Appendix A: Notice of Preparation (NOP) and Comments Received

NOTICE

NOTICE OF PREPARATION
of an
ENVIRONMENTAL IMPACT REPORT (EIR)

Distribution Date: February 21, 2017

Project Title:	Gateway Crossings Project (Files: PLN2016-12318, PLN2016-12321, PLN2016-12481, and CEQ2016-01025)
Location:	1205 Coleman Avenue an approximately 24-acre project site located at the southwest corner of Coleman Avenue and Brokaw Road, Santa Clara, CA 95050 (APN: 230-46-069 and 070)
Applicant:	Hunter Storm, LLC
Property Owner:	TOD Brokaw, LLC
Request:	General Plan Amendment to change the land use designation on the project site to allow residential development at 51 to 100 dwelling units per acre in conjunction with a minimum commercial floor area ratio of 0.20; an amendment to the General Plan Land Use Map for the Santa Clara Station Focus Area to reflect the General Plan change; a rezoning of the project site; and a zoning code text amendment to add a new zoning designation to facilitate the development of the land uses and building types contemplated for the project site. Approval of the proposed Project will require actions by the City of Santa Clara, including the preparation and certification of an Environmental Impact Report (EIR).

As the Lead Agency, the City of Santa Clara will prepare an EIR for the above-referenced Project. The City is seeking comments from Responsible Agencies and the public as to **the scope and content** of the environmental information that should be considered for inclusion in the EIR for the proposed project.

The project description, location, and potential environmental effects are contained in the materials provided in the form of a Notice of Preparation (NOP). The NOP is available from the Planning Division Office at the address below, and is available on line at the City's website [www.santaclaraca.gov\CEQA].

You may provide submit written comments and/or attend the following City-Sponsored EIR Scoping Meeting to convey comments within the scope of the environmental analysis:

When: **Thursday, March 16, 2017, from 6:00 p.m. to 7:00 p.m.**
Where: **City of Santa Clara City Hall – City Council Chambers, 1500 Warburton Avenue, Santa Clara, CA, 95050.**

Public agencies and the public will be provided with an opportunity to identify issues that they believe should be addressed in the EIR that will be prepared for this project. Written comments for the EIR scope and content will be accepted if they are received by 5:00 p.m. on March 23, 2017. Please note that the EIR scoping meeting noted above will focus on identifying issues to be studied in the EIR. The project itself will be discussed at publicly noticed community meetings commencing in the next few months. If you wish to respond in writing, please send your comments to:

Lead Agency: City of Santa Clara, Planning Division
Contact: Debby Fernandez, Associate Planner, dfernandez@santaclaraca.gov
1500 Warburton Avenue, Santa Clara, CA 95050
Phone: (408) 615-2450, FAX: (408) 247-9857

Andrew Crabtree Date 2-21-17
Director of Community Development, City of Santa Clara

Contact Planning on 03/24/2017 for removal of this notice from posting review board.

NOTICE

NOTICE OF PREPARATION OF A DRAFT ENVIRONMENTAL IMPACT REPORT FOR THE GATEWAY CROSSINGS PROJECT

Project Applicant: TOD Brokaw, LLC
File Nos. PLN2016-12318, PLN2016-12321, PLN2017-12481 and CEQ2016-01025

February 21, 2017

To: State Clearinghouse, Responsible Agencies, Other Public Agencies, Interested Individuals, Interested Organizations, and the County Clerk of Santa Clara

From: City of Santa Clara
Community Development, Planning Division
1500 Warburton Avenue, Santa Clara, CA 95050

Notice is hereby given that the City of Santa Clara, as the Lead Agency, will prepare an Environmental Impact Report (EIR) for the Gateway Crossings project. This Notice of Preparation (NOP) has been prepared in compliance with California Environmental Quality Act (CEQA) Guidelines §15082. The purpose of this NOP is to solicit comments from the public and public agencies on the scope and content of the EIR for the project.

The City has determined that the project could result in potentially significant impacts and, therefore, an EIR is required. An EIR is a detailed statement prepared under CEQA describing and analyzing the significant environmental effects of a project and discussing ways to mitigate or avoid the effects. Consistent with CEQA Guidelines §15206, the project is considered of statewide, regional, or areawide significance.

Members of the public and public agencies are invited to provide comments on the scope and content of the EIR to the City. The City would like to know the views of your agency as to the scope and content of the environmental information that is germane to your agency's statutory responsibilities in connection with the proposed project. Your agency may use the EIR prepared by the City when considering your permits or other approvals for the project.

Due to the time limits mandated by State law, your response **must be sent** at the earliest possible date, but **no later than** the close of the 30-day NOP review period on **March 23, 2017** by **5:00 PM**. Please send your response to:

City of Santa Clara, Community Development Department
Attention: Debby Fernandez
1500 Warburton Avenue
Santa Clara, CA 95050
dfernandez@santaclaraca.gov

If you submit comments on the scope and content of the EIR, you will automatically be added to the City's distribution list for future notices and information about the environmental review process for the project.

In addition, the City will hold a Public EIR Scoping Meeting to receive comments regarding the scope and content of the EIR on March 16, 2017 at 6:00 PM at City Hall in the Council Chambers located at 1500 Warburton Avenue. Members of the public and public agencies are welcome to attend.

The proposed project, its location, and potential environmental effects are described on the following pages.

