



December 8, 2020

Department of Planning, Building, and Code Enforcement
200 E. Santa Clara Street, T-3
San José, CA 95113

Attn: Shannon Hill

By Email: shannon.hill@sanjoseca.gov

Subject: Draft Environmental Impact Report (DEIR) for the Downtown West Mixed-Use Plan (Google Project); File Nos GP 19-009, PDC19-039, and PD19-029

Dear Ms. Hill,

Thank you for the opportunity to provide comments on the DEIR for the Downtown West Mixed-Use Plan located in the City of San José. The Santa Clara Valley Transportation Authority (VTA) is excited about the opportunity that this project represents for San José and the growth for transit ridership it will bring to the Diridon area from new Bay Area Rapid Transit (BART) service, new High-Speed Rail (HSR) service, and additional Caltrain, Altamont Corridor Express (ACE), and Capitol Corridor service coming to Diridon Station. Combined with light rail and the multiple bus routes already provided, Diridon Station will support more high-capacity transit connections than any other place west of the Mississippi River. It is the goal of all our agencies to develop a world-class center of transit and public life that provides smooth connections between modes and integration with the surrounding neighborhoods. We are pleased to see Google work with all public agency partners to support that vision.

We are supportive of the overall efforts of Downtown West to promote non-vehicle transit modes, including bicycles and pedestrians, within the station area as primary access modes to transit. VTA looks forward to remaining involved in the considerations and decisions being made for non-vehicle modes to provide the greatest benefit to the traveling public within the Diridon Station area. VTA has reviewed the DEIR and would like to highlight three key topics in this cover letter.

Public Service Lanes

VTA applauds the City's efforts to make San José and especially the downtown area a transit-rich community. This is evident through the applicant's funding of a Public Service Lane Feasibility Study for Santa Clara Street, in which public service lanes are defined as travel lanes to be used by public transit and emergency vehicles only. VTA recommends that the funding for the study be put into the earliest phase of the community benefits package and that the Development Agreement memorialize the Public Service Lanes Feasibility Study as an early deliverable. VTA believes that the implementation of this project is critical to the success of the Downtown West area and would like it implemented as soon as possible. Completing the study early provides the City and VTA time and opportunity to identify a larger variety of funding sources including developer contributions and grants such as the Affordable Housing and Sustainable Communities (AHSC) grant funding in association with the Affordable Housing Implementation Policy. VTA looks forward to working with the City through this process.

VTA accepts the invitation from City of San José to lead the feasibility study for public service lanes along Santa Clara Street with San José serving as an equal partner. From the City's perspective, this partnership could include coordinating with other interested parties; equally writing the RFP, selecting consultant(s), and deciding the final design; presenting at public meetings, and serving as co-author for the final report, among others.

Congestion Management Program Consistency

The DEIR identifies one Congestion Management Program (CMP) facility (First Street/Alma Avenue) that would be impacted by this development. The California Congestion Management Program (CMP) statute requires Member Agencies to prepare a Multimodal Improvement Plan (MIP) for CMP facilities that exceed the CMP traffic Level of Service (LOS) Standard. MIPs must include a set of improvements, programs, and actions that measurably improve multimodal performance and contribute to a significant improvement in air quality around the CMP facility as a way of offsetting the LOS vehicular impact. As such, the City will be required to develop an MIP for the First Street/Alma Avenue CMP facility. VTA looks forward to working with City staff to identify the multimodal improvements that will address the CMP impacts so that new development can begin to contribute to those projects.

DISC Integration

The Diridon Integrated Station Concept (DISC) Program is a joint effort of the City of San José, the Peninsula Corridor Joint Powers Board (PCJPB, also known as Caltrain), VTA, the California High-Speed Rail Authority (CHSRA), and the Metropolitan Transportation Commission (MTC) (the "Partner Agencies") to redesign the Diridon Station area. The redevelopment of Diridon Station is an ongoing, long-term project that will take many years to plan, design, and build and the Partner Agencies will work together with the Downtown West team over many years throughout the process.

