

DEPARTMENT OF TRANSPORTATION

DISTRICT 4

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Governor's Office of Planning & Research

*Making Conservation
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STATE CLEARINGHOUSE

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Art Henriques, Contract Project Planner
City of East Palo Alto, Community and Economic
Development Department
1960 Tate Street
East Palo Alto, CA 94303

Woodland Park Euclid Improvements Project- Notice of Preparation (NOP) of an Environmental Impact Report**Dear Art Henriques:**

Thank you for including the California Department of Transportation (Caltrans) in the environmental review process for the Woodland Park Euclid Improvements 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 May 2020 NOP.

Project Understanding

The 3.92-acre project site is on East Palo Alto's west side, located northwest of University Avenue, adjacent to U.S. 101 and northwest of University Circle. The project is within the city limits of East Palo Alto. The project area consists of a grouping of 14 individual parcels/addresses. The project parcels are bounded by West Bayshore Road, Manhattan Avenue, Euclid Avenue and O'Connor Street. The project is seeking a General Plan and zoning amendment to create a Neighborhood Center Residential Overlay (NCO), allowing new development standards for the proposed project. These standards would allow mixed-use, neighborhood-serving commercial and community uses on the ground floor, additional housing units, and increased building heights.

The project proposes removal of the existing 161 units, to be replaced with 605 residential units ranging in size. The residential buildings would be up to 13 stories in height. The project plans include an affordable housing plan, tenant relocation

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plan, and fiscal impact analysis, not necessarily subject to environmental review.

Travel Demand Analysis

Please submit a travel demand analysis that provides a Vehicle Miles Traveled (VMT) analysis resulting from the proposed project. The travel demand analysis should include:

- A vicinity map, regional location map, and site plan clearly showing project access in relation to the State Transportation Network (STN). Ingress and egress for all project components should be clearly identified. Clearly identify the State right-of-way (ROW). Project driveways, local roads and intersections, car/bike parking, and transit facilities should be mapped.
- A 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 safety issues for all road users should be identified and fully mitigated.
- 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.

With respect to the local and regional roadway system, provide project related trip generation, distribution, turning movements, and assignment estimates. The project-generated trips should be added to the existing, future and cumulative scenario traffic volumes for the intersections affected by the project. In conducting these evaluations, it is necessary to use demand volumes rather than output volumes or constrained flow volume. If there are impacts to the STN, the project applicant shall coordinate with the City of East Palo Alto and Caltrans to discuss mitigation measures.

Vehicle Trip Reduction

From Caltrans' *Smart Mobility 2010: A Call to Action for the New Decade*, the project site is identified as **Place Type 1b: Urban Centers** where location efficiency factors, such as community design, and regional accessibility are strong. Given the place, type and size of the project, it should include a robust Transportation Demand Management (TDM) Program to reduce VMT and greenhouse gas emissions. Such measures are critical to facilitating efficient site access. The measures listed below can promote smart mobility and reduce regional VMT:

- Project design to encourage walking, bicycling and transit access;
- Transit and trip planning resources such as a commute information kiosk;
- Ten percent vehicle parking reductions;
- Charging stations and designated parking spaces for electric vehicles;
- Carpool and clean-fuel parking spaces;
- Designated parking spaces for a car share program;
- Unbundled parking;
- Secured bicycle storage facilities;
- Bicycle repair facilities;
- Participation/Formation in/of a Transportation Management Association (TMA) in partnership with other developments in the area; and
- Aggressive trip reduction targets with Lead Agency monitoring and enforcement.

Transportation Demand Management 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. Also, reducing parking supply can encourage active forms of transportation, reduce regional VMT, and lessen future transportation impacts on State facilities.

For additional TDM options, please refer to the 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>.

Multimodal, Bicycle and Pedestrian Planning

The project's primary and secondary effects on pedestrians, bicyclists, travelers with disabilities, and transit users should be evaluated, including countermeasures and trade-offs resulting from mitigating VMT increases. Access for pedestrians and bicyclists to transit facilities must be maintained. The

proposed project exhibits strong locational connections to bicycle and transit networks, including Caltrain, bicycle trails, connections to major employment centers and the Newell/Clark bicycle and pedestrian overcrossing. The inclusion of well-marked, well-connected bicycle and pedestrian facilities can encourage mode shift here.

Given the project location and adequate TDM measures, these smart growth approaches should be consistent with MTC's Regional Transportation Plan/SCS and would help meet Caltrans Strategic Management Plan targets.

Transportation Impact Fees

The City should 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 the City of East Palo Alto's development impact fee program for transportation infrastructure should also be identified. We encourage a sufficient allocation of fair share contributions toward multimodal 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.

The City should also ensure that a capital improvement plan identifying the cost of needed improvements, funding sources, and a scheduled plan for implementation is consistent with the East Palo Alto General Plan. 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.

Encroachment Permit

Please be advised that any permanent work or temporary traffic control that encroaches onto the ROW requires a Caltrans-issued encroachment permit. If any Caltrans facilities are impacted by the project, those facilities must meet American Disabilities Act (ADA) Standards after project completion. 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, six (6) sets of plans clearly delineating the State ROW, six (6) copies 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.

Art Henriques, Project Planner
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To download the permit application and to obtain more information on all required documentation, 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, please contact Laurel Sears at (510)286-5614 or laurel.sears@dot.ca.gov.

Sincerely,

A handwritten signature in black ink that reads "Mark Leong". The signature is written in a cursive, flowing style with a long horizontal stroke at the end.

Mark Leong
District Branch Chief
Local Development - Intergovernmental Review

cc: State Clearinghouse