



BAY AREA  
AIR QUALITY  
MANAGEMENT  
DISTRICT

June 28, 2014

Rob Eastwood, Principal Planner  
Santa Clara County  
70 West Hedding Street, 7<sup>th</sup> floor  
San Jose, California 95110

Subject: Notice of Preparation of a Draft Environmental Impact Report for the Santa Clara County General Plan Circulation and Mobility Element Update

Dear Mr. Rob Eastwood:

Bay Area Air Quality Management District (Air District) staff reviewed the Notice of Preparation (NOP) of a Draft Environmental Impact Report (DEIR) for the Santa Clara County General Plan Circulation and Mobility Element Update (Project). We understand that the Project will identify objectives, policies and strategies for multimodal transportation networks, airports and utilities within Santa Clara County. It will also contain policies to support and implement improvements to the transportation network, including bicycle, pedestrian and transit systems.

Air District staff has the following specific comments on the environmental analysis that should be included in the DEIR:

1. The DEIR should provide a detailed analysis of the Project's potential effects on local and regional air quality impacts. The Air District's *CEQA Air Quality Guidelines (May, 2012)* provide guidance on how to evaluate a project's construction, operational and cumulative air quality impacts. A copy may be downloaded from: <http://www.baaqmd.gov/Divisions/Planning-and-Research/CEQA-GUIDELINES.aspx>.
2. The DEIR should include a discussion on the Air District's attainment status for all criteria pollutants and the implications for the region if these standards are not attained or maintained by statutory deadlines; a discussion of the health effects of air pollution; and a discussion of greenhouse gas (GHG) emissions and the potential impacts from climate change in the Bay Area.
3. The DEIR should provide a map that clearly identifies the Project's boundary; existing and future planned sensitive receptors (e.g., residences, schools, day cares, hospitals, and nursing care facilities) and all stationary sources, highways, major roadways, and rail lines within 1,000 feet of the Project's boundary.

ALAMEDA COUNTY

Tom Bates  
Margaret Fujioka  
Scott Haggerty  
Nate Miley  
(Chair)

CONTRA COSTA COUNTY

John Gioia  
David Hudson  
Mary Piepho  
Mark Ross

MARIN COUNTY

Susan Adams

NAPA COUNTY

Brad Wagenknecht

SAN FRANCISCO COUNTY

John Avalos  
Edwin M. Lee  
Eric Mar  
(Secretary)

SAN MATEO COUNTY

Carole Groom  
(Vice-Chair)  
Carol Klatt

SANTA CLARA COUNTY

Cindy Chavez  
Ash Kalra  
Liz Kniss  
Jan Pepper

SOLANO COUNTY

James Spering

SONOMA COUNTY

Teresa Barrett  
Shirlee Zane

Jack P. Broadbent  
EXECUTIVE OFFICER/APCO

4. The DEIR should estimate and evaluate the potential health risk to existing and future sensitive populations within the Project area from toxic air contaminants (TACs) as a result of Project construction and operation. Air District staff recommends that the DEIR evaluate potential impacts of TAC emissions with siting land uses attracting sensitive populations, such as residents, children, and seniors, near major transportation corridors and other sources of TACs.
5. The DEIR should identify and evaluate mitigation measures to reduce criteria pollutants, toxic air contaminants, and GHGs to lesson any potential air quality impacts. The Air District's *CEQA Air Quality Guidelines* can assist in identifying and quantifying mitigation measures.
6. The DEIR should demonstrate its consistency with the Air District's *2010 Clean Air Plan*. The Air District's *2010 Clean Air Plan* may be found on the Air District's website, <http://www.baaqmd.gov/Divisions/Planning-and-Research/Plans/Clean-Air-Plans.aspx>.

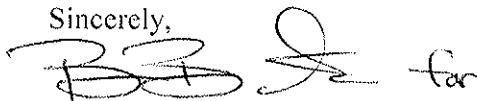
If any aspects of the Project require a discretionary permit from the Air District, then the Air District is a responsible agency for CEQA purposes. The Project must obtain the appropriate permits from the Air District and comply with all applicable Air District rules and regulations and permitting requirements. If the Project will require an Air District permit, then the analysis methodology used in the DEIR and all subsequent environmental documents for the proposed Project must be consistent with the Air District's permitting requirements.

The DEIR should include all appendices or technical documents related to the air quality, toxic air contaminant, and GHG analyses, such as emission calculation and health risk assessment files. Without all the supporting air quality documentation, the Air District may be unable to review the air quality analysis in a timely manner.

The Air District's website contains a number of tools and resources to assist lead agencies in analyzing environmental impacts, including: posted CEQA comment letters; guidance on quantifying plan level GHG emissions; and risk and hazard screening tools and guidance. View and download available tools here: <http://www.baaqmd.gov/Divisions/Planning-and-Research/CEQA-GUIDELINES/Tools-and-Methodology.aspx>.

We encourage lead agencies to contact Air District staff with any questions, and request assistance during the environmental analysis process. If you have any questions regarding these comments, please contact Jackie Winkel, Environmental Planner, 415-749-4933.

Sincerely,



Jean Roggenkamp  
Deputy Air Pollution Control Officer

cc: BAAQMD Director Cindy Chavez  
BAAQMD Chair Ash Kalra  
BAAQMD Director Liz Kniss  
BAAQMD Director Jan Pepper

# Memorandum

**To:** Keith Larkin, Chief  
Northern Region  
Department of Forestry and Fire Protection

**Date:** June 3, 2014  
R13

**Attention:** Environmental Coordinator  
Santa Clara Unit

**Telephone:** (916) 653-4995

**From:** Department of Forestry and Fire Protection  
Chris Browder, Deputy Chief  
Environmental Protection

**Subject:** Environmental Document Review

Project Name: Santa Clara General Plan Circulation & Mobility Element Update  
SCH #: 2014052102  
Document Type: Notice of Preparation (NOP)

Potential Area(s) of Concern: Fire Protection?;  
Other:

**MANDATED DUE DATE: 6/30/2014**

The above referenced environmental document was submitted to State Headquarters, Environmental Protection for review under the California Environmental Quality Act (CEQA) or the National Environmental Policy Act (NEPA). The proposed project, located within your Unit/Program Area, may have an impact upon the Department's fire protection and/or natural resource protection and management responsibilities or require the Department's permits or approval. Your determination of the appropriate level of CAL FIRE involvement with this project is needed. Please review the attached document and address your comments, if any, **to the lead agency** prior to the due date. Your input at this time can be of great value in shaping the project. If your Unit's Environmental Coordinator is not available, please pass on to another staff member in order to meet the mandated deadline.

