

Comment Letters Received on the Initial Study

The public comment period on the draft Initial Study Negative Declaration began on September 26, 2017 and ended on October 16, 2017 at 5 p.m. Copies of the submitted written comment letters can be found in Appendix A

Comment Letter From

Date Received

A. County of Santa Clara Roads and Airports Department

October 20, 2017

B. Santa Clara Valley Transportation Authority

October 16, 2017

Ellen Talbo, AICP, County Transportation Planner, County of Santa Clara Roads and Airports Department, October 20, 2017 – LETTER A

COMMENT A1: In the Site-Specific GPA for West Trimble Road section of the Long Range Traffic Analysis (pgs. 52- 66 of Appendix C), the analysis needs to demonstrate that impacts at the following intersections have been analyzed:

- *Montague at Trimble, Montague at Zanker, Montague at First, Montague at River Oaks, Montague at De La Cruz, Montague at Mission, and Montague at McCarthy;*
- *San Tomas at Scott, San Tomas at Walsh, San Tomas at Monroe;*
- *Central at De La Cruz, Central and Lafayette, Central at Scott, Central at Bowers*

For County intersections, the long range traffic analysis is required to analyze and perform level of service analysis as currently mandated and required by the most recent congestion management agency adopted TIA guidelines.

The County can project traffic counts and timing information as needed for level of service calculation. Please contact Ananth Prasad to request any data at (408) 494-1342 or Ananth.prasad@rda.sccgov.org.

Please provide project trip info with diagrams showing the trip distribution and assignment through the existing roadway network.

When individual projects are going through the BIR/TIA process, as currently required by the latest CMA TIA Guidelines, the TIA must include intersection level of service analysis as the basis for identifying impacts to the roadway network.

RESPONSE A1: The Long-Range Traffic Impact Analysis (Appendix C) was prepared to provide General Plan Amendment (GPA)-level CEQA clearance for the proposed 2017 General Plan Amendments, including the subject project site at 350/370 West Trimble Road. The analysis was done in conformance with the guidelines established by the City of San Jose for GPA traffic analyses. The purpose of the study is to assess the long-range impacts of the

amendments on the citywide transportation system. The study includes an evaluation of the cumulative impacts of all of the proposed GPA sites as well as the required site-specific GPA traffic analysis for the three sites that exceed the Guidelines trip thresholds. The subject site is one of the three, and thus, a site-specific analysis was included.

The long-range analysis only provides a GPA-level clearance and not a project-level clearance. A separate project-level clearance will be required when an application for a planning permit is filed with the City. At that time, a traffic analysis be prepared for the project that assesses the project's impacts in comparison to the findings of the North San Jose Area Development Policy (NSJADP) EIR, including impacts to County expressways that were addressed in the NSJADP EIR. Impacts to the intersections along Montague, San Tomas and Central Expressways will be addressed as part of that analysis. Mitigation measures such as payment of the North San Jose Traffic Impact Fee will be included as necessary.

***COMMENT A2:** Please clarify how the City's travel demand forecast and VMT methodology differ or are similar to other agencies in the Bay Area and to the VTA's regional travel demand model. Please describe how the City's VMT methodology considers differences in geographic characteristics (i.e. downtown to less populated areas).*

RESPONSE A2: The City is in the process of developing a VMT policy and CEQA threshold per the requirements of SB 743. VTA has participated in discussions with City staff regarding the policy changes. The comment is acknowledged.

***COMMENT A3:** The Comprehensive County Expressway Planning Study - 2008 Update adopted by the Board of Supervisors in March 2009, and/or the preliminary Comprehensive County Expressway Planning Study - 2040 project list should be consulted for a list of mitigation measures for significant impacts to the expressways. Should the Expressway Study (2008) or the preliminary Expressway Plan 2040 project list not include an improvement that would mitigate a significant impact, the TIA should identify mitigation measures that would address the significant impact. Mitigation measures listed in the TIA should be incorporated into the EIR document.*

RESPONSE A3: Please refer to Response A1. When an application for a specific project is received by the City, a project specific TIA will be prepared. Impacts will be compared to those described in the NSJADP EIR. Mitigation, if necessary, will be identified.

