

DEPARTMENT OF TRANSPORTATION

DISTRICT 4
 OFFICE OF TRANSIT AND COMMUNITY PLANNING
 P.O. BOX 23660, MS-10D
 OAKLAND, CA 94623-0660
 PHONE (510) 286-5528
 TTY 711
 www.dot.ca.gov

7/22/2020



*Making Conservation
 a California Way of Life.*

Governor's Office of Planning & Research

July 20, 2020

Jul 20 2020

SCH # 2020060425

GTS # 04-SCL-2020-00761

STATE CLEARINGHOUSE

GTS ID: 19924

PM: SCL-101-42.3~42.7

John Davidson
 City of Santa Clara
 1500 Warburton Avenue
 Santa Clara, CA 95050

Freedom Circle Focus Area and Greystar General Plan Amendment- Notice of Preparation (NOP) for a Draft Environmental Impact Report (DEIR)

Dear John Davidson:

Thank you for including the California Department of Transportation (Caltrans) in the environmental review process for the Freedom Circle Focus Area and Greystar General Plan Amendment. 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 Freedom Circle project consists two components: the incorporation of the Focus Area description into the General Plan and the Greystar General Plan Amendment. The Focus Area is bounded by San Tomas Aquino Creek to the east, Great America Parkway (pkwy) to the west, Great America Theme Park to the north, and US-101 to the south.

The Focus Area would allow, subject to future planning study, 2,500 dwelling units beyond those anticipated in the Greystar General Plan Amendment and 2 million square feet (s.f.) of additional office space beyond that allowed under the current high-intensity office designation.

The Greystar component, located within the Focus Area, proposes to change

the General Plan land use designation for the 13.3 acre Greystar site and to construct a total of 1,100 dwelling units in three 7-story buildings, a 2-acre public park with a connection to the San Tomas Aquino Creek trail, and up to 2,000 s.f. of neighborhood-serving retail. In addition, the project also includes the removal of existing view easements along US-101 and relocation of the City of Santa Clara/Great America sign from its current location to the southeastern corner of the property.

The EIR would evaluate the wider Freedom Circle Focus Area at the program level and the Greystar component at the project level.

Highway Operations

In addition to the analysis on the intersections surrounding the area of the project vicinity, please provide the 95 percentile queue analysis for the following intersections for all the scenarios listed for this project:

- US-101 Northbound off-ramp to Great America Pkwy/Bowers Avenue
- US-101 Southbound off-ramp to Great America Pkwy/Bowers Avenue
- SR-237 Westbound off-ramp to Great America Pkwy
- SR-237 Eastbound off-ramp to Great America Pkwy

The impacts of turning movement queues at these intersections may spill back onto the mainline. The project should provide an intersection analysis at the above-mentioned intersections. The intersections should be analyzed as a system to determine the impacts of queues spilling back from one intersection into an upstream intersection and not as an isolated intersection analysis.

Hydraulics

Please note that any increase in runoff that drains towards the State Right of Way (ROW) should be metered to pre-construction levels.

When available, please share the Drainage Plans with Caltrans as the project moves along. For the Hydrology and Water Quality section, include the supporting calculations for the Bio-retention basin to show that the proposed project would meet the criteria of less-than-significant impact on the existing drainage pattern.

Please also include a section of floodplain in the EIR since there are areas of flood zone "A" in the project site and the San Tomas Aquino Creek along the east boundary of the site. This section needs to discuss the potential impact(s) to the floodplain due to the project and if any mitigation would be required.

Landscape Architecture

In the Aesthetics section, please include the discussion of the visual change experienced by highway travelers on US-101, including the proposal to move the Great America sign to the southeast corner of the site, near the creek.

Travel Demand Analysis

Please submit a travel demand analysis that provides a Vehicle Miles Traveled (VMT) analysis resulting from the proposed project. 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 ROW. Project driveways, local roads and intersections, car/bike parking, and transit facilities should be mapped.
- A VMT analysis pursuant to the City's 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.

Lead Agency

As the Lead Agency, the City of Santa Clara is responsible for all project mitigation, including any needed improvements to the STN. The project's fair share contribution, financing, scheduling, implementation responsibilities and lead agency monitoring should be fully discussed for all proposed mitigation measures.

Encroachment Permit

Please be advised that any permanent work or temporary traffic control that encroaches onto the ROW requires a Caltrans-issued encroachment permit. If any Caltrans facilities are impacted by the project, those facilities, including the sidewalk and curb, must meet American Disabilities Act (ADA) Standards as well as other Caltrans Standard Plan after project completion. As part of the encroachment permit submittal process, you may be asked by the Office of Encroachment Permits to submit a completed encroachment permit application, six (6) sets of plans clearly delineating the State ROW, six (6) copies of signed, dated and stamped (include stamp expiration date) traffic control plans, this comment letter, your response to the comment letter, and where applicable, the following items: new or amended Maintenance Agreement (MA), approved Design Standard Decision Document (DSDD), approved encroachment exception request, and/or airspace lease agreement. To download the permit application and to obtain more information on all required documentation, visit <https://dot.ca.gov/programs/traffic-operations/ep/applications>.

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. Additionally, for future notifications and requests for review of new projects, please contact ldigr-d4@dot.ca.gov.

Sincerely,



Mark Leong
District Branch Chief
Local Development - Intergovernmental Review
cc: State Clearinghouse