INTRODUCTION

The purpose of an EIR is to inform decision makers and the general public of the environmental effects of a proposed project. The EIR process is intended to: provide environmental information sufficient to evaluate a project and its potential for significant impacts on the environment; examine methods of reducing adverse environmental impacts; and consider alternatives to the project. Upon finding the EIR is complete and in compliance with CEQA, the City Council will consider certification of the EIR at a public hearing and may take action on the proposed project.

PROJECT LOCATION

The approximately 24-acre project site (Assessor's Parcel Numbers 230-46-069 and 230-46-070) is located at the southwest corner of Coleman Avenue and Brokaw Road.[1] Most of the project site is located in the City of Santa Clara, with the tip of the southeast corner in the City of San José. The project site was previously developed with several industrial/office buildings totaling approximately 272,840 square feet, which were recently demolished. Currently, the site is undeveloped. Regional and vicinity maps of the project site are shown on Figures 1 and 2.

The project site is bounded by Brokaw Road and commercial uses to the north, Coleman Avenue and commercial and industrial uses to the east, a parking lot and undeveloped land to the south, and a storage area and railroad tracks to the west. An aerial photograph with surrounding land uses is shown on Figure 3.

The project site is part of a larger 244-acre area designated as the *Santa Clara Station Focus Area* in the City's General Plan. The Santa Clara Station Focus Area includes land on both the west and east side of the railroad tracks and is generally bound by De La Cruz Boulevard, Reed Street, and Martin Avenue to the north and northeast, and Franklin Street and El Camino Real to the south and southwest (see Figure 2). At the center of this area is the existing Santa Clara Transit Station, which is served by Caltrain, Altamont Commuter Express, Capital Corridor, and Valley Transportation Authority bus service. The Transit Station will ultimately include the Bay Area Rapid Transit terminus of the planned Fremont, San José, and Santa Clara extension.

The Santa Clara Station Focus Area is envisioned to be a new gateway into the City with office, hotel, retail, and high-density residential uses that maximizes the use of existing and planned transit and provides for improved pedestrian, bicycle, and transit connections. Pedestrian and bicycle circulation is a priority within the Santa Clara Station Focus Area, with transit and vehicular access a priority for access to the Station.

[1] For ease of reference, this document assumes Brokaw Road is north of the site and Coleman Avenue is east of the site.

PROJECT DESCRIPTION

The project requires a General Plan Amendment to change the land use designation on the site to allow residential development at 51 to 100 dwelling units per acre in conjunction with a minimum commercial floor area ratio of 0.20; an amendment to the General Plan Land Use Map for the Santa Clara Station Focus Area to reflect the General Plan change; a rezoning of the project site; and a Zoning Code text amendment to add a new zoning designation to facilitate the development of the land uses and building types contemplated for the project site. The project also includes a Vesting Tentative Parcel Map and Development Agreement. The project would develop one of two options at the project site:

- **Option 1:** Up to 1,400 residential dwelling units and up to 215,000 square feet of commercial uses, or
- **Option 2:** Up to 1,600 residential dwelling units and up to 215,000 square feet of commercial uses.

The proposed maximum building height on the site under both options is 145 feet and subject to the Federal Aviation Administration regulation Part 77 height restrictions. The project may also include a new traffic signal on Coleman Avenue.

ENVIRONMENTAL EFFECTS OF THE PROJECT

The EIR will describe the existing environmental conditions on the project site and will identify the significant effects on the environment ("impacts") anticipated to result from implementation of the project. Where potentially significant impacts are identified, the EIR will identify mitigation measures to avoid or reduce those impacts, as feasible. The EIR will also discuss a reasonable range of alternatives to the project that could reasonably attain most of the basic objectives of the project and would avoid or substantially lessen any of the significant environmental impacts (CEQA Guidelines §15126.6(a)). The EIR will analyze the project's significant environmental impacts in the topic areas described below.

- **Aesthetics** – The EIR will describe the existing visual character of the project area and the projected changes resulting from implementation of the project. Visual impacts resulting from the proposed project could include significant adverse environmental effects resulting from building mass and height, lighting, and possible glare to adjacent land uses.

- **Agricultural and Forestry Resources** –The project site is located in an urban and developed area. The project site is not used for agricultural or forestry uses. The EIR will discuss the project's impact on existing farmland, forest land, and timberland.

- **Air Quality** – The EIR will describe the regional air quality conditions of the San Francisco Bay Area and will evaluate air quality impacts from the project, in conformance with the criteria identified by the Bay Area Air Quality Management District. The project's consistency with the 2010 Bay Area Clean Air Plan will also be discussed.

- **Biological Resources** – The EIR will describe the existing biological resources onsite and discuss if the project would have a substantial adverse impact on special-status species,

sensitive habitat (including wetlands), wildlife movement, or native wildlife nursery sites. The EIR will also discuss if the project conflicts with local policies or ordinances protecting biological resources.

- **Cultural Resources** – The project site is currently undeveloped; there are no structures onsite. The EIR will describe the potential for cultural resources onsite and discuss if the project would result in significant impacts to unknown, buried historical resources, archaeological resources, paleontological resources, unique geologic features, and human remains.

- **Energy** – The EIR will examine the potential for the project to result in excessive or inefficient use of energy and will discuss the energy conservation measures included in the project.

- **Geology and Soils** – The existing geologic and soil conditions at the project site will be described in the EIR. The EIR will discuss if the project would exacerbate geological and soil conditions that could result in significant offsite impacts.

