

July 10, 2006

Ken Strelo
City of Pittsburg Planning Department
65 Civic Avenue
Pittsburg, CA 94565

Subject: Draft EIR for the Trans Bay Cable Project

Dear Mr. Strelo:

Thank you for the opportunity to comment on this important project. The Bay Trail Project is a nonprofit organization administered by the Association of Bay Area Governments (ABAG) that plans, promotes and advocates for the implementation of a continuous 500-mile bicycling and hiking path around San Francisco Bay. When complete, the trail will pass through 47 cities, all nine Bay Area counties, and cross seven toll bridges. To date, slightly more than half the length of the Bay Trail alignment has been developed.

San Francisco Bay Plan and San Francisco Bay Trail Plan

The proposed project has the potential to impact the Bay Trail alignment on the shoreline at the Port of San Francisco’s Warm Water Cove Park. While the current alignment of the Bay Trail in this area is along Illinois Street, as referenced in the DEIR when discussing the San Francisco Bay Plan (Section 4.8.2.3.6—Land Use and Recreation) the “San Francisco Bay Trail sections should be located near the shoreline unless that alignment would have significant effects on Bay resources; in this case, an alignment as near to the shore as possible should be provided consistent with Bay resource protection”. This is also a central point of the San Francisco Bay Trail Plan which states as its first policy that the goal of the Bay Trail program is “to develop a continuous trail which...is *situated as close as feasible to the shoreline...*” (emphasis added—“*The Bay Trail—Planning for a Recreational Ring Around San Francisco Bay*”, July 1989). The Final EIR should discuss the proposed project in the context of the Bay Trail Plan and its Policies.

20-1

Mayor’s “Blue Greenway” Task Force

A significant investment of time, energy and money has recently been allocated to the “Blue Greenway”—a coordinated citywide effort to complete San Francisco’s Bay Trail from AT&T Park south to the County line in the near

term, and to plan in the long-term for the realignment of the Bay Trail to the water's edge on the central and southern waterfront. Gavin Newsom appointed a Mayor's Task Force comprised of a wide array of community groups, stakeholders, and agency representatives to achieve this goal. This ambitious plan can only be achieved by securing public access to the shoreline whenever the opportunity arises on San Francisco's waterfront. It is our hope that this project will help further the Mayor, the City, and the Bay Trail Project's goals for shoreline public access.

Proposed Mitigation Measures

While the document seems to recognize that public access to the shoreline is an important—and likely required—amenity, the DEIR states that the use of the site as a converter facility precludes the development of public access amenities due to the facility's industrial nature and public safety concerns. The proposed mitigation measure for this potentially significant impact is to "obtain any necessary permits from applicable agencies, including BCDC, and meet requisite conditions of approval including any conditions to provide Bay access in the vicinity of the Project site" (Section 4.8, Land Use and Recreation).

20-1

While BCDC may in fact require public access on the project site or in the immediate vicinity, it is not appropriate to rely on a future permit negotiation as a mitigation measure in an environmental review document. The purpose of the California Environmental Quality Act is to disclose to the public the significant impacts a project may impose, and offer specific mitigation measures to address the impacts. The DEIR identifies the proposed project as being in "potential conflict with public access improvements"—a potentially significant impact. It is not possible for interested parties to effectively comment on the appropriateness of proposed mitigation measures if they are not clearly stated in the document. Please include specific plans for public access to the shoreline in the Final EIR.

Integration of the Bay Trail Into the Project Description

It is our understanding that fencing associated with security and public safety concerns will surround the site, thereby blocking any potential future public access. It is essential that a waterfront trail alignment connecting to existing shoreline access at Warm Water Cove Park be included as an integral part of the proposed project. Regarding safety and security concerns, an existing 8-10 foot-wide Bay Trail segment is located bayward of PG & E's Hunter's Point Power Plant connecting Heron's Head Park and India Basin Shoreline Park. The path is separated from the generating facility by a 10-12 foot cyclone fence, and was in use while the power plant was in operation. In addition, a segment of Bay Trail in Palo Alto is similarly located adjacent to a PG & E substation, and a pathway in Pinole directly borders a functioning water treatment plant. We believe that it is entirely feasible for a similar arrangement to be employed at any one of the three alternative sites chosen

for the converter station. Please include a detailed description, including graphics, of such a layout in the Final EIR.

If you have any questions, or if I can be of any assistance, please do not hesitate to contact me at (510) 464-7909, or by e-mail at maureeng@abag.ca.gov.

20-1

Sincerely,

Maureen Gaffney

Cc: Marshall Foster, Mayor's Office of City Greening
David Beaupre, Port of San Francisco
Jamie Michaels, SF Bay Conservation and Development Commission
Jeff Condit, San Francisco Neighborhood Parks Council