



November 21, 2016

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

Attention: Jeff Schwilk

Subject: City File No. PLN2014-10851 / Great America Theme Park Master Plan

Dear Mr. Schwilk:

Santa Clara Valley Transportation Authority (VTA) staff have reviewed the Draft EIR for a master plan for expansion of the existing Great America facility, including redevelopment of commercial/entertainment space for a net increase of 100,000 square feet of development. We have the following comments.

Land Use

VTA supports the proposed land use intensification of this important site, strategically located on the regional transportation network. The site is close to the Great America Light Rail Transit (LRT) Station, and approximately ½-mile from the Santa Clara Great America train station served by Altamont Corridor Express (ACE) and Capitol Corridor services. Tasman Drive is identified as a Corridor 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.

Pedestrian Accommodations, Site Design, & Access to Transit

The existing pedestrian accommodations along the Tasman Drive frontage contain an attached sidewalk with no street trees between pedestrians and automobiles. Given the project's intent to create a commercial and entertainment district potentially located "outside of the Theme Park entrance and open to the general public," the project will increase pedestrian volumes along Tasman Drive, particularly given the site's synergy with the adjacent Levi's Stadium and planned City Place project. VTA recommends the provision of high-quality pedestrian accommodations along the Tasman Drive frontage, specifically that the City work with the applicant to provide a landscaped buffer with street trees between the sidewalk and Tasman Drive. Resources on pedestrian quality of service, such as the Highway Capacity Manual 2010 Pedestrian Level of Service methodology, indicate that such accommodations improve pedestrian perceptions of comfort and safety on a roadway. Additionally, VTA recommends that the project approvals include a Site Plan that clearly indicates safe pedestrian pathways between entrances, parking areas, and surrounding sidewalks.

In VTA's comment letter on the NOP, dated April 11, 2016, VTA encouraged the applicant to consider a site design that maximizes the desirability of walking to the project site, which also supports the use of nearby transit. VTA reiterates this comment, and recommends that the City and applicant work together to improve the Tasman Drive frontage to provide active frontages and building entrances located closer to the street. The project materials indicate that the restaurant and retail component, which represents active building frontages that are open to the general public, would likely be located near the existing Great America park entrance, approximately a 1/3-mile from Tasman Drive. Therefore, park patrons arriving at the Tasman Drive frontage by foot, bicycle, or transit, would require a 1/3-mile path of travel through the existing parking lot.

VTA encourages a design approach that maximizes the relationship between the pedestrian network and new development. New developments along Tasman Drive present exceptional opportunities to provide site designs with active street frontages, building entrances located closer to the street, and structured parking in order to improve walkability to and within the site. VTA encourages the City and applicant to explore such measures in considering the project's site design. Neighboring planning efforts and new development along Tasman Drive, such as the proposed Tasman East Specific Plan and City Place, support this approach. Such design contributes toward a higher quality walking environment along Tasman Drive that encourages greater trips by walking and by transit, and incrementally reduces auto trips. This is consistent with the City's General Plan Policy 5.8.3-P9 to "require new development to incorporate reduced on-site parking and provided enhanced amenities such as pedestrian links, benches and lighting, in order to encourage transit use and increase access to transit services." New development within the Great America Master Plan area should reinforce these principles. VTA notes that a multiparty parking agreement exists among the City, applicant, and other entities, which describes the parking supply and operational obligations among the parties, and is factored into the overall site design.

Bicycle Accommodations

VTA supports bicycling as an important transportation mode and thus recommends inclusion of conveniently located bicycle parking for the project. 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 www.vta.org/bikeprogram.

VTA supports the TIA's recommendation to reserve space within the project area to accommodate a potential Hetch Hetchy pedestrian/bicycle trail. VTA supports this City of Santa Clara project, which will incrementally reduce trips by automobiles to the site, and improve bicycle access in Santa Clara.

