* meaningful discussion of a range of reasonable alternatives/*or this Project* (i.e., for tracks running between San Francisco and San Jose). The City's September 2020 Letter also noted that the Draft EIR/EIS did not include any alternatives that addressed any significant impacts within the City.

1223-2805 New section 3.20 purports to present a "variant" that analyzes a smaller, "potentially feasible footprint for the station design" in the City. (Authority's summary of RDEIR/SEIS at <https://hsr.ca.gov/programs/environmental-planning/project-section-environmental-documents-tier-2/san-francisco-to-san-jose-project-section-draft-environmental-impact-report-environmental-impact-statement/>.) But analysis of this Reduced Site Plan Design Variant ("RSP Design Variant") is just a *single* alternative to the Project as proposed. The addition of one "variant," *which is not even identified as a Project alternative*, is not sufficient to save the Draft EIR/EIS.

1223-2806 First, CEQA requires a reasonable *range* of alternatives. The RSP Design Variant is not a "range." The Project is inherently characterized in the alternative (i.e. the decision makers will choose Alternative A or Alternative B depending on where they want to locate the following: a light maintenance facility within the City of Brisbane, certain passing tracks between San Mateo and Redwood City, and the viaduct approach at San Jose Diridon Station). Simply adding the RSP Design Variant does not, by any means, represent a *range* of alternatives.

1223-2807 Second, CEQA requires that the alternatives analyzed accomplish most of the basic objectives of the Project *but could avoid or substantially lessen one or more of its significant impacts*. The RSP Design Variant would not require *any* changes to the impact determinations made in the Draft EIR/EIS. While it appears to lessen or "*slightly lessen*" a few impacts (see Table 3.20-10), it does not *avoid or substantially lessen* one or more significant impacts as required by CEQA, and is not sufficient to cure the Draft EIR/EIS's lack of analysis of alternatives. The Draft EIR/EIS still has no alternative that analyzes CHSR's original proposal to underground tracks - in the City or elsewhere - to reduce significant noise, visual, and land use impacts. It completely ignores alternatives that analyze redesigning or repurposing existing Caltrain tracks or the extra BART tracks, and consolidation of a HSR and Caltrain station inside or on the BART station site. No one needs three separate transit stations at an intermodal center.

1223-2804 Third, the RSP Design Variant is not even presented *as an alternative* that can be adopted by the decision makers. New section 3.20 is not part of Chapter 2 - Alternatives. It does not purport to change or revise Chapter 2. Instead, new section 3.20 was stuck on the end of Chapter 3 - Affected Environment, Environmental Consequences, and Mitigation Measures. It is not clear to the public, nor to the City, whether the RSP Design Variant could even be adopted as an alternative.

Sincerely,



Gina Papan,
Millbrae City Councilmember

Response to Submission 1223 (Gina Papan, City of Millbrae, September 8, 2021)

1223-2800

The comment summarizes previous comments submitted by the City of Millbrae on the Draft EIR/EIS as part of submission FJ-1073. Please refer to the responses to submission FJ-1073, comments 325 through 344, which address the City of Millbrae's previous comments on the Draft EIR/EIS.

The comment also makes general assertions regarding the Revised/Supplemental Draft EIR/EIS, stating that it "contains the same flaws as the Draft EIR/EIS" and "adds a few more." Please refer to the responses to submission FJ-1223, comments 2799 through 2807, which address the commenter's specific comments and concerns on the Revised/Supplemental Draft EIR/EIS.

The comment did not result in any revisions to the Draft EIR/EIS.

1223-2799

The comment repeats a comment submitted by the City of Millbrae on the Draft EIR/EIS as part of submission FJ-1073, asserting that the Draft EIR/EIS did not meet CEQA standards for an informational document. The comment further asserts that neither the Draft EIR/EIS nor the Revised/Supplemental Draft EIR/EIS contains a "straightforward explanation" of impacts within the city of Millbrae or any other city along the project corridor.

Please refer to the response to submission FJ-1073, comment 325, which responds to these concerns expressed regarding the Draft EIR/EIS and also apply to the additional assertions in this new comment regarding the Revised/Supplemental Draft EIR/EIS. The comment did not result in any revisions to the Draft EIR/EIS.