Please submit comments directly to the lead agency before the mandated due date with copy to the State Clearinghouse (P.O. Box 3044, Sacramento, CA 95812-3044).

No Comment - explain briefly on the lines below.

This project is within Local Responsibility Area (LRA), has no

impact on State Responsibility Area (SRA).

Name and Title of Reviewer: Jamie Norton, Division Chief  
Phone: (408) 779-2121 Email: jamie.norton@fire.ca.gov

Note: Please complete this form and return it, with a copy of any comments, for CAL FIRE's records to: Ken Nehoda or Chris Browder, Deputy Chief, Environmental Protection, P.O. Box 944246, Sacramento CA 94244-2460.

**DEPARTMENT OF TRANSPORTATION**

DISTRICT 4

P.O. BOX 23660

OAKLAND, CA 94623-0660

PHONE (510) 286-6053

FAX (510) 286-3559

TTY 711

www.dot.ca.gov



*Serious Drought.  
Help save water!*

June 26, 2014

SCLGEN116  
SCL/GEN/PM VAR  
SCH# 2014052102

Mr. David Rader  
Santa Clara County  
70 W. Hedding Street  
7<sup>th</sup> Floor, East Wing  
San Jose, CA 95110

Dear Mr. Rader:

**Santa Clara General Plan Circulation and Mobility Element Update – Notice of Preparation (NOP)**

Thank you for including the California Department of Transportation (Caltrans) in the environmental review process for the project referenced above. We have reviewed the NOP and have the following comments to offer.

***Lead Agency***

As the lead agency, the County of Santa Clara (County) 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. This information should also be presented in the Mitigation Monitoring and Reporting Plan of the environmental document.

***Vehicle Trip Reduction***

Caltrans encourages you to locate any needed housing, jobs and neighborhood services near major mass transit centers, with connecting streets configured to facilitate walking and biking, as a means of promoting mass transit use and reducing regional vehicle miles traveled and traffic impacts on the State highways.

We also encourage you to develop Travel Demand Management (TDM) policies to promote usage of nearby public transit lines and reduce vehicle trips on the State Highway System. These policies could include lower parking ratios, car-sharing programs, bicycle parking and showers for employees, and providing transit passes to residents and employees, among others.

In addition, please ensure secondary impacts on pedestrians and bicyclists resulting from any traffic impact mitigation measures are analyzed. The analysis should describe any pedestrian and

Mr. David Rader/County of Santa Clara

June 26, 2014

Page 2

bicycle mitigation measures and safety countermeasures that would in turn be needed as a means of maintaining and improving access to transit facilities and reducing vehicle trips and traffic impacts on State highways.

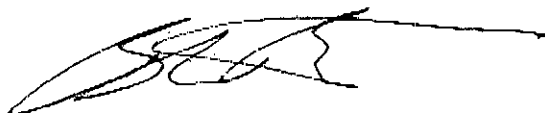
Please note that "Intersection improvements" is defined in the NOP as a project that includes the "addition and/or extension of turning lanes, signalization changes, and/or intersection reconfigurations to improve level of service or operations/safety." However, an improvement for one mode could result in the degradation of facilities for another mode. Therefore, Caltrans recommends omitting the word "improvement" and replacing the term with a reference to what the project actually proposes to do. We also recommend you be more specific with descriptions such as, "Interchange modification," "Reconstruct and modify," and "Interchange reconfiguration."

#### ***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:  
<http://www.dot.ca.gov/hq/traffops/developserv/permits>.

Should you have any questions regarding this letter, please contact Brian Brandert of my staff at (510) 286-5505 or [brian.brandert@dot.ca.gov](mailto:brian.brandert@dot.ca.gov).

Sincerely,



for

ERIK ALM, AICP

District Branch Chief

Local Development - Intergovernmental Review

c: Scott Morgan, State Clearinghouse



OFFICE OF THE CITY MANAGER

CITY OF  
**PALO  
ALTO**

250 Hamilton Avenue, 7th Floor  
Palo Alto, CA 94301  
650.329.2392

June 30, 2014

County of Santa Clara  
Department of Planning and Development  
Attention: David Rader  
70 W Hedding Street, East Wing, 7<sup>th</sup> Floor  
San Jose, CA 95110

Subject: Comments to NOP for the Santa Clara General Plan  
Circulation and Mobility Element Update

Dear Mr. Rader,

Thank you for the opportunity to provide comments regarding the County's Expressway Study, Circulation and Mobility Element update, and associated Environmental Impact Report (EIR). The County's expressways form critical links in the City's transportation infrastructure and the County must plan to better meet existing and future regional transportation demands including transit, bicycle, and pedestrian modes. We appreciate the County's efforts to solicit comments on the scope of this effort through its Policy Advisory Board and Technical Working Group, and appreciate your staff's attendance at a recent City Council study session. In addition, we request your consideration of the following comments as the study gets underway.

Central Expressway & Rengstorff Avenue

The notice of preparation (NOP) discusses grade separation of the Caltrain tracks and expressway intersection at this location. Palo Alto requests that the study expand the study limits to the north so as to include the existing San Antonio Road overpass and the San Antonio Avenue intersection. Palo Alto's interests include improving Bicycle-Pedestrian circulation from San Antonio Avenue to the San Antonio Caltrain Station in Palo Alto as well as considerations of Caltrain grade-separation.

