

California Department of Transportation

DISTRICT 4
OFFICE OF TRANSIT AND COMMUNITY PLANNING
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Governor's Office of Planning & Research

March 29, 2022

Mar 29 2022

STATE CLEARINGHOUSE

SCH #: 2022020665
GTS #: 04-SM-2022-00426
GTS ID: 25843
Co/Rt/Pm: SM/101/23.68

Kelly Beggs, Consulting Planner
City of Brisbane
50 Park Place
Brisbane, CA 94005

Re: Sierra Point Towers Project Notice of Preparation (NOP)

Dear Kelly Beggs:

Thank you for including the California Department of Transportation (Caltrans) in the environmental review process for the Sierra Point Towers 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 February 2022 NOP.

Project Understanding

The proposed project includes demolition of the existing parking garage and surface parking lots on the project site and construction of three new buildings and a new parking garage. Two existing office buildings on the project site would be retained and incorporated into the site design to create a life science campus. In total, the proposed project would result in approximately 863,220 square feet of new building construction and retention of 427,283 square feet of existing building space, for a total of approximately 1,290,503 square feet of office/life science uses, and a total of 3,858 parking spaces. The project site is located roughly 0.1 miles east of the United States Route (US)-101/Sierra Point Parkway interchange in the City of Brisbane.

Travel Demand Analysis

With the enactment of Senate Bill (SB) 743, Caltrans is focused on maximizing efficient development patterns, innovative travel demand reduction strategies, and multimodal improvements. For more information on how Caltrans assesses Transportation Impact Studies, please review Caltrans' Transportation Impact Study Guide ([link](#)).

If the project meets the screening criteria established in the City's adopted Vehicle Miles Traveled (VMT) policy to be presumed to have a less-than-significant VMT impact and exempt from detailed VMT analysis, please provide justification to support the exempt status in alignment with the City's VMT policy. Projects that do not meet the screening criteria should include a detailed VMT analysis in the Draft Environmental Impact Report (DEIR), which should include the following:

- 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 traffic safety issues to the State Transportation Network (STN) may be assessed by Caltrans via the Interim Safety Guidance.
- 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.

Mitigation Strategies

Location efficiency factors, including community design and regional accessibility, influence a project's impact on the environment. Using Caltrans' Smart Mobility Framework Guide 2020 ([link](#)), the proposed project site is identified as a Suburban Area where community design and regional accessibility is moderate.

Given the place, type and size of the project, the DEIR should include a robust Transportation Demand Management (TDM) Program to reduce VMT and greenhouse gas emissions from future development in this area. The measures listed below have been quantified by California Air Pollution Control Officers Association (CAPCOA) and shown to have different efficiencies reducing regional VMT:

- Traffic calming measures;
- Limiting parking supply;
- Ridesharing programs, Commute Trip Reduction programs, bike sharing programs;
- Transit and trip planning resources such as a commute information kiosk;
- Real-time transit information system;

- Transit access supporting infrastructure (including bus shelter improvements and sidewalk/ crosswalk safety facilities);
- Increased transit accessibility;
- Bus rapid transit;
- Discounted transit programs;
- VMT Banking and/or Exchange program;
- Increased density;
- Increased location efficiency;
- Increased mixed-use development;
- Orientation of Project towards non-auto corridor;
- Pedestrian network improvements;
- Provide local shuttles to increase transit outreach;
- Employer-based vanpool;
- School pool program; and
- Telecommuting programs and alternative work schedules

Using a combination of strategies appropriate to the project and the site can reduce VMT, along with related impacts on the environment and State facilities. TDM 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.

Please reach out to Caltrans for further information about TDM measures and a toolbox for implementing these measures in land use projects. Additionally, 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>.

Transportation Impact Fees

Please 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 development and/or transportation impact fees should also be identified. We encourage a sufficient allocation of fair share contributions toward multi-modal 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.

Lead Agency

As the Lead Agency, the City of Brisbane 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.

Equitable Access

If any Caltrans facilities are impacted by the project, those facilities must meet American Disabilities Act (ADA) Standards after project completion. As well, the project must maintain bicycle and pedestrian access during construction. These access considerations support Caltrans' equity mission to provide a safe, sustainable, and equitable transportation network for all users.

Thank you again for including Caltrans in the environmental review process. Should you have any questions regarding this letter, or for future notifications and requests for review of new projects, please email LDR-D4@dot.ca.gov.

Sincerely,



MARK LEONG
District Branch Chief
Local Development Review

c: State Clearinghouse