DRAFT

CITY OF MOUNTAIN VIEW

Office of the Mayor and City Council • 500 Castro Street • Post Office Box 7540 • Mountain View, California 94039-7540
650-903-6305 • FAX 650-903-6039

April 23, 2014

Ms. Stacy Cocke—Senior Planner
Peninsula Corridor Joint Powers Board (Caltrain)
1250 San Carlos Avenue—P.O. Box 3006
San Carlos, CA 94070-1306

CITY OF MOUNTAIN VIEW COMMENTS ON THE DRAFT ENVIRONMENTAL IMPACT REPORT (DEIR) FOR THE CALTRAIN PENINSULA CORRIDOR ELECTRIFICATION PROJECT (PCEP)

Dear Ms. Cocke:

The City of Mountain View appreciates the opportunity to share with you its comments and concerns regarding the Draft Environmental Impact Report (DEIR) for the Peninsula Corridor Joint Power Board's (Caltrain's) Peninsula Corridor Electrification Project (PCEP) dated February 28, 2014.

After reviewing the DEIR, the Mountain View City Council is concerned about the potentially significant right-of-way, aesthetic, biological resource, land use, noise, transportation/traffic, and other impacts the PCEP will have on the quality of life in our community.

The City requests that Caltrain carefully consider the comments contained in this letter and continue to work with the City as the environmental review process progresses to ensure that the City's interests are addressed and proper mitigations are included in the Final EIR to be released later this year.

Right-of-Way/Easement Impacts

The DEIR provides only general descriptions of right-of-way impacts to properties along the Caltrain Corridor with little/no specific information regarding which properties will be impacted (and to what extent) in each of the cities along the Caltrain Corridor.

City Comment: Caltrain must identify the specific properties and land uses in Mountain View that may be affected by the PCEP and ensure this information is clearly disclosed in the Final EIR. Further, documentation of Caltrain's notices to

property owners who may be impacted by the PCEP should also be included in the Final EIR.

Aesthetic/Visual Impacts

In Mountain View, there are areas and land uses along the Caltrain Corridor, most notably between Castro Street/Moffett Boulevard and Rengstorff Avenue, that currently benefit from the existing landscaping and trees that provide extensive visual screening from train operations. For these areas in particular, there is heightened sensitivity to the potential for negative visual impacts resulting from the PCEP.

The DEIR (Page 3.1-7) acknowledges that existing rail facilities will continue to dominate the visual environment of the Caltrain Corridor with the electrification project. Consequently, it is incumbent upon Caltrain to minimize potential visual impacts from the PCEP not only in Mountain View, but along the entire Peninsula Corridor. The City of Mountain View prides itself on the landscaping treatments along its transportation corridors and these treatments are a strong part of the image and character of the City. Retaining and improving green space and tree canopy has also been identified as a priority by the City Council.

The City is particularly concerned about the significant visual impact the installation of new 30' to 50' tall poles, electrical equipment, and security fencing/screening for the PCEP will have not just in Mountain View, but the entire length of the Peninsula Corridor. The installation of new power lines will require the removal and/or extensive pruning of hundreds of existing trees along the Peninsula Corridor which will further exacerbate the visual impacts of the new power lines and electrical equipment.

The PCEP will also require modifications to 47 existing roadway/bicycle/pedestrian bridges that cross over Caltrain's alignment, including six overcrossings in Mountain View (Shoreline Boulevard, Stevens Creek Pedestrian Crossing, Whisman Road, State Route 85, State Route 237 westbound, and State Route 237 eastbound) to provide protection for Caltrain's new electrification-related infrastructure.

City Comment: Given the sensitive design environment and the importance of aesthetics/tree canopy to the City, the following additional mitigations to reduce the potential for significant visual impacts in the community should be undertaken by Caltrain and included in the Final EIR:

- ***Provide the City with a visual simulation of the entire Caltrain Corridor in Mountain View for review and comment. The simulation should include the***

anticipated tree removals, new corridor fencing, new security measures at the City's six overcrossings, and side pole system.

- ***Thoroughly evaluate the possibility of designing and building the PCEP with 100 percent center electrical pole placement as a way to mitigate/reduce the significant amount of vegetation in the Caltrain right-of-way that will have to be removed and/or pruned for the installation of new electrification-related infrastructure and equipment.***

- ***Revise Aesthetic mitigation (MM AES-2b) to require Caltrain to work cooperatively with the City on design strategies to reduce the visual impact of the overhead contact system (OCS) equipment to be installed.***

- ***Ensure that any modifications to existing roadway/bicycle/pedestrian overcrossings in Mountain View required for the PCEP match/complement the existing designs rather than utilizing a one-size-fits-all approach for the entire Corridor.***

Biological Resource Impacts

According to the arborist report (Appendix F of the DEIR), the PCEP will require the removal of 284 trees, and the pruning of an additional 292 trees, in Caltrain's existing right-of-way in Mountain View to provide the required 10' clearance on each side of the tracks. This loss of canopy will have significant aesthetic and noise impacts on properties and land uses in Mountain View along Central Expressway and Evelyn Avenue adjacent to the Corridor. Most notably, the DEIR states that all existing trees along the north side of Evelyn Avenue between State Route 85 and Bernardo Avenue will be removed.

