

PUBLIC UTILITIES COMMISSION

505 VAN NESS AVENUE
SAN FRANCISCO, CA 94102



October 21, 2026

ENVR 20261000002

Ryan Shum

San Francisco Planning Department
49 South Van Ness Avenue, Suite 1400
San Francisco, CA 94103

Sent via email: CPC.RailyardsEIR@sfgov.org

Re: Notice of Preparation of an Environmental Impact Report for the Railyards Mixed-Use
Development Project (700 4th Street), SCH No. 2026091295 (Case No. 2026-002123ENV).

Dear Mr. Shum:

The California Public Utilities Commission's (Commission or CPUC) Rail Crossings and Engineering Branch (RCEB), in coordination with the Rail Transit Safety Branch (RTSB), submits these comments on the City and County of San Francisco Planning Department's (City) Notice of Preparation (NOP) of an Environmental Impact Report (EIR) for the Railyards Mixed-Use Development Project (Project). These comments address rail and transit crossing safety issues that should be evaluated in the Draft EIR.

Commission Jurisdiction and Potentially Applicable Requirements

The Commission is a responsible agency for the Project under the California Environmental Quality Act (CEQA) because it has jurisdiction over the safety of highway-rail and light-rail transit crossings in California and authority over the design, alteration, and closure of crossings pursuant to Public Utilities Code section 1201 et seq. Depending on the final Project design and the nature of the proposed crossing work, construction of a new crossing or alteration of an existing public crossing

may require a formal application under Rules 3.7 through 3.11 of the Commission's Rules of Practice and Procedure or authorization through the General Order (GO) 88-B process.

The Project may also be subject to other Commission rules and regulations. Project design and any proposed crossing modifications should conform to the California Manual on Uniform Traffic Control Devices (CA MUTCD) and all applicable Commission General Orders. Because the Project involves both Peninsula Corridor Joint Powers Board (Caltrain) commuter rail facilities and San Francisco Municipal Transportation Agency (SFMTA or Muni) light-rail transit facilities, the following General Orders may apply, depending on the final design and scope of work:

- GO 26-D: Regulations governing clearances on railroads and street railroads with reference to side and overhead structures, parallel tracks, and the crossing of public roads, highways, and streets.
- GO 72-B: Rules governing the construction and maintenance of crossings at grade of railroads with public streets, roads, and highways.
- GO 75-D: Regulations governing standards for warning devices for at-grade highway-rail crossings.
- GO 88-B: Rules for altering public highway-rail crossings.
- GO 95: Rules for overhead electric line construction (including Overhead Catenary Systems for electrified rail and light rail).
- GO 118-A: Regulations governing the construction, reconstruction, and maintenance of walkways adjacent to railroad trackage and the control of vegetation adjacent thereto.
- GO 143-B: Safety Rules and Regulations Governing Light-Rail Transit.
- GO 164-E: Rules and Regulations Governing State Safety Oversight of Rail Fixed Guideway Systems.
- GO 172: Rules and regulations governing the use of personal electronic devices by employees of rail transit agencies and rail fixed guideway systems.
- GO 175-A: Rules and regulations governing Roadway Worker Protection provided by rail transit agencies and rail fixed guideway systems.

Affected Crossings Within the Project Vicinity

RCEB has identified the following existing crossings within or immediately adjacent to the Project area that may be affected by construction, roadway reconfiguration, or increased pedestrian, bicycle, transit, and vehicle activity. The inventory includes facilities associated with the Peninsula Corridor Joint Powers Board (PCJX/Caltrain) and SFMTA (Muni). Separate entries at the same intersection reflect distinct CPUC crossing identifiers or rail subsystems.

CPUC Crossing No.	Federal DOT No.	Location	Agency / Rail Subsystem	Crossing Configuration	Dedicated Pedestrian Crossing
105E-0.50-A	754660U	China Basin Viaduct (I-280 / Sixth Street freeway structure)	Caltrain (PCJX)	Roadway above track	No
105E-0.62	922712X	Mission Bay Drive	Caltrain (PCJX)	At grade	No
125T-5.09	—	Fourth Street at King Street	SFMTA (Muni) — T-Third Street line/Central Subway	At grade	No
125T-5.17	—	Fourth Street at Townsend Street	SFMTA (Muni) — T-Third Street line/Central Subway	At grade	No
125J-5.09	—	Fourth Street at King Street	SFMTA (Muni) — Embarcadero Portal	At grade	No
125J-5.18-D	—	King Street pedestrian crossing between Third and Fourth streets	SFMTA (Muni) — Embarcadero Portal	At grade	Yes

125E-5.26	—	King Street at Fifth Street	SFMTA (Muni) — Embarcadero Portal	At grade	No
125E-5.35-D	—	Fourth and King Station pedestrian crossing between Fourth and Fifth streets	SFMTA (Muni) — Embarcadero Portal	At grade	Yes

Note: A dash indicates that this inventory does not list a Federal DOT number. Confirm crossing identifiers, agency designations, and pedestrian-crossing classifications with CPUC, Caltrain, and SFMTA during subsequent project design and review.