1223-2802

The comment largely repeats a comment submitted by the City of Millbrae on the Draft EIR/EIS as part of submission FJ-1073. The comment asserted that the Draft EIR/EIS document did not meet CEQA standards for an informational document. Please refer to the responses to submission FJ-1073, comments 325 and 327, which respond to these concerns expressed regarding the Draft EIR/EIS and also apply to the additional assertions in this new comment regarding the Revised/Supplemental Draft EIR/EIS. The comment further asserts that neither the Draft EIR/EIS nor the Revised/Supplemental Draft EIR/EIS contains a "succinct summary" of impacts. The Authority disagrees with this assertion. The Draft EIR/EIS Summary provides an overview of the substantive chapters of the main report and includes a table listing the potential environmental impacts for each environmental resource topic. Table 3.20-10 in the Revised/Supplemental Draft EIR/EIS summarizes the differences between the Millbrae Station design evaluated in the Draft EIR/EIS and the RSP Design Variant by environmental topic area. As these documents are intended for the general public, every attempt has been made to limit technical terms, provide the information in a clear and understandable format, and provide summaries of the impacts analysis. The comment did not result in any revisions to the Draft EIR/EIS.

Response to Submission 1223 (Gina Papan, City of Milbrae, September 8, 2021) - Continued

1223-2803

Refer to Standard Response FJ-Response-ALT-1: Alternatives Selection and Evaluation Process, FJ-Response-ALT-2: Millbrae Station Alternatives Considerations.

The comment in part summarizes prior comments submitted by the City of Millbrae on the Draft EIR/EIS as part of submission FJ-1073. Please refer to the response to submission FJ-1073, comment 326, which responds to the City's comments regarding the alternatives analyzed in the Draft EIR/EIS and also responds to the additional assertions in this new comment concerning the Revised/Supplemental Draft EIR/EIS. The Authority acknowledges that the Millbrae Station Design evaluated in the Draft EIR/EIS is the same for both Alternatives A and B and that the impacts would be the same for the Millbrae Station design under both project alternatives. As described in Standard Response FJ-Response-ALT-1: Alternatives Selection and Evaluation Process, Alternatives A and B constitute a reasonable range of alternatives under CEQA and NEPA for this Project. The adequacy of the range of alternatives analyzed for this Project is understood within the context of the legal directives in SB 1029 (2012) and SB 557 (2013), which defined the parameters for the San Francisco to San Jose Project Section and require that the San Francisco to San Jose Project Section operate as a blended system north of Scott Boulevard in Santa Clara.

As described in Standard Response FJ-Response-ALT-2: Millbrae Station Alternatives Considerations, the Authority developed a design variant for the Millbrae Station—the RSP Design Variant—that would eliminate replacement parking and reduce land use conflicts with existing and planned development. This design variant, which was developed in a good faith effort to address concerns expressed by the City of Millbrae regarding the Millbrae Station area, was evaluated in a Revised/Supplemental Draft EIR/EIS circulated for public review and was subsequently incorporated into this Final EIR/EIS.

The Revised/Supplemental Draft EIR/EIS includes two concise summaries of the impact differences associated with the RSP Design Variant. As summarized in Revised/Supplemental Draft EIR/EIS Section 3.20.4, Environmental Impacts of the Millbrae Station Reduced Site Plan Design Variant and Comparison with the Millbrae Station Design, for all but three resource topics, the RSP Design Variant would have similar or lesser impacts relative to the Millbrae Station design examined in the Draft EIR/EIS. Moreover, Revised/Supplemental Draft EIR/EIS Section 3.20.4.20, Impact Summary, includes a topic-by-topic summary table spelling out the comparative degree

1223-2803

of impact between the Millbrae Station design evaluated in the Draft EIR/EIS and the RSP Design Variant. As explained in Standard Response FJ-Response-ALT-2, there are no other reasonable alternatives or design variants with respect to the Millbrae Station.

The comment did not result in any revisions to the Draft EIR/EIS.

