

Final Environmental Impact Report

Santa Clara University Five-Year Master Plan

City of Santa Clara

July 2016

PREFACE

This document, together with the Draft Environmental Impact Report (DEIR), constitute the Final Environmental Impact Report (FEIR) for the Santa Clara University Five-Year Master Plan project. The DEIR was circulated to affected public agencies and interested parties for a 45-day review period from May 16, 2016 to June 29, 2016. This volume consists of comments received by the Lead Agency on the DEIR during the public review period, responses to those comments, and revisions to the text of the DEIR.

In conformance with the California Environmental Quality Act (CEQA) and the CEQA Guidelines, the FEIR provides objective information regarding the environmental consequences of the proposed project. The FEIR also examines mitigation measures and alternatives to the project intended to reduce or eliminate significant environmental impacts. The FEIR is intended to be used by the City and any Responsible Agencies in making decisions regarding the project. The CEQA Guidelines advise that, while the information in the FEIR does not control the agency's ultimate discretion on the project, the agency must respond to each significant effect identified in the DEIR by making written findings for each of those significant effects.

According to the State Public Resources Code (Section 21081), no public agency shall approve or carry out a project for which an environmental impact report has been certified which identifies one or more significant effects on the environment that would occur if the project is approved or carried out unless both of the following occur:

- (a) The public agency makes one or more of the following findings with respect to each significant effect:
 - (1) Changes or alterations have been required in, or incorporated into, the project which will mitigate or avoid the significant effect on the environment.
 - (2) Those changes or alterations are within the responsibility and jurisdiction of another public agency and have been, or can and should be, adopted by that other agency.
 - (3) Specific economic, legal, social, technological, or other considerations, including considerations for the provision of employment opportunities of highly trained workers, make infeasible the mitigation measures or alternatives identified in the environmental impact report.

- (b) With respect to significant effects which were subject to a finding under paragraph (3) of subdivision (a), the public agency finds that specific overriding economic, legal, social, technological, or other benefits of the project outweigh the significant effects on the environment.

In accordance with CEQA and the CEQA Guidelines, the FEIR will be made available to the public prior to consideration of the Environmental Impact Report. All documents referenced in this FEIR are available for public review in the office of the Department of Planning and Inspection, 1500 Warburton Avenue, Santa Clara, California, on weekdays during normal business hours.

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I. LIST OF AGENCIES AND ORGANIZATIONS TO WHOM THE DRAFT EIR WAS SENT

State Agencies

California Department of Fish and Game, Region 3
California Department of Parks and Recreation
California Department of Resources, Recycling and Recovery
California Department of Transportation, District 4
California Department of Toxic Substances Control
California Department of Transportation, Division of Aeronautics
California Department of Water Resources
California Highway Patrol
California Resources Agency
Native American Heritage Commission
San Francisco Bay Conservation and Development Commission
State Clearinghouse – Office of Planning and Research
State Office of Historic Preservation

Regional Agencies

California Regional Water Quality Control Board, San Francisco Bay Region 2
Santa Clara Valley Transportation Authority

II. LIST OF COMMENT LETTERS RECEIVED ON THE DRAFT EIR

State Agencies

A. California Department of Transportation June 29, 2016

Regional Agencies

B. Santa Clara Valley Transportation Authority June 29, 2016

Cities and Local Agencies

None

Organizations/Individuals

None

III. RESPONSES TO COMMENTS RECEIVED ON THE DRAFT EIR

The following section includes the two comments on the DEIR that were received by the City in either letter or email during the 45-day review period. The specific comments from the letter are presented as “Comment” with each response to that specific comment directly following. The letter is attached in its entirety in Section V of this document.

CEQA Guidelines Section 15086 requires that a local lead agency consult with and request comments on the Draft EIR prepared for a project of this type from responsible agencies (government agencies that must approve or permit some aspect of the project), trustee agencies for resources affected by the project, adjacent cities and counties, and transportation planning agencies. Section I of this document lists all of the recipients of the DEIR.