Specific Project Comments

According to the NOP and its supporting materials, the Project would redevelop the approximately 18.63-acre Caltrain Railyards site bounded by Townsend, Fourth, King, and Seventh streets. The proposed program includes up to 7.84 million square feet of above-grade mixed-use development. Under the Maximum Residential Scenario, the Project would provide up to 5,834 residential units; under the Maximum Commercial Scenario, it would provide up to 5.64 million square feet of commercial space. The Project also includes full replacement and modernization of the Fourth and King Caltrain Station, including the below-grade Caltrain Tunnel and platforms approximately 35 to 60 feet below grade and the surface-level Caltrain Station Hall on Block 1, as well as program-level consideration of a future offsite train storage and maintenance facility for which no specific site has been selected.

RCEB and RTSB request that the Draft EIR evaluate the rail, transit, and crossing-safety issues identified below and, where significant impacts are identified, describe feasible measures to avoid or reduce those impacts.

1. **Evaluation of Below-Grade Muni Facilities and Grade Separation.** Grade separation can eliminate conflict points among light-rail vehicles, motorists, bicyclists, and pedestrians.

In light of the additional travel demand associated with up to 7.84 million square feet of development and the planned convergence of Caltrain, Muni, and the Transbay Joint Powers Authority's Portal Project, RCEB requests that the Draft EIR evaluate the feasibility and environmental effects of an alternative or design modification that would place the Muni tracks and station facilities at Fourth and Townsend streets and Fourth and King streets below grade. The analysis should consider an underground extension of the Muni T-Third Street line/Central Subway from its existing Fourth Street portal to below-grade station facilities, integrated where feasible with the proposed Fourth and King Plaza, Station Lane, the below-grade Caltrain Tunnel and platforms approximately 35 to 60 feet below grade, and the surface-level Caltrain Station Hall on Block 1. The analysis should address engineering feasibility; rail and transit operations; emergency access and evacuation; accessibility; construction effects; interfaces with existing and planned infrastructure; and the comparative safety and reliability benefits and impacts of below-grade and at-grade configurations. It should also evaluate whether grade separation could eliminate or reduce conflicts at Townsend Street (CPUC No. 125T-5.17) and King Street (CPUC Nos. 125T-5.09, 125J-5.09, 125J-5.18-D, 125E-5.26, and 125E-5.35-D). This request is intended to support comparative environmental review and does not constitute CPUC selection or approval of a particular design.

2. **Multimodal Circulation and At-Grade SFMTA Light-Rail Crossings.** For any light-rail facilities that remain at grade, the Draft EIR should evaluate how proposed street and circulation changes could affect safety and operations at nearby SFMTA crossings. The proposed changes include narrowing the travel lanes on King Street between Fourth and Fifth streets to provide a westbound left-turn pocket at Fifth Street; modifying the traffic signal at King and Fifth streets (CPUC No. 125E-5.26) to allow left turns and U-turns; and widening the west sidewalk on Fourth Street between Townsend and King streets. The proposed Fourth and King Plaza, Station Lane, and Station Place would also direct pedestrians, bicyclists, and transit riders between the surface-level Caltrain Station Hall on Block 1 and adjacent Muni light-rail stops near CPUC Nos. 125T-5.09, 125T-5.17, 125J-5.09, 125J-5.18-D, and 125E-5.35-D. The transportation and crossing-safety analysis should evaluate: (1) vehicle queues and the potential for vehicles to stop on or foul the tracks; (2)

traffic-signal coordination, interconnection, and any necessary transit or rail preemption; (3) pedestrian and bicycle volumes, circulation paths, crossing times, and crowding on boarding islands or refuge areas; (4) accessible routes, detectable warnings, and other applicable Americans with Disabilities Act requirements; (5) sight distance and visibility of trains, light-rail vehicles, signals, signs, and crossing users; and (6) the need for operational, geometric, or warning-device improvements at each affected crossing. The analysis should consider normal operations, peak travel periods, special events, service disruptions, and reasonably foreseeable cumulative conditions.