In 2020, the Boards and Councils of the Partner Agencies accepted the Concept Layout for the Station that reflects the guiding principles of maintaining the track approaches generally within the northern and southern rail corridor, advancing an elevated station concept, and designing for one station concourse near Santa Clara Street and one station concourse near San Fernando Street. The Partner Agencies envision a highly-visible main entrance, iconic station hall, and active public space in front of the station. To achieve this, the Concept Layout envisioned that Cahill Street will be open to only bicycle and pedestrian traffic between Santa Clara and San Fernando Streets. While Appendix M, Page 263, mentions Cahill Street has been identified by the DISC project as a potential pedestrian only transit plaza, the First Amendment to the DEIR should update the circulation and transportation analysis to reflect how Cahill Street will be closed to vehicle traffic. Cahill Street is also designated as a "local connector" in the design guidelines and VTA recommends that that be changed to a more appropriate designation.

The Project Description states that "the preferred Concept Layout is still preliminary" and "no dedicated funding is currently in place to construct the improvements." (Page 2-11). As stated above, the Partner Agencies mutually accepted the Concept Layout in 2020 and \$100 million of dedicated funding is included in Regional Measure 3. The First Amendment of the DEIR should be updated to reflect this.

Thank you again for the opportunity to review this DEIR. VTA looks forward to our continued collaboration with the DISC partners and Google in the review of the DEIR to ensure a “transit first” perspective for circulation and land use decisions. Please see the attached technical memo that provides additional comments on the Downtown West project DEIR on the following topics in addition to the three key topics described above:

- Conformance Review Process
- DISC Partners
- DISC Rail Alignment
- Pedestrian and Bicycle Accommodations
- Transit Services
- Utilidor and Infrastructure Analysis
- Street Network: Use of Dynamic Lanes and Prohibited Curb Cuts
- Transportation Demand Management/Trip Reduction Strategies
- Santa Clara Street Cross Section
- Land Use
- VTA's BART Silicon Valley Phase II Extension Project
- At-Grade Railroad Crossings

If you have any questions, please contact our planning lead for this effort, Lola Torney at 408-321-5830/lola.torney@vta.org, or me at 408-321-7093/deborah.dagang@vta.org.

Sincerely,



Deborah Dagang
Chief Planning & Programming Officer

MEMORANDUM

TO: Shannon Hill, Department of Planning, Building, and Code Enforcement, City of San José

FROM: Lola Torney, Department of Planning and Programming, VTA

DATE: December 8, 2020

SUBJECT: Additional Comments on Draft Environmental Impact Report (DEIR) for the Downtown West Mixed-Use Plan

Conformance Review Process

As a land use-transportation integration partner, VTA engages in the review of public and private developments that are adjacent to transit to facilitate coordination, synergy, and an overall successful transit-supportive/oriented environment. This enables both VTA and the City to meet shared goals for city livability, support for transit and multimodal transportation, reduction vehicles miles traveled and greenhouse gas emissions, safer travel, and increase physical activity and public health as outlined in the City's General Plan (*Envision 2040*) and the *Diridon Station Area Plan* (DSAP), both of which are currently being updated. VTA's comments on the draft DSAP update are forthcoming and VTA looks forward to ongoing partnership and review of future conformance plans to assist the City's review.

The Downtown West Design Standards and Guidelines (DWDSG) describes the conformance review process for future Horizontal Improvements, Final Mapping, and Improvement Plans (Page 17). VTA looks forward to participating in the conformance review process at the earliest stage possible to facilitate sustainable development and protect transit investments.

DISC Partners

BART should be removed from the list of DISC Partner Agencies. VTA is the representative of VTA's BART Silicon Valley Extension project, in collaboration with the BART organization, in the DISC effort. (Page 3-12). Additionally, the Metropolitan Transportation Commission (MTC) joined the DISC partnership in 2020. VTA recommends that the Downtown West documents be updated to describe the partnership correctly throughout.

DISC Rail Alignment

While the development application for Downtown West, submitted in October 2019, accounted for space for the DISC rail alignment (represented by the hatching and notes included on *Figure 2.09 Illustrative Framework* of the development application¹), VTA notes that *Figure 2.2: Downtown West Mixed-Use Plan* in the DWDSG does not similarly account for space needed for DISC rail alignment.

¹ <https://www.sanJoseca.gov/home/showpublisheddocument?id=43691> (Accessed December 2nd, 2020).