The CEQA Guidelines require that:

A responsible agency or other public agency shall only make substantive comments regarding those activities involved in the project that are within an area of expertise of the agency or which are required to be carried out or approved by the responsible agency. Those comments shall be supported by specific documentation. [§15086(c)]

Regarding mitigation measures identified by commenting public agencies, the CEQA Guidelines state that:

Prior to the close of the public review period, a responsible agency or trustee agency which has identified what the agency considers to be significant environmental effects shall advise the lead agency of those effects. As to those effects relevant to its decisions, if any, on the project, the responsible or trustee agency shall either submit to the lead agency complete and detailed performance objectives for mitigation measures addressing those effects or refer the lead agency to appropriate, readily available guidelines or reference documents concerning mitigation measures. If the responsible or trustee agency is not aware of mitigation measures that address identified effects, the responsible or trustee agency shall so state. [§15086(d)]

Two public agencies commented on the DEIR for the proposed project. No comment letters were received from local organizations or private citizens.

The CEQA Guidelines state that the Lead Agency shall evaluate comments on the environmental issues received from persons who reviewed the DEIR and shall prepare a written response to those comments. The lead agency is also required to provide a written proposed response to a Public Agency on comments made by that public agency at least 10 days prior to certifying an environmental impact report. This FEIR contains written responses to the one comment letter made on the DEIR received during the advertised 45-day review period. A copy of this FEIR has been provided to the agencies that submitted comments.

A. RESPONSE TO COMMENTS FROM CALIFORNIA DEPARTMENT OF TRANSPORTATION, DATED JULY 29, 2016:

Comment A-1: Thank you for continuing to include the California Department of Transportation (Caltrans) in the environmental review process for the above-referenced project. Caltrans' new mission, vision, and goals signal a modernization of our approach to California's State Transportation Network (STN), in which we seek to reduce statewide vehicle miles traveled (VMT) and increase non-auto modes of active transportation. Caltrans plans to increase non-auto mode shares by 2020 through tripling bicycle, and doubling both pedestrian and transit. Also, these targets support the Metropolitan Transportation Commission's (MTC) Sustainable Communities Strategy (SCS), which promotes the increase of non-auto mode shares by ten percentage points and a decrease in automobile VMT per capita by ten percent. Our comments are based on the Draft Environmental Impact Report (DEIR). Please also refer to the previous comment letter, dated May 18, 2015, on this project and incorporated herein.

Project Understanding

The proposed project would amend the Master Plan for the Santa Clara University (University) campus, demolishing approximately 232,000 square feet (sf) of existing building floor area to construct up to 523,000 sf of net new classroom, office and student activity space in conjunction with 600 new student housing units on the University campus. The project site is located on State Route (SR) 82 (El Camino Real) with several access points (i.e., driveway) on SR 82 and with the main campus entrance Palm Drive intersecting with SR 82 at Franklin Street.

Lead Agency

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

Response A-1: All required information regarding the project mitigation will be provided in the Mitigation Monitoring or Reporting Program consistent with CEQA requirements. No impacts were identified to State highways and no mitigation is required or proposed.

Comment A-2: Traffic Impacts

Provide the 95th percentile queuing analyses (including storage lengths) and necessary mitigation for the following intersections:

- San Tomas Expressway and SR 82 (El Camino Real)
- Lafayette Street and SR 82
- The Alameda and northbound Interstate (I-) 880
- The Alameda and southbound I-880

Response A-2: It should be noted that there is no adopted threshold for vehicle queuing under CEQA. Furthermore, the City does not have any adopted thresholds of significance for queuing. As such, a queuing analysis is not required. Nevertheless, the Traffic Impact

Analysis (Appendix B of the DEIR), includes an analysis of vehicles queues at the metered on-ramp at The Alameda and southbound I-880 in the PM Peak Hour. The AM Peak Hour was not analyzed because the project generates only 26 outbound AM Peak Hour trips. The northbound I-880 ramp was not analyzed because it is not metered in the PM Peak Hour and, as a result, queueing is unlikely to occur.