The DEIR also acknowledges that tree removal near parks such as Rengstorff Park may be potentially significant. However, the tree assessment in the DEIR does not include adequate graphics for locations of tree removals, especially for sensitive locations in Mountain View, such as Rengstorff Park, where trees serve as a major visual and sound buffer to the railroad. Loss of buffer trees in these locations will more significantly affect noise and aesthetic conditions.

City Comment: Provide more specific details in the Final EIR regarding the scope of the tree removal impacts near Rengstorff Park as well as a more robust analysis of the ability of the proposed mitigations to adequately address those impacts.

City Comment: The Final EIR must more definitively commit Caltrain to working with each community along the Peninsula Corridor to continually assess and adjust its tree removal assumptions in order to preserve as many trees as possible. Specifically, in Mountain View, Caltrain and its contractors must consult with the City's Forestry Division staff throughout the PCEP construction to jointly determine whether trees must be removed or if pruning is a viable option.

City Comment: Revise Mitigation Measure BIO-5, Implement Tree Avoidance, Minimization, and Replacement, to correctly reflect that the City of Mountain View has local ordinance requirements governing tree replacement ratios and specifications and commit Caltrain to abide by the requirements of Chapter 32, Article II (Protection of the Urban Forest) of the City Code and other City requirements for the size and replacement ratio of trees.

Land Use/Recreation Impacts

The DEIR states the PCEP's impact to physically dividing established communities is less than significant. The City strongly disagrees with this conclusion. The existing Caltrain Corridor is already perceived as a barrier to efficient vehicle, bicycle, and pedestrian traffic between neighborhoods and destinations located on each side of the Corridor in Mountain View. Of particular concern is the barrier existing Caltrain tracks create for those wishing to travel to recreational facilities in Rengstorff Park. Further intensification of the use of the rail system will only exacerbate this problem.

The City has commissioned two studies—the Rengstorff Avenue Grade Separation Feasibility Study and a Multimodal Design Concept Study—to explore options to improve connectivity at Caltrain's at-grade crossing at Rengstorff Avenue. A grade-separation project at this location is also included in the County of Santa Clara Expressway Plan. The conceptual design plans and feasibility studies developed could be used as the basis for developing a potential mitigation measure for the PCEP project.

City Comment: A grade-separated rail crossing at Rengstorff Avenue should be thoroughly evaluated as a potential mitigation in the Final EIR.

The DEIR does not accurately reflect predominant land uses adjacent to the Corridor or several nearby private development projects.

City Comment: The FEIR should include revised land use information as well as any updated analyses based on the corrected information.

Noise Impacts

Electric Multiple Units (EMUs) operate at lower decibel levels than diesel trains, but the proposed increase in service frequency as a result of the electrification project will result in more train horn noise at the City's two at-grade crossings (Castro Street/Central Expressway and Rengstorff Avenue/Central Expressway).

The DEIR acknowledges there will be increased noise at specific locations as a result of additional train service, primarily due to horns at at-grade signal crossings. The horns' impact will be most significant at the downtown Mountain View Caltrain Station and nearby residential and commercial land uses.

City Comment: The Final EIR must evaluate how businesses and residences near the downtown Mountain View Caltrain Station will be impacted by train horn noise and if acoustical enhancement renovations to buildings may be able to mitigate the horn noise in buildings in close proximity to train horn noise and at-grade crossings.

The noise analysis and graphics in the discussion portion of the DEIR do not provide clear information regarding the potential noise impacts in Mountain View.

City Comment: Include revised noise analysis and graphics information in the Final EIR to identify the City in which each measurement location and noise levels occur.

Transportation/Traffic Impacts

The DEIR focuses on the traffic impacts at the City's two at-grade railroad crossings (Castro Street/Moffett Boulevard and Rengstorff Avenue) as well as local streets and intersections used to access the downtown area. The DEIR predicts impacts resulting in extensive delay and congestion in these two areas, which can substantially impact Mountain View's gateway to downtown. There are two primary reasons for the traffic impact:

1. An increased number of trains operating in the Corridor (including Baby Bullet service) attracting between 2,000 and 6,000 new passengers per day to the downtown station.