Pedestrian and Bicycle Accommodations

As bicycles are a primary mode of access for transit, VTA anticipates reviewing the bike parking numbers and locations that will be determined as the project progresses. Section 6.15 of the DWDSG mostly concurs with Chapter 10 of the VTA Bicycle Technical Guidelines (https://www.vta.org/sites/default/files/documents/vta_bicycle_technical_guidelines_complete.pdf), which provides guidance on bicycle parking types, locations, and the number of spaces that should be provided for a project by land use type. VTA has also begun to recommend projects also provide at least 30 square feet of designated micromobility parking (such as scooters). This square footage can be divided and arranged to fit the space but should be provided close to the building entrance(s). VTA recommends that this be required as part of building design for the Downtown West development with the understanding that if buildings are placed close enough, one micromobility parking area could serve for multiple buildings. This concurs with the “Scooter Corrals” guideline in Section 6.15 of DWDSG.

VTA appreciates the inclusion of Mobility Hubs in the DWDSG. VTA recommends language be added to promote short, well-lit, walking paths for users who transfer between rail, bus, bike, and scooter. VTA also recommends the list of Mobility Hubs amenities include transit system map cases/information signs for regional travelers. Lastly, VTA suggests the second amenity listed under Mobility Hubs be updated to say, “Transit shelters with seating and real-time arrival information.”

While the DISC program is intended to have consolidated bicycle facilities for transit use, Downtown West should also provide bicycle facilities as DISC is not planned to open for eight to 10 years after the Downtown West development. It is understood that the DWDSG are not intended to outline exact locations at this stage of the project’s design, but there does not appear to be consideration given to the need for bicycle facilities near the BART station mentioned in the guidelines. VTA recommends that a statement to this effect be added to the DWDSG. For the BART station specifically, the BART access design principles state that there should be a minimum number of bicycle parking spaces within proximity to the BART headhouse. While these bicycle facilities will not be limited to BART users only, Downtown West should also provide bicycle facilities in the vicinity of the BART station to ensure cumulative needs are met (Page S-21 TDM Program and Appendix J2 Section 6.4).

VTA supports the proposed widening of the sidewalk north of the light rail tracks to better accommodate more active transportation users. VTA expects that the linear open space will maintain its current distance from the trackway and that the level of separation (fencing and plantings) will be maintained or increased as required for safety. Construction Access Permits will be required for any construction that occurs within 10 feet of the light rail system and can be coordinated through permits@vta.org. VTA notes that Figure 4.42 Illustrative Plan of the Creekside Walk at South Autumn Street of the DWDSG depicts a section of light rail track at east of Autumn Street with a green, planted treatment. VTA currently does not have any portion of our light rail tracks with green, planted treatment. Such modifications may require CPUC review and approval as well as VTA concurrence. VTA looks forward to working with the City in reviewing the proposed plans for the area.

The DWSDG notes that “bikeways should be designed based on Vision Zero design principles to eliminate conflicts between drivers of transit vehicles and people riding bicycles” (Page 254). The DEIR includes a potential for public

service lanes on Santa Clara Street between I-880 and 17th Street. Concurrently, the *San José Better Bike Plan* includes recommendations to upgrade the existing bike lanes on Santa Clara Street to protected bike lanes between the City of Santa Clara border and Almaden Boulevard. VTA provides guidance on the design of protected bikeways adjacent to bus routes to eliminate such conflicts and safeguard bus travel times. For Santa Clara Street, protected bikeways paired with bus boarding islands and in-lane bus stops can accomplish the goals of traveler safety and support on-time performance for buses.

Transit Services

VTA is excited for the potential of Downtown West to both promote and increase transit use in the area, specifically for the VTA bus and light rail network and future BART service. While the DEIR notes that the transit service analyzed was in place at the time of the NOP, there have been several changes to VTA service in the area both related and unrelated to the COVID-19 pandemic. The routes currently serving Diridon Station include, 22, 64A, 64B, 68, 168, 500, 522, and the Green Line. Routes 23 and 523 also serve nearby San Carlos Street. The First Amendment to the DEIR should be updated to reflect this.

Construction Impacts to Transit

The Diridon Station area is anticipated to see a significant level of construction for many years through VTA's BART Silicon Valley Phase II Extension Project, Downtown West, and work related to DISC. The DEIR does not address how project construction would impact transit. VTA expects the City to emphasize to all parties involved in the project construction that there should be minimal to no impacts to transit as projects are being built. If changes to bus routes are needed, the City shall coordinate with VTA by contacting bus.stop@vta.org at least two weeks prior to rerouting. If any construction occurs within 10 feet of the light rail system, Construction Access Permits will be required and can be coordinated through permits@vta.org.