In addition to the information provided in the Traffic Report, an additional assessment of the San Tomas Expressway/El Camino Real and Lafayette Street/El Camino Real intersections was completed per Caltrans' request. A summary table of the assessment is provided as Attachment A to this document. The assessment shows that the maximum vehicle queues for several left-turn movements at the subject intersections would exceed the existing vehicle storage capacity under no project and project conditions during the AM and PM peak hours. The addition of project traffic at each of the left-turn movements along El Camino Real would not, however, result in the projected vehicle queues to increase beyond what is projected under no project conditions. Therefore, the addition of project traffic would not result in the need to improve the intersection turn-pockets.

Comment A-3: Vehicle Trip Reduction

Caltrans encourages the City to locate future housing, jobs, and employee-related services near major mass transit centers with connecting streets configured to facilitate walking and biking. The project will generate new Pedestrian and bicycle trips, so the developer should coordinate with the City and Caltrans to facilitate the trips. In particular, bike lanes, bike pockets at intersections, or other improvements for bicyclists along SR 82, and providing a marked crosswalk at the southern leg of the SR 82/The Alameda Intersection should be studied. This would promote mass transit use thereby reducing regional VMT and traffic impacts.

Response A-3: Caltrans' comments on the placement of future land uses are acknowledged. It should be noted that the DEIR did not identify any impacts to existing pedestrian and bicycle facilities. As a result, there is no nexus for additional analysis or implementation of improvements on SR 82.

Comment A-4: Transportation Demand Management (TDM) programs should be documented with annual monitoring reports by an onsite TDM coordinator to demonstrate the effectiveness. Suggested TDM strategies include working with the Santa Clara Valley Transportation Authority (VTA) to decrease headway times and improve way-finding on bus lines to provide a better connection between the project, the Santa Clara and College Park Stations, and regional destinations and providing:

- Membership in a transportation management association
- Transit subsidies and/or transit passes to all employees, faculty and students
- Ten percent vehicle parking reduction
- Transit and trip planning resources
- Carpool and vanpool ride-matching support
- Carpool and clean-fuel parking spaces
- Secured bicycle storage facilities

- Bicycles for employee, faculty and student uses to access local resources
- Showers, changing rooms and clothing lockers
- Fix-it bicycle repair station(s)
- Amenities, access and connections, incorporate wide sidewalks
- Transportation and commute information kiosk
- Outdoor patios, outdoor areas, furniture, pedestrian pathways, picnic and recreational areas
- Nearby walkable amenities
- A transportation coordinator
- Emergency Ride Home program
- Bicycle route mapping resources and incentivized bicycle parking

These smart growth approaches are consistent with the MTC Regional Transportation Plan/SCS goals and would meet Caltrans Strategic Management Plan. Please refer to “Reforming Parking Policies to Support Smart Growth,” a MTC study funded by Caltrans, for sample parking rations and strategies that support compact growth. Reducing parking supply can encourage alternate forms of transportation, reduce regional VMT, and lessen future traffic impacts on SR 82 and the STN.

Response A-4: Caltrans recommendations for TDM measures are acknowledged. The University already has a robust TDM program, which includes most of the components noted above. As an example, the University 1) is a member of the Silicon Valley Leadership Group’s Transportation Committee, 2) provides subsidized transit passes, 3) has transit trip planning information on their website, 4) has carpool/vanpool programs available through Zip Car, Scoop/mnV, and Uber, 5) provides charging stations within their parking areas and free carpool parking, 6) provides secure bicycle parking, 7) has a Zagster shared bicycle program, 8) includes showers, changing rooms, and clothes lockers, 9) has four fix-it bicycle repair stations on campus, 9) has a Transportation Service Office that provides transit and commute information and a transportation coordinator. In addition, by its nature the University has on-site services, including but not limited to food services and outdoor recreational areas. Lastly, the University is within walking distance of a grocery store, multiple restaurants, other service providers such as laundry, dry cleaners, and banks, and the Santa Clara Transit Station.