2. A substantial increase in gate downtime.

Castro Street/Moffett Boulevard/Central Expressway Intersection

The City has identified the following potential traffic delay and congestion at the Castro Street/Moffett Boulevard/Central Expressway intersection that may result from the PCEP:

- Impacts to the economic viability of the businesses in the downtown area because of an overall increase in traffic congestion and greater difficulty accessing the downtown area.

- Impacts on the existing downtown transit system, including Transit Center operations and the extensive public and private transit and shuttle systems serving employers throughout the City and South Bay region.

- Impacts to bicycle and pedestrian safety and access associated with the at-grade crossings and to access Caltrain, VTA service, and other transit as well as Moffett Boulevard and Castro Street businesses.

- Potential increase in emergency response time for Fire and Police first responders.

The DEIR's mitigation evaluation for "feasibility" notes that mitigating the impacts at Castro Street grade crossing is infeasible due to the high cost associated with grade-separated crossing. The basic argument is that if all the at-grade crossings were separated, this would create too great an economic hardship on the project. This suggests the severity of the impacts are similar at all crossings along the Corridor. The City strongly disagrees with this assessment. Traffic delay and congestion impacts at this location will negatively impact:

- The extensive VTA and other transit feeder systems serving the Transit Center (the third busiest Caltrain Station on the Peninsula Corridor).

- One of the primary pedestrian/bicycle routes to Mountain View's Downtown Transit Center and access to Caltrain, VTA, and shuttle service.

- The gateway to downtown Mountain View itself.

Therefore, these impacts at the Castro Street grade crossing should be considered to be significantly greater than impacts at other at-grade crossings along the Caltrain Corridor.

City Comment: The City objects to the DEIR's blanket dismissal of grade separating the Castro Street/Moffett Boulevard at-grade railroad crossing as a potential mitigation because of costs. It would be more appropriate for Caltrain to analyze and prioritize the impacted at-grade crossings and review the feasibility of a smaller group of crossings based on their local and regional importance. This analysis may still result in a significant and unavoidable impact, but will be at least a more reasoned and informed analysis, rather than a blanket dismissal of the mitigation as infeasible.

City Comment: Caltrain should continue discussions with the City to explore the potential development of a second Transit Center or other transit facilities on the north side of Central Expressway to mitigate the additional traffic delay and congestion impacts at the Castro Street/Moffett Boulevard/Central Expressway intersection resulting from the PCEP. This could include an evaluation of improved pedestrian and bicycle connections to the existing Caltrain station and downtown via a quality at-grade, subgrade, or overhead crossing of Central Expressway and the railroad.

City Comment: Caltrain should commit to additional joint planning efforts with the City and other transit agencies to identify solutions to further mitigate traffic delay and congestion at and around the Downtown Mountain View Transit Center (e.g., operational improvements).

City Comment: The City does not support the removal of on-street parking on Villa Street as a method to mitigate traffic delay and congestion impacts from the PCEP. Mountain View's downtown is already significantly impacted by Caltrain riders' demand for parking near the station. The situation will only worsen if on-street parking spaces on Villa Street are removed. Additionally, increasing the number of vehicles traveling on Villa Street is contrary to the City's goal of making its downtown safe and walkable. Caltrain should evaluate and include other traffic delay and congestion mitigations in the Final EIR.

Rengstorff Avenue/Central Expressway Intersection

The DEIR also identifies significant and unavoidable impacts at the Rengstorff Avenue/ Central Expressway intersection as a result of the PCEP. However, the City has already prepared the Rengstorff Avenue Grade Separation Feasibility Study and a Multimodal Design Concept Study that could serve as the bases for the evaluation of a grade-separation project at this location. The grade-separation project is also included in the County of Santa Clara Expressway Plan and MTC Regional Transportation Plan.

City Comment: Caltrain should include the City's grade-separation project in the Final EIR as additional mitigation for these significant impacts. Additionally, Caltrain

should commit to additional joint planning efforts with the City to identify future solutions to mitigate potential traffic delay and congestion impacts at Central Expressway and North Rengstorff Avenue and Rengstorff Avenue and California Street that will result from the PCEP.

Cumulative Impacts

The DEIR includes an evaluation of a blended Caltrain and high-speed rail (HSR) system under cumulative analysis. While a blended approach meets the goals of Caltrain and HSR, the DEIR also includes a summary of proposed blended system improvements, including one of five passing track alternatives. The South 4 Track (Mountain View to Santa Clara) identifies the need for a third passing track in Mountain View (Page 4-53). The City has previously stated its opposition to any passing track within Mountain View. No overtake tracks should be constructed in the rail segment between the San Antonio and Lawrence Caltrain Stations.