3. **Evaluation of the Proposed Project and Rail and Street Variants.** The Draft EIR should compare the rail- and crossing-safety implications of the Proposed Project, the At-Grade Rail Variant, and the Fifth Street Variant. Under the Proposed Project, the Caltrain tracks would transition from at grade near Seventh and Berry streets, adjacent to Mission Bay Drive (CPUC No. 105E-0.62) and beneath the China Basin Viaduct (I-280 / Sixth Street freeway structure) (CPUC No. 105E-0.50-A), into the Caltrain Tunnel and platforms approximately 35 to 60 feet below grade, with access through the surface-level Caltrain Station Hall on Block 1. Under the At-Grade Rail Variant, two terminal tracks and a platform would be located within an at-grade rail enclosure between Townsend and King streets, with open-space connections such as the approximately one-acre Fifth Street Park terrace and the Sixth Street pocket parks crossing or spanning the enclosure. For this variant, the analysis should explain how proposed pedestrian, bicycle, and vehicle connections at Fifth Street, Sixth Street, the mid-block lane on Block 3, Station Place, and the Access Lane would be designed to avoid or minimize conflicts with rail operations. It should evaluate the feasibility and safety performance of grade-separated and any proposed at-grade connections; emergency and maintenance access; trespass prevention; sight distance; warning and protective devices; and compliance with applicable side and overhead clearance requirements, including GO 26-D. Under the Fifth Street Variant, Fifth Street would operate as a one-way northbound roadway with northbound and southbound Class IV protected bike lanes on opposite sides of the street between King and Townsend streets. The analysis should evaluate how the resulting vehicle and bidirectional bicycle movements could affect operations and safety where Fifth Street crosses the Muni tracks at King Street (CPUC No. 125E-5.26), including

queueing, turning movements, signal operations, bicycle detection and channelization, pedestrian interactions, and the need for crossing or traffic-control improvements.

4. **Construction Phasing and Temporary Crossing Modifications.** The Draft EIR should evaluate rail and crossing safety throughout Rail Infrastructure Phases A and B and identify measures needed to maintain safe Caltrain operations and public access during construction. During Phase A, the existing at-grade platforms and tracks would be shifted approximately 200 feet west while Caltrain revenue service continues, with peak service of up to eight trains per hour in each direction, concurrent with vertical construction on Blocks 1 and 5. The analysis should evaluate how excavation and deep-foundation work, including work extending approximately 65 to 200 feet below grade, and construction beneath or adjacent to the China Basin Viaduct (I-280 / Sixth Street freeway structure) (CPUC No. 105E-0.50-A) could affect active tracks, structures, utilities, and rail operations. For each phase, the Draft EIR should address construction haul routes; any temporary at-grade construction crossings; separation of workers, equipment, and the public from active rail operations; protection of overhead catenary and related electrical systems in accordance with applicable requirements, including GO 95; emergency and maintenance access; temporary traffic, pedestrian, and bicycle controls; coordination of outages or service changes; and continuous, vandal-resistant fencing or other appropriate barriers along active rail rights-of-way. If the Project proposes temporary crossings or modifications to existing crossings, the Draft EIR should identify the anticipated configuration, duration, warning and protective devices, inspection and maintenance responsibilities, and any CPUC review or authorization required before construction.
5. **Coordination with the TJPA Portal Project and OCII Improvements.** The Project's proposed below-grade Caltrain Tunnel and Townsend Street surface improvements would interface with planned improvements associated with the Transbay Joint Powers Authority's (TJPA) Portal Project, including the proposed traffic signal at Townsend and Fifth streets, and the San Francisco Office of Community Investment and Infrastructure's (OCII) Westbound King Street Extension. The Draft EIR should evaluate whether construction and operation of these related projects, together with the Railyards Mixed-Use Development Project, could result in significant cumulative rail, roadway, transit, bicycle, or pedestrian

safety impacts. The analysis should address coordinated construction phasing and traffic handling; interfaces among tunnel, track, roadway, signal, and utility improvements; vehicle queues and the potential to obstruct rail or transit operations; traffic-signal coordination and any necessary transit or rail preemption; pedestrian and bicycle circulation between projects; emergency and maintenance access; and the timing, responsibility, and funding of any shared safety improvements. The City should coordinate with TJPA, OCII, Caltrain, SFMTA, and CPUC so that the Draft EIR uses consistent design assumptions and identifies any interdependent improvements or mitigation measures.