With the TDM program already in place, the University is consistent with the MTC Regional Transportation Plan/SCS goals. The City finds this program would also meet Caltrans Strategic Management Plan.

Comment A-5: Traffic Impact Fees

Given the project’s contribution to area traffic and its proximity to SR 82 the project should contribute fair share traffic impact fees. These contributions would be used to lessen future traffic congestion and improve transit in the project vicinity.

Response A-5: As discussed in Section 4.3 of DEIR and the Traffic Impact Analysis (Appendix B of the DEIR), the proposed project would not have an impact on SR 82 or any other roadway. As a result, there is no nexus to require traffic impact fees for the proposed project.

Comment A-6: Voluntary Contribution Program

We encourage the City to participate in the VTA’s voluntary contribution program and plan for the impact of future growth on the regional transportation system. Contributions by the City funding regional transportation programs would improve the transportation system by reducing congestion and improving mobility on major roadways throughout the San Francisco Bay Area.

Response A-6: This comment does not raise any questions or comments about the analysis in the DEIR. This comment is noted.

Comment A-7: Cultural Resources

Caltrans requires that a project’s environmental document include documentation of a current archaeological record search from the Northwest Information Center of the California Historical Resources Information System if construction activities are proposed within State right-of-way (ROW). Current record searches must be no more than five years old. Caltrans requires the records search, and if warranted, a cultural resources study by a qualified professional archaeologist, and evidence of Native American consultation to ensure compliance with CEQA, Section 5024.5 and 5097 of the California Public Resources Code, and Volume 2 of Caltrans’ Standard Environmental Reference (www.dot.ca.gov/ser/vol2/vol2.htm).

These requirements, including applicable mitigation, must be fulfilled before an encroachment permit can be issued for project-related work in State ROW. Work subject to these requirements includes, but is not limited to: lane widening, channelization, auxiliary lanes, and/or modification of existing features such as slopes, drainage features, curbs, sidewalks and driveways within or adjacent to State ROW.

Response A-7: A cultural resources study was completed for the project and is summarized in Section 4.2 of the DEIR. Due to the sensitive nature of the information included in the study, the study was not circulated as part of the DEIR, but a redacted copy is provided for reference on the City’s website. The City consulted the California Historical Resources database in its analysis, and a treatment plan is included in the study which details all required mitigation for the proposed project.

Comment A-8: Traffic Control Plan

Since it is anticipated that vehicular, bicycle, and pedestrian traffic will be impacted during the construction of the proposed project requiring traffic restrictions and detours, a Caltrans-approved Traffic Control Plan (TCP) is required to avoid project-related impacts to the STN. The TCP must also comply with the requirements of corresponding jurisdictions. In addition, pedestrian access through the construction zone must be in accordance with the Americans with Disabilities Act (ADA) regulations (see Caltrans’ *Temporary Pedestrian Facilities Handbook* for maintaining pedestrian access and meeting ADA requirements during construction at: www.dot.ca.gov/hq/construc/safety/Temporary_Pedestrian_Facilities_Handbook.pdf) (see also Caltrans’ Traffic Operations Policy Directive 11-0] “Accommodating Bicyclists in Temporary Traffic Control Zones” at: www.dot.ca.gov/hq/traffops/policy/11-01.pdf). All curb ramps and pedestrian facilities located within the limits of the project are required to be brought up to current ADA standards as part of this project.

For further TCP assistance, please contact the Caltrans District 4 Office of Traffic Management Operations at (510) 286-4579. Further traffic management information is available at the following website: www.dot.ca.gov/hq/traffops/trafmgmt/tmp_lcs/index.htm.

Response A-8: If traffic restrictions and detours are needed that affect State highways, the City will require the applicant to comply with all applicable regulations of Caltrans and other responsible agencies. This comment does not raise any questions or comments about the analysis in the DEIR. This comment is noted.