City Comment: The City once again reiterates its opposition to passing tracks in Mountain View. These concerns have been previously articulated in the City's 2030 General Plan update, the rail grade-separation policy adopted by the City Council in May 2012, and in past communications with Caltrain, CHSRA, and regional transportation agencies.

Alternatives

Mountain View's Caltrain Station has several special characteristics that make it unique among the stations along the Peninsula Rail Corridor and deserving of additional consideration as potential PCEP mitigation measures are evaluated:

- The Mountain View Caltrain Station is the third most used station along the Corridor.

- The Mountain View Caltrain Station is a part of a very successful multimodal transit facility providing connections to VTA light rail and bus service and an extensive shuttle system serving many of Silicon Valley's largest employers.

- The Mountain View Caltrain Station is located in the heart of Mountain View's vibrant downtown and close to highly desirable residential neighborhoods.

These attributes make the Mountain View Caltrain Station unique and particularly sensitive to the impacts identified in the DEIR; thus, extensive mitigation of these impacts should be more closely considered. The DEIR's mitigation evaluation for

"feasibility" suggests that cost of mitigating the impacts at the Castro Street grade crossing is infeasible because of the projected costs associated with grade-separated crossing.

As explained above, the DEIR assumes the impacts are similar at all crossings along the Caltrain Corridor. However, the impacts to Mountain View's extensive feeder systems, downtown, and major bicycle/pedestrian access to Caltrain and VTA light rail stations, downtown, and regional employment areas are much greater than other locations.

City Comment: In preparing the FEIR, Caltrain should acknowledge that the location of the Mountain View Caltrain Station makes it unique and particularly sensitive to the impacts identified in the DEIR. Consequently, Caltrain should review the feasibility of alternatives to grade separate the highly impacted at-grade crossing at Castro Street/Moffett Boulevard in the Final EIR.

Additional DEIR Comments

Community Connectivity and Linkages

City Comment: The environmental review, engineering/urban design, construction, and operation of an electrified Caltrain Corridor must be sensitive to and support the goal of improving City-wide linkages and community connectivity. Specifically:

- ***PCEP infrastructure and operations should not divide the community visually or with physical barriers.***

- ***Vehicular, pedestrian, and bicycle traffic across the rail line should not be disrupted; rather the PCEP should provide enhancements and encourage improved connectivity across the rail tracks for all modes of transportation.***

Level Boarding and Platform Extension

The DEIR does not evaluate the options of level boarding or extending the platform length to run longer trains to add capacity. Level boarding allows passengers to get on and off the train from the platform without stepping up or down. Examples of level boarding benefits include safety enhancements, operating efficiencies, and passenger convenience.

City Comment: Caltrain should include opportunities for level boarding and platform extensions in the Final EIR as alternatives to improve efficiency and service to all

users, especially users with disabilities, the elderly, and passengers with bicycles, strollers, and/or luggage.

Service and Ridership

Mountain View supports the increase in service (greater peak period frequencies) and the resulting projected increase in ridership. These increases will benefit the City's plans for accommodating employment growth. However, the City is concerned that additional measures will be needed to support these service and ridership increases and to provide adequate connections and facilities to get riders to and from the stations.

City Comment: Caltrain should begin planning for the introduction of longer trains as soon as possible and support City efforts to increase Caltrain commute shuttles and improve bicycle facilities.

Parking

The DEIR identified a parking demand that exceeds the available parking capacity. The City is concerned that there will be an increase in overflow parking (already occurring) into adjacent neighborhoods, requiring new City programs to properly manage.

City Comment: Caltrain should commit to additional joint planning efforts with the City and other transit agencies operating at the Downtown Transit Center to identify solutions to mitigate parking impacts.

Station-Related Improvements

The DEIR acknowledges the impact the PCEP will have on bicycle facilities; however, the proposed mitigation provides no specifics. The City is developing plans for improved bicycle facilities that connect to both Caltrain stations in the City and that will benefit Caltrain riders.

City Comment: Caltrain should identify specific PCEP-required bicycle facility improvements and commit to their implementation in the Final EIR.

City Comment: Caltrain should fully analyze the need for platform widening and other station-related improvements as a part of the Final EIR and identify what improvements will be implemented as mitigation measures.

More detailed discussion of the questions and concerns that served as the basis for the City's comments described above are described in Enclosure 1.

The City is submitting the above comments to ensure the CEQA review process for the Caltrain Peninsula Corridor Electrification Project is conducted thoroughly with all potential environmental impacts, and benefits, within Mountain View fully and accurately analyzed and disclosed.

The City of Mountain View appreciates the opportunity to comment on the proposed PCEP and future plans for blending the electrified Caltrain service with California's State-wide high-speed rail service.

