

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



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Christopher Dacumos, Senior Planner
City of East Palo Alto
1960 Tate Street
East Palo Alto, CA 94303

Re: Four Corners Mixed Use Project + Notice of Preparation (NOP) of an Environmental Impact Report

Dear Nicholas Hamilton:

Thank you for including the California Department of Transportation (Caltrans) in the environmental review process for the Four Corners Mixed Use 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 September 2022 NOP.

Project Understanding

The project is proposing to develop a mixed-use project on the 6.1-acre parcel located at 1675 Bay Road, adjacent to SR-109. The development includes up to 40,000 square feet of retail, restaurants, and community space, 180 units of mixed-income housing, and 500,000 square feet of employment uses (e.g., life science/laboratory and research space).

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 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 ([link](#)).
- 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 community where community design is moderate to weak and regional accessibility is varied.

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 Project design to encourage mode shift like walking, bicycling and transit access;

- Orientation of project towards non-auto corridor;
- Location of project near bicycle network;
- Incorporation of bicycle lanes in street design;
- Pedestrian network improvements;
- Traffic calming measures;

- Implementation of a neighborhood electric vehicle (EV) network, including designated parking spaces for EVs;
- Limiting parking supply;
- Unbundled parking from property costs;
- Implementation of Urban Non-Motorized Zone
- Market price public parking;
- 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);
- Bike parking near transit facilities.

The Caltrans District 4 Bike Plan (2018) and Caltrans District 4 Pedestrian Plan (2021) evaluated bicycling and pedestrian needs along and across the STN in the nine-county Bay Area. These efforts culminated in a list of prioritized improvements to address bicycling and pedestrian needs, taking into account safety, equity, existing and future bicycle demand. Near the proposed project location, the plans identify the need for Class IV bike facilities and pedestrian improvements along the entirety of SR 114, as well as intersection improvements at the SR 114 crossing of the Dumbarton rail line. The City of Menlo Park is currently seeking funding to implement these improvements. Additionally, Caltrans and the City of East Palo Alto are now in the final design phases of a new separate pedestrian and bicycle overcrossing of US 101 at University Avenue. Such improvements will expand and enhance the pedestrian and bicycle network surrounding the proposed project location, and should encourage the project sponsors to plan for and invest in active transportation infrastructure on premises and nearby.

Near the project location, Caltrans District 4 Bike and Pedestrian Plans further identify needs for crossing improvements at the intersections of US 101 and Clarke, Euclid, and Ralmar Avenues, a new separated crossing at US 101 and University Avenue, buffered Class II bike lanes along SR 109 from Notre Dame Avenue to SR 84 with pedestrian crossing improvements at Adams Drive and Purdue Avenue, intersection improvements at the SR 109 crossing of the Dumbarton rail line, improvements to the Class I shared-use path along SR 84 on the western approach and over the span of the Dumbarton Bridge, and partner-identified pedestrian needs at the intersection of Donohoe Street and University Avenue. When preparing the environmental document, please include these nearby stated needs and the larger regional objective of a connected active transportation and transit network. Improving the existing nearby bike and pedestrian infrastructure, including any of the needs mentioned above, would be considered partial implementations of the District 4 Bike or Pedestrian Plans.

The proposed site is located near the Bay Trail, an important local and regional recreational trail, in addition to unique open space preserves and wildlife refuges such as Ravenswood Open Space Preserve, Baylands Nature Preserve, and Don Edwards San Francisco Bay National Wildlife Refuge. For project Fair Share contributions, please consider improving trailheads, signage and wayfinding, crossing improvements at nearby intersections, bike lanes along adjoining streets, and/or other improvements to promote active transportation uses in coordination with the City, SamTrans, and Caltrans.

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, refer to the California Air Pollution Control Officers Association (CAPCOA) Handbook for Analyzing Greenhouse Gas Emission Reductions, Assessing Climate Vulnerabilities, and Advancing Health and Equity ([link](#)).

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 East Palo Alto 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.

Encroachment Permit

Please be advised that any permanent work or temporary traffic control that encroaches onto Caltrans' Right-of-Way (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. Your application package may be emailed to D4Permits@dot.ca.gov.

Please note that Caltrans is in the process of implementing an online, automated, and milestone-based Caltrans Encroachment Permit System (CEPS) to replace the current permit application submittal process with a fully electronic system, including online payments. The new system is expected to be available during 2022. To obtain information about the most current encroachment permit process and to download the permit application, please 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, 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