Comment A-9: Encroachment Permit

Please be advised that any work or traffic control that encroaches onto the State ROW requires an encroachment permit that is issued by Caltrans. To apply, a completed encroachment permit application, environmental documentation, and five (5) sets of plans clearly indicating State ROW must be submitted to: David Salladay, District Office Chief, Office of Permits, California Department of Transportation, District 4, P.O. Box 23660, Oakland, CA 94623-0660. Traffic-related mitigation measures should be incorporated into the construction plans prior to the encroachment permit process. See this website for more information: www.dot.ca.gov/hq/traffops/developserv/permits.

Response A-9: If an encroachment permit is required, the City will require the applicant to comply with all applicable regulations of Caltrans and other responsible agencies. This comment does not raise any questions or comments about the analysis in the DEIR. This comment is noted.

**B. RESPONSE TO COMMENTS FROM SANTA CLARA VALLEY
TRANSPORTATION AUTHORITY, DATED JULY 29, 2016:**

Comment B-1: Santa Clara Valley Transportation Authority (VTA) staff have reviewed the Draft EIR for up to 449,524 square feet of new classroom, office, and activity space and 600 new student housing units for the University campus at 500 El Camino Real. We have the following comments.

Land Use

VTA supports the proposed land use intensification of these sites of the Santa Clara University campus within a 2,000-foot walking distance of the Santa Clara Transit Center, served by Caltrain, ACE, Capitol Corridor, VTA Local Bus Lines 22, 60, and 81, VTA Community Bus Line 32, and VTA Rapid 522, which VTA is planning to upgrade to Bus Rapid Transit (BRT) service. The Santa Clara Station will also be served by BART in the future. 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.

Response B-1: It is acknowledged that the VTA supports the proposed growth on the Santa Clara University campus.

Comment B-2: Pedestrian Accommodations and Access to Transit

As noted above, the projects included in the Santa Clara University Master Plan are within walking distance of the Santa Clara Transit Center, which provides access to multiple bus and rail transit services. However, the existing pedestrian access point between the university and this facility at the intersection of El Camino Real and Palm Drive has several characteristics that reduce the safety and comfort of pedestrians, including long crossing distances, wide turning radii which encourages high-speed right turns, angled crosswalks, and permitted left turns across the crosswalks. VTA recommends the following improvements at both corners of El Camino Real and Palm Drive to encourage transit ridership by students, faculty and staff:

- Provide pedestrian bulb-outs to shorten crossing distances and reduce the speed of right-turning vehicles;
- Provide high-visibility, straightened crosswalks;
- Provide a leading pedestrian interval to reduce conflicts between pedestrians and left-turning vehicles.

Response B-2: The VTA's recommendations are acknowledged and will be provided to the decision-makers as part of the public record. This comment does not raise any questions or comments about the analysis in the DEIR.

Comment B-3: Parking Supply and Management

The TIA notes that the Master Plan would result in a net reduction of 163 parking spaces, although the City's parking requirements would require a net increase of 60 parking spaces based on the

development envisioned in the Master Plan. The TIA notes that a parking supply and occupancy study conducted by Hexagon Transportation Consultants, Inc. showed that during peak parking demand approximately 65% of the existing 3,175 parking spaces were occupied. The study also found that parking facilities serving non-residential students tended to be full, while those serving faculty, staff and residential students had lower rates of occupancy (TIA, pgs. 55-56).

VTA agrees with the statement in the DEIR that “The amount of parking currently available for University use is more than sufficient to support the increase in student population,” (DEIR, pg. 72) and supports the recommendation in the TIA to encourage more efficient parking utilization by changing the designation of existing parking spaces to provide more parking for non-residential students (TIA, pg. 56).

Response B-3: It is acknowledged that the VTA agrees with the parking assessment.

