

DEPARTMENT OF TRANSPORTATION

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PLANNING

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Governor's Office of Planning & Research

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*Making Conservation
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STATE CLEARINGHOUSE

July 8, 2020

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Art Henriques
Contract Project Manager
City of East Palo Alto, Planning Division
1960 Tate Street
East Palo Alto, CA 94303

University Circle Phase II Office Project- Notice of Preparation (NOP) of an Environmental Impact Report**Dear Art Henriques:**

Thank you for including the California Department of Transportation (Caltrans) in the environmental review process for The University Circle Phase II office 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 June 2020 NOP.

Project Understanding

The proposed site is 11.84 acres in East Palo Alto and is adjacent to US-101. The project proposes to redevelop the existing parking lot located in the southeast corner of the project site with a six-story, approximately 180,000-square-foot office building above three levels of below-grade parking. The project would connect to existing utilities lines (e.g., water, sanitary sewer, and storm drain lines) on Woodland Avenue and Manhattan Avenue and would incorporate stormwater detention measures to store and control project peak flow rates to pre-project levels.

Travel Demand Analysis

Please note that a travel demand analysis that provides a Vehicle Miles Traveled (VMT) analysis will be required as part of the California Environmental Quality Act

(CEQA) process. With the enactment of Senate Bill (SB) 743, Caltrans is focusing on transportation infrastructure that supports smart growth and efficient development to ensure alignment with State policies using efficient development patterns, innovative travel demand reduction strategies, multimodal improvements, and VMT as the primary transportation impact metric. The travel demand analysis should include:

- A vicinity map, regional location map, and site plan clearly showing project access in relation to the State Transportation Network (STN). Ingress and egress for all project components should be clearly identified. Clearly identify the State right-of-way (ROW). Project driveways, local roads and intersections, car/bike parking, and transit facilities should be mapped.
- A VMT analysis pursuant to the City's proposed guidelines. Projects that result in automobile VMT per capita above the threshold of significance for existing (i.e. baseline) city-wide or regional values for similar land use types may indicate a significant impact. If necessary, mitigation for increasing VMT should be identified. Mitigation should support the use of transit and active transportation modes. Potential mitigation measures that include the requirements of other agencies such as Caltrans are fully enforceable through permit conditions, agreements, or other legally-binding instruments under the control of the City.
- A schematic illustration of walking, biking and auto conditions at the project site and study area roadways. Potential safety issues for all road users should be identified and fully mitigated.
- The project's primary and secondary effects on pedestrians, bicycles, travelers with disabilities and transit performance should be evaluated, including countermeasures and trade-offs resulting from mitigating VMT increases. Access to pedestrians, bicycle, and transit facilities must be maintained.
- Clarification of the intensity of events/receptions to be held at the location and how the associated travel demand and VMT will be mitigated.

Vehicle Trip Reduction

From Caltrans' *Smart Mobility 2010: A Call to Action for the New Decade*, the project site is identified as **Place Type 1b: Urban Centers** where location efficiency factors, such as community design, and regional accessibility are strong. Given the place, type and size of the project, it should include a robust Transportation Demand Management (TDM) Program to reduce VMT and greenhouse gas emissions. Such measures are critical to facilitating efficient site access. The measures listed below can promote smart mobility and reduce

regional VMT.

- Project design to encourage walking, bicycling and transit access;
- Transit and trip planning resources such as a commute information kiosk;
- Real-time transit information system;
- Ten percent vehicle parking reductions;
- Charging stations and designated parking spaces for electric vehicles;
- Carpool and clean-fuel parking spaces;
- Designated parking spaces for a car share program;
- Unbundled parking;
- Secured bicycle storage facilities;
- Bicycle route mapping resources;
- Bicycle repair facilities;
- Participation/Formation in/of a Transportation Management Association (TMA) in partnership with other developments in the area; and
- Aggressive trip reduction targets with Lead Agency monitoring and enforcement.

Transportation Demand Management programs should be documented with annual monitoring reports by a TDM coordinator to demonstrate effectiveness. If the project does not achieve the VMT reduction goals, the reports should also include next steps to take in order to achieve those targets. Also, reducing parking supply can encourage active forms of transportation, reduce regional VMT, and lessen future transportation impacts on State facilities.

For additional TDM options, please refer to the Federal Highway Administration's *Integrating Demand Management into the Transportation Planning Process: A Desk Reference* (Chapter 8). The reference is available online at: <http://www.ops.fhwa.dot.gov/publications/fhwahop12035/fhwahop12035.pdf>.

Multimodal, Bicycle and Pedestrian Planning

The project's primary and secondary effects on pedestrians, bicyclists, travelers with disabilities, and transit users should be evaluated, including countermeasures and trade-offs resulting from mitigating VMT increases. Access for pedestrians and bicyclists to transit facilities must be maintained. The proposed project exhibits strong locational connections to bicycle and transit networks, including Caltrain, bicycle trails, connections to major employment centers and the Newell/Clark pedestrian/ bicycle overcrossing. The inclusion of well-marked, well-connected bicycle/pedestrian facilities can encourage mode shift here.

These smart growth approaches, given the project location and adequate TDM

measures, should be consistent with MTC's Regional Transportation Plan/SCS and would help meet Caltrans Strategic Management Plan targets.

Transportation Impact Fees

The City should identify project-generated travel demand and estimate the costs of transit and active transportation improvements necessitated by the proposed project; viable funding sources such as the City's existing development and/or transportation impact fee programs should also be identified. We encourage a sufficient allocation of fair share contributions toward multimodal and regional transit improvements to fully mitigate cumulative impacts to regional transportation. We also strongly support measures to increase sustainable mode shares, thereby reducing VMT.

The City should also ensure that a capital improvement plan identifying the cost of needed improvements, funding sources, and a scheduled plan for implementation is prepared along with the General Plan. Caltrans welcomes the opportunity to work with the City and local partners to secure the funding for needed mitigation. Traffic mitigation- or cooperative agreements are examples of such measures.

Construction-Related Impacts

Potential impacts to the State Right-of-Way (ROW) from project-related temporary access points should be analyzed. Mitigation for significant impacts due to construction and noise should be identified in the EIR. Project work that requires movement of oversized or excessive load vehicles on state roadways requires a transportation permit that is issued by Caltrans. To apply, visit: <https://dot.ca.gov/programs/traffic-operations/transportation-permits>.

Prior to construction, coordination is required with Caltrans to develop a Transportation Management Plan (TMP) to reduce construction traffic impacts to the STN.

Art Henriques, Senior Planner
July 8, 2020
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Thank you again for including Caltrans in the environmental review process. Should you have any questions regarding this letter, please contact Laurel Sears at (510) 286-5614 or laurel.sears@dot.ca.gov. Additionally, for future notifications and requests for review of new projects, please contact LDIGR-D4@dot.ca.gov.

Sincerely,

A handwritten signature in black ink that reads "Mark Leong". The signature is written in a cursive, flowing style.

Mark Leong
District Branch Chief
Local Development - Intergovernmental Review

c: State Clearinghouse