



July 9, 2018

City of Cupertino
Community Development Department
10300 Torre Avenue
Cupertino, CA 95014

Attention: Piu Ghosh

Subject: Vallco Special Area Specific Plan

Dear Ms. Ghosh:

Santa Clara Valley Transportation Authority (VTA) staff have reviewed the NOP for 6000,000 square feet of commercial uses, 2 million square feet of office uses, 339 hotel rooms, and 800 dwelling units to replace an existing shopping center on a 70-acre site on both sides of Wolfe Road. We have the following comments.

VTA Key Topics

VTA supports the City's efforts to develop a specific plan for the Vallco Special Area which will intensify land uses along the Steven Creek Boulevard transit corridor. VTA's key topics on the proposed project are below, followed by our detailed comments.

1. Supports the project's Wolfe Road bike lane improvements.
2. Requests a meeting to discuss further details regarding the Transit Hub, Congestion Management Program (CMP) Impact and Mitigation Measures and Transit Vehicle Delay.
3. Commends the City for performing a VMT analysis and offers some revised details and guidance.

Bicycle Accommodations

In VTA's 3/12/2018 comments on the Notice of Preparation, VTA recommended analyzing opportunities to improve bicycle lanes along Wolfe Road. VTA is pleased to that the proposed project will provide buffered bicycle lanes on Wolfe Road in the immediate project vicinity, and install on-site bicycle lanes. Wolfe Road is designated as a "Cross-County Bikeway Corridor" (CCBC) per the VTA Santa Clara County Bicycle Plan. VTA recommends that CCBCs are designed to be high-quality, low stress and context-sensitive. The VTA Santa Clara County Bicycle Plan can downloaded here: <http://www.vta.org/projects-and-programs/planning/bike-plan>.

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VTA recommends requirements for high-capacity bicycle parking for all new development within the Specific Plan. 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 parking guidance (Chapter 10), it can be downloaded from <http://www.vta.org/bikeprogram>.

Transit Hub

VTA request further details as to the location and operations of the proposed Transit Hub. As with previous proposals at this location, VTA requests that a new Transit Hub complement and improve operations for VTA's Stevens Creek Boulevard Corridor routes, Route 23 (currently operating) and the Rapid 523 (near-term implementation per the 2018-2019 Transit Operation Plan, Next Network). Therefore, an optimal location for the Transit Hub would be on Stevens Creek Boulevard. VTA recommends "bulb-out" or "floating-island" stops to maintain transit travel speeds and provide safe passenger boarding. We recommends that space be provided to accommodate one 40-foot bus and one 60-foot articulated bus. VTA requests a meeting with the City to discuss how VTA transit will be accommodated at the new Transit Hub. We would also like to discuss improvements to the existing Vallco bus stop on Stevens Creek Boulevard.

Transit Vehicle Delay

VTA notes that Table 3.17-19 reflects a one minute and 39 seconds delay to the future Rapid 523, and one minute and 36 second delay to Route 23, which the DEIR regards as a "Less than Significant" impact to transit. Both of these routes carry large passenger loads and will be part of VTA's new 'Frequent' network. Degrading the speed and quality of this network will result in reduced performance and increased transit travel times making transit a less attractive option for travelers. These impacts could negate the proposed TDM measures designed to support transit and shift solo vehicles trips for the project. While VTA is generally supportive of increased land use intensification along transit corridors we believe that the effect of increased roadway traffic congestion on existing and planned transit operations should be adequately addressed. VTA requests more detail and coordination with the City regarding the proposed Condition of Approval that "the project proponent shall coordinate with the City and VTA to identify feasible transit priority measures near the affect facility and include contribution to applicant project that improve transit speed a reliability." (DEIR pg. 353)

Transportation Demand Management/Trip Reduction

VTA commends the City for including a commitment to a Transportation Demand Management (TDM) Program with vehicle trips reduction targets of 25-35% in office vehicle trips based on ITE Land Use 710, and a penalty structure if the TDM goals are not met. VTA supports the

additional TDM tools discussed in the TIA, including a parking management program (cash-out/unbundled parking) and VTA SmartPass transit subsidies for residents and employees.