Comment B-4: Transportation Demand Management/Trip Reduction

The DEIR and TIA do not discuss the inclusion of a Transportation Demand Management (TDM) Program for the Master Plan. VTA recognizes that Santa Clara University’s Center for Sustainability already offers several transportation programs for students, faculty and staff, including carpool matching services, on-site car-sharing options, bicycle facilities, a campus bikeshare program, electric vehicle charging stations, and discounted transit passes, as detailed on the University’s website at <https://www.scu.edu/sustainability/operations/transportation/>. However, these measures could be more effective if connected to a specific trip reduction target, annual monitoring of vehicle trip generation and an enforcement mechanism if the target is not met. VTA recommends that the City work with the University to incorporate these elements into the University’s TDM efforts.

Response B-4: The VTAs recommendation that the existing TDM program could be more effective if it was connected to a specific trip reduction target, had annual monitoring of vehicle trip generation, and had an enforcement mechanism is acknowledged and will be provided to the decision-makers as part of the public record. This comment does not raise any questions or comments about the analysis in the DEIR.

IV. REVISIONS TO THE TEXT OF THE DRAFT EIR

The following section contains revisions/additions to the text of the *Draft Environmental Impact Report, Santa Clara University Five-Year Master Plan Project*, dated May 2016. Revised or new language is underlined. All deletions are shown ~~with a line through the text~~.

No revisions to the Draft EIR are required.

V. COPIES OF THE COMMENT LETTERS RECEIVED ON THE DRAFT EIR

DEPARTMENT OF TRANSPORTATION

DISTRICT 4
P.O. BOX 23660
OAKLAND, CA 94623-0660
PHONE (510) 286-5528
FAX (510) 286-5559
TTY 711
www.dot.ca.gov



*Serious Drought.
Help save water!*

June 29, 2016

SCL082481
SCL/82/PM R10.95
SCH# 2015042076

Ms. Debbie Fernandez
Department of Planning
City of Santa Clara
1500 Warburton Avenue
Santa Clara, CA 95050

Dear Ms. Fernandez:

Santa Clara University 5 Year Master Plan – Draft Environmental Impact Report

Thank you for continuing to include the California Department of Transportation (Caltrans) in the environmental review process for the above-referenced project. Caltrans' new mission, vision, and goals signal a modernization of our approach to California's State Transportation Network (STN), in which we seek to reduce statewide vehicle miles traveled (VMT) and increase non-auto modes of active transportation. Caltrans plans to increase non-auto mode shares by 2020 through tripling bicycle, and doubling both pedestrian and transit. Also, these targets support the Metropolitan Transportation Commission's (MTC) Sustainable Communities Strategy (SCS), which promotes the increase of non-auto mode shares by ten percentage points and a decrease in automobile VMT per capita by ten percent. Our comments are based on the Draft Environmental Impact Report (DEIR). Please also refer to the previous comment letter, dated May 18, 2015, on this project and incorporated herein.

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Lead Agency

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

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Traffic Impacts

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Vehicle Trip Reduction

Caltrans encourages the City to locate future housing, jobs, and employee-related services near major mass transit centers with connecting streets configured to facilitate walking and biking. The project will generate new Pedestrian and bicycle trips, so the developer should coordinate with the City and Caltrans to facilitate the trips. In particular, bike lanes, bike pockets at intersections, or other improvements for bicyclists along SR 82, and providing a marked crosswalk at the southern leg of the SR 82/The Alameda intersection should be studied. This would promote mass transit use thereby reducing regional VMT and traffic impacts.

Transportation Demand Management (TDM) programs should be documented with annual monitoring reports by an onsite TDM coordinator to demonstrate effectiveness. Suggested TDM strategies include working with the Santa Clara Valley Transportation Authority (VTA) to decrease headway times and improve way-finding on bus lines to provide a better connection between the project, the Santa Clara and College Park Stations, and regional destinations and providing:

- Membership in a transportation management association.
- Transit subsidies and/or transit passes to all employees, faculty and students.
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- Fix-it bicycle repair station(s).
- Amenities, access and connections, incorporate wide sidewalks.
- Transportation and commute information kiosk.
- Outdoor patios, outdoor areas, furniture, pedestrian pathways, picnic and recreational areas.
- Nearby walkable amenities.
- A transportation coordinator.
- Emergency Ride Home program.
- Bicycle route mapping resources and incentivize bicycle parking.