Transit Analysis

VTA is very concerned about the anticipated impacts to travel speeds to both bus and light rail services in the project area. VTA's goal is to provide fast, frequent, and reliable transit for all riders, including the potential large influx of riders related to the proposed project. The environmental analysis estimates a large increase in ridership, with up to 39,500 daily boardings in the project area as part of the Goal-Based project Buildout scenario. This is a 20-time increase over existing ridership and it is critical that VTA is put in an advantageous position to best serve these new riders. The transit analysis included in Sections 313 Transportation, Appendix J1 Transportation Analysis, and Appendix J2 Local Transportation Analysis, all show some potential impacts to VTA bus and light rail travel speeds with the build out of the project. While VTA does not have an existing threshold to define significant impacts to transit speeds, VTA does have a number of policies including the Transit Speed Policy, Land Use Development and Review Policy, Parking and Transit Oriented Development (TOD) policy, and Station Access Policy that are all designed to give direction regarding the interface between new development and their potential impacts to transit. Furthermore, VTA does not agree with the significance criteria assumed in the DEIR (Page 3.13-26), specifically the impact threshold requiring transit speed to fall below 15mph. VTA believes that any degradation in transit speeds, regardless of whether or not it falls below 15mph, should be considered an impact to transit.

The transit analysis appears to analyze existing BART conditions and ultimately concludes that the project is unlikely to cause excessive crowding on BART. This analysis should be updated to include VTA's BART Silicon Valley Phase II Extension Project as it is an environmentally approved project that will be operational along with the development of this project (Appendix J2, Section 5.2.6.2).

Shuttles

When private commuter shuttles propose to use VTA bus stops, VTA and the City shall coordinate the responsible shared use of such facilities to ensure safe and efficient accommodations for passengers of both public transit and private commuter shuttles.

Utilidor and Infrastructure Analysis

VTA understands that there is no phasing plan for the construction of the proposed utility corridor, or "utilidor," and that the phasing plan is expected to be made available after the public comment period for this DEIR has ended. VTA looks forward to receiving this from the City as soon as it is available. This is especially important as the proposed layout for the utilidor shows is adjacent to the BART headhouse and timing for the construction of the utilidor and BART could overlap. The construction of the utilidor should not impact the BART headhouse or tunnel in any way. Therefore, construction mitigation will need to be implemented to ensure no impacts to these facilities.

Street Network: Use of Dynamic Lanes and Prohibited Curb Cuts

VTA would like to continue to discuss the use and location of dynamic lanes and prohibition of curb cuts for the street network with the City. It is understood that Cahill Street (west of the VTA parcel, which is bounded by Santa Clara Street, Cahill Street, Montgomery Street, and the new Post Street) and the new Post Street (south of the VTA parcel) are not a part of the DWDSG, but VTA would like to ensure considerations for the BART station are studied prior to finalization of the document. VTA recommends, at a minimum, that language be added to the DWDSG that the roadway network may have a different cross-section in the streets not currently included in the project but located within the core area.

Passenger pick up and drop off (PUDO) will continue to be a mode of access for BART patrons and should be accommodated in advance of a future consolidated PUDO through the DISC program as BART is intended to be open well in advance of DISC. A review of the current plans for Montgomery Street between Santa Clara Street and the new Post Street and the new Post Street south of the VTA parcel should be reviewed for the higher volume of vehicle traffic expected in this segment and to support the BART station PUDO activities. Consideration should be given to which side of the street the dynamic lane is built along Montgomery Street. It is important to activate ground floor retail within the station area core, but pedestrian safety when crossing the street must also be a part of the decision. Montgomery Street from Santa Clara Street to the new Post Street may also benefit by allowing a standard curb separation between the active streetscape and the curb-to-curb zone and/or dynamic lanes. Future consideration may also be given for a dynamic lane along the northside of the new Post Street.

It appears that heavier uses such as loading is not an intended use within the dynamic lanes. VTA is concerned that if Montgomery Street and the new Post Street are also not intended for heavier uses either, then the VTA parcel

development may have difficulties in the future when Cahill Street is no longer open to vehicle traffic. VTA would like to better understand how this area will be futureproofed for these types of needs and requests that the DWDSG modifies the designated permanent uses in dynamic lanes to allow for short-term parking for users such as PG&E and maintenance and freight vehicle activities adjacent to the BART headhouse.

VTA would like to note that it is currently intended for an underground parking garage access to take place along the new Post Street rather than Montgomery Street as noted in the DWDSG. VTA requests that future consideration be given to this use for the new Post Street (DWDSG Chapter 6).