The study of this intersection should include a focused analysis of Bicycle-Pedestrian circulation to at least San Antonio Avenue as any grade separation considerations at Rengstorff Avenue may influence traffic patterns in South Palo Alto. The City also requests the opportunity to participate in discussions with between the County, Valley Transportation Authority, and Caltrain to determine if grade separation considerations modifying the grade of the Caltrain tracks in addition to that of Rengstorff Avenue and Central Expressway.



CityOfPaloAlto.org

Page Mill Road & I-280 Interchange

Signalization improvements to the I-280 Off-Ramps should be considered immediately as near-term improvements to help improve the safety of the off-ramps as queuing currently extends beyond the off ramp limits onto I-280, increasing the potential for rear-end collisions on I-280. The City also requests that modifications of the Page Mill Road & I-280 Interchange preserve the free-flow access of the I-280 On-Ramps to preserve egress from Palo Alto and the Stanford Research Park. Modification of the two existing westbound right turn lanes could be analyzed, with a one-lane configuration up to the on-ramp itself in order to reduce weaving with bicyclists as part of this improvement.

Page Mill Road – I-280 to El Camino Real

The Palo Alto City Council on June 23<sup>rd</sup> approved a funding agreement between the City and the County of Santa Clara to help fund an analysis of potential operational and capacity improvements on Page Mill Road from I-280 to El Camino Real. The City will be working closely with County staff on this project but wishes to document its interest in immediate and near-term solutions to improve both safety and operations of Page Mill Road. Speeding on Page Mill Road is a growing concern for Palo Alto staff, residents, and patrons. The City requests that the Council consider the immediate installation of vehicle speed feedback signs on both approaches of Page Mill Road between I-280 and Deer Creek Road. The use of vehicle speed feedback signs provides dynamic information to motorists regarding their vehicle speed to encourage speed reductions that in turn improve safety considerations for bicyclists on Page Mill Road. In the near-term the City requests the installation of pedestrian facilities between I-280 and Deer Creek Road along both sides of Page Mill Road to offer facilities for expressway users. Immediate improvements between Old Page Mill Road and Junipero Serra Boulevard should also be considered by the County as Old Page Mill Road offers a safer alternative to both bicyclists and pedestrians traveling along the north side of Page Mill Road.

Oregon Expressway & US101/Embarcadero/Oregon Interchange

Palo Alto is glad to see an analysis of this section of the expressway system. The City requests that the analysis of this segment also include a discussion of operations of the Oregon Expressway Bicycle-Pedestrian Overpass. The overpass is an integral part of the Highway 101 interchange network through this area. The analysis should include a focused discussion regarding the condition and operation of the overpass as it relates to the existing conditions and proposed improvements to the interchange.

Palo Alto Bicycle Boulevard Program

The City has 23 active bicycle boulevard program projects, including projects that cross the Oregon Expressway-Page Mill Road, Foothill Expressway, and Central Expressway corridors. Projects that the County should be aware of the following:

- Bryant Street Bicycle Boulevard Update (Crossing Oregon Expressway)
- Ross Road Bicycle Boulevard (Crossing Oregon Expressway)
- Greer Road Bicycle Boulevard (Crossing Oregon Expressway)
- Charleston-Arastradero Corridor Project (Terminating at Foothill Expressway)
- Stanford-Palo Alto Trail Program (Terminating at Junipero Serra Blvd & Page Mill Rd)
- San Antonio Avenue Bicycle Route (Terminating at Alma Street-Central Expressway)



The City can make available existing resident input regarding these projects to provide additional community perspectives regarding interaction with the expressway network.

Palo Alto Safe Routes to School

The City has "Walk and Roll" maps available for each of the City's public schools available online at [www.cityofpaloalto.org/saferoutes](http://www.cityofpaloalto.org/saferoutes). The County should be aware of suggested routes to school activities to understand how students currently interact with the expressway network. For example, the Foothill Expressway & Arastradero Road intersection is a critical link for students traveling from the Town of Los Altos Hills to Gunn High School. Grade separation is already being considered at this location, but the County should also evaluate near-term improvements. Palo Alto's transportation staff can be reached for input regarding Safe Routes to School Program activities at (650) 329-2442.

Potential Environmental Impacts of the Project

The NOP discusses traditional environmental factors that will be studied as part of the project such as Aesthetics, Air Quality, Land Use, Transportation, etc. Palo Alto requests that the study also include an analysis of Vehicle Miles Traveled (VMTs) and Greenhouse Gas Emissions as factors in the evaluation and ranking of alternatives being studied. The use of tools that measure the stress of bicyclists-pedestrians on the existing expressways with and without future improvements should also be introduced.

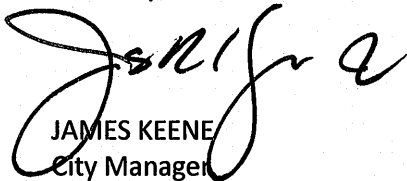
For Land Use, the City requests that the County outreach to Palo Alto's planning staff discuss County land use assumptions in Palo Alto. The City is currently undertaking an update to its Comprehensive (General) Plan, and planning staff can provide the County with information about the alternatives being considered. We understand that the County wishes to rely on Transportation-Land Use assumptions from the Valley Transportation Authority (VTA), but a focused discussion regarding assumptions should take place prior to in-depth analysis using the VTA's model.

Non-Resident Community Outreach and Input

In Palo Alto, many of the users of the Oregon Expressway-Page Mill Road Corridor travel from outside of Santa Clara County, including residents in San Mateo and San Francisco Counties. Palo Alto requests that the County quantify these volumes and make an effort to engage and solicit input from those Counties. Through this input, we would be interested in learning more about the origins and destinations of these drivers and methods that could be used to shift peak period trips to other modes.

Thank you for the opportunity to provide these comments. If you have any questions, please feel free to contact Jaime Rodriguez, the City's Chief Transportation Official, at (650) 329-2442.