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These smart growth approaches are consistent with the MTC Regional Transportation Plan/SCS goals and would meet Caltrans Strategic Management Plan. Please refer to "Reforming Parking Policies to Support Smart Growth," a MTC study funded by Caltrans, for sample parking ratios and strategies that support compact growth. Reducing parking supply can encourage alternate forms of transportation, reduce regional VMT, and lessen future traffic impacts on SR 82 and the STN.

Traffic Impact Fees

Given the project's contribution to area traffic and its proximity to SR 82 the project should contribute fair share traffic impact fees. These contributions would be used to lessen future traffic congestion and improve transit in the project vicinity.

Voluntary Contribution Program

We encourage the City to participate in the VTA's voluntary contribution program and plan for the impact of future growth on the regional transportation system. Contributions by the City funding regional transportation programs would improve the transportation system by reducing congestion and improving mobility on major roadways throughout the San Francisco Bay Area.

Cultural Resources

Caltrans requires that a project's environmental document include documentation of a current archaeological record search from the Northwest Information Center of the California Historical Resources Information System if construction activities are proposed within State right-of-way (ROW). Current record searches must be no more than five years old. Caltrans requires the records search, and if warranted, a cultural resource study by a qualified, professional archaeologist, and evidence of Native American consultation to ensure compliance with CEQA, Section 5024.5 and 5097 of the California Public Resources Code, and Volume 2 of Caltrans' Standard Environmental Reference (www.dot.ca.gov/ser/vol2/vol2.htm).

These requirements, including applicable mitigation, must be fulfilled before an encroachment permit can be issued for project-related work in State ROW. Work subject to these requirements includes, but is not limited to: lane widening, channelization, auxiliary lanes, and/or modification of existing features such as slopes, drainage features, curbs, sidewalks and driveways within or adjacent to State ROW.

Traffic Control Plan

Since it is anticipated that vehicular, bicycle, and pedestrian traffic will be impacted during the construction of the proposed project requiring traffic restrictions and detours, a Caltrans-approved Traffic Control Plan (TCP) is required to avoid project-related impacts to the STN. The TCP must also comply with the requirements of corresponding jurisdictions. In addition, pedestrian access through the construction zone must be in accordance with the Americans with Disabilities Act (ADA) regulations (see Caltrans' *Temporary Pedestrian Facilities Handbook* for maintaining pedestrian access and meeting ADA requirements during construction at: www.dot.ca.gov/hq/construc/safety/Temporary_Pedestrian_Facilities_Handbook.pdf) (see also Caltrans' Traffic Operations Policy Directive 11-01 "Accommodating Bicyclists in Temporary Traffic Control Zones" at: www.dot.ca.gov/hq/traffops/policy/11-01.pdf). All curb ramps and

Ms. Debbie Fernandez/City of Santa Clara
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pedestrian facilities located within the limits of the project are required to be brought up to current ADA standards as part of this project.

For further TCP assistance, please contact the Caltrans District 4 Office of Traffic Management Operations at (510) 286-4579. Further traffic management information is available at the following website:
www.dot.ca.gov/hq/traffops/trafmgmt/tmp_lcs/index.htm.

Encroachment Permit

Please be advised that any work or traffic control that encroaches onto the State ROW requires an encroachment permit that is issued by Caltrans. To apply, a completed encroachment permit application, environmental documentation, and five (5) sets of plans clearly indicating State ROW must be submitted to: David Salladay, District Office Chief, Office of Permits, California Department of Transportation, District 4, P.O. Box 23660, Oakland, CA 94623-0660. Traffic-related mitigation measures should be incorporated into the construction plans prior to the encroachment permit process. See this website for more information:
www.dot.ca.gov/hq/traffops/developserv/permits.