Transportation Demand Management/Trip Reduction

The primary mitigation measures discussed in the document to address the overall project are enhanced transportation demand management (TDM) measures as well as a study of public service lanes on Santa Clara Street. The San José City Council Study session on November 16, 2020 also noted a contribution to studying potential improvements to light rail (slide 94). VTA would like additional details on these two mitigation measures as well as a stronger commitment on what aspects will be funded by the project. VTA also recommends the project contribute to transit signal priority improvements for any routes or transit corridors impacted by the project (Table 3.13-8, Table 37 and Table 38 in Appendix J2).

VTA appreciates the list of TDM measures that may be applied to each of the phases/buildings for this project that were included in the DEIR with the understanding that the final TDM measures will be decided as the development progresses through the entitlement process. VTA recommends the City also include projects that increase transit speed and reliability in the TDM list including public service lanes, transit signal priority, and contributions towards capital and operating improvements that would extend service spans and facilitate transfers between modes.

VTA would like clarification on language from Appendix J1, Page 79 that says, “After two years of not meeting monitoring requirements, the City may initiate enforcement action against the applicant and successors, including imposition of financial penalties to the owners and/or operators of the office and residential development that will support the funding and management of transportation improvements that would bring the non-SOV mode share to the targeted level.” Specifically, VTA would like to see “may” changed to “shall” as well as clarification on what “support funding and management of transportation improvements that would bring the non-SOV mode share to the targeted level,” would entail. For example, would the financial penalties be placed into the City’s General Fund or perhaps into a specific DSAP-area account? What is the list of projects that could be funded through those penalties?

Santa Clara Street Cross Section

VTA would like to note that the cross section of Santa Clara Street shown in the DWDSG incorrectly shows two left turning lanes from Santa Clara Street to Autumn Street. VTA requests this be updated to reflect the correct number of vehicle lanes.

VTA also recommends the First Amendment to the DEIR show a cross section of Santa Clara Street with the possible public service lanes as the outside lanes (adjacent to the curb) with bus boarding islands.

Land Use

VTA agrees with the City that the land uses and building designs in Downtown West (and the larger Diridon Station area) should be as pedestrian-friendly and transit-supportive as possible. VTA recommends that the buildings/public realm immediately framing the station area within a one- to two-minute walking distance (approximately 220-440 feet) such as buildings along Cahill Street (north and south of the station) be oriented and designed for ease of movement and orientation of first- time visitors. While the presence of office buildings is welcome, this immediate area could become a desolate public realm after business hours. The project prescribes “active uses” along certain frontages but not along the ground floors of buildings immediately framing the station along Cahill Street. VTA notes that active uses are located approximately *east* of the station along Montgomery Street, providing visual cues east of the station but no visual cues are provided north or south. Providing active uses along Cahill Street (north and south of the station) will ensure a 24-hour character for a world-class transit hub and an increased sense of safety and comfort through “eyes on the street.”

Furthermore, active use frontages reinforce pedestrian and transit walking routes to the station. Such transit walking routes are along *all* streets within the station area and should be complemented by some active uses along a portion of all block frontages. When active uses are visible along a street, it provides visual cues to encourage walking and increases the comfort and safety of the pedestrian. Cahill Street/North Montgomery Street and Santa Clara Street are key transit walking routes that do not have clearly designated active frontages. VTA recommends providing clearly designated active frontages along these streets.

The DWSDG includes a figure that delineates areas or block frontages that are appropriate for off-street parking and loading, in other words the allowance of curb cuts and loading activities which can be unwelcoming for pedestrians as these can be considered “back of house uses.” These delineated areas for off-street parking and loading amount to 60 percent of Cahill Street within the project area (excluding the section between San Fernando and Santa Clara Streets). While the project provides for ‘Logistics Hubs’ which could consolidate loading activities in fewer locations throughout the project area, VTA recommends special attention to the pedestrianization of Cahill Street and requests relocating off-street parking and loading to another location.

VTA’s BART Silicon Valley - Phase II Extension Project

VTA is looking forward to continuing our public-private partnership with Google and the close coordination between VTA’s BART Silicon Valley Phase II Extension Project and the Downtown West development as both projects advance towards construction in the near-term.

Project Name

The name of the project should be consistent throughout the document and should be called “VTA’s BART Silicon Valley Phase II Extension Project.” It is called several different names, such as “BART Downtown” and “BART Silicon Valley Phase II,” throughout the document.