- **Greenhouse Gas Emissions** – The EIR will discuss the project's consistency and conformance with applicable plans, policies, and/or regulations adopted for the purpose of reducing greenhouse gas emissions, including the City's Climate Action Plan, and assess whether the project's greenhouse gas emissions would have a significant impact on the environment.

- **Hazards and Hazardous Materials** – The EIR will evaluate the potential for hazardous materials contamination on and near the project site which could be affected by project construction (including grading and excavation activities). In addition, the EIR will discuss if the project would conflict with the Airport's Comprehensive Land Use Plan and result in a safety hazard for people residing or working in the project area.

- **Hydrology and Water Quality** – The EIR will describe the existing hydrologic and drainage conditions (including flooding) at the project site, as well as any changes in site drainage and hydrological conditions resulting from the implementation of the proposed project. Water quality impacts during and post-project construction will also be addressed.

- **Land Use and Planning** – The EIR will describe the existing land uses on and adjacent to the project site, and discuss the project's conformance with relevant land use plans, policies, and regulations including the City's General Plan and Zoning Ordinance. The EIR will evaluate the proposed land use changes and the relationship between the proposed uses and existing development in the area. Land use conflicts between the proposed uses and existing, surrounding uses will be identified.

- **Mineral Resources** – The EIR will describe if the project would result in the loss of availability of a known mineral resource or locally-important mineral resource recovery site.

- **Noise and Vibration** – The project site is subject to several sources of urban noise and vibration including vehicular traffic, aircraft, and railroad passbys. The EIR will describe the

existing noise and vibration conditions in the project area and will address noise and vibration impacts from the project (including noise from project-generated traffic and project construction).

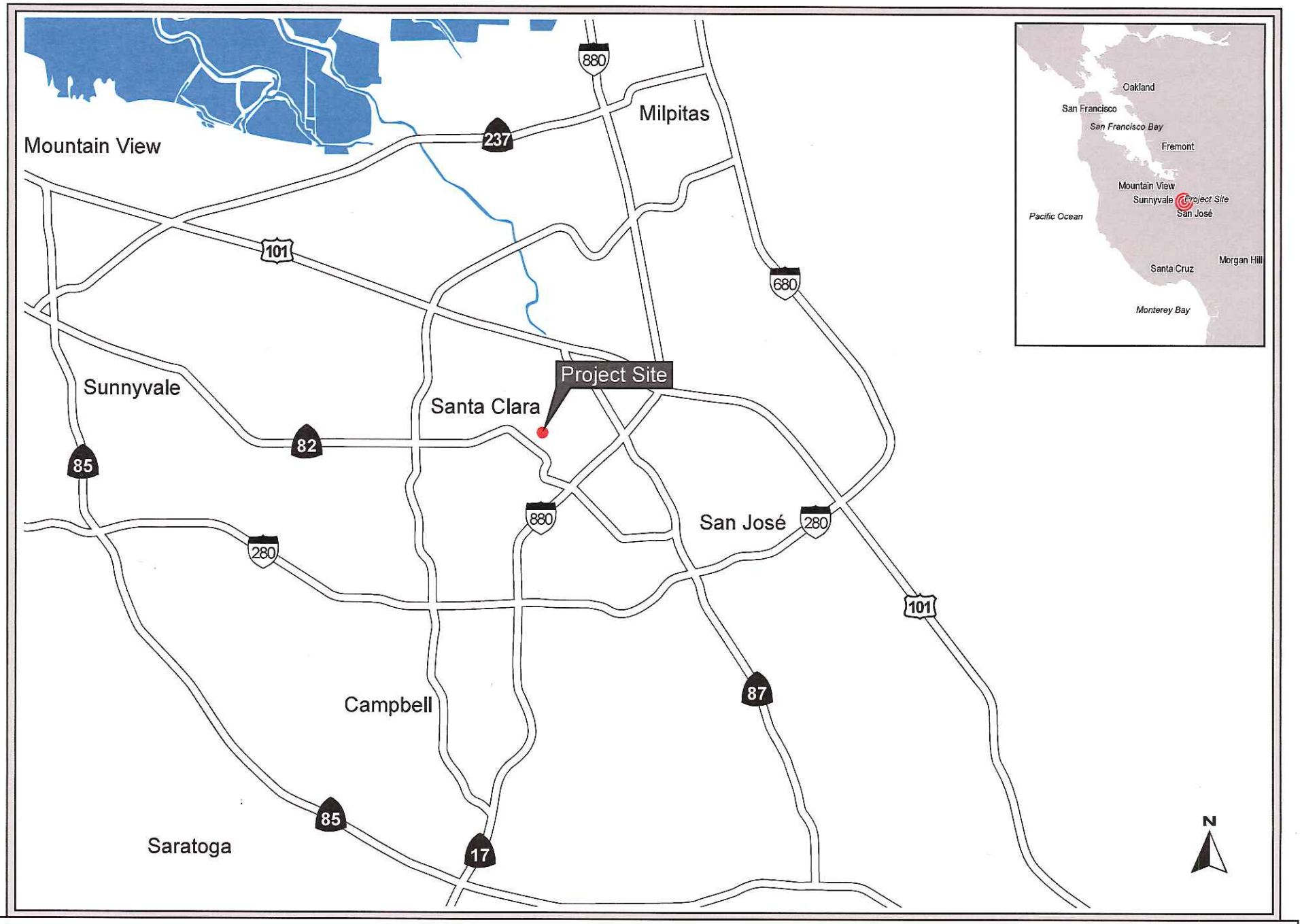
- **Population and Housing** – The project site is currently undeveloped and the proposed project includes new housing (as well as commercial uses) onsite. The EIR will discuss if the project would induce substantial population growth in the area, displace substantial numbers of existing housing units, or displace a substantial number of residents.