Please continue to work with Councilmember Ronit Bryant, the City's representative to the CalMod Program Local Policymaker Group, and City staff to coordinate future City participation and input into the Final EIR documents as they are being prepared.

Sincerely,

Christopher R. Clark
Mayor

CRC/HK/3/PWK
001-04-08-14L-E

Enclosure: 1. Detailed Comments—Draft Environmental Impact Report

	City of Mountain View Comments – Peninsula Corridor Electrification Project Draft EIR	Page	Topic
1.	The DEIR is very general in its description of a project that affects multiple cities and agencies and their existing facilities that cross Caltrain Corridor. More information is needed to describe mitigations to protect these facilities during construction. More information is also needed to describe work outside the right-of-way (ROW) and utility relocations. More description regarding the design and installation of Caltrain structures is needed to ensure the preservation of existing City facilities.		General
2.	Table 2-6: In addition to City permanent encroachment permits, excavation permits will also be required during the construction of the PCEP. City Permit conditions will include specific utility relocation work parameters, videotape inspection of gravity mains, etc.	Chapter 2.5	Permits
3.	The Final EIR should provide an exhibit detailing the existing ROW along with the proposed ROW in the City for staff review and comment. Depending on the size of the required ROW, the JPB may need to obtain an easement from the City to maintain their infrastructure in the future HSR/Caltrain Corridor.	Chapter 2.5	Right-of-Way
4.	The DEIR notes approximately 1.4 acres in commercial/industrial areas of ROW would be needed to support two new electrical substations. Additionally, up to 18 acres of residential, commercial, and parkland would be needed for overhead contact system (OCS) poles. The DEIR describes general ROW impacts to properties within the project area and notes some are located within Mountain View. The City needs additional information to identify the specific properties and uses in Mountain View that may be affected by the PCEP and have them clearly disclosed in the Final EIR, including notices to the individual property owners impacted before the FEIR is released.	Chapter 2.5	Right-of-Way
5.	The Arborist Report indicates 284 trees need to be removed and 292 pruned in Mountain View to provide 10' clearance on each side of tracks; similar clearances required for VTA light rail line. This loss of canopy will cause significant aesthetic impacts along Central Expressway and Evelyn Avenue. All trees along the north side of Evelyn Avenue, Highway 85 to Bernardo Avenue, are to be removed. It is not clear if tree pruning can be done instead of tree removal to provide the required clearances. Pruning in lieu of removal will help to maintain aesthetics along the roadway by providing canopy and screening. The VTA prunes and maintains trees along the light rail. The canopies of the camphor trees along north side of Evelyn Avenue from Castro Street to Shoreline Boulevard will be impacted. Due to the significant tree impacts discussed above, Caltrain must involve the City Forestry Division staff during design and construction to help assess whether trees actually have to be removed or if pruning is a viable option.	Chapter 3.3 Appendix F	Tree Inventory and Canopy

	City of Mountain View Comments – Peninsula Corridor Electrification Project Draft EIR	Page	Topic
6.	The DEIR notes tree removal near parks such as Rengstorff Park may be potentially significant. The tree assessment in the DEIR does not include adequate graphics for locations of tree removals, especially for sensitive locations in Mountain View, such as Rengstorff Park, where trees serve as the major sound and visual buffer to the railroad. Loss of buffer trees in these locations would significantly affect noise and aesthetic conditions. More specific details regarding the impacted trees are required to properly evaluate the scope of the impacts and ability of proposed mitigations to address those impacts.	Chapter 3.3 Appendix F	Tree Inventory and Canopy
7.	The City Council and General Plan support increasing tree canopy in the City, and proposed tree removals are a concern. The tree removals would also be expected to compound visual impacts and potential noise conditions. The City supports the DEIR language to adjust plans to preserve trees where feasible, and would recommend additional language to target tree replacements in areas where there are significant community gathering spaces with views of the Caltrain Corridor, existing gaps in landscape screening, as well as locations where landscaping will be affected by the project.	Chapter 3.3 Appendix F	Tree Inventory and Canopy
8.	The proposed MM BIO-5 does not accurately reflect the City of Mountain View's replacement requirements. On private property, the Mountain View Zoning Ordinance specifies Heritage trees be replaced with minimum 24" and/or 36" trees. The final sizing and replacement ratio is evaluated on a case-by-case basis, based on analysis of the size of trees to be removed and available for replacement plantings. Typical replacement ratios range from 1:1 up to 3:1. The mitigation measure should be corrected to identify Mountain View as a city where specific replacement ratios, specifications, and guidance are provided.	Chapter 3.3 MM BIO-5	Tree Inventory and Canopy
9.	In Mountain View, much of the length of the Corridor is adjacent to residential land uses and/or includes the City's vibrant, historic downtown. For these areas in particular, there is heightened sensitivity for visual impacts. The DEIR notes (Page 3.1-7) that existing rail facilities continue to dominate the visual environment of the Corridor. As a result, it is important to try to minimize impacts from additional infrastructure as transit service is improved. Given the sensitive design environment, Caltrain should consider revising MM AES-2b to address more visual impacts by specifically requiring measures for Caltrain to work with cities on design strategies and funding options to reduce the amount of OCS equipment to be installed. This would be similar to the analysis conducted for protecting historic resources along the Corridor. These types of measures should be done before resorting to other aesthetic treatments and screening options. This revision is supported by the Alternatives discussion, where undergrounding other utilities, integrating wires into support poles, and center pole construction are identified as potential aesthetic mitigations. Despite this discussion, the measures are not included in MM AES-2b.	Chapter 3.1	Aesthetics

