

California Department of Transportation

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

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STATE CLEARINGHOUSE

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Tim Wong, Senior Planner
City of Palo Alto
250 Hamilton Avenue
Palo Alto, CA 94301

Re: City of Palo Alto 2023-2031 Housing Element Update Notice of Preparation (NOP) for Draft Environmental Impact Report (DEIR)

Dear Tim Wong:

Thank you for including the California Department of Transportation (Caltrans) in the environmental review process for the City of Palo Alto Housing Element Update 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 proposed project consists of a complete update to the Housing Element and related edits to the City's Comprehensive Plan Land Use Element and Palo Alto Municipal Code. The goals, policies, and actions in the Housing Element are required to meet Palo Alto's Regional Housing Needs Allocation (RHNA). Palo Alto's latest RHNA calls for 6,086 new housing units, including 2,452 new units for residents in the low-, very low-, and extremely low-income categories. The City chose to have a buffer of 10 percent above its RHNA. Thus, overall, the City's zoning and other land use regulations must accommodate at least 6,695 new units during the 8-year planning period.

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](#)). Please note that current and future land use projects proposed near and

adjacent to the State Transportation Network (STN) may be assessed, in part, through the TISG.

Transportation Impact Fees

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 Vehicle Miles Traveled (VMT). 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.

Lead Agency

As the Lead Agency, the City of 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.

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