- **Public Services** – The EIR will discuss the availability of public services (e.g., fire and police protection, schools, and parks and recreational facilities) in the project area and the potential for the project to require the expansion or construction of those facilities.

- **Transportation** – The EIR will describe the existing transportation network serving the project site and will evaluate the traffic impacts resulting from the proposed project (including impacts to intersection and freeway segment levels of service, as well as transit, bicycle, and pedestrian facilities).

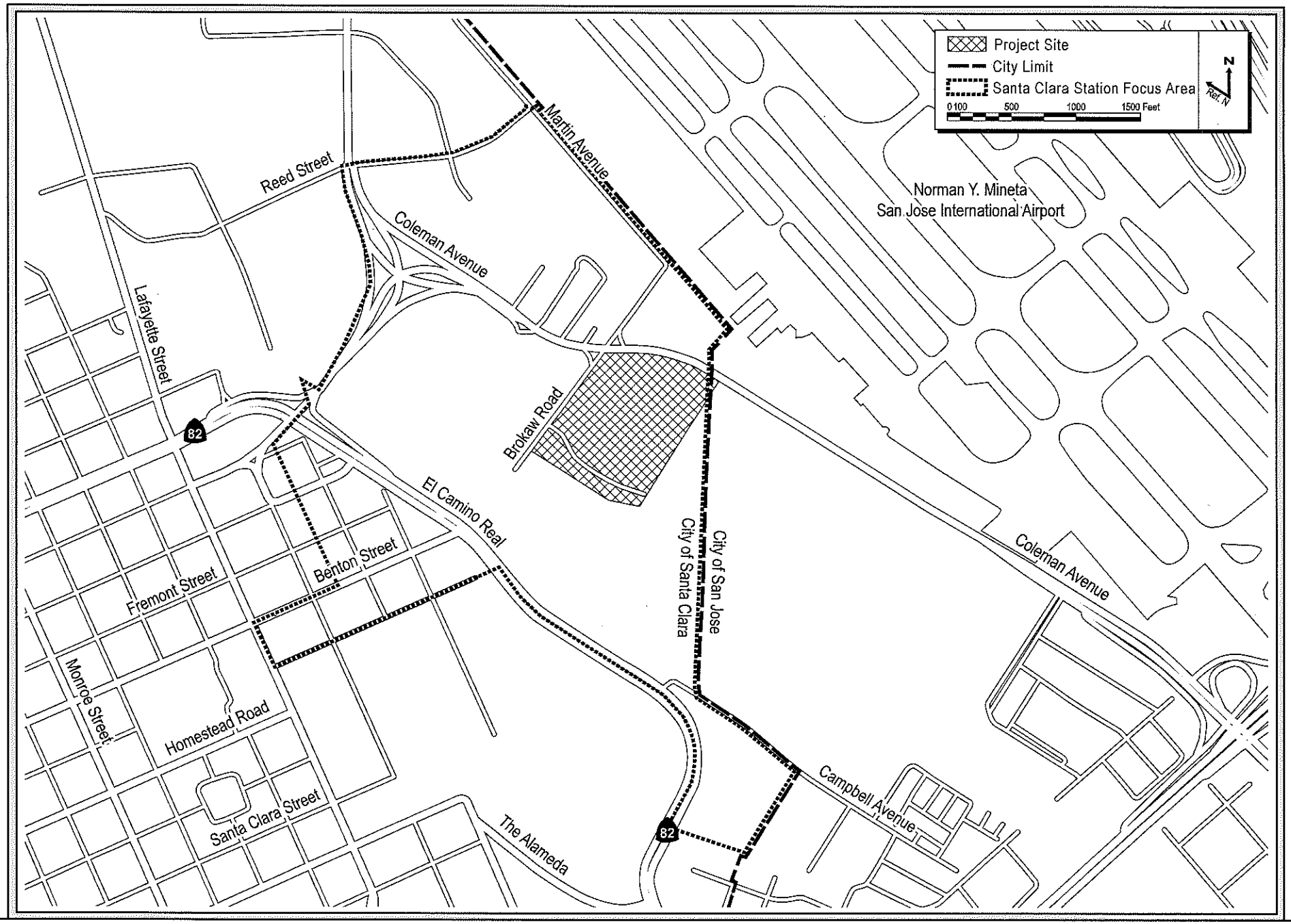
- **Utilities and Service Systems** – The EIR will describe the existing sanitary sewer, storm drain, water, and solid waste services in the project area. The EIR will address the ability and capacity of the existing utilities in the project area to serve the project.

- **Cumulative Impacts** – The EIR will evaluate the significant cumulative impacts of the project when considered with other past, present, and reasonably foreseeable future projects in the development area and discuss if the project's contribution is cumulatively considerable.