	City of Mountain View Comments— Peninsula Corridor Electrification Project Draft EIR	Page	Topic
10.	There are no graphics showing the specific locations and extent of OCS and electrical safety zone (ESZ). Similar to Figure 3.1-11, Simulation 9: San Antonio Caltrain Station (Mountain View), Caltrain should provide simulations of OCS and ESZ at the Downtown Mountain View Caltrain Station and entire Corridor within the City for review and comment.	Chapter 3.1	Aesthetics (Mountain View Station)
11.	Like Figure 3.1-18, Simulation 17: Overbridge Protection Barrier—provide simulations for all other overhead protection barrier options being considered for City review and comment. These additional barrier constructions may have a significant impact to the existing visual quality. As mitigation to the potential significant aesthetic impacts, the City requests these barriers be designed to match/complement the design of other bike/pedestrian bridge designs in Mountain View, rather than utilizing a one-size-fits-all approach for the entire Corridor.	Chapter 3.1	Aesthetics (overbridge protection barrier)
12.	Stormwater treatment requirements are described in Section 3.9.1.1, but not in Section 3.9.2.3, which is "Impacts and Mitigation." Section 3.9.2.3 needs to be revised/updated.	Chapter 3.9	Hydrology & Water Quality
13.	The Land Use and Recreation analysis and related Appendix H are missing several Mountain View Precise Plans that are adjacent to the Caltrain Corridor and must be added to the Final EIR, including: P(7)—Mayfield Mall Precise Plan; P(8)—San Antonio Station Precise Plan; P(17)—Villa-Mariposa Precise Plan; P(29)—111 Ferry-Morse Way Precise Plan; P(30)—Sylvan-Dale Precise Plan; P(31)—Mora-Ortega Precise Plan; and P(35)—Whisman Station Precise Plan.	Chapter 3.10 Appendix H	Land Use
14.	In Mountain View, the predominant land uses adjacent to the Corridor are residential and office. The discussion (3.10-4) and Table 3.10-1 do not accurately reflect these predominant conditions. The City recommends the following revisions and any appurtenant analysis updates: • San Antonio Station to Mountain View Station: — East—residential, office (added) (deleted industrial and mixed-use). — West—residential, office (added), parks/open space (deleted commercial and industrial). • Mountain View Station to South Mountain View border: — East—residential, industrial/office (added). — West—residential (added), industrial/office (added), commercial.	Chapter 3.10 Appendix H	Land Use

	City of Mountain View Comments – Peninsula Corridor Electrification Project Draft EIR	Page	Topic
15.	The following City development projects are missing on Page 4-42 and should be added to Final EIR: • 405 San Antonio Road: Mixed-use project with approximately 400,000 square feet of office space, approximately 120,000 square feet of retail/commercial/restaurant space, a 167-room hotel with conference facilities, and an approximately 70,000 square foot cinema/movie theater. • 100 Mayfield Avenue: Reoccupancy of approximately 520,000 square feet of office space. • 400 San Antonio Road: 373-unit residential apartment project with ground-floor retail/commercial.	Chapter 4.1 Appendix H	Cumulative Impacts Land Use
16.	In addition to the above-listed development projects and 370 residential units recently completed in the San Antonio Precise Plan Area (Phase I of the 405 San Antonio project), the San Antonio Precise Plan is analyzing cumulative growth in the Precise Plan area comprised of: • 300,000 net new square feet of retail/services/entertainment • 530,000 net new square feet of office/R&D • 820 net new residential units Total (2030) development within the Precise Plan area, including projected growth and existing development is expected to result in: • 1,300,000 square feet of retail/services/entertainment • 1,080,000 square feet of office/R&D • 1,650 residential units • Up to 170 lodging rooms The Plan area is a subset of the broader San Antonio neighborhood, and the above-listed totals do not include significant existing residential units in the area.	Chapter 4.1 Appendix H	Cumulative Impacts Land Use
17.	The noise analysis and graphics in the discussion portion of the DEIR do not provide clear impact information for Mountain View. At minimum, the table should be revised to identify the City in which each measurement location and noise levels occur.	Chapter 3.11 Appendix C	Noise
18.	It appears that the existing noise measurements used for Mountain View date back to 2009-10. These measurements are out of date given the current level of economic activity and extent of new development in Mountain View since 2009. Per the updated noise measurements for Palo Alto (2013), noise conditions in Mountain View are anticipated to be louder than the baseline established in 2009-10 and, therefore, the potential greater-than-moderate noise impact could occur due to the project and potential mitigation may be needed. Caltrain must include updated noise evaluations in the FEIR for City staff to review and comment.	Chapter 3.11 Appendix C	Noise