Construction Transportation Management Plan (CTMP)

Continued access to the Diridon Transit Center during the construction period is of the utmost importance to VTA.

We understand that significant work needs to take place regarding the coordination and development of the Construction Transportation Management Plans (CTMP) for both projects. VTA requests that language be added to the DEIR related to direct coordination with VTA regarding coordination of any Downtown West construction plans in addition to the City of San José as VTA's BART Silicon Valley Phase II Extension Project schedules and areas overlap (Appendix J2, Chapter 12).

VTA would also like to suggest a formalized coordination and review process for the CTMPs for the Diridon Station area. We are aware that there are several topics that will need to be discussed as the projects progress in design such as road closures, truck haul routes, stormwater, security, outreach and messaging, and vibration monitoring plans. VTA is also looking forward to receiving more information about the utilidor and the use of a tunnel boring machine (TBM) as it becomes available to the City. It is understood that depending on the schedules, the vibration and noise monitoring plans required for both projects due to the use of a TBM will need to be coordinated (Section 2.8.9 and Impact NO-2).

The document notes that the 2017 Infrastructure Analysis would need to be reevaluated once more information was known about VTA's BART Silicon Valley Phase II Extension Project (stated as the BART Downtown extension). VTA understands that this document will be updated following the approval of the DSAP in 2021. VTA suggests that this statement be revised if it is not going to be updated for this environmental document (Section 2.8.7).

Construction vehicles, equipment, and other facilities should be clearly marked with project identification/branding in a manner that is distinguishable from other nearby projects. This will ensure community outreach, stakeholder communications, and issues management are streamlined.

Parking Assessment

VTA understands that the Downtown West project will ultimately replace any loss of parking due to the development of the project. VTA would like the second paragraph of this section to be revised as written below to the following to better represent the end state of VTA's BART Silicon Valley Phase II Extension Project. VTA's BART Silicon Valley Phase II Extension Project has its own set of mitigation measures for temporary replacement parking during construction that are not referenced in this document and all construction vehicles and equipment will be staged within the project's construction staging areas.

"During BART construction at Diridon Station, portions of the parking lots within their construction staging area (CSA) will be reserved for storage of construction vehicles and equipment. The Phase II Project's environmental mitigation requires the temporary replacement of 450 parking spaces during construction, which is not included as part of the Downtown West Project. When construction is complete of VTA's BART Silicon Valley Phase II Extension Project, the property within the construction staging areas will be returned to the property owner. As such, some, but not all the reserved parking lots may be reopened, at the property owner's discretion." (Appendix J2, Section 10.5).

Security

VTA noted that the Downtown West project plans to develop its own on-site security plan. VTA would like to

discuss security as a future coordination topic closer to Opening Day of VTA's BART Silicon Valley Phase II Extension Project. With the multiple police and security jurisdictions in the area, it is important to VTA that protocols and procedures are coordinated to ensure proper responses (Page 2-60).

Construction Schedules

VTA recommends that the dates for VTA's BART Silicon Valley Phase II Extension project be updated throughout the document to be "2022 through 2030, with substantial completion anticipated in 2028."

VTA would like a better understanding of the constraints that VTA's BART Silicon Valley Phase II Extension Project construction places on the Downtown West project that will lead to the extension of phasing of the project to the extent that necessitates calling it out in the document as such (Appendix J2, Chapter 12, Page 240).

Ridership

VTA has also recently updated our ridership modeling to meet FTA requests for their Expedited Project Delivery Pilot Program. Our new modeling estimates approximately 11,500 riders by 2040 for the Diridon BART Station. VTA asks that this be reflected in your document and analysis (Page 3.13-7).

At-Grade Railroad Crossings

VTA acknowledges the potential modification to existing or new at-grade crossings of the railroad tracks, possibly by North Montgomery Street (crossing number 750151J) or at Autumn Parkway (crossing number 924191R), as noted in Appendix J, and at light rail tracks at Delmas Avenue and Autumn Street noted in the DWDSG. For such modifications, the project sponsor should work together with the CPUC and VTA to review the potential at-grade crossing changes and implement safety measures as a direct result of the project. Such safety measures should be expressly stated in the Conditions of Approval. Specifically, with Autumn Street being converted to two lanes, the at-grade crossing of the light rail tracks across Autumn Street will require additional crossing improvements including new "back" gates on the north side of the crossing. VTA looks forward to reviewing the designs for the improvements.