

**DEPARTMENT OF TRANSPORTATION**

DISTRICT 4

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**STATE CLEARINGHOUSE**

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Shannon Hill, Planner III  
Department of Planning, Building and Enforcement  
City of San Jose  
200 E. Santa Clara Street, T-3  
San Jose, CA 95113

**Re: Downtown West Mixed Use Plan (Google Project) - Draft Environmental Impact Report (DEIR)**

Dear Shannon Hill:

Thank you for including the California Department of Transportation (Caltrans) in the environmental review process for the Downtown West Mixed Use Plan (Google Project). We are committed to ensuring that impacts to the State's multimodal transportation system and to our natural environment are identified and mitigated to support a safe, sustainable, integrated and efficient transportation system. The following comments are based on our review of the October 2020 DEIR.

***Project Understanding***

The proposed project includes the development of up to 5,900 residential units; up to 7,300,000 gross square feet (GSF) of office space; up to 500,000 GSF of active uses such as retail, cultural, arts, etc.; up to 300 hotel rooms; up to 800 rooms of limited-term corporate accommodations; up to two event and conference centers totaling up to 100,000 GSF; up to two central utility plants totaling 130,000 GSF; logistics/warehouse(s) totaling 100,000 GSF; and 15 acres of open space, along with infrastructure, transportation, and public realm improvements.

The approximately 81-acre project site is within close proximity to Interstate (I)-280 and State Route (SR)-87, located within the Priority Development Area

identified in the Plan Bay Area 2040 and within the Transit Priority Areas defined in the California Public Resources Code, Section 21099.

### **Travel Demand Analysis**

Caltrans commends the lead agency in preparing a quantitative and thorough VMT analysis in the DEIR. Based on the VMT analysis, the project would have less-than-significant VMT impact. Caltrans also commends the lead agency in developing the Enhanced Transportation Demand Management Project to further reduce the project generated VMT, which is in support of helping achieve the State's VMT reduction goals.

### **Highway Operations**

Referring to the Local Transportation Analysis, for the intersection listed in Table 52 (Intersection, Turn-lane Queueing Analysis) within the State ROW and the off-ramps in Table 53 (Off-Ramp Queue Analysis), the "Background Plus Goal-Based Project Buildout" scenario may not sufficiently mitigate the queue spillback from the left-turn and right-turn pockets or onto the freeway mainline. While Caltrans agrees with not recommending non-capacity increasing mitigation measures, the Bird Avenue/I-280 bicycle and pedestrian multimodal connection from Diridon Station area to the Gardner community and the additional 9 percentage point trip reduction from the TDM Program and Monitoring Plan may not be sufficient to mitigate the potentially adverse impacts.

For the on-ramp locations listed in Table 54 (On-ramp Capacity Analysis) where "Background Plus Project Buildout" queues spill out of on-ramp storage capacity, the existing metering rate should be used for evaluation instead of the maximum metering rate, which is 900 vehicle per hour per lane. If other non-capacity increasing mitigation measures cannot be accommodated, the State may then consider modifying the on-ramp metering rate, which would impact an already congested mainline freeway.

### **Fair Share Contributions**

As stated in the Highway Operations section above, due to the potentially adverse impacts of the project on the intersections within the State ROW, the freeway off-ramps and the freeway segments identified in the DEIR and therefore, the City of San Jose, as the lead agency, is responsible for all project mitigation, including any needed improvements to the State Transportation Network (STN). The project's fair share contribution, financing, scheduling, implementation responsibilities and lead agency monitoring should be fully

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discussed for all proposed mitigation measures. Fair share fees should be allocated for the impacted freeway ramps due to added project traffic. The project applicant shall coordinate with the City of San Jose, Santa Clara Valley Transportation Authority and Caltrans for the proposed mitigation.

Fair share contributions should be considered to projects listed below:

- SR-87 Express Lanes: from I-880 to SR-85 (Plan Bay Area 2040, ID: 17-07-0082);
- SR-87 Technology-based Corridor Improvements (Plan Bay Area 2040, ID: 17-07-0009);
- SR-87 Corridor & Interchange Improvement Santa Clara (Plan Bay Area 2050, Project category: 2036-2050);
- I-280 Express Lanes: US 101 to Leland Avenue (VTP 2040, ID: H12);
- Part Time Lane projects identified in the VTA SR-87 Corridor Study within the proposed project area.

Thank you again for including Caltrans in the environmental review process. Should you have any questions regarding this letter, please contact Yunsheng Luo at [Yunsheng.Luo@dot.ca.gov](mailto:Yunsheng.Luo@dot.ca.gov). Additionally, for future notifications and requests for review of new projects, please contact [LDIGR-D4@dot.ca.gov](mailto:LDIGR-D4@dot.ca.gov).

Sincerely,



MARK LEONG  
District Branch Chief  
Local Development - Intergovernmental Review

c: State Clearinghouse