	City of Mountain View Comments – Peninsula Corridor Electrification Project Draft EIR	Page	Topic
19.	The DEIR notes there will be increased noise at specific locations due to a cumulative additional train service, primarily due to horns at at-grade signal crossings. The horns' impact will be substantial at the downtown Mountain View Caltrain Station area and on businesses. The impacts on restaurants and food service establishments with outdoor facilities could be greater as they are more sensitive than other business types. The City requests evaluating how downtown businesses may be impacted and whether acoustical-enhanced renovations of buildings may mitigate the horn noise in buildings in close proximity to train horn noise and at-grade crossings.	Chapter 3.11 Appendix C	Noise
20.	Utility crossings identified in the DEIR do not include the City of Los Altos sewer trunk main crossing and parallel piping, SCVWD creeks and flood control structures, and SFPUC Hetch Hetchy large-diameter water main crossings. These other agency facilities are integral to the City of Mountain View utility operations and should be included in the FEIR.	Chapter 3.13	Public Services & Utilities
21.	The City has other facilities located adjacent to Caltrain ROW not mentioned in the narrative. Evelyn Avenue abuts the project frontage and has multiple utility mains within the street and sidewalk areas. City's Potable Well No. 19 abuts the project and there is need for periodic crane operations to pull pump casings and submersible pumps. Caltrain needs to provide location information regarding foundations, overhead catenaries, etc., to ensure that the project will not interfere with City well operations.	Chapter 3.13	Public Services & Utilities
22.	There are multiple City utility crossings of the Corridor. The DEIR fails to address mitigation measures to protect existing facilities, opportunities for upgrades, and utility relocation coordination. These must be addressed in the FEIR.	Chapter 3.13	Public Services & Utilities
23.	If the project will include any regrading and/or additional stormwater or sanitary flows that will be discharged into the City's system, a hydraulic capacity analysis must be completed.	Chapter 3.13	Public Services & Utilities
24.	What is the expected increase in water service, sewer, and stormwater disposal?	Chapter 3.13	Public Services & Utilities
25.	It is unclear from the DEIR where and how the ESZ may affect City utilities. Caltrain needs to provide detailed maps to assess the impacts of project construction on City utilities. It is also unclear if any utilities will need to be relocated as a result of the ESZ. The scheduling of any required relocation will be seasonally dependent. Stormwater relocations are typically constructed during dry periods. Water main relocations are water demand-driven based on season or time of day for shutdowns. Sewer water relocations are generation-driven based on season or time of day for shutdowns. The City will need to review and comment on mitigations once detailed plans are provided.	Chapter 3.13	Public Services & Utilities