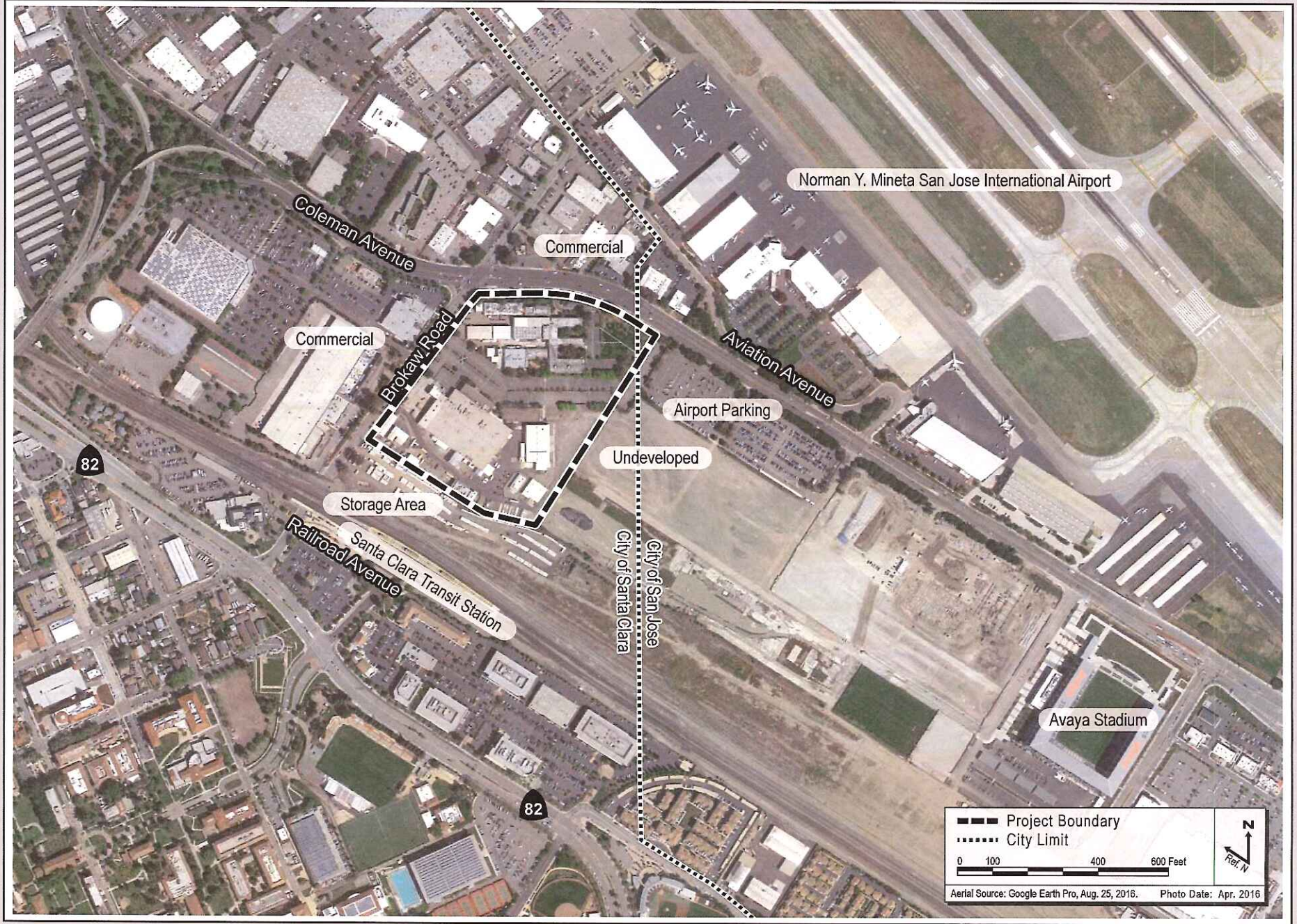
REGIONAL MAP

FIGURE 1



VICINITY MAP

FIGURE 2



AERIAL PHOTOGRAPH AND SURROUNDING LAND USES

FIGURE 3

STATE OF CALIFORNIA
NATIVE AMERICAN HERITAGE COMMISSION
1550 Harbor Blvd., Suite 100
West Sacramento, CA 95691
Phone (916) 373-3710
Fax (916) 373-5471
Email: nahc@nahc.ca.gov
Website: http://www.nahc.ca.gov
Twitter: @CA_NAHC

Edmund G. Brown Jr., Governor

RECEIVED
MAR 24 2017
PLANNING DIVISION

March 21, 2017

Debby Fernandez
City of Santa Clara
16500 Warburton Avenue
Santa Clara, CA 95050

Re: SCH# 2017022066 Gateway Crossings, Santa Clara County, California

Dear Ms. Fernandez:

The Native American Heritage Commission (NAHC) has reviewed the Notice of Preparation (NOP) prepared for the project referenced above.

The California Environmental Quality Act (CEQA)[1], specifically Public Resources Code section 21084.1, states that a project that may cause a substantial adverse change in the significance of a historical resource is a project that may have a significant effect on the environment.[2] If there is substantial evidence, in light of the whole record before a lead agency, that a project may have a significant effect on the environment, an environmental impact report (EIR) shall be prepared.[3] In order to determine whether a project will cause a substantial adverse change in the significance of a historical resource, a lead agency will need to determine whether there are historical resources with the area of project effect (APE).

CEQA was amended in 2014 by Assembly Bill 52. (AB 52).[4] **AB 52 applies to any project for which a notice of preparation or a notice of negative declaration or mitigated negative declaration is filed on or after July 1, 2015.** AB 52 created a separate category for "tribal cultural resources"[5], that now includes "a project with an effect that may cause a substantial adverse change in the significance of a tribal cultural resource is a project that may have a significant effect on the environment.[6] Public agencies shall, when feasible, avoid damaging effects to any tribal cultural resource.[7] Your project may also be subject to **Senate Bill 18 (SB 18)** (Burton, Chapter 905, Statutes of 2004), Government Code 65352.3, if it also involves the adoption of or amendment to a general plan or a specific plan, or the designation or proposed designation of open space. **Both SB 18 and AB 52 have tribal consultation requirements**. Additionally, if your project is also subject to the federal National Environmental Policy Act (42 U.S.C. § 4321 et seq.) (NEPA), the tribal consultation requirements of Section 106 of the National Historic Preservation Act of 1966[8] may also apply.

