

## California Department of Transportation

DISTRICT 4  
OFFICE OF REGIONAL AND COMMUNITY PLANNING  
P.O. BOX 23660, MS-10D | OAKLAND, CA 94623-0660  
[www.dot.ca.gov](http://www.dot.ca.gov)



September 10, 2024

SCH #: 2022040352  
GTS #: 04-SM-2022-00603  
GTS ID: 26271  
Co/Rt/Pm: SM/109/1.121

Alvin Jen, Associate Planner  
City of East Palo Alto  
1960 Tate Street  
East Palo Alto, CA 94303

### **Re: Ravenswood Business District/4 Corners Specific Plan Update – Draft Subsequent Environmental Impact Report (SEIR)**

Dear Alvin Jen:

Thank you for including the California Department of Transportation (Caltrans) in the environmental review process for the Ravenswood Business District/4 Corners Specific Plan Update. The Local Development Review (LDR) Program reviews land use projects and plans to ensure consistency with our mission and state planning priorities. The following comments are based on our review of the July 2024 Draft SEIR.

Please note this correspondence does not indicate an official position by Caltrans on this project and is for informational purposes only.

#### **Project Understanding**

The proposed project is to update the Ravenswood Business District/4 Corners Specific Plan, which serves as a guide for development and redevelopment within the approximately 350-acre Specific Plan area. The proposed update to the Specific Plan would increase the total amount of development allowed within the plan area by increasing the maximum square footages for office, research and development/life science, light industrial, civic/community, tenant amenity, and the total number of residential units allowed to be developed. The plan area is within a mile of three freeways: U.S. Route 101 (U.S. 101), State Route 84 (SR 84), and State Route 109 (SR 109). A small portion of the plan area is directly adjacent to a segment of SR 109 that is within Caltrans right-of-way (ROW).

### **Travel Demand Analysis**

The project Vehicle Miles Traveled (VMT) analysis and significance determination are undertaken in a manner consistent with the City's adopted VMT policy. Per the SEIR, this project is found to have a less than significant VMT impact and proposes a number of Transportation Demand Management measures to encourage multimodal options, which is in support of meeting state policy goals on VMT reductions.

Future projects under this Specific Plan Update would make fair share contributions towards the identified improvements listed in the SEIR. Please note that some proposed improvements may require coordination with and approval by Caltrans.

### **Multimodal Transportation Planning**

Please review and include the reference to the *Caltrans District 4 Pedestrian Plan* (2021) and the *Caltrans District 4 Bike Plan* (2018) in the SEIR. These two plans studied existing conditions for walking and biking along and across the State Transportation Network (STN) in the nine-county Bay Area and developed a list of location-based and prioritized needs.

The *Caltrans District 4 Bike Plan* considers SR 109 from SR 84 to Donohoe Street/East Bayshore Road as a top priority for Corridor Improvement. The *Caltrans District 4 Pedestrian Plan* identifies the segment of SR 109 from SR 84 to Notre Dame Avenue a top priority for Highway Segment Improvements for pedestrians. Within the project limits, please consider incorporating higher visibility striping for any planned pedestrian crosswalks, installing "YIELD TO PEDS" signs as needed, and incorporating curb ramps on the crosswalks that are compliant with American Disability Act (ADA) standards.

Please note that any Complete Streets reference should be updated to reflect Caltrans Director's Policy 37 ([link](#)) that highlights the importance of addressing the needs of non-motorists and prioritizing space-efficient forms of mobility, while also facilitating goods movement in a manner with the least environmental and social impacts. This supersedes Deputy Directive 64-R1, and further builds upon its goals of focusing on the movement of people and goods.

### **Hydrology**

Please ensure that any increase in storm water runoff to State Drainage Systems or Facilities be treated, contained on project site, and metered to preconstruction levels. Any floodplain impacts must be documented and mitigated.

It is recommended to mention in Section 3.18.2.1, Project Impacts, Stormwater Drainage, 2013 Specific Plan Policy UTIL-3.1 that the latest storm water model analysis included in Appendix G - Utility Impact Study has been prepared with consideration of Sea Level Rise (SLR) and other current and proposed flood resiliency projects (primarily

levees) being constructed or proposed along the San Francisco Bay, in the direct vicinity of the proposed storm drain outfall locations.

Please note that Section 3.10.1.2, Flood Hazards references discussion of SLR effects in "Section 3.10.3 Non-CEQA Effects"; however, the SEIR does not have a section 3.10.3 and it appears that the intention was to reference "Section 3.11.3 Non-CEQA Effects".

### **Construction-Related Impacts**

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, please visit Caltrans Transportation Permits ([link](#)).

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

### **Lead Agency**

As the Lead Agency, the City 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 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.

We will achieve equity when everyone has access to what they need to thrive no matter their race, socioeconomic status, identity, where they live, or how they travel. Caltrans is committed to advancing equity and livability in all communities. We look forward to collaborating with the City to prioritize projects that are equitable and provide meaningful benefits to historically underserved communities.

Caltrans encourages the City to foster meaningful, equitable and ongoing public engagement in the Specific Plan development process to ensure future transportation decisions and investments reflect community interests and values. The public engagement process should include community-sensitive and equity-focused approaches seeking out the needs of individuals from underserved, Tribal, and low-income communities, the elderly, and individuals with disabilities.

### **Encroachment Permit**

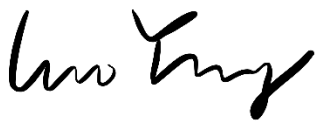
Please be advised that any permanent work or temporary traffic control that encroaches onto Caltrans' ROW requires a Caltrans-issued encroachment permit. As part of the encroachment permit submittal process, you may be asked by the Office of Encroachment Permits to submit a completed encroachment permit application package, digital set of plans clearly delineating Caltrans' ROW, digital copy 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.

The Office of Encroachment Permit requires 100% complete design plans and supporting documents to review and circulate the permit application package. To obtain more information and download the permit application, please visit Caltrans Encroachment Permits ([link](#)). Please note that the checklist TR-0416 is used to determine the appropriate Caltrans review process for encroachment projects. Your application package may be emailed to [D4Permits@dot.ca.gov](mailto:D4Permits@dot.ca.gov).

Thank you again for including Caltrans in the environmental review process. Should you have any questions regarding this letter, please contact Luana Chen, Transportation Planner, via [LDR-D4@dot.ca.gov](mailto:LDR-D4@dot.ca.gov).

For future early coordination opportunities or project referrals, please visit Caltrans LDR website ([link](#)) or contact [LDR-D4@dot.ca.gov](mailto:LDR-D4@dot.ca.gov).

Sincerely,



YUNSHENG LUO  
Branch Chief, Local Development Review  
Office of Regional and Community Planning

c: State Clearinghouse