	City of Mountain View Comments— Peninsula Corridor Electrification Project Draft EIR	Page	Topic
26.	Water mains crossing the ROW are 16" (8' deleted) diameter transmission main. Water mains are parallel to ROW, Central Expressway and Evelyn Avenue (Stevens Creek Freeway deleted). Storm drains and sanitary sewers are parallel to ROW, Central Expressway "and Evelyn Avenue" (added). The FEIR needs to reflect these corrections.	Chapter 3.13 Table 3.13-2	Public Services & Utilities
27.	Transportation Analysis Table 2-18: Existing Intersection Delay and Level of Service (LOS) (2013)—Identify LOS for the intersection of Central Expressway and North Rengstorff Avenue, and Central Expressway and Moffett Boulevard as LOS F. Traffic signals at these two intersections were modified recently as part of the Caltrain Signal Preemption Improvement Project (12-PCJPB-C-036). The new signals became operational on the first week of January 2014. Caltrain needs to verify that the Existing Condition Table (Table 2-18, Page 83) reflects the new signal phasing, signal timing, and lane geometry. The Existing Condition Table must be revised if the new signal arrangements have not been considered.	Appendix D	Traffic
28.	Transportation Analysis Table 3-23: 2020 Project scenario identifies significant impacts at the intersections of Central Expressway/North Rengstorff Avenue and Central Expressway/Moffett Boulevard. Table 3-25 further explains that no feasible mitigations exist for impacts at these two intersections. Although the DEIR acknowledges grade separation could be mitigation, it declares the mitigations as costly and infeasible. The City disagrees with the DEIR's dismissal of grade separation as a mitigation for this location. The City has already prepared Rengstorff Avenue Grade Separation Feasibility Study and a Multimodal Design Concept Study. The grade-separation project at this location is also included in the County of Santa Clara Expressway Plan. Therefore, the City requests this grade separation project be included as additional mitigations for these significant impacts. The delay and traffic congestion as a result of PCEP on Castro Street (downtown Mountain View) has far-reaching consequences beyond traffic congestion and delays including: • Impacts to economic viability of businesses in the downtown area, loss of on-street parking, and greater difficulty accessing the downtown area. • Impact of congestion and delay on the existing downtown transit system, including Transit Center functions and extensive public and private transit and shuttle systems. • Impacts to bicycle and pedestrian safety and access associated with the at-grade crossings and access to Caltrain, VTA trains, and other transit, as well as Moffett Boulevard and Castro Street businesses.	Appendix D	Traffic

	City of Mountain View Comments – Peninsula Corridor Electrification Project Draft EIR	Page	Topic
	• Potential increase in emergency response time for Fire and Police first responders. Therefore, the Final DEIR must include a grade-separation alternative in the FEIR.		
29.	Transportation Analysis Table 3-26: 2040 Project Scenario identifies significant impact at the following intersections: • Central Expressway at North Rengstorff Avenue • Central Expressway at Moffett Boulevard and Castro Street • Rengstorff Avenue and California Street • Castro Street and Villa Street The DEIR specifies the impacts at Central Expressway/Rengstorff Avenue, Central Expressway/Castro Street, and Rengstorff Avenue/ California Street are significant and unavoidable. As mentioned in previous comment, the City disagrees with the conclusions and requests further exploration of mitigating theses significant impacts by including grade separations as additional mitigations for these significant impacts.	Appendix D	Traffic
30.	The DEIR specifies mitigation at the intersection of Castro Street/Villa Street by removing parking on Villa Street to add an additional travel lane. The City does not support the removal of on-street parking as a mitigation for traffic delay and congestion.	Appendix D	Traffic
31.	The DEIR includes an evaluation of a blended Caltrain and HSR system under cumulative analysis. While the blended approach meets the goals of Caltrain and HSR, the DEIR also includes a summary of proposed blended-system improvements, including one of five passing track alternatives. The South 4 Track (Mountain View to Santa Clara) identifies the need for a third passing track in Mountain View (Page 4-53). The City is opposed to any passing track. No overtake tracks should be constructed in the rail segment between the San Antonio and Lawrence Caltrain Stations. The City reiterates to Caltrain that these concerns have been articulated in the City General Plan update, City's rail grade-separation policy, and past communications with Caltrain, CHSRA, and regional transportation agencies.	Chapter 4.1	Cumulative Impacts

	City of Mountain View Comments – Peninsula Corridor Electrification Project Draft EIR	Page	Topic
32.	Because of the unique nature of the Mountain View Caltrain Station/ Transit Center area, the City believes this single location should be considered as unique and particularly sensitive to the impacts identified in the DEIR; thus, extensive mitigation of these impacts should be more closely considered. The DEIR's mitigation evaluation for "feasibility" suggests that costs of mitigating the impacts at Castro Street grade crossing is infeasible due to the project cost associated with grade-separated crossing. The DEIR assumes the impacts are similar at all crossings along the Caltrain Corridor. However, the impacts to Mountain View's extensive feeder systems, downtown and major bicycle/pedestrian access to Caltrain and VTA light rail stations, and downtown and regional employment areas are much greater than other locations. Grade crossing and associated congestions are much greater than other locations. It is, therefore, reasonable to request Caltrain review the feasibility of alternatives to grade separate this highly impacted at-grade crossing in the Final EIR.	Chapter 5	Alternatives
33.	The DEIR does not evaluate the options of level boarding or extending the platform length to run longer trains to add capacity. Level boarding allows passengers to get on and off the train from the platform without stepping up or down. Examples of level boarding benefits include safety enhancements, operating efficiencies, and passenger convenience. The City requests Caltrain to include in the Final EIR opportunities for level boarding and platform extensions as alternatives to improve efficiency and service to all users especially users with disabilities, elderly, and those with bikes, strollers, and luggage.	Chapter 5	Alternatives