

**From:** [Hill, Shannon](#)  
**To:** [Banwait, Manjit](#); [Phan, Johnny](#); [Moody, Doug](#); [Tom, Vivian](#); [Lapustea, Florin](#)  
**Cc:** [Keyon, David](#); [Severino, Lori](#); [Han, James](#); [Ruano, Jose](#); [Todorov, Vera](#); [Douglas-Fry, Joan](#)  
**Subject:** Downtown West: Transportation Comments & Santa Clara County Projects for Model  
**Attachments:** [Santa Clara County Transportation rcvd 111919.pdf](#)  
[City of Santa Clara Pending and Approved Projects rcvd 112219.xlsx](#)  
[City of Santa Clara Transportation-Land Use and Planning rcvd 112219.pdf](#)  
[Ca HSR Authority rcvd 112519.pdf](#)  
[Caltrain-Peninsula Corridor JPA rcvd 112519.pdf](#)

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Hi All,

We received a few substantial transportation comments on the NOP. Of particular interest is the 11/22/19 comment letter and project spreadsheet that includes projects that may affect the transportation model. Multiple agencies also commented on consistency with the DISC.

In addition, please note that the letter from the High Speed Rail Authority indicates they will be sending a subsequent, more detailed scoping letter. I will forward that when I receive it.

We will be posting comments on the NOP on the EIR webpage. I will provide an update to the project team with that link when we are done with that process.

Thank you,

Shannon Hill, Planner

Planning, Building & Code Enforcement | Environmental Review Section  
City of San José | 200 East Santa Clara Street  
[Shannon.Hill@sanjoseca.gov](mailto:Shannon.Hill@sanjoseca.gov) | (408) 535 - 7872

# County of Santa Clara

Roads and Airports Department  
Planning, Land Development and Survey

101 Skyport Drive  
San Jose, California 95110-1302  
(408) 573-2400 FAX (408) 441-0276



November 19, 2019

**Shannon Hill,**  
Planning, Building & Code Enforcement  
City of San José  
200 East Santa Clara Street

**SUBJECT: NOP/EIR – Downtown West Mixed-Use Plan (Google Project)**

Dear Shannon Hill,

The County of Santa Clara Roads and Airports Department appreciates the opportunity to review the Downtown West Mixed-Use Plan (Google Project) and submits the following comments:

- The Transportation Analysis (TA) for the proposed project should include existing local and regional transportation facilities such as expressways and unincorporated areas, maintained by the County and using both LOS and VMT methodologies. The EIR based on the TA should identify and mitigate all project traffic impacts on County road facilities.
- Please submit a Transportation Demand Management Plan for County review and comment.

Thank you for the opportunity to comment on the NOP/EIR. If you have any questions about these comments, please feel free to contact me at (408) 573-2462 or [ben.aghegnehu@rda.sccgov.org](mailto:ben.aghegnehu@rda.sccgov.org).

Sincerely,

Ben Aghegnehu  
Associate Transportation Planner  
County of Santa Clara | Roads & Airports















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November 22, 2019

City of San Jose  
Department of Planning, Building and Code Enforcement  
Attention: Shannon Hill, Environmental Project Manager  
200 E. Santa Clara Street, 3<sup>rd</sup> Floor Tower  
San Jose, CA 95113-1905

**Re: Downtown West Mixed-Use Plan Notice of Preparation**

Dear Ms. Hill:

Thank you for the opportunity to comment on the October 2019 Notice of Preparation (NOP) of an Environmental Impact Report (EIR) for the Downtown West Mixed-Use Plan (Google Project).

We understand the Google Project involves demolishing numerous buildings within an approximately 84-acre project site and the phased development of up to 5,900 residential units, 7,300,000 gross square feet (GSF) of office space, 500,000 GSF of commercial retail space, 300 hotels rooms, 800 rooms for limited-term corporate accommodations, 100,000 GSF of event center space, 115,000 GSF for utility plants, and 100,000 GSF of logistics warehouse space. We also understand that the City has submitted an Environmental Leadership Development Project Application pursuant to Assembly Bill (AB) 900 (AB 900 Application).

Based on our understanding of the Google Project, we offer the following comments on the scope of the environmental analysis.

**1. Project Description**

The California Environmental Quality Act (CEQA) requires an accurate, stable and finite project description to enable evaluation of potential impacts of a proposed project and determination of appropriate mitigation measures. The NOP includes a range of anticipated project components, including residential, office, retail, hotel and limited-term corporate accommodations, event center space, a central utility plant, and a logistics warehouse. The AB 900 Application (pages 10-11) provides additional information on anticipated project phasing and project variants. The project description should accurately describe the anticipated phasing for the Project and the EIR should also discuss how each development phase will align with the implementation of necessary improvements as mitigation for project impacts. The EIR should also clarify the timeline for the Google Project. Generally, the NOP and AB 900 Application indicate a 9- to 10-year construction window, with construction anticipated to conclude by 2030, but the NOP also references 2040 as the project's horizon year.