Should you have any questions regarding this letter, please contact Brian Ashurst at (510) 286-5505 or brian.ashurst@dot.ca.gov.

Sincerely,



 PATRICIA MAURICE
District Branch Chief
Local Development - Intergovernmental Review

c: Scott Morgan, State Clearinghouse
Robert Swierk, Santa Clara Valley Transportation Authority (VTA) – electronic copy
Robert Cunningham, Santa Clara Valley Transportation Authority (VTA) – electronic copy



June 29, 2016

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

Attention: Debby Fernandez

Subject: City File No. PLN2014-10779 / Santa Clara University Five-Year Master Plan

Dear Ms. Fernandez:

Santa Clara Valley Transportation Authority (VTA) staff have reviewed the Draft EIR for up to 449,524 square feet of new classroom, office, and activity space and 600 new student housing units for the University campus at 500 El Camino Real. We have the following comments.

Land Use

VTA supports the proposed land use intensification of these sites on the Santa Clara University campus within a 2,000-foot walking distance of the Santa Clara Transit Center, served by Caltrain, ACE, Capitol Corridor, VTA Local Bus Lines 22, 60, and 81, VTA Community Bus Line 32, and VTA Rapid 522, which VTA is planning to upgrade to Bus Rapid Transit (BRT) service. The Santa Clara Station will also be served by BART in the future. 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.

Pedestrian Accommodations and Access to Transit

As noted above, the projects included in the Santa Clara University Master Plan are within walking distance of the Santa Clara Transit Center, which provides access to multiple bus and rail transit services. However, the existing pedestrian access point between the university and this facility at the intersection of El Camino Real and Palm Drive has several characteristics that reduce the safety and comfort of pedestrians, including long crossing distances, wide turning radii which encourage high-speed right turns, angled crosswalks, and permitted left turns across the crosswalks. VTA recommends the following improvements at both corners of El Camino Real and Palm Drive to encourage transit ridership by students, faculty and staff:

- Provide pedestrian bulb-outs to shorten crossing distances and reduce the speed of right-turning vehicles;
- Provide high-visibility, straightened crosswalks;
- Provide a leading pedestrian interval to reduce conflicts between pedestrians and left-turning vehicles.

Parking Supply and Management

The TIA notes that the Master Plan would result in a net reduction of 163 parking spaces, although the City's parking requirements would require a net increase of 60 parking spaces based on the development envisioned in the Master Plan. The TIA notes that a parking supply and occupancy study conducted by Hexagon Transportation Consultants, Inc. showed that during peak parking demand approximately 65% of the existing 3,175 parking spaces were occupied. The study also found that parking facilities serving non-residential students tended to be full, while those serving faculty, staff and residential students had lower rates of occupancy (TIA, pgs. 55-56).

VTA agrees with the statement in the DEIR that "The amount of parking currently available for University use is more than sufficient to support the increase in student population," (DEIR, pg. 72) and supports the recommendation in the TIA to encourage more efficient parking utilization by changing the designation of existing parking spaces to provide more parking for non-residential students (TIA, pg. 56).

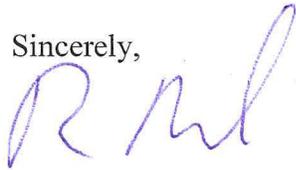
Transportation Demand Management/Trip Reduction

The DEIR and TIA do not discuss the inclusion of a Transportation Demand Management (TDM) Program for the Master Plan. VTA recognizes that Santa Clara University's Center for Sustainability already offers several transportation programs for students, faculty and staff, including carpool matching services, on-site car-sharing options, bicycle facilities, a campus bikeshare program, electric vehicle charging stations, and discounted transit passes, as detailed on the University's website at <https://www.scu.edu/sustainability/operations/transportation/>. However, these measures could be more effective if connected to a specific trip reduction target, annual monitoring of vehicle trip generation and an enforcement mechanism if the target is not met. VTA recommends that the City work with the University to incorporate these elements into the University's TDM efforts.

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June 29, 2016
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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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