6. **Offsite Train Storage and Maintenance Facility.** The Draft EIR should analyze at a program level a future offsite train storage and maintenance facility of approximately 15 to 30 acres, with approximately 45,000 linear feet of track, lead tracks, and potential flyover structures at a candidate location along the Caltrain corridor between the Fourth and King Station area and San Francisco International Airport. The program-level analysis should identify the types of rail and crossing impacts the facility could cause and establish criteria for evaluating candidate sites. At a minimum, the analysis should address potential construction, alteration, closure, or operational effects on existing at-grade and grade-separated crossings; new or modified lead-track connections; roadway, pedestrian, and bicycle access; emergency and maintenance access; clearances and structural interfaces associated with any flyover; trespass prevention and right-of-way security; and potential changes in train movements or switching activity. Because no specific site has been selected, the Draft EIR should explain that subsequent site-specific environmental review, engineering analysis, field diagnostic review, and any required CPUC authorization would occur once candidate sites and crossing modifications are defined. RCEB recommends early coordination with CPUC, Caltrain, affected local jurisdictions, and other relevant agencies during site screening and before selecting a preferred site or crossing design.

Potential Mitigation Measures and Field Diagnostic Reviews

Where the Draft EIR identifies significant rail, transit, or crossing-safety impacts, it should evaluate feasible measures to avoid or reduce those impacts. Depending on the affected location and final

design, potential measures may include grade separation; geometric or operational changes; upgraded warning devices and traffic-signal interconnection or preemption; improved pedestrian and bicycle channelization; active pedestrian warning devices, gates, or other treatments; accessible routes and detectable warning surfaces; sight-distance improvements; and continuous, vandal-resistant fencing or other appropriate barriers along rail rights-of-way. The Draft EIR should identify the performance objective, responsible implementing party, timing, funding mechanism, monitoring requirements, and applicable CPUC or other agency approval for each proposed measure. Consideration of these measures in the Draft EIR would not substitute for subsequent engineering review or constitute CPUC approval of a particular design.

Field diagnostic reviews should be conducted for each existing crossing that may be materially affected and for each proposed new or temporary crossing, at a stage when the team can evaluate sufficiently developed plans. Participants should include, as applicable, representatives of the Project Sponsor and its Consultants, Caltrans, CPUC RCEB and RTSB, Caltrain, SFMTA, TJPA, Caltrans, emergency responders, and other affected agencies or stakeholders. Each review should document existing conditions, anticipated user volumes and train or light-rail operations, proposed circulation and design changes, identified hazards, feasible measures to eliminate or mitigate those hazards, and the additional engineering information and regulatory approvals that may be required. Depending on the scope of the proposed work, CPUC authorization may involve a GO 88-B request or a formal application under the Commission's Rules of Practice and Procedure.

As a responsible agency under CEQA Guidelines section 15381, the Commission appreciates the opportunity to coordinate with the City to improve public safety at rail and transit crossings in the City and County of San Francisco. We request that the City keep RCEB and RTSB informed of developments associated with the Railyards Mixed-Use Development Project and arrange meetings with RCEB and RTSB staff to discuss relevant safety issues and conduct field diagnostic reviews of proposed and affected crossing locations within the Project area.

If you have any questions, please contact Eyitejumade "Ade" Sogbesan via email at es3@cpuc.ca.gov.

Sincerely,

A handwritten signature in black ink, appearing to read 'Ade' with a stylized flourish at the end.

Eyitejumade “Ade” Sogbesan

Utilities Engineer

California Public Utilities Commission

Rail Safety Division

Rail Crossings and Engineering Branch

cc:

Rajat Pandit, Utilities Engineer, RTSB — Rajat.Pandit@cpuc.ca.gov

Stacy Cocke, Deputy Director, Caltrain — cockes@samtrans.com

Susan Yogi, Consultant, Environmental Science Associates — SYogi@esassoc.com

James Abrams, J. Abrams Law, P.C., on behalf of Prologis 4th and King LLC, Project Sponsor
— jabrams@jabramslaw.com

Oliver J. Gajda, SFMTA Safety Division — Oliver.Gajda@sfmta.com

State Clearinghouse (SCH No. 2026091295) — state.clearinghouse@opr.ca.gov