Sincerely,

  
JAMES KEENE  
City Manager





## Rader, David

---

**From:** Lewis Isbell <[REDACTED]>  
**Sent:** Friday, June 06, 2014 2:11 PM  
**To:** Rader, David  
**Cc:** Andy Wong  
**Subject:** EIR plan, Circulation and Mobility Element update

Greetings, David,

In reading over the plan, I see nothing that addresses the increase in noise that these extra lanes of Expressway, specifically in Los Altos, would cause. I live on Granger Ave., and have been dealing with the ever-increasing noise and air pollution caused by the expressway. I would like to see this effect added to the scope of the EIR, and I am guessing, that all of my neighbors would like and expect to see that too.

Thank you,  
Sincerely,  
Lewis Isbell

[REDACTED]  
[REDACTED]  
[REDACTED]

I do not see any mention in this document regarding the widening of Montague Expressway over the Guadalupe River.

Is that work already covered under another plan/EIR?

Thank You

Kevin Kelleher

[REDACTED]  
[REDACTED]



June 25, 2014

County of Santa Clara  
Department of Planning and Development  
Attention: David Rader, Planner III  
70 West Hedding Street, East Wing, 7<sup>th</sup> Floor  
San Jose, CA 95110

**RE:** Notice of Preparation for the Santa Clara County General Plan Circulation and Mobility Element Update Program Environmental Impact Report – Expressway Plan 2040 - Public Comments from the Town of Los Altos Hills Community Development Department

Mr. Rader:

Thank you for the opportunity to provide public comments on the Notice of Preparation for the Santa Clara County General Plan Circulation and Mobility Element Update Program Environmental Impact Report. The Town of Los Altos Hills' comments are focused on the possible future modifications to the County expressway systems and the draft Expressway Plan 2040, which is currently being prepared by the County. In particular, the Town has concerns with the proposed improvements at the I-280/Page Mill Expressway interchange which include the possible signalization of the southbound and northbound I-280 offramp/Page Mill/Arastradero intersection which is a four-way stop controlled intersection that experiences significant level of service delays during the morning commute period. In addition, the Town is concerned with the increased use of busses and shuttles at the expanded/redesigned Park & Ride Lot on the southwest corner of Arastradero and Page Mill Roads

The Town of Los Altos Hills is requesting that the following be included in the analysis of potential environmental impacts associated with the proposed I-280/Page Mill Expressway improvements:

**Aesthetics** – The impact of the additional lighting and signage associated with the signalization of the intersection in a very low density residential/rural environment.

**Air Quality** – The impact of increased emissions that would result from short-term impacts (construction related emissions) and the potential long term impacts of increased traffic and congestion that would result from the increased capacity of the intersection and potential future development east of I-280 and at Stanford University.

**Energy** – Increased energy use from short-term impacts (construction related) and potential long term impacts of increased traffic and congestion that would result from the increased capacity of the intersection.

**Greenhouse Gas Emissions** - The impact of increased emissions that would result from short-term impacts (construction related emissions) and the potential long term impacts of increased traffic and congestion that would result from the increased capacity of the intersection and potential future development east of I-280 and at Stanford University.

**Land Use** – Discuss the impacts of the signalization of the I-280/Page Mill intersection and widening of Page Mill Expressway and its potential to allow for increased potential future development east of I-280 and at Stanford University.

**Noise** – The impacts of increased noise on surrounding residential uses from additional traffic and the higher speeds that would result from vehicles that no longer need to perform a complete stop at the intersection.

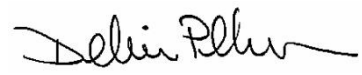
**Population and Housing** – Discuss the potential for increased population and housing that could result from the potential future development along Page Mill Expressway that would be facilitated by improvements to the I-280/Page Mill intersection and widening of Page Mill Expressway.

**Transportation** – Impacts from increased traffic and congestion that would result from the increased capacity of the intersection and potential future development east of I-280 and at Stanford University. In addition, the Draft EIR needs to address potential increases in level of service delays for vehicles approaching the intersection from the west on Page Mill Road, and from Arastradero Road. Furthermore, the Draft EIR should address the increased use of the Park & Ride Lot by busses and shuttles. Safety impacts associated with the proposed improvements should be evaluated to confirm that speeds do not increase on other nearby local road. Sufficient accident data should be reviewed and analyzed prior to designing improvements.

**Alternatives** – The scope of alternatives be discussed in the Draft EIR for the I-280/Page Mill Interchange project should include a no-build option, the addition of a second lane on the southbound I-280 off ramp, and a grade separated off-ramp solely for vehicles traveling from southbound I-280 to eastbound Page Mill Expressway

Please contacted me at (650) 947-2517 or by e-mail at [dpedro@losaltoshills.ca.gov](mailto:dpedro@losaltoshills.ca.gov) if you have any questions regarding any of these comments. Thank you.

Sincerely,

A handwritten signature in black ink, appearing to read "Debbie Pedro". The signature is fluid and cursive, with a long horizontal flourish extending to the right.

Debbie Pedro, AICP  
Community Development Director

cc: Carl Cahill, City Manager

## Rader, David

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**From:** Solomon, Jacqueline <Jacqueline.Solomon@mountainview.gov>  
**Sent:** Thursday, June 12, 2014 4:01 PM  
**To:** Rader, David  
**Cc:** Blount, Terry; Forsberg, Linda; Kim, Helen  
**Subject:** NOP for Program EIR for the Santa Clara County General Plan-Circulation and Mobility Element Update

David and Rod-

Thank you for including the City of Mountain View in your noticing for this project.

Please keep the contact information you used for this notice the same for the City of Mountain View (our Community Development Department).

I would appreciate it if you could add me to the list to receive a separate notice for any correspondence or notices for this specific project.