Consult your legal counsel about compliance with AB 52 and SB 18 as well as compliance with any other applicable laws.

Agencies should be aware that AB 52 does not preclude agencies from initiating tribal consultation with tribes that are traditionally and culturally affiliated with their jurisdictions before the timeframes provided in AB 52. For that reason, we urge you to continue to request Native American Tribal Consultation Lists and Sacred Lands File searches from the NAHC. The request forms can be found online at: http://nahc.ca.gov/resources/forms/. Additional information regarding AB 52 can be found online at http://nahc.ca.gov/wp-content/uploads/2015/10/AB52TribalConsultation_CalEPAPDF.pdf, entitled "Tribal Consultation Under AB 52: Requirements and Best Practices".

The NAHC recommends lead agencies consult with all California Native American tribes that are traditionally and culturally affiliated with the geographic area of your proposed project as early as possible in order to avoid inadvertent discoveries of Native American human remains and best protect tribal cultural resources.

A brief summary of portions of AB 52 and SB 18 as well as the NAHC's recommendations for conducting cultural resources assessments is also attached.

Please contact me at Email address, katy.sanchez@nahc.ca.gov or call phone number, (916) 373-3712 if you have any questions.

Sincerely,

Katy Sanchez

Katy Sanchez
Associate Environmental Planner

Attachment

[1] Pub. Resources Code § 21000 et seq.
[2] Pub. Resources Code § 21084.1; Cal. Code Regs., tit.14, § 15064.5 (b); CEQA Guidelines Section 15064.5 (b)
[3] Pub. Resources Code § 21080 (d); Cal. Code Regs., tit. 14, § 15064 subd.(a)(1); CEQA Guidelines § 15064 (a)(1)
[4] Government Code 65352.3
[5] Pub. Resources Code § 21074
[6] Pub. Resources Code § 21084.2
[7] Pub. Resources Code § 21084.3 (a)
[8] 154 U.S.C. 300101, 36 C.F.R. § 800 et seq.

- SB 18 applies to **local governments** and requires them to contact, provide notice to, refer plans to, and consult with tribes prior to the adoption or amendment of a general plan or a specific plan, or the designation of open space. Local governments should consult the Governor's Office of Planning and Research's "Tribal Consultation Guidelines," which can be found online at: https://www.opr.ca.gov/docs/09_14_05_Updated_Guidelines_922.pdf
- Tribal Consultation: If a local government considers a proposal to adopt or amend a general plan or a specific plan, or to designate open space it is required to contact the appropriate tribes identified by the NAHC by requesting a "Tribal Consultation List." If a tribe, once contacted, requests consultation the local government must consult with the tribe on the plan proposal. **A tribe has 90 days from the date of receipt of notification to request consultation unless a shorter timeframe has been agreed to by the tribe.**[19]
- There is no Statutory Time Limit on Tribal Consultation under the law.
- Confidentiality: Consistent with the guidelines developed and adopted by the Office of Planning and Research,[20] the city or county shall protect the confidentiality of the information concerning the specific identity, location, character, and use of places, features and objects described in Public Resources Code sections 5097.9 and 5097.993 that are within the city's or county's jurisdiction.[21]
- Conclusion Tribal Consultation: Consultation should be concluded at the point in which:
  - The parties to the consultation come to a mutual agreement concerning the appropriate measures for preservation or mitigation; or
  - Either the local government or the tribe, acting in good faith and after reasonable effort, concludes that mutual agreement cannot be reached concerning the appropriate measures of preservation or mitigation.[22]

NAHC Recommendations for Cultural Resources Assessments:

- Contact the NAHC for:
  - A Sacred Lands File search. Remember that tribes do not always record their sacred sites in the Sacred Lands File, nor are they required to do so. A Sacred Lands File search is not a substitute for consultation with tribes that are traditionally and culturally affiliated with the geographic area of the project's APE.
  - A Native American Tribal Contact List of appropriate tribes for consultation concerning the project site and to assist in planning for avoidance, preservation in place, or, failing both, mitigation measures.
    - The request form can be found at http://nahc.ca.gov/resources/forms/.
- Contact the appropriate regional California Historical Research Information System (CHRIS) Center (http://ohp.parks.ca.gov/?page_id=1068) for an archaeological records search. The records search will determine:
  - If part or the entire APE has been previously surveyed for cultural resources.
  - If any known cultural resources have been already been recorded on or adjacent to the APE.
  - If the probability is low, moderate, or high that cultural resources are located in the APE.
  - If a survey is required to determine whether previously unrecorded cultural resources are present.
- If an archaeological inventory survey is required, the final stage is the preparation of a professional report detailing the findings and recommendations of the records search and field survey.
  - The final report containing site forms, site significance, and mitigation measures should be submitted immediately to the planning department. All information regarding site locations, Native American human remains, and associated funerary objects should be in a separate confidential addendum and not be made available for public disclosure.
  - The final written report should be submitted within 3 months after work has been completed to the appropriate regional CHRIS center.