Roy Molseed, Senior Environmental Planner, Santa Clara Valley Transportation Authority, October 16, 2017 – LETTER B

***COMMENT B1:** The Long Range TIA states that "a near term traffic analysis in conjunction with any future development permit applications consistent with the Envision San Jose 2040 General Plan will be required once a specific development proposal for the site is identified" (p. 52). VTA looks forward to reviewing this future transportation analysis for its consistency with*

the Congestion Management Program, specifically VTA's Transportation Impact Analysis (TIA) Guidelines. The October 2014 version of the 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 Programming Division at 408-321-5949 or Robert.Swierk@vta.org.

RESPONSE B1: Please refer to Responses A1 and A3. The comment acknowledged.

COMMENT B2: *The Long Range TIA notes that "The GPA traffic analysis guidelines established a trip threshold for General Plan land use amendments that require a site-specific GPA analysis. A proposed land use amendment that would result in an increase of more than 250 peak-hour trips due to increased households or employment would be required to prepare a site-specific GPA traffic analysis." (p. 1). VTA recommends citing the specific adopted City policy or technical guidelines document that established this threshold.*

RESPONSE B2: The 250-trip threshold originated from a City of San Jose Department of Transportation guidelines document entitled City of San José: Methodology for Transportation Network Modeling & Analysis, August 2007.

COMMENT B3: *VTA notes that the 350-370 W. Trimble Road parcels are subject to a separate proposed action for a Planned Development (PD) Zoning designation, which includes a development plan for up to 100,000 square feet of retail/commercial space and a 130-room hotel. VTA looks forward to reviewing the TIA report/CEQA document associated with the proposed PD Zoning designation and providing more specific comments on land use, site design, and pedestrian and bicycle accommodations when those documents are available.*

RESPONSE B3: The comment is acknowledged.

Valerie Onuoha, Assistant Engineer II (Civil), Santa Clara Valley Water District, October 13, 2017 – LETTER C

COMMENT C1: *The Santa Clara Valley Water District (District) has reviewed the draft Initial Study/ Negative Declaration for the West Trimble Road General Plan Amendment that was received on September 29, 2017.*

The District has a fee title right-of-way for the Guadalupe River which lies west to the Phillips Lumileds industrial campus. Since the General Plan Amendment does not include work within the District's right-of-way, a District permit is not required for this project. The District does request, however, to receive any future development plans for the portion of land labeled as Area A in the Negative Declaration due to its proximity to the river.

RESPONSE C1: The comment acknowledged.

COMMENT C2: Regarding the text on page 72 of the ND, please note that the site is also subject to inundation from Anderson Dam.

RESPONSE C2: The discussion of exposure to hazards from dam failure on Page 75 will be revised to include the potential for site inundation from Anderson Dam.

APPENDIX A

Comment Letters

County of Santa Clara

Roads and Airports Department



101 Skyport Drive
San Jose, California 95110-1302
1-408-573-2400

SENT ELECTRONICALLY

October 16, 2017



Kieulan Pham
City of San Jose
Department of Planning, Building & Code Enforcement
200 East Santa Clara Street
San Jose, California 95001

SUBJECT: NOI-MND: 350/370 West Trimble Road General Plan Amendment

Dear Kieulan:

The County of Santa Clara Roads and Airports Department appreciates the opportunity to review to the Notice of Preparation (NOP) and is submitting the following comments:

- In the Site-Specific GPA for West Trimble Road section of the Long Range Traffic Analysis (pgs. 52-66 of Appendix C), the analysis needs to demonstrate that impacts at the following intersections have been analyzed:
 - Montague at Trimble, Montague at Zanker, Montague at First, Montague at River Oaks, Montague at De La Cruz, Montague at Mission, and Montague at McCarthy
 - San Tomas at Scott, San Tomas at Walsh, San Tomas at Monroe
 - Central at De La Cruz, Central and Lafayette, Central at Scott, Central at Bowerd
- For County intersections, the long range traffic analysis is required to analyze and perform level of service analysis as currently mandated and required by the most recent congestion management agency adopted TIA guidelines.
- The County can project traffic counts and timing information as needed for level of service calculation. Please contact Ananth Prasad to request any data at (408) 494-1342 or Ananth.prasad@rda.sccgov.org.
- Please provide project trip info with diagrams showing the trip distribution and assignment through the existing roadway network.
- When individual projects are going through the EIR/TIA process, as currently required by the latest CMA TIA Guidelines, the TIA must include intersection level of service analysis as the basis for identifying impacts to the roadway network.