Jacqueline Solomon, Assistant Public Works Director/City Engineer  
City of Mountain View-Public Works Department  
500 Castro Street  
Mountain View, CA 94041  
[jacqueline.solomon@mountainview.gov](mailto:jacqueline.solomon@mountainview.gov)

At this time, the City of Mountain View does not have any comments for the NOP. We will look forward to reviewing the Draft EIR.

Thank you-

Jacqueline  
Jacqueline Andrews Solomon, PE  
Assistant Public Works Director/City Engineer

City of Mountain View  
500 Castro Street  
Mountain View, CA 94041  
(650)903-6311

Have a question or comment? Please visit ASK MOUNTAIN VIEW at [www.mountainview.gov](http://www.mountainview.gov)

## Rader, David

---

**From:** Ted Shab <[REDACTED]>  
**Sent:** Thursday, June 19, 2014 12:01 AM  
**To:** Rader, David  
**Subject:** Issues with expansion plan on El Monte

Mr. Rader,

I believe the plan to change the intersection of Foothill @ El Monte/San Antonio is extremely flawed.

El Monte to San  
Antonio  
Widen from 4 to 6 lanes by extending  
right turn lanes and intersection  
improvements at El Monte and San  
Antonio

First, the premise is that this will solve the problem - it won't, it's a temporary bandaid that will default to the same traffic problems within 5 years, and I'm guessing the projections would support that if you haven't simulated it.

In the meantime, it will dramatically change the landscape of the local community.

Drivers are already extremely aggressive at that intersection, both to pedestrians and bikers, and I believe adding the extra lane will amplify the problem.

This brings the second major issue, it does nothing to increase pedestrian and biker traffic which would reduce the number of cars on the road. This RIGHT next to the downtown area, one block from an elementary school and the major path from both sides of S El Monte to the Library and other parts of downtown.

Third, this is masking Caltrans problem, which is that San Antonio/Foothill/South El Monte is being used as a major thoroughfare between Interstates.

I would strongly recommend what has been done in other situations where there are pedestrian issues near one of the Expressways, and that is Squaring the corner of the intersection. it is counter-intuitive, but I believe it will solve the pedestrian and bike access issues of this intersection. As far as the traffic issue, I believe their needs to be action to prevent San Antonio/Foothill/S El Monte being used to connect the highways. I'm not a Civil Engineer or County planner, but I've seen towns like Palo Alto and Berkeley address unwanted traffic through neighborhoods, and I believe there are solutions to be had, rather than just jamming more cars through a highly residential area.

Thanks for your consideration.

--Ted Shab  
[REDACTED]



EDMUND G. BROWN JR.  
GOVERNOR

STATE OF CALIFORNIA  
GOVERNOR'S OFFICE of PLANNING AND RESEARCH  
STATE CLEARINGHOUSE AND PLANNING UNIT



KEN ALEX  
DIRECTOR

Notice of Preparation

May 30, 2014

To: Reviewing Agencies

Re: Santa Clara General Plan Circulation and Mobility Element Update  
SCH# 2014052102

RECEIVED  
COUNTY OF SANTA CLARA  
2014 JUN 16 PM 12:03

Attached for your review and comment is the Notice of Preparation (NOP) for the Santa Clara General Plan Circulation and Mobility Element Update draft Environmental Impact Report (EIR).

Responsible agencies must transmit their comments on the scope and content of the NOP, focusing on specific information related to their own statutory responsibility, within 30 days of receipt of the NOP from the Lead Agency. This is a courtesy notice provided by the State Clearinghouse with a reminder for you to comment in a timely manner. We encourage other agencies to also respond to this notice and express their concerns early in the environmental review process.

Please direct your comments to:

**David Rader**  
**Santa Clara County**  
**70 W. Hedding Street**  
**7th Floor, East Wing**  
**San Jose, CA 95110**

with a copy to the State Clearinghouse in the Office of Planning and Research. Please refer to the SCH number noted above in all correspondence concerning this project.

If you have any questions about the environmental document review process, please call the State Clearinghouse at (916) 445-0613.

Sincerely,

Scott Morgan  
Director, State Clearinghouse

Attachments  
cc: Lead Agency



**Document Details Report  
State Clearinghouse Data Base**

**SCH#** 2014052102  
**Project Title** Santa Clara General Plan Circulation and Mobility Element Update  
**Lead Agency** Santa Clara County

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**Type** NOP Notice of Preparation  
**Description** The proposed project is an update to the County of Santa Clara's Circulation and Mobility Element, one of the State-mandated elements of the General Plan. The draft update is designed to be consistent with the requirements of the CA Complete Streets Act and the Governor's Office of Planning and Research Update to the General Plan Guidelines: Complete Streets and the Circulation Element. The County of Santa Clara is unique in that it is the only county to the State of CA that maintains and operates a regional expressway system within incorporated areas, in addition to roads in unincorporated areas. The Circulation and Mobility Element Update will identify possible future modifications to the County roads and expressway systems based upon transportation modeling and a consideration of complete streets in conformance with State law.

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**Lead Agency Contact**

**Name** David Rader  
**Agency** Santa Clara County  
**Phone** 408 299 5779 **Fax**  
**email**  
**Address** 70 W. Hedding Street  
7th Floor, East Wing  
**City** San Jose **State** CA **Zip** 95110

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**Project Location**

**County** Santa Clara  
**City**  
**Region**  
**Cross Streets**  
**Lat / Long**  
**Parcel No.**  
**Township** **Range** **Section** **Base**

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**Proximity to:**

**Highways**  
**Airports**  
**Railways**  
**Waterways**  
**Schools**  
**Land Use**

---

**Project Issues** Aesthetic/Visual; Agricultural Land; Air Quality; Archaeologic-Historic; Biological Resources; Drainage/Absorption; Flood Plain/Flooding; Forest Land/Fire Hazard; Geologic/Seismic; Noise; Population/Housing Balance; Public Services; Recreation/Parks; Soil Erosion/Compaction/Grading; Toxic/Hazardous; Traffic/Circulation; Vegetation; Water Quality; Growth Inducing; Landuse; Cumulative Effects; Other Issues