Examples of Mitigation Measures That May Be Considered to Avoid or Minimize Significant Adverse Impacts to Tribal Cultural Resources:

- Avoidance and preservation of the resources in place, including, but not limited to:
  - Planning and construction to avoid the resources and protect the cultural and natural context.
  - Planning greenspace, parks, or other open space, to incorporate the resources with culturally appropriate protection and management criteria.
- Treating the resource with culturally appropriate dignity, taking into account the tribal cultural values and meaning of the resource, including, but not limited to, the following:
  - Protecting the cultural character and integrity of the resource.
  - Protecting the traditional use of the resource.
  - Protecting the confidentiality of the resource.
- Permanent conservation easements or other interests in real property, with culturally appropriate management criteria for the purposes of preserving or utilizing the resources or places.
- Please note that a federally recognized California Native American tribe or a non-federally recognized California Native American tribe that is on the contact list maintained by the NAHC to protect a California prehistoric, archaeological, cultural, spiritual, or ceremonial place may acquire and hold conservation easements if the conservation easement is voluntarily conveyed.[23]
- Please note that it is the policy of the state that Native American remains and associated grave artifacts shall be repatriated.[24]

The lack of surface evidence of archaeological resources (including tribal cultural resources) does not preclude their subsurface existence.

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[19] (Gov. Code § 65352.3 (a)(2)).
[20] pursuant to Gov. Code section 65040.2,
[21] (Gov. Code § 65352.3 (b)).
[22] (Tribal Consultation Guidelines, Governor's Office of Planning and Research (2005) at p. 18).
[23] (Civ. Code § 815.3 (c)).
[24] (Pub. Resources Code § 5097.991).

- Lead agencies should include in their mitigation and monitoring reporting program plan provisions for the identification and evaluation of inadvertently discovered archaeological resources.[25] In areas of identified archaeological sensitivity, a certified archaeologist and a culturally affiliated Native American with knowledge of cultural resources should monitor all ground-disturbing activities.
- Lead agencies should include in their mitigation and monitoring reporting program plans provisions for the disposition of recovered cultural items that are not burial associated in consultation with culturally affiliated Native Americans.
- Lead agencies should include in their mitigation and monitoring reporting program plans provisions for the treatment and disposition of inadvertently discovered Native American human remains. Health and Safety Code section 7050.5, Public Resources Code section 5097.98, and Cal. Code Regs., tit. 14, section 15064.5, subdivisions (d) and (e) (CEQA Guidelines section 15064.5, subds. (d) and (e)) address the processes to be followed in the event of an inadvertent discovery of any Native American human remains and associated grave goods in a location other than a dedicated cemetery.

[25] per Cal. Code Regs., tit. 14, section 15064.5(f) (CEQA Guidelines section 15064.5(f)).

Santa Clara Valley Transportation Authority

March 23, 2017

City of Santa Clara
Department of Planning
1500 Warburton Avenue
Santa Clara, CA 95050

Attention: Debby Fernandez

Subject: Gateway Crossings

Dear Ms. Fernandez:

Santa Clara Valley Transportation Authority (VTA) staff have reviewed the NOP for 1,400 to 1,600 residential units and 215,000 square feet of commercial uses on 24 acres at the southwest corner of Coleman Avenue and Brokaw Road. We have the following comments.

Project Location and Land Use/Transportation Integration

VTA supports the proposed land use intensification, located near the Santa Clara Station and the center of the Santa Clara Station Focus Area as part of the City's General Plan. Santa Clara Station provides local service for two of VTA's busiest routes, 522 Blue (Rapid) and Route 22. The station also provides regional transportation options with service by Capitol Corridor, Caltrain and Altamont Corridor Express (ACE).

This location is identified as a Station Area in VTA's Community Design & Transportation (CDT) Program Cores, Corridors and Station Areas framework, which shows VTA and local jurisdiction priorities for supporting concentrated development in the County. The CDT Program was developed through an extensive community outreach strategy in partnership with VTA Member Agencies, and was endorsed by all 15 Santa Clara County cities and the County.

VTA commends the applicant for proposing high-density residential and commercial uses, with densities of 51 to 100 dwelling units per acre and a minimum commercial floor area ratio of 0.20. Such measures significantly support transit ridership. Additionally, the high-density residential land use complements the area's current and future regional office, retail, education and entertainment uses, such as Avaya Stadium and Santa Clara University. VTA supports a mix of land uses that encourage additional opportunities for residents and employees to reduce vehicle trips, and greenhouse gas emissions.

Site Design

VTA notes that the draft site plan (provided to VTA by City of Santa Clara staff on March 15, 2017) displays an internal street network with limited relationship and connectivity to the surrounding context of existing streets. To encourage pedestrian walkability VTA recommends

the City and developer focus its attention to the 'Main Street' concept, Figure 5.4-4 recommended in the Santa Clara Station Area Focus plan. A central core street located within a grid will enhance circulation and encourage greater trips by walking and biking. Such a concept could provide a gateway and vision for proposed development.

Transportation Impact Analysis (TIA) Report

VTA's Congestion Management Program (CMP) requires a Transportation Impact Analysis (TIA) for any project that is expected to generate 100 or more net new peak-hour trips. Based on the information provided on the size of this project, a TIA may be required. The updated 2014 VTA *TIA Guidelines*, which can be found at http://www.vta.org/cmp/tia-guidelines, include updated procedures for documenting auto trip reductions, analyzing non-auto modes, and evaluating mitigation measures and improvements to address project impacts and effects on the transportation system. For any questions about the updated *TIA Guidelines*, please contact Robert Swierk of the VTA Planning and Program Development Division at 408-321-5949 or Robert.Swierk@vta.org.

