

## 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)



April 22, 2024

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Kelly Cha, Senior Planner  
City of Palo Alto  
250 Hamilton Avenue, 6th Floor  
Palo Alto, CA 94301

Governor's Office of Planning & Research

**Apr 23 2024**

**STATE CLEARINGHOUSE**

### **Re: North Ventura Coordinated Area Plan – Draft Environmental Impact Report (DEIR)**

Dear Kelly Cha:

Thank you for including the California Department of Transportation (Caltrans) in the environmental review process for the North Ventura Coordinated Area Plan. 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 March 2024 DEIR.

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

#### **Project Understanding**

The proposed project will adopt land use policies and programs that would allow for additional 530 residential units and would incorporate two acres of new public open space within the North Ventura Coordinated Area. Residential densities would range from low to high. The plan would additionally result in a net reduction of up to 278,000 square feet of office space and up to 7,500 square feet of retail space.

The project site is located at the intersection State Route (SR)-82 and Page Mill Rd in Palo Alto and is approximately 60 acres with three proposed intersection improvement sites located within Caltrans' Right of Way (ROW).

#### **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 Vehicle

Miles Traveled (VMT) analysis for land use projects, please review Caltrans' Transportation Impact Study Guide ([link](#)). The project VMT analysis and significance determination are undertaken in a manner consistent with the City of Palo Alto VMT policy. Per DEIR, this project is found to have a less than significant VMT impact.

However, since the additional trips generated from this project would impact several intersections along El Camino Real within Caltrans' jurisdiction, we request an in-depth traffic safety impact analysis including Intersection Safety Operational Assessment Process (ISOAP).

### **Fair Share Contributions**

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

The DEIR has identified that the additional trips generated from this project could have an adverse effect on the operation of three Caltrans intersections under horizon plus project conditions. Please consider the following Projects for fair share contributions to mitigate the impact of this project to the State Transportation Network:

- Metropolitan Transportation Commission (MTC)'s Plan Bay Area 2050: Bus Rapid Transit (BRT) Modernization with SamTrans on El Camino Real (RTP ID 21-T10-078). This program includes funding to implement BRT improvements to existing bus service along El Camino Real from Daly City Bay Area Rapid Transit (BART) to Palo Alto Caltrain Station. Improvements include frequency upgrades (15-minute peak headways), dedicated lanes (45% of route), transit priority infrastructure and transit signal priority.
- Active transportation projects in support of building a multimodal transportation system to accommodate users of all ages and abilities:
  - Caltrans District 4 Bike Plan: Class IV separated buffered bike lanes on El Camino Real from Sand Hill Rd to San Antonio Rd.

### **Hydrology**

There would be significant impact from storm runoff due to proposed development. Please ensure that any increase in storm water runoff from the development do not encroach on Caltrans' ROW but be efficiently intercepted by drainage inlets. The existing storm drain system in Caltrans' ROW might need to be upgraded in size to allow increased runoff. A detailed Drainage report will be required to be submitted to our office for review and approval.

### **Freight**

SR-82 is identified as a Terminal Access Route by the Freight Network Designation. Lane widths and turning movements should be considered during development.

### **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.

### **Encroachment Permit**

This project would result in a significant increase in usage for El Camino Real. Please identify whether any projects will be required on SR-82 in the immediate vicinity as a result of this area plan to accommodate the residential and mixed use. In the event of such projects, please provide information if there would be dedications for additional ROW required as a condition of future development.

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 checklist TR-0416 ([link](#)) is used to determine the appropriate Caltrans review process for encroachment projects. 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](#)). Your application package may be emailed to [D4Permits@dot.ca.gov](mailto:D4Permits@dot.ca.gov).

### **Equity**

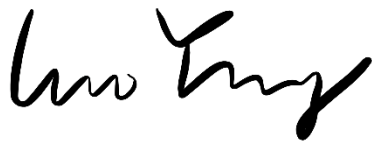
We will achieve equity when everyone has access to what they need to thrive no matter their race, socioeconomic status, identity, where they live, or how they travel. Caltrans is committed to advancing equity and livability in all communities. We look

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forward to collaborating with the City to prioritize projects that are equitable and provide meaningful benefits to historically underserved communities. 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, please contact Marley Mathews, Transportation Planner, via [LDR-D4@dot.ca.gov](mailto:LDR-D4@dot.ca.gov). For future early coordination opportunities or project referrals, please contact [LDR-D4@dot.ca.gov](mailto:LDR-D4@dot.ca.gov).

Sincerely,

A handwritten signature in black ink, appearing to read "Luo Yunsheng". The signature is fluid and cursive, with the first name "Luo" being more prominent and the last name "Yunsheng" following in a similar style.

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

c: State Clearinghouse