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**Reviewing Agencies** Resources Agency; Cal Fire; Department of Parks and Recreation; San Francisco Bay Conservation and Development Commission; Department of Water Resources; Department of Fish and Wildlife, Region 3; Office of Emergency Services, California; Native American Heritage Commission; Public Utilities Commission; California Highway Patrol; Caltrans, District 4; Air Resources Board; Air Resources Board, Transportation Projects; Regional Water Quality Control Board, Region 2

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**Date Received** 05/30/2014 **Start of Review** 05/30/2014 **End of Review** 06/30/2014

NOP Distribution List

- Resources Agency
- Resources Agency  
Nadell Gayou
- Dept. of Boating & Waterways  
Nicole Wong
- California Coastal Commission  
Elizabeth A. Fuchs
- Colorado River Board  
Tamya Trujillo
- Dept. of Conservation  
Elizabeth Carpenter
- California Energy Commission  
Eric Knight
- Cal Fire  
Dan Foster
- Central Valley Flood Protection Board  
James Herota
- Office of Historic Preservation  
Ron Parsons
- Dept of Parks & Recreation Environmental Stewardship Section
- California Department of Resources, Recycling & Recovery  
Sue O'Leary
- S.F. Bay Conservation & Dev't Comm.  
Steve McAdam
- Dept. of Water Resources Agency  
Nadell Gayou
- Fish and Game
- Dept. of Fish & Wildlife  
Scott Flint  
Environmental Services Division
- Fish & Wildlife Region 1  
Donald Koch
- Fish & Wildlife Region 1E  
Laurie Harnsberger
- Fish & Wildlife Region 2  
Jeff Drongesen
- Fish & Wildlife Region 3  
Charles Armor
- Fish & Wildlife Region 4  
Julie Vance
- Fish & Wildlife Region 5  
Leslie Newton-Reed  
Habitat Conservation Program
- Fish & Wildlife Region 6  
Gabrina Gatchel  
Habitat Conservation Program
- Fish & Wildlife Region 6/IM  
Heidi Sickler  
Inyo/Mono, Habitat Conservation Program
- Dept. of Fish & Wildlife M  
George Isaac  
Marine Region
- Food & Agriculture  
Sandra Schubert  
Dept. of Food and Agriculture
- Dept. of General Services  
Public School Construction
- Dept. of General Services  
Environmental Services Section  
Anna Garbeff
- Dept. of Public Health  
Jeffery Worth  
Dept. of Health/Drinking Water
- Delta Stewardship Council  
Kevan Samsam
- Independent Commissions, Boards
- Delta Protection Commission  
Michael Machado
- Cal EMA (Emergency Management Agency)  
Dennis Castrillo

- Native American Heritage Comm.  
Debbie Treadway
- Public Utilities Commission  
Leo Wong
- Santa Monica Bay Restoration  
Guangyu Wang
- State Lands Commission  
Jennifer Deleong
- Tahoe Regional Planning Agency (TRPA)  
Cherry Jacques
- Business, Trans. & Housing
- Caltrans - Division of Aeronautics  
Philip Crimmins
- Caltrans - Planning  
Terri Pencovic
- California Highway Patrol  
Suzann Ikeuchi  
Office of Special Projects
- Housing & Community Development  
CEQA Coordinator  
Housing Policy Division
- Dept. of Transportation
- Caltrans, District 1  
Rex Jackman
- Caltrans, District 2  
Marcelino Gonzalez
- Caltrans, District 3  
Eric Federicks - South  
Susan Zanchi - North
- Caltrans, District 4  
Erik Alm
- Caltrans, District 5  
David Murray
- Caltrans, District 6  
Michael Navarro
- Caltrans, District 7  
Dianna Watson

- Caltrans, District 8  
Dan Kopulsky
- Caltrans, District 9  
Gayle Rosander
- Caltrans, District 10  
Tom Dumas
- Caltrans, District 11  
Jacob Armstrong
- Caltrans, District 12  
Maureen El Harake
- Cal EPA
- Air Resources Board
- All Projects  
CEQA Coordinator
- Transportation Projects  
Nesamani Kalandiyur
- Industrial Projects  
Mike Tollstrup
- State Water Resources Control Board  
Regional Programs Unit  
Division of Financial Assistance
- State Water Resources Control Board  
Student Intern, 401 Water Quality Certification Unit  
Division of Water Quality
- State Water Resources Control Board  
Phil Crader  
Division of Water Rights
- Dept. of Toxic Substances Control  
CEQA Tracking Center
- Department of Pesticide Regulation  
CEQA Coordinator

- Regional Water Quality Control Board (RWQCB)
- RWQCB 1  
Cathleen Hudson  
North Coast Region (1)
- RWQCB 2  
Environmental Document Coordinator  
San Francisco Bay Region (2)
- RWQCB 3  
Central Coast Region (3)
- RWQCB 4  
Teresa Rodgers  
Los Angeles Region (4)
- RWQCB 5S  
Central Valley Region (5)
- RWQCB 5F  
Central Valley Region (5)  
Fresno Branch Office
- RWQCB 5R  
Central Valley Region (5)  
Redding Branch Office
- RWQCB 6  
Lahontan Region (6)
- RWQCB 6V  
Lahontan Region (6)  
Victorville Branch Office
- RWQCB 7  
Colorado River Basin Region (7)
- RWQCB 8  
Santa Ana Region (8)
- RWQCB 9  
San Diego Region (9)
- Other
- Conservancy

### Notice of Completion & Environmental Document Transmittal

Mail to: State Clearinghouse, P.O. Box 3044, Sacramento, CA 95812-3044 (916) 445-0613  
For Hand Delivery/Street Address: 1400 Tenth Street, Sacramento, CA 95814