Pedestrian and Bicycle Accommodations

Santa Clara Station Focus Area Goal 5.4.3-G4 strives to make bicycle and pedestrians a priority within the focus area. VTA recommends that the DEIR/TIA include an analysis of Pedestrian and Bicycle Accommodations, including access and connectivity within and near the project site. Such analysis should consider the completeness and quality of the pedestrian and bicycle network on roadways and intersections adjacent to and nearby the project site. See sections 6.4 and 9.3 of the VTA *TIA Guidelines* for further details.

Given the anticipated pedestrian and bicycle volumes associated with this location, in part due to the proximity of the Santa Clara Pedestrian Undercrossing connecting the site to the Santa Clara Station, VTA recommends that the DEIR evaluate the safety of pedestrians and bicyclists travelling along Brokaw Drive and Coleman Avenue. VTA notes that Brokaw Drive is also the proposed location of future bus access and kiss-and-ride locations for the planned BART Silicon Valley Santa Clara Station. Additionally, VTA recommends that the City work with applicant to provide exceptional pedestrian accommodations on all project frontages, including wide buffered sidewalks with street trees between pedestrians and automobiles. Resources on pedestrian quality of service, such as the Highway Capacity Manual 2010 Pedestrian Level of Service methodology, indicate that a buffer containing landscaping elements, such as closely planted street trees, improve pedestrian perceptions of comfort and safety on a roadway.
VTA recommends that the development provide conveniently located bicycle parking. Bicycle parking facilities can include bicycle lockers or secure indoor parking for all-day storage and bicycle racks for short-term parking. VTA's Bicycle Technical Guidelines provide guidance for estimating supply, siting and design for bicycle parking facilities. This document may be downloaded from http://www.vta.org/bikeprogram.

CMP Facilities

Based on the size and location of the project, there may be impacts to one or more Congestion Management Program (CMP) facilities, including freeway segments and CMP intersections. If the transportation analysis in the DEIR indicates that there will be significant impacts according to CMP standards, VTA suggests early coordination with the appropriate agencies to identify potential mitigation measures and opportunities for voluntary contributions to regional transportation improvements in or near the impacted facility in the latest Valley Transportation Plan (e.g. US 101 Express Lanes and US 101/Trimble/De La Cruz Interchange) or other associated projects.

BART Silicon Valley Extension

The proposed development site is adjacent to the planned location of VTA's BART Silicon Valley Extension's Santa Clara Station and Newhall Yard. Information about the station and yard planned configuration and associated access and activities can be found in the *BART Silicon Valley Phase II Extension Draft Supplemental Environmental Impact Report/Subsequent Environmental Impact Statement*, which can be accessed at www.vta.org/bart/environmentalphaseII. VTA strongly encourages future coordination between the project applicant, City of Santa Clara and VTA.

Transportation Demand Management/Trip Reduction

Given the size of the project and limited roadway access to and from the project area, the project should include a robust Transportation Demand Management (TDM) Program to reduce auto trips, vehicle miles traveled and greenhouse gas emissions. Such measures will be critical in order to facilitate efficient transportation access to and from the site and reduce transportation impacts associated with the project. VTA supports City of Santa Clara Focus Area policy 5.4.2-P11 to reduce parking ratios and promote alternate use of transportation in the surrounding area. VTA recommends that the City consider the following TDM/Trip Reduction strategies:

- Project design to encourage walking, bicycling, and convenient transit access;
- Parking cash out/parking pricing;
- Adoption of an aggressive trip reduction target with a Lead Agency monitoring and enforcement program;
- Transit fare incentives such as such as free or discounted transit passes on a continuing basis;
- First mile/last mile ride sharing voucher
- Public-private partnerships or employer contributions to provide improved transit or shuttle service in the project area.
- Bicycle lockers and bicycle racks
- Showers and clothes lockers for bicycle commuters

- Parking for car-sharing vehicles
- Reduced parking ratios

Bus Stop Improvements

VTA has two existing bus stops within ¼ mile of the project site and recommends the following improvements.

Eastbound Coleman Avenue, east of Brokaw Road:

- Replace existing bus shelter with a new bus shelter, per VTA's updated specifications
- Retain or expand the existing bus shelter pad and passenger pad
- Retain bus pad (PCC pavement)

Westbound Coleman Avenue, east of Brokaw Road:

- Install new 12'x55' bus pad (PCC pavement) per VTA specifications
- A minimum 8'x40' passenger pad to comply with ADA standards and VTA specifications
- A new bus stop bench provided by the project, per VTA specifications

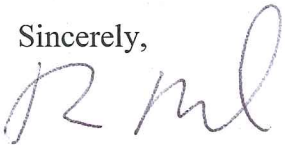
VTA would like the opportunity to review updated site plans to ensure the placement of driveways, landscaping and any other features do not conflict with bus operations

VTA's Transit Passenger Environment Plan provides design guidelines for bus stops. This document can be downloaded at http://www.vta.org/tpep.

VTA has a Bus Stop Placement, Closures and Relocations Policy. Prior to any construction or bus stop impact, please contact bus.stop@vta.org.

Thank you for the opportunity to review this project. If you have any questions, please call me at (408) 321-5784.

Sincerely,



Roy Molseed
Senior Environmental Planner

cc: Patricia Maurice, Caltrans
Brian Ashurst, Caltrans

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