CMP Impacts and Mitigation Measures

The DEIR/TIA identifies significant impacts to 14 mixed-flow segments in the AM peak hour, 18 mixed-flow segments in the PM peak hour, five HOV segments in the AM peak hour, and five HOV segments in the PM peak hour. VTA supports the City for including a mitigation measure stating that future development pay “a fair-share payment contribution to improvements identified in VTA’s VTP 2040 for freeway segments on SR 85, I-280, and I-880 that the project,” including Express Lanes on SR 85, US 101 and I-280, and ramp improvements on I-280 and I-880 (DEIR pg. 313). Express Lanes in operation have been shown to provide improved travel speeds, lower levels of congestion, higher traffic throughput carrying capacity and overall improved traffic operations. VTA recommends adding the I-280 Wolfe Interchange Project to the recommended project list. VTA looks forward to working with the City to identify contribution opportunities as projects come forward in the Vallco Specific Plan area. VTA requests a meeting with City staff to discuss these future improvements.

VTA also notes the DEIR’s Mitigation Measures TRN 2.5 and 7.13, which include signal timing adjustments along different intersections on Steven Creek Boulevard. VTA requests coordinating these improvements with the City to review traffic operational changes, in order to improve, and at least do no harm to transit speed and reliability, specifically for Route 23 and Rapid 523.

Vehicle Miles Traveled (VMT) Analysis

VTA commends the City for performing an analysis of Vehicle Miles Traveled (VMT) effects of the proposed project, in light of Senate Bill 743 and the upcoming transition from congestion-based measures to VMT-based analysis in CEQA. VTA recognizes that this analysis was performed for informational purposes only because the City has not yet adopted VMT thresholds for Transportation analysis in CEQA. VTA also commends the City for including a discussion of how the results of the VMT analysis of the proposed project compare to the results in the City’s *General Plan Amendment, Housing Element Update, and Associated Rezoning Draft EIR* several years ago.

VTA offers the following specific comments on the VMT Analysis and discussion of SB 743:

- The Year 2020 and Year 2040 regional average VMT per service population (referenced on DEIR p. 324 and TIA p. 234) are based on the MTC / ABAG regional model, which is an activity-based/tour-based model rather than a trip-based model as utilized by some other jurisdictions.

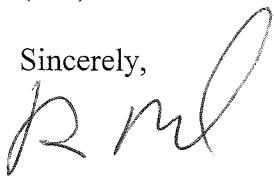
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- There is an error in the statements in the DEIR and TIA about what VMT thresholds the current draft guidance for SB 743 would translate to in the Bay Area. The DEIR/TIA states that “This translates to thresholds of 15.5 (21.8 x 85%) and 17.3 (20.3 x 85%) for the years 2020 and 2040, respectively” while the first figure should actually be 18.5 (21.8 x 85%).
- The section on of the TIA report on “Level of Service and Senate Bill (SB) 743” states that “Pending expected adoption in mid-2018, the proposed new CEQA Guidelines are currently scheduled to apply statewide on July 1, 2019” (TIA p. 19). Please note that in the California Natural Resource Agency’s latest rule-making document, the 15-Day Revisions (available at <http://resources.ca.gov/ceqa/>), the state has clarified that the expected date of statewide application of VMT is **July 1, 2020**.

VTA notes that Proposed New Section 15064.3 of the CEQA Guidelines (from the California Natural Resources Agency’s latest rule-making documents) states that “A lead agency has discretion to choose the most appropriate methodology to evaluate a project’s vehicle miles traveled... A lead agency may use models to estimate a project’s vehicle miles traveled, and may revise those estimates to reflect professional judgment based on substantial evidence. Any assumptions used to estimate vehicle miles traveled and any revisions to model outputs should be documented and explained in the environmental document prepared for the project.” For specific questions about emerging VMT analysis practices in Santa Clara County, please contact Robert Swierk at Robert.Swierk@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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