SCH # **2014052102**

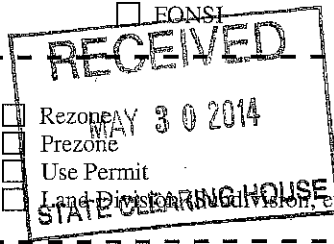
**Project Title:** Santa Clara General Plan Circulation and Mobility Element Update

Lead Agency: County of Santa Clara Contact Person: David Rader  
Mailing Address: County Gov Ctr, East Wing, 7th Floor, 70 W. Hedding St. Phone: (408) 299-5779  
City: San Jose Zip: 95110-1705 County: Santa Clara

**Project Location:** County: Santa Clara City/Nearest Community: Not applicable  
Cross Streets: Not applicable Zip Code: \_\_\_\_\_  
Longitude/Latitude (degrees, minutes and seconds): \_\_\_\_\_ " N / \_\_\_\_\_ " W Total Acres: \_\_\_\_\_  
Assessor's Parcel No.: \_\_\_\_\_ Section: \_\_\_\_\_ Twp.: \_\_\_\_\_ Range: \_\_\_\_\_ Base: \_\_\_\_\_  
Within 2 Miles: State Hwy #: \_\_\_\_\_ Waterways: \_\_\_\_\_  
Airports: \_\_\_\_\_ Railways: \_\_\_\_\_ Schools: \_\_\_\_\_

**Document Type:**

CEQA:  NOP  Draft EIR NEPA:  NOI Other:  Joint Document  
 Early Cons  Supplement/Subsequent EIR  EA  Final Document  
 Neg Dec (Prior SCH No.) \_\_\_\_\_  Draft EIS  Other: \_\_\_\_\_  
 Mit Neg Dec Other: \_\_\_\_\_  FONSI



**Local Action Type:**

General Plan Update  Specific Plan  Rezoning  Annexation  
 General Plan Amendment  Master Plan  Prezone  Redevelopment  
 General Plan Element  Planned Unit Development  Use Permit  Coastal Permit  
 Community Plan  Site Plan  Land Disturbance (e.g., etc.)  Other: \_\_\_\_\_

**Development Type:**

Residential: Units \_\_\_\_\_ Acres \_\_\_\_\_  Transportation: Type \_\_\_\_\_  
 Office: Sq.ft. \_\_\_\_\_ Acres \_\_\_\_\_ Employees \_\_\_\_\_  Mining: Mineral \_\_\_\_\_  
 Commercial: Sq.ft. \_\_\_\_\_ Acres \_\_\_\_\_ Employees \_\_\_\_\_  Power: Type \_\_\_\_\_ MW  
 Industrial: Sq.ft. \_\_\_\_\_ Acres \_\_\_\_\_ Employees \_\_\_\_\_  Waste Treatment: Type \_\_\_\_\_ MGD  
 Educational: \_\_\_\_\_  Hazardous Waste: Type \_\_\_\_\_  
 Recreational: \_\_\_\_\_  Other: \_\_\_\_\_  
 Water Facilities: Type \_\_\_\_\_ MGD \_\_\_\_\_

**Project Issues Discussed in Document:**

Aesthetic/Visual  Fiscal  Recreation/Parks  Vegetation  
 Agricultural Land  Flood Plain/Flooding  Schools/Universities  Water Quality  
 Air Quality  Forest Land/Fire Hazard  Septic Systems  Water Supply/Groundwater  
 Archeological/Historical  Geologic/Seismic  Sewer Capacity  Wetland/Riparian  
 Biological Resources  Minerals  Soil Erosion/Compaction/Grading  Growth Inducement  
 Coastal Zone  Noise  Solid Waste  Land Use  
 Drainage/Absorption  Population/Housing Balance  Toxic/Hazardous  Cumulative Effects  
 Economic/Jobs  Public Services/Facilities  Traffic/Circulation  Other: Energy

**Present Land Use/Zoning/General Plan Designation:**

Not applicable

**Project Description:** (please use a separate page if necessary)

The proposed project is an update to the County of Santa Clara's Circulation and Mobility Element, one of the State-mandated elements of the General Plan. The draft update is designed to be consistent with the requirements of the California Complete Streets Act and the Governor's Office of Planning and Research Update to the General Plan Guidelines: Complete Streets and the Circulation Element. The County of Santa Clara is unique in that it is the only county in the State of California that maintains and operates a regional expressway system within incorporated areas, in addition to roads in unincorporated areas. The Circulation and Mobility Element Update will identify possible future modifications to the County roads and expressway systems based upon transportation modeling and a consideration of complete streets in conformance with State law.

Note: The State Clearinghouse will assign identification numbers for all new projects. If a SCH number already exists for a project (e.g. Notice of Preparation or previous draft document) please fill in.

**Reviewing Agencies Checklist**

Lead Agencies may recommend State Clearinghouse distribution by marking agencies below with an "X".  
If you have already sent your document to the agency please denote that with an "S".