1223-2801

The comment suggests that the Draft EIR/EIS is deficient due to the lack of “a single map depicting” all cities along the San Francisco to San Jose Project Section, citing an orientation map (Draft EIR/EIS Figure S-2) that was intended to provide readers with an overview of the 49-mile-long Project Section. The cities and communities called out in that figure were intended to orient the reader; an exhaustive detailing of cities and communities on that map would detract from the purpose of the map to provide an overview of the project corridor. The comment suggests that the City of Millbrae should have been called out on this figure (along with the Town of Atherton), but this additional information is not necessary in light of the purpose of the figure, which is to provide an overview of the project corridor.

Finer-grained maps are available in several locations. Please refer to the Final EIR/EIS Appendix 3.1-A, Parcels within the HSR Project Footprint, which overlays the project footprint over every affected parcel. Please also refer to Volume 3, Preliminary Engineering Plans, which includes engineering drawings of the project alternatives.

Moreover, all relevant technical analyses fully evaluate project impacts within each adjacent city and community along the Project Section. For one example, please refer to the analysis in Draft EIR/EIS Section 3.12, Socioeconomics and Communities, within which Section 3.12.5.1, Communities and Neighborhoods, provides a characterization of every city and community along the project corridor to inform the assessment of project impacts. Please also refer to Figure 3.12-1, which fully depicts the names and limits of such cities and communities. The comment did not result in any revisions to the Draft EIR/EIS.

Response to Submission 1223 (Gina Papan, City of Milbrae, September 8, 2021) - Continued

1223-2805

Please refer to the response to submission FJ-1223, comment 2803, which addresses the consideration of project alternatives and the Authority's evaluation of a design variant for the Millbrae Station that would reduce conflicts with planned development. The RSP Design Variant was developed in a good faith effort to address concerns expressed by the City of Millbrae and other stakeholders on the Draft EIR/EIS regarding the disposition of the Millbrae Station area. Please also refer to Final EIR/EIS Chapter 2, Alternatives, which describes the project alternatives and the RSP Design Variant. As noted there, as well as in the Revised/Supplemental Draft EIR/EIS, the RSP Design Variant could be applicable to either Alternative A or Alternative B in the Millbrae area. The comment did not result in any revisions to the Draft EIR/EIS.

1223-2806

Please refer to the responses to submission FJ-1223, comments 2803 and 2805, which address the consideration of a reasonable range of project alternatives and the Authority's evaluation of a design variant for the Millbrae Station, which could be applicable to either Alternative A or B. The comment did not result in any revisions to the Draft EIR/EIS.

1223-2807

Refer to Standard Response FJ-Response-ALT-2: Millbrae Station Alternatives Considerations.

The standard response referenced above describes the Authority's requirements with respect to the Millbrae Station and specifically addresses several alternative station configurations (including underground tracks, eliminating the HSR bypass track and platform, and removing BART's third track) the Authority considered but did not carry forward for evaluation in this EIR/EIS.

The comment correctly notes that the alternatives evaluation process in CEQA is intended to identify potentially feasible alternatives to the proposed project that substantially lessen or avoid one or more significant impacts while being able to accomplish most basic project objectives.

As noted in Revised/Supplemental Draft EIR/EIS Section 3.20.4, Environmental Impacts of the Millbrae Station Reduced Site Plan Design Variant and Comparison with the Millbrae Station Design, the RSP Design Variant would reduce impacts on existing and planned development in the Millbrae Station area compared to the Millbrae Station design examined in the Draft EIR/EIS, and it would have similar or lesser impacts for most other resource topic areas.

The comment did not result in any revisions to the Draft EIR/EIS.

1223-2804

Please refer to Final EIR/EIS Chapter 2, Alternatives, which describes the project alternatives and the RSP Design Variant. As noted in Final EIR/EIS Chapter 2, as well as in the Revised/Supplemental Draft EIR/EIS, the RSP Design Variant could apply to either Alternative A or Alternative B in the Millbrae area. The RSP Design Variant has been evaluated in this Final EIR/EIS consistent with CEQA and NEPA requirements. The Authority will consider whether to approve Alternative A (the Preferred Alternative) or a different alternative; Alternatives A and B could be selected with or without the RSP Design Variant. The comment did not result in any revisions to the Draft EIR/EIS.