Additionally, the NOP and AB 900 Application state the Google Project will include up to two central utility plants totaling approximately 100,000-115,000 GSF that would provide power generation, possibly include an electrical distribution system with embedded renewable energy

generation and storage, and possibly include wastewater treatment facilities. The project description must provide stable, detailed information regarding the proposed onsite power generation and potential wastewater treatment facilities to enable the public to understand and comment on the full scope of the Google Project's environmental impacts.

Please also provide information in the project description related to whether the Project will utilize the environmental clearance capacity included within the Downtown Strategy Update 2040 EIR, and the extent to which San Jose intends to tier environmental review off of that or other relevant EIRs.

## **2. Transportation and Circulation**

### **a. General Comments**

The City of Santa Clara understands that the EIR will identify the transportation impacts of the project on the existing local and regional transportation system and the planned long-range transportation network based on the City of San Jose's Transportation Analysis Policy (Council Policy 5-1). Consistent with Policy 5-1, the transportation analysis should include both an analysis of vehicle miles traveled (VMT) to analyze impacts under CEQA and a local transportation analysis (LTA) per the City of San Jose's Transportation Analysis Handbook to evaluate the project's effect on the local transportation network. The LTA will include an evaluation of the project access, circulation, parking, Congestion Management Plan conformance, and multi-modal facilities. Santa Clara would like to review and comment on the scope of work related to the local transportation and VMT analysis to be prepared for this project.

To the extent the EIR identifies significant transportation impacts under CEQA, the EIR will need to identify clear and specific mitigation obligations with identified funding mechanisms to address environmental impacts affecting not only San Jose, but also its neighbors in Santa Clara.

In addition, relevant approved and pending projects within Santa Clara needs to be included in the traffic analysis under background and cumulative scenarios, respectively. Attached is the list of both approved and pending projects within the City of Santa Clara.

### **b. VMT Analysis**

Santa Clara assumes the City of San Jose will analyze VMT impacts in accordance with the thresholds provided in its 2018 Transportation Analysis Handbook. For general employment uses, the City of San Jose places the threshold of significance at a 15 percent reduction in regional average per employee VMT. Due to the size of the project, its potential for significant cumulative impacts, and the fact that a 15 percent reduction may not achieve State climate goals,<sup>1</sup> Santa Clara

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<sup>1</sup> OPR's 2018 Technical Advisory discusses that the CARB 2017 Scoping Plan – Identified VMT Reductions and Relationship to State Climate Coals found that “per-capita light-duty vehicle travel would need to be approximately 16.8 percent lower than existing, and overall per-capita vehicle travel would need to be approximately 14.3 percent lower than existing levels under that scenario.” (OPR Technical Advisory on Evaluating Transportation Impacts in CEQA, p. 11, available at [http://opr.ca.gov/docs/20190122-743\\_Technical\\_Advisory.pdf](http://opr.ca.gov/docs/20190122-743_Technical_Advisory.pdf).) Fehr & Peers



requests that San Jose evaluate whether a more stringent reduction in average per employee VMT be used as the threshold of significance, or whether a citywide or countywide average VMT be used as the baseline instead of a regional average. Such an evaluation would ensure VMT impacts are adequately analyzed and mitigated, if necessary.

c. Local Transportation Analysis

Page 20 of the NOP states that “The EIR will examine the existing traffic conditions in the immediate vicinity of the project site.” Due to the magnitude of the proposed development, Santa Clara believes that the Project will likely have transportation impacts beyond the “immediate vicinity” of the Project. Consequently, Santa Clara requests that the scope of the Transportation Analysis be expanded beyond the “immediate vicinity.” Specifically, local operational analysis at signalized intersections using level of service and delay are requested at intersections further than a half-mile from the project site contrary to what is stated in San Jose’s Transportation Analysis Handbook as this is a large mixed-use development with potentially significant regional traffic impacts. The City of Santa Clara uses criteria of the VTA TIA Guidelines as a basis for determining study intersections. Accordingly, municipal and CMP intersections with ten or more project trips per approach lane should be analyzed including along the corridors of Stevens Creek Boulevard, Coleman Avenue, El Camino Real, Newhall Street, Pruneridge Avenue within Santa Clara.

The local transportation analysis should also include an analysis of bicycle and pedestrian facilities in terms of their availability, project effects on future bike/pedestrian plans, transit delay analysis, and improvements proposed by the project. Maps and information on existing and planned bicycle facilities within Santa Clara can be found on the City’s website at:  
<http://santaclaraca.gov/government/departments/public-works/engineering/committees/bicycle-and-pedestrian-advisory-committee>.