- |  |  |
|--|--|
| <input checked="" type="checkbox"/> Air Resources Board              | <input type="checkbox"/> Office of Historic Preservation                     |
| <input type="checkbox"/> Boating & Waterways, Department of          | <input type="checkbox"/> Office of Public School Construction                |
| <input type="checkbox"/> California Emergency Management Agency      | <input type="checkbox"/> Parks & Recreation, Department of                   |
| <input checked="" type="checkbox"/> California Highway Patrol        | <input type="checkbox"/> Pesticide Regulation, Department of                 |
| <input checked="" type="checkbox"/> Caltrans District #4             | <input type="checkbox"/> Public Utilities Commission                         |
| <input type="checkbox"/> Caltrans Division of Aeronautics            | <input type="checkbox"/> Regional WQCB # _____                               |
| <input type="checkbox"/> Caltrans Planning                           | <input type="checkbox"/> Resources Agency                                    |
| <input type="checkbox"/> Central Valley Flood Protection Board       | <input type="checkbox"/> Resources Recycling and Recovery, Department of     |
| <input type="checkbox"/> Coachella Valley Mtns. Conservancy          | <input type="checkbox"/> S.F. Bay Conservation & Development Comm.           |
| <input type="checkbox"/> Coastal Commission                          | <input type="checkbox"/> San Gabriel & Lower L.A. Rivers & Mtns. Conservancy |
| <input type="checkbox"/> Colorado River Board                        | <input type="checkbox"/> San Joaquin River Conservancy                       |
| <input type="checkbox"/> Conservation, Department of                 | <input type="checkbox"/> Santa Monica Mtns. Conservancy                      |
| <input type="checkbox"/> Corrections, Department of                  | <input type="checkbox"/> State Lands Commission                              |
| <input type="checkbox"/> Delta Protection Commission                 | <input type="checkbox"/> SWRCB: Clean Water Grants                           |
| <input type="checkbox"/> Education, Department of                    | <input type="checkbox"/> SWRCB: Water Quality                                |
| <input type="checkbox"/> Energy Commission                           | <input type="checkbox"/> SWRCB: Water Rights                                 |
| <input type="checkbox"/> Fish & Game Region # _____                  | <input type="checkbox"/> Tahoe Regional Planning Agency                      |
| <input type="checkbox"/> Food & Agriculture, Department of           | <input type="checkbox"/> Toxic Substances Control, Department of             |
| <input type="checkbox"/> Forestry and Fire Protection, Department of | <input type="checkbox"/> Water Resources, Department of                      |
| <input type="checkbox"/> General Services, Department of             |  |
| <input type="checkbox"/> Health Services, Department of              | Other: _____   |
| <input type="checkbox"/> Housing & Community Development             | Other: _____   |
| <input type="checkbox"/> Native American Heritage Commission         |  |

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**Local Public Review Period (to be filled in by lead agency)**

Starting Date May 30 Ending Date June 29

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**Lead Agency (Complete if applicable):**

Consulting Firm: _____	Applicant: _____
Address: _____	Address: _____
City/State/Zip: _____	City/State/Zip: _____
Contact: _____	Phone: _____
Phone: _____	

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Signature of Lead Agency Representative: David M. Rader Date: 5/29/14

Authority cited: Section 21083, Public Resources Code. Reference: Section 21161, Public Resources Code.



June 27, 2014

County of Santa Clara  
Planning Office  
70 West Hedding Street  
San Jose, CA 95110

Attention: David Rader

Subject: County General Plan Circulation and Mobility Element

Dear Mr. Rader:

Santa Clara Valley Transportation Authority (VTA) staff have reviewed the NOP for the County Circulation and Mobility Element for County Expressways and Roads.. We have the following comments.

Transportation Analysis

VTA recommends that the County take a multimodal approach to transportation analysis in the DEIR, including meaningful analyses of impacts and mitigation measures for pedestrian, bicycle, and transit modes in addition to automobiles. VTA also recommends the use of other multimodal performance indicators such as non-auto mode shares, transit boardings, and pedestrian and bicycle quality of service measures. VTA recommends that the County consider recently-adopted Senate Bill 743 in selecting performance measures for the DEIR Transportation Analysis, including consideration of the use of Vehicle-Miles-Traveled (VMT) or other broader performance measures. VTA recommends that the DEIR analyze the effects of the proposed capacity-enhancing roadway modifications on countywide Vehicle-Miles-Traveled and the demand for automobile travel.

Transportation Network and Land Use Assumptions

Please clearly state the County's assumptions regarding the future transportation network and future land uses throughout the County in the horizon year in the DEIR. In particular, the DEIR should identify any areas where the transportation network assumptions (including freeways, expressways, arterials, and transit network) diverge from the Valley Transportation Plan (VTP) 2040 financially constrained project list. If the County is introducing changes from the VTP 2040 network, we believe it is important to understand the effects on the County's transportation system as well as Congestion Management Program (CMP) facilities, of including and not including these projects. For land use assumptions, please clearly state how the General Plan buildout figures for population, households and jobs compare to ABAG's Projections 2013 assumptions both in the County and in individual cities.

County of Santa Clara  
June 27, 2014  
Page 2

Consistency with VTA Travel Demand Model

VTA recommends that the County refer to the VTA CMP *Local Transportation Model Consistency Guidelines* prior to developing the Transportation analysis for this DEIR. This document, which includes the local model consistency guidelines and the local model evaluation and acceptance procedure, may be downloaded from <http://www.vta.org/cmp/technical-guidelines>. We recommend that the County coordinate with VTA modeling staff early in the EIR process to discuss the application of the local model and specific local assumptions. We are happy to assist with this coordination; please contact the head of our modeling group, Transportation Planning Manager George Naylor, at (408) 321-5763 for more information.

Congestion Impacts to Transit Service

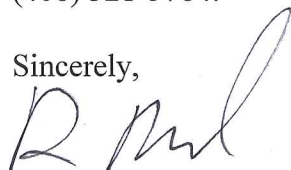
The transportation analysis in the DEIR should address any potential impacts that increased motor vehicle traffic and congestion associated with the General Plan build-out may have on transit travel times. If increased transit delay is found in this analysis, the County should work with VTA to identify feasible transit priority measures and include contributions to any applicable projects as mitigation measures in the DEIR. Transit priority measures that improve transit speed and reliability may include queue jump lanes, transit priority signal timing, bulb-out transit stops, and/or dedicated transit lanes.

Secondary Effects of Roadway Modifications

Any proposed capacity-enhancing roadway modifications to address automobile LOS standards should not unreasonably degrade bicycle, pedestrian or transit access and circulation. Potential negative secondary effects of roadway modifications include, but are not limited to: increased crossing distances, longer signal cycles, removal of a buffer between pedestrians and automobiles, narrowing or removal of sidewalks or bike lanes, or otherwise adversely affecting pedestrians and bicycles. Please see the *VTA TIA Guidelines* Chapter 10, Mitigation Measures, for more information about potential secondary effects of roadway modifications on bicycles, pedestrians and transit users.

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