Transit – Existing Conditions and Plans

The DEIR/TIA describes the current hours of operation for the Mountain View–Winchester Light Rail Line, stating that it operates “until midnight seven days a week, generally on 30-minute headways, with 15-minute headways during weekday commute hours” (DEIR p. 64, TIA p. 13). The description should also reflect VTA’s planned service for a direct light rail connection between the Milpitas BART station (anticipated to open in fall 2017) and Mountain View, which would increase the frequency of trains along Tasman Drive. These service enhancements were first outlined in VTA’s Light Rail Systems Analysis (completed in May 2010) and are being refined and advanced in VTA’s current Light Rail Enhancements project. The DEIR/TIA should assume two lines of service along Tasman going through Santa Clara. Both lines would operate with 15 minute frequencies during peak periods.

Congestion Impacts on Transit Travel Times

VTA supports the DEIR/TIA’s inclusion of a transit vehicle delay analysis, which is mostly focused on bus operations (DEIR p.79, TIA p. 47), The DEIR/TIA should also include an analysis of light rail vehicle delay. Delay to transit travel times degrades schedule reliability, increases operating costs, and make transit a less attractive option for travelers in these corridors. If an analysis of light rail vehicle delay results in transit travel time impacts, VTA requests to work with the City to identify transit priority measures for the Tasman Corridor.

Traffic Management and Operations Plan (TMOP)

VTA appreciates that the DEIR/TIA references the City’s TMOP, which may need to be refined to “ensure that Theme Park traffic is not prohibited by road closures” (DEIR p. 82/TIA p. 48). As the project is defined and event parameters are determined, VTA and the City should collaborate to update the TMOP to include procedures for accommodating the Theme Park’s larger events, ensuring that light rail trains and buses have continued and safe operations during such event periods. VTA appreciates the ongoing coordination through the TMOP.

Altamont Commuter Express (ACE)/ Capitol Corridor (Amtrak) Great America Station

The DEIR/TIA describes ACE commuter rail’s operating hours at Great America Station, but does not include any reference to Amtrak service, which also serves this station (DEIR p. 64, TIA p. 13). The DEIR/TIA should describe Capitol Corridor’s existing service and operating hours.

In previous comment letters associated with new development occurring along the Tasman Corridor, VTA has acknowledged the significant opportunity associated with this area’s emergence as an activity center located on the regional transportation network near VTA’s Great America and Lick Mill Rail Stations and the ACE/Capitol Corridor Great America Station. In order to enhance local and regional access to the area, and help create a more convenient, accessible, and seamless transit connection between all transit modes and new development, VTA supports the creation of an ACE/Capitol Corridor/VTA Great America Station Master Plan. A planning effort that addresses the future long-term improvement of a redesigned, intermodal Great America Station, would be beneficial for nearby land uses in the area such as the Great

America Theme Park, and should include the participation of other Tasman area land uses, and public agency partners. VTA encourages the City to consider a developer contribution toward the creation of the plan.

Transportation Demand Management (TDM) /Trip Reduction

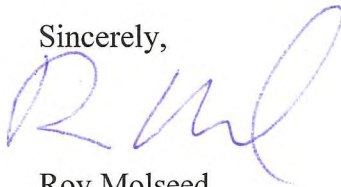
The DEIR states that “the City would require the project to incorporate a transportation demand management (TDM) program that reduces vehicle miles traveled (VMT) by at least five percent” (p. 187). VTA supports the reduction of vehicle trips by encouraging employees and patrons to walk or bike to the site. In order to reduce the number of single occupant vehicle trips generated by the project, VTA recommends that the City and project sponsor consider a comprehensive Transportation Demand Management (TDM) program for the project.

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;
- Bicycle lockers and bicycle racks;
- Showers and clothes lockers for bicycle commuters;
- Preferentially located carpool parking;
- Employee carpool matching services;
- Parking for car-sharing vehicles;
- Transit fare incentives for employees, such as free or discounted transit passes on a continuing basis;
- Transit fare incentives geared at theme park patrons to encourage the use of transit to the site.

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