- Please clarify how the City's travel demand forecast and VMT methodology differ or are similar to other agencies in the Bay Area and to the VTA's regional travel demand model.
- Please describe how the City's VMT methodology considers differences in geographic characteristics (i.e. downtown to less populated areas).
- The *Comprehensive County Expressway Planning Study - 2008 Update* adopted by the Board of Supervisors in March 2009, and/or the preliminary *Comprehensive County Expressway Planning Study - 2040* project list should be consulted for a list of mitigation measures for significant impacts to the expressways. Should the *Expressway Study (2008)* or the preliminary *Expressway Plan 2040* project list not include an improvement that would mitigate a significant impact, the TIA should identify mitigation measures that would address the significant impact. Mitigation measures listed in the TIA should be incorporated into the EIR document.

If you have any questions or concerns about these comments, please contact me at (408) 573-2465 or ellen.talbo@rda.sccgov.org.

Sincerely,



Ellen Talbo, AICP
County Transportation Planner

cc: Ananth Prasad, *Senior Traffic Engineer*



October 16, 2017

City of San Jose
Department of Planning and Building
200 East Santa Clara Street
San Jose, CA 95113

Attention: Kieulan Pham

Subject: City File No. GP17-007 / 350-370 West Trimble Road

Dear Mr. Pham:

VTA has reviewed the Initial Study for the proposed General Plan Amendments in connection with 350-370 W. Trimble Road, and the Long Range Transportation Impact Analysis (TIA) for the proposed City of San Jose 2017 General Plan Amendments in connection with ten parcels within the City of San Jose. This letter specifically addresses VTA's comments on the Initial Study and the portions of the Long Range TIA that analyze the proposed 350-370 W. Trimble Road General Plan Amendment. VTA appreciates the opportunity to provide the following comments:

Transportation Analysis

The Long Range TIA states that "a near term traffic analysis in conjunction with any future development permit applications consistent with the Envision San Jose 2040 General Plan will be required once a specific development proposal for the site is identified" (p. 52). VTA looks forward to reviewing this future transportation analysis for its consistency with the Congestion Management Program, specifically VTA's Transportation Impact Analysis (TIA) Guidelines. The October 2014 version of the 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 Programming Division at 408-321-5949 or Robert.Swierk@vta.org.

The Long Range TIA notes that "The GPA traffic analysis guidelines established a trip threshold for General Plan land use amendments that require a site-specific GPA analysis. A proposed land use amendment that would result in an increase of more than 250 peak-hour trips due to increased households or employment would be required to prepare a site-specific GPA traffic analysis." (p. 1). VTA recommends citing the specific adopted City policy or technical guidelines document that established this threshold.

City of San Jose
October 16, 2017
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VTA notes that the 350-370 W. Trimble Road parcels are subject to a separate proposed action for a Planned Development (PD) Zoning designation, which includes a development plan for up to 100,000 square feet of retail/commercial space and a 130-room hotel. VTA looks forward to reviewing the TIA report/CEQA document associated with the proposed PD Zoning designation and providing more specific comments on land use, site design, and pedestrian and bicycle accommodations when those documents are available.

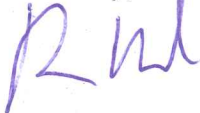
Transportation Demand Management (TDM)

VTA notes that while the Long Range TIA does not show a significant impact based on the General Plan Measures of Effectiveness and significance criteria, the subject parcels are located beyond a ½ mile walking distance from transit. VTA recommends a comprehensive Transportation Demand Management (TDM) program for this site, which could include contributions to improved transit service to the area (for example, shuttles to VTA Light Rail and Caltrain).

We appreciate the opportunity to comment. For staff reference, we have also included the attached VTA Contact List for any questions regarding these comments.

If you have any questions, please call me at (408) 321-5784.

Sincerely,



Roy Molseed
Senior Environmental Planner

cc: Michael Liw, San Jose Development Services
Patricia Maurice, Caltrans
Brian Ashurst, Caltrans