In the local transportation analysis, please also provide information about the proposed event center in terms of operations and what the expected level of programming will be.

d. Regional Bicycle and Pedestrian Multi-Modal Connections

The NOP discusses that the Google Project would promote bicycling and pedestrian modes of transportation and improve linkages to existing trails. Santa Clara requests that the EIR fully analyze the extent to which bicycle and pedestrian trails will interconnect to regional bicycle and pedestrian trails to ensure these modes of transportation are supported and will be improved on a regional scale, and not simply within the City of San Jose alone.

e. Increasing Service Demands on Multi-Modal Transit

published a memorandum on OPR’s SB 743 Implementation Thresholds Assessment (F&P Memorandum). The F&P Memorandum notes that the 16.8 and 14.3 percent reductions themselves are dependent on MPO RTP/SCS targets being met and cautions this may not be a reasonable assumption for CEQA purposes. (F&P Memorandum, pp. 14-15, available at <https://www.fehrandpeers.com/wp-content/uploads/2019/03/Thresholds-Evaluation.pdf>).

Due to the scope of development, it appears likely the Google Project will significantly increase service demand on Valley Transportation Authority (VTA) and other means of multi-modal transit, including Caltrain, Altamont Corridor Express (ACE), Amtrak Capitol Corridor, Amtrak Coast Starlight, Amtrak Thruway Bus, Monterey-Salinas Transit, Santa Cruz Metro, DASH Downtown Area Shuttle, Greyhound Lines, Megabus, and employer shuttles, as well as BART, once completed. Per the City of San Jose's Supplemental Memorandum regarding the sale of city-owned properties in the Diridon Station Area to Google, dated November 11, 2018, the Google Project would conservatively lead to the direct generation of 20,000 jobs at full buildout and indirectly lead to the generation of another 63,500 jobs in the greater San Jose area; these numbers are anticipated to rise significantly due to increased building heights, which will allow greater density within the Project area. The Google Project will also include 3,000-5,900 residential units.

The EIR must fully analyze the impacts of increased ridership arising from the Google Project on multi-modal transit and provide mitigation for these impacts. As noted above, this analysis also needs to discuss how the phasing will align with improvements and implementation of mitigation measures. Additionally, the NOP anticipates that the BART service to Diridon Station will begin in 2030, the same year the last phase of the Google Project construction is projected to conclude. The EIR should include analysis of transit impacts arising from the Google Project prior to completion of the BART extension, and if completion of the BART extension is delayed. It is reasonably foreseeable a delay in completing the BART extension will further increase dependence on other forms of transportation and exacerbate those impacts.

f. Settlement Agreement Compliance

Per the terms of the Santana West settlement agreement, any impacts found at protected intersections, including Winchester Boulevard / Stevens Creek Boulevard, which will also impact traffic in the City of Santa Clara will require payment of fees to be used for transportation system improvements to alleviate the increased traffic congestion in Santa Clara. A clear explanation of (1) how potential impacts to protected intersections are analyzed and (2) how traffic fees are calculated should be included in the Transportation Analysis. Additionally, any offsetting improvements should be identified with specificity and be coordinated with the City of Santa Clara. Further, the secondary impacts of implementing these improvements should be identified.

g. Fair Share Contribution

Fair share contributions should be required for impacts found along roadways and/or intersections, including along expressways.

### **3. Land Use and Planning**

Due to the size and projected density contemplated for the Google Project, Santa Clara requests thorough discussion and analysis of the Google Project's cumulative impacts and consistency with other planning documents. Santa Clara understands that the General Plan and Diridon Station Area Plan will be amended to encompass the Google Project. However, it is not clear how the Google



Project and its contribution to cumulative growth will impact the growth and planning assumptions in other City of San Jose planning documents. Because the Google Project may result in population growth, displaced housing, and a substantial increase in indirect employment growth in the greater San Jose area, it is possible that development in surrounding areas may surpass the amount of growth anticipated in existing planning documents. Accordingly, Santa Clara requests that the EIR include robust discussion and analysis of the Google Project's impacts on the assumptions made in other planning documents, including the Downtown Strategy and the North San Jose Development Policy. For example, the North San Jose Area Development Policy has assumptions regarding the build-out of Downtown San Jose. Please provide information about how the proposed Project will affect past approvals by the City of San Jose.

#### **4. Cumulative Impacts**

Given the size and scope of the Project and its potential to have wide-reaching impacts, Santa Clara requests robust analysis of the Google Project's cumulative impacts on surrounding areas.

#### **5. Scope of Incentives**

Based on the draft MOU between the City and the Google Project applicant, it appears that the City of San Jose represents it will require Google to fully pay all applicable fees, charges, and taxes in accordance with standard payment requirements and that no City funds are to be expended on the Google Project. Santa Clara requests the EIR provide a transparent discussion regarding the scope of any direct or indirect incentives provided to the applicant by the City of San Jose or confirm that no direct or indirect incentives were provided.

\* \* \* \* \*

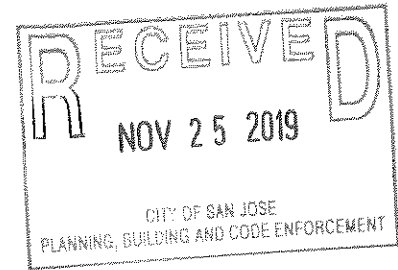
The City of Santa Clara appreciates the opportunity to comment on the scope of the EIR for the Google Project. We look forward to working with the City of San Jose as it examines the Google Project's environmental impacts.

Best Regards,



Andrew Crabtree  
Director of Community Development

cc: Brian Doyle, City Attorney, City of Santa Clara  
Manuel Pineda, Assistant City Manager, City of Santa Clara  
Deanna Santana, City Manager, City of Santa Clara



November 19, 2019

Kim Walesh  
Deputy City Manager  
Director of Economic Development  
City of San José  
200 E. Santa Clara St.  
San José, CA 95113

**RE: Downtown West Mixed-Use Rezoning and Development Plan  
(Google Village Concept Plan)**

Dear Ms. Walesh,

This letter is the California High Speed Rail Authority's (Authority) initial response to Google's proposed Downtown West Mixed-Use Rezoning and Development Plan (Google Plan) submittal to the City of San José dated 10/10/19. We appreciate the City of San José's support for the California High-Speed Rail program and our on-going partnership to deliver high-speed rail passenger service to San José, the heart of Silicon Valley.

Given Google's expedited schedule to gain certification from the Governor, as a Leadership Project under Assembly Bill 900, we are in process of preparing a scoping letter to send to you of our comments by November 22, 2019 for consideration in the Google Plan Environmental Impact Report (EIR). This letter is intended to be a first high-level review of the application materials to date with the scoping letter being more detailed.

#### Authority Support

As a state project with a long lead-time, we appreciate the years of planning and outreach needed to prepare and approve the Diridon Station Area Plan (DSAP). The Google Plan fulfills a long sought-after city goal to attract a preeminent Silicon Valley tech company to Diridon Station. We're sure that working with Google as they bring their transformative vision of the future Silicon Valley to San José is both inspirational and daunting in scale and ambition.

The Authority is supportive of the City of San José's efforts to attract Google to the Diridon Station Area. It is consistent with Authority policy to attract employment and housing to downtown station areas. It advances city-regeneration and district-scale development consistent with the Authority's sustainability policies and our vision for how investment in transportation infrastructure and supporting land uses can shape a sustainable future for the State of California.

#### Authority Feedback

Authority engineers and planners have reviewed the Google Plan and we want to highlight our high-level feedback here. Beyond the points here, attached you will find a more detailed memo of our concerns and important considerations with the plan moving forward.

#### Interface with Plans for High-Speed Rail at Diridon Station

The Authority has been studying the route and infrastructure needed to bring high-speed rail service to Diridon Station since 2000. This has involved an extensive evaluation of alternatives and broad-based engagement in the community. After all of that effort, on September 17, 2019,

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GAVIN NEWSOM  
GOVERNOR



the Authority Board of Directors identified Alternative 4 as the Preferred Alternative for the San José to Merced Project Section. Alternative 4 utilizes a blended at-grade high-speed rail/electrified Caltrain configuration through Diridon Station. The Google Plan needs to accommodate the Authority's plans and needs for the rail corridor and station facilities and either meet or exceed the performance of station access facilities for all users of the station.

There are some consequences for Google's property from the preferred alternative, but they are substantially less than the other alternatives under study. At the same time, it is critical that Google's project does not propose buildings where future tracks and rail infrastructure need to be for high-speed rail to serve the station. If that land was used for development it would impose substantial risk and cost for the Authority's ability to serve Diridon Station, a joint objective of both the Authority and the City of San José.

Additionally, the Google Plan reconfigures the station environment that will impact passengers' ability to get to and from the station. The Google Plan creates an opportunity to comprehensively plan transportation and land use along the corridor to mutually benefit the transit partners, the City and Google development. We ask that Google's plans meet or exceed the performance of access facilities (as shown in the Authority's plans) needed to accommodate high-speed rail and other transit riders who will be using the station. We can provide the technical basis for the Authority's design work and look forward to coordinating with City Staff and the Google team to ensure mutual success.

#### Diridon Station Intermodal Concept (DISC)

We were disappointed that the Google Plan does not show an understanding of DISC. Working as partners in the DISC effort, the City and the Authority (along with VTA and Caltrain), have developed a vision for the future of Diridon Station as an integrated transit hub that provides substantial local, regional, and interregional transit service to the area while also being well-integrated to the surrounding community. It does not appear that Google's plans have taken any of that into account. This includes both space for transit facilities, the planning for access to the station (including what happens with Cahill Street), and the orientation of the proposed land uses away, instead of toward, the multi-modal hub.

As DISC anticipates the scale of Google's transformational development, the Google Plan needs to incorporate the scope of DISC. The Google Plan needs to anticipate the vision of DISC and support the realization of the DISC vision over time.

#### Land Use and Transit

Diridon Station is evolving into one of the largest transit hubs on the West Coast. This transformation is a key part of what attracted Google to San José. It is in our common interest to ensure that station facilities and access improvements are available to meet growth in transit demand with new development over time. It is also critical that public realm elements including plazas, streetscapes, and sidewalks, work cohesively to reinforce pedestrian movement within the site and through to the station.

The Google Plan needs to envision the station as the point of arrival to the City, with an identifiable, public space for the interchange of people and station access modes. This entrance to the city - a vibrant center of city life - needs to be welcoming and safe for people to connect, way find and orient to downtown. To maximize transit mode share, the pedestrian network needs to visibly extend and connect to the center of the surrounding districts and neighborhoods.

Land use considerations, including the amount and timing of development, parking supply and management, mode share and transportation demand management, will all have a significant impact on transit use. The Google Plan needs a coordinated approach to integrating land use and transit to ensure balanced growth in transit demand and capacity.

### Transit and Rail Investment

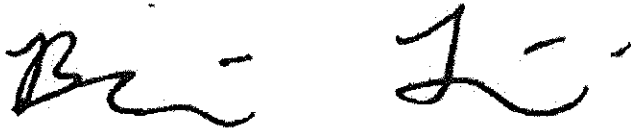
The transit partners are investing tens of billions of dollars to increase regional and statewide accessibility to Diridon Station, with significant economic, social and environmental benefits to the City of San José. However, bringing 20,000 jobs and thousands of housing units to the area will strain an already busy public transit system that serves the station and may not be feasible without additional investment in transportation infrastructure to meet this higher level of demand.

The Authority supports the City's action to create an impact fee to pay for one-time infrastructure costs in the station area per the HMM Infrastructure Study. We also support the City's consideration of other revenue sources to fund public infrastructure costs. Significant parts of the transit infrastructure needed to meet the new demand from this development are not fully funded. As such, we want to see station facilities and station access improvements included in the mix of public improvements that benefit development. Development needs to make reasonable, fair share contributions to impacts on transit service.

As the Diridon Station Area evolves as the gateway to the heart of Silicon Valley, becoming a vibrant and iconic urban Downtown environment, the long-term benefits of a coordinated program of investments in transportation infrastructure and the public realm will increase in value. Google participation in the creation of an innovative multi-modal transportation environment with high-speed rail service can create a new model for a sustainable and livable downtown fitting San José's vision as a global city.

Thank you for your consideration of our concerns. We look forward to our continuing collaboration with you and your staff to create both a great station facility and a supportive downtown neighborhood around it.

Sincerely,

A handwritten signature in black ink, appearing to read 'Boris Lipkin', with a stylized, cursive script.

Boris Lipkin  
Northern California Regional Director



**Comments on Proposed Downtown West Mixed-Use Rezoning and Development Plan  
California High Speed Rail Authority**

November 8, 2019

The following comments are based on our engineering and planning review of the Downtown West Mixed-Use Rezoning and Development Plan (Google Plan) dated 10/10/19.

**1. Authority Preliminary Engineering for Project Definition**

a. Rail Corridor Right-of-Way

Ensuring sufficient right-of-way for current and future rail operations is a top priority for the Authority. The Google Plan needs to provide detailed information and coordination regarding the proposed Google Plan boundaries and building footprints to ensure that the development in the north, station and southern rail corridor areas does not conflict with the Authority's proposed preliminary engineering for project definition footprint. More detail is needed regarding note 3 in Exhibit 2.09 Illustrative Framework.

b. Impact on Authority Preliminary Engineering for Station Facilities

The reconfiguration of station facilities as shown in the Google Plan needs to be guided by the transit partners in conformance with their ridership, revenue, station facility and station access needs.

To optimize transit mode share it is essential for the Google Plan to reflect coordination with the Authority's preliminary engineering for the station and plans for how access will work for all transit providers. The Google Plan needs to address at least the following:

- Recognition of the location and orientation of the proposed BART station and BART station access
- Connectivity between Diridon Station and BART
- VTA Transit Center location and design
- Street network and design to facilitate curbside operations for pick-up and drop off for passengers, shuttles, taxis, transportation network company vehicles or regional buses
- Urban bikeway design that complements and does not conflict with station access and curbside passenger operations
- Align public space to accommodate station access for greater convenience and utility for transit users

The Google Plan also has no indication of potential Google bus routes or bus center. Disabled, Amtrak and commuter parking has been removed without any location for replacement parking. The VTA Transit Center is redesigned and relocated, displacing commuter parking, without consideration of access to BART from Diridon Station or future TOD or joint development at the station.

c. Impact on Authority Preliminary Engineering for Station Access

The Authority's plans for access to the station are based on a number of key parameters that are essential to a successful transit station and user experience. If Google is going to propose different approaches to station access, then we ask that they meet or exceed the performance achieved in the Authority's plans.

- i. Passenger Interchange Time. Minimizing transfer time and door-to-door travel time is an essential consideration for transit and high-speed rail travel choice. The Google Plan

needs to support the range of station access mode choices for high-speed rail passengers and other transit passengers.

- ii. Transportation Analysis. The Authority needs to see a comprehensive transportation analysis that identifies the benefits and impacts of the Google Plan's proposed plans on station access, including planned employment and residential population estimates with the buildout of the plan, TOD mode share and parking justifications, transportation demand strategies and the impacts of the reconfigured street network.
- iii. Connectivity to BART. The need for pedestrian crossings at Cahill Street between Santa Clara Street and San Fernando Street will conflict with heavy rail to BART passenger connectivity and safety. BART is the highest rail to rail transfer to the high-speed rail system. Crossing Cahill Street to connect transit modes contradicts the principles of the City's Vision Zero program. There needs to be a continuous and safe pedestrian environment for modal interchange.
- iv. Cahill Street. The extension of Cahill Street north from Santa Clara to Julian Street seems beneficial, as well as the extension of Cahill Street from San Fernando Street to Park Avenue, however the section of Cahill Street between Santa Clara Street and San Fernando Street needs to be a continuous pedestrian environment connecting the station with BART without crossing through vehicle movements. The street section is also not functional for the level of pick-up and drop-off anticipated with all of the services (including high-speed rail) that will use the station. A one-way, two travel lanes and one curb side lane configuration is more optimal for curbside operations. A single lane adjacent to the curbside lane will be hopelessly congested with maneuvering in and out of curbside spaces. Cars will double park and block on-coming street traffic. The Authority can provide a program of curb-side operations needed for station access for analysis and design. Protected bike lanes on the west side of Cahill Street will conflict with pedestrian movements for pick-up and drop-off. Authority preliminary engineering has bike lanes installed on the east side of Cahill Street to avoid this conflict.
- v. Stover and Crandall Streets. Authority preliminary station design proposes the extension of Stover Street and Crandall Street from Montgomery Street to Autumn Street for station access, whereas the Google Plan proposes to close these streets. The Google Plan does extend Cahill Street to Otterson Street, which is consistent with Authority plans for pick-up and drop-off. The Authority would like to better understand the impact on station access and mobility from these changes.
- vi. VTA Transit Center. Authority preliminary design shows the relocation of the VTA transit center to a new facility between Cahill Street, Crandall Street, South Montgomery Street, and West San Fernando Street to make space for a station hall, vertical circulation and direct pedestrian access to BART, all of which are precluded in the Google Plan. It would be beneficial for the Google Plan, or a transportation analysis, to show how the all of the transit providers' station access requirements can be accommodated in the Google Plan.
- vii. Displaced transit commuter parking. The Google Plan needs an agreement with the Transit partners on the displacement and replacement of transit parking.
- viii. Station Plaza. Locating a station plaza across Cahill Street away from the station diminishes the vitality and functionality of the plaza as a space for travelers to connect to other travel modes. The Google Plan only paves over the existing pick-up and drop-off area in front of the historic station. The Google Plan does not create a significant public

space that visually emphasizes the station nor shape a safe, contiguous pedestrian environment uninterrupted by vehicle travel.

## 2. DISC

Over the past year the four Partner Agencies - VTA, City of San José, Caltrain, and the California High-Speed Rail Authority - have been working with the Arcadius Benthem Crowel team to develop a vision for the Diridon Station, the Diridon Station Integrated Concept (DISC). As you know, DISC strives to coordinate the spatial layout of complex, inter-related transportation infrastructure projects that fit with the surrounding community.

- a. Incorporate Partner Agency Planning. The Google Plan does not show any awareness of the extensive, multi-year partner agency planning for the station area of DISC. The Google Plan can orient development in anticipation of the vision of DISC, or it can support the realization of the DISC vision over time. In either case, the Google Plan needs to incorporate DISC planning.
- b. Locate Station Plazas at the Station Entries. The DISC vision is a two-concourse vision with a main station hall at Santa Clara Street and a secondary station entrance at San Fernando Street. When realized, the Google Plan will be out of sync with the DISC vision by locating the station plaza where there is no station, at Stover and Crandall Streets.
- c. Close Cahill Street to Through Vehicle Traffic. To accommodate the vision of DISC, Cahill Street needs to be closed to through traffic between Santa Clara Street and San Fernando Street. This is the primary pedestrian area for intermodal exchange of traveler to BART, VTA light rail, bus, shuttles, taxis, TNC's and pick-up and drop-off. A safe, pedestrian precinct area needs to extend at least a ¼ mile from the station, as a Vision Zero priority area for the City of San José.
- d. Lack of an Urban Destination Adjacent to New Intermodal Transit Station. The Google Plan does not create an urban destination adjacent to a new intermodal station, nor focus public space to visually emphasize the station. The Google Plan orients urban destinations towards the Los Gatos Creek. Buildings orient to the "Cultural Hub" and "Autumn Street to the Creek", or the "Green Meander and Neighborhood Plazas," which are internal campus circulation spaces, rather than towards a public space that faces the station.
- e. Orient Development to Transit. Transit-oriented development orients development to transit. As shown in the research, transit-adjacent development under performs in transit mode shift and parking reductions. For development to orient to transit means that buildings have their main entrance and address directly facing the public interchange space of the station. The three-character areas, as transit-oriented districts, need to be directly visible and accessible from the station. For example, Exhibit 2.09 the Illustrative Framework needs to show how travelers arriving by transit can directly see and access an event space for each character area. This would greatly advance the principle of connecting to transit and nature.

## 3. Land Use

- a. Timing of Development, Transit Demand and Service Capacity

Additional information is needed to understand the timing of development and demand for transit services for the build out of office and housing in the station area. This includes projected mode share, transportation demand management and phasing of development over time. The initial phase Google development could be ready for occupancy as early as 2025 – 2027 with buildout over several years. Caltrain electrification is expected by 2022, BART by 2030 and high-speed rail Valley to Valley service at the earliest by 2029.

Land use considerations, including the amount and timing of development, parking supply and management, mode share and transportation demand management, will all have a significant impact on transit use. There is a direct nexus between transit-oriented development and the increased demand for transit infrastructure. Growth in transit services will be needed to accommodate the future growth in mobility of people working, living and visiting the station area.

The Google Plan needs a coordinated approach with the City and transit partners to ensure balance growth in transit demand and capacity to ensure a sustainable and livable future for the downtown. The Google Plan needs to address any potential service gaps before BART and high-speed rail service comes on line to meet employment and residential transit demand. Transforming the station area from a predominantly auto-oriented to a transit-oriented, world-class multi-modal transit hub and gateway to Silicon Valley will take a highly coordinated land use and transit planning effort by our agencies.

b. Street Network

It is an Authority priority to ensure the street network is designed to accommodate the hierarchy of station access needs for all transit providers. Please see comments above on concerns with how the Google Plan works regarding the reconfiguration of the street network and street sections.

c. Placemaking

The Google Plan needs to envision the station as the point of arrival to the City, with an identifiable, public space for the interchange of people and station access modes. This entrance to the city - a vibrant center of city life - needs to be welcoming and safe for people to connect, way find and orient to downtown. To maximize transit mode share, the pedestrian network needs to visibly extend and connect to the center of the surrounding neighborhoods.

#### **4. Policy Considerations**

a. Performance Measures

Shifting travel behavior from single occupant vehicles (SOV) to transit requires attractive travel alternatives to be available prior to the demand for travel. The City, with the partner transit agencies, would benefit by identifying performance measures to shift travel behavior to leverage the synergy with constraining parking capacity and the availability transit. Applying VTA's performance measures are a good starting point.

From a transportation agency perspective, we encourage the City to focus Google's transportation demand management program for employment and residential uses on the expansion of public transit services, rather than expansion of private commuter bus service. The Authority needs to see Google's proposed transportation demand management strategy to plan for future ridership.

b. Transit and Rail Investment

The Authority is highly supportive of attracting significant investment to the station and station area consistent with Authority policy and partner agency interests. The Authority supports the City's action to create an impact fee to pay for one-time infrastructure costs in the station area per the HMM Infrastructure Study we funded to evaluate public infrastructure needs in the station area.

The transit partners, funded by Federal, State and regional funds, are investing billions of dollars to increase regional and statewide accessibility to Diridon Station, with significant economic, social and environmental benefits to the City of San José. Development in the Diridon Station area will also directly benefit from public investment in transit as an alternative to traffic congestion that saves travel time and cost as well as reduces greenhouse gas emissions.

We support the City's consideration of other revenue sources to fund public infrastructure costs. Future transit services and facilities at Diridon Station, however, are not fully funded. We want to see station facilities and station access improvements included in the mix of public improvements benefitting development. Development needs to make reasonable, fair share contributions to impacts on transit service.

As the Diridon Station Area evolves as the gateway to the Capital of Silicon Valley, becoming a vibrant and iconic urban Downtown environment, the long-term benefits of a coordinated program of investments in transportation infrastructure and the public realm will increase in value.

Google participation in the creation of an innovative multi-modal transportation environment with high-speed rail service can create a new model for a sustainable and livable downtown fitting San José's vision as a global city.



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November 22, 2019

City of San Jose  
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200 East Santa Clara Street, 3<sup>rd</sup> Floor Tower  
San Jose, CA 95113  
Email: [shannon.hill@sanioseca.gov](mailto:shannon.hill@sanioseca.gov)

Dear Ms. Hill:

Thank you for providing the opportunity to comment on the Notice of Preparation (NOP) of the Environmental Impact Report (EIR) for the Downtown West Mixed-Use Plan (Google Project). The Peninsula Corridor Joint Powers Board (Caltrain) has reviewed the NOP and associated development plans and provides the comments below for consideration. Please note that Caltrain may submit additional technical comments on the project itself outside the NOP process, and looks forward to collaborating with the City, Google, and other stakeholders as the Google Project proceeds.

### **Diridon Integrated Station Concept (DISC) Integration**

As you know, the California High-Speed Rail Authority (CHSRA), Santa Clara Valley Transportation Authority (VTA), the City of San José, and Caltrain (Partner Agencies) are working together on a plan to expand and redesign Diridon Station. This effort, known as DISC, has been underway since summer/fall 2018 and has included a significant amount of public involvement and input. Most importantly, based on these discussions, the Partner Agencies have given their input and arrived at a recommendation that would allow the development of a world-class transit center that provides smooth connections between modes and integration with the surrounding neighborhoods. This future transit center must also accommodate the thousands of new jobs and residents in the area that result from the proposed development. The partner agencies released the recommended concept layout on November 15, 2019.

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Caltrain therefore requests that the Draft EIR analyze the proposed project as it relates to the DISC recommended concept layout. For example, the Draft EIR should evaluate how the project might be changed to accommodate the additional land required along the railroad right-of-way to meet future rail service needs consistent with the DISC recommended concept (10 tracks and five platforms). That is just one example of how the proposed development patterns may change as a result of DISC implementation.

We understand that Google's team is working diligently with the DISC design team to potentially integrate design features. However, the overall need for consistency and close coordination between the Google Project EIR and DISC process remains. Most importantly, incorporating the DISC analysis will allow decision makers to better understand the differences between the Google proposal and the recommended DISC design and come to an informed decision.

### **Need to Assess Impact on Rail Capacity, Rail Infrastructure and Transit Services**

As noted in the NOP, Google's project calls for 5,900 residential units; up to 7,300,000 gross square feet (GSF) of office space; up to 500,000 GSF of active uses such as retail, cultural, arts, etc.; up to 300 hotel rooms; up to 800 rooms of limited-term corporate accommodations; an approximately 100,000 GSF event center; up to two central utilities plants totaling approximately 115,000 GSF; and a logistics warehouse(s) of approximately 100,000 GSF; all on approximately 84 acres. The proposal also includes conceptual infrastructure, transportation, and public open space plans.

In other words, there will be tens of thousands of additional people in the project area when the Google Project is fully built out. Compared to San Jose's adopted General Plan, there will be a substantial increase to the daytime and nighttime populations in the immediate Diridon Station area. Caltrain agrees that the Diridon area is the right place for type this project, and fully supports the balance of land uses proposed. The project also appears to do a good job proposing the improvements necessary to handle the increase in bicycles, pedestrians, and vehicles in the area. Furthermore, it is our understanding that the City of San Jose has impact fees that quantify the impact of this project on the local transportation infrastructure (roadways, sidewalks, bike lanes, etc.) and assess a fee consistent with the project's impact.

While we understand that a portion of the increased population in the immediate area may be "shifted" from other areas of proposed growth in the General Plan, the closer people are to a transit center, the more likely they are to use transit. In order

to fully and adequately assess the project's impact on the area's transit services, Caltrain believes the EIR must quantify the impact the project has on rail infrastructure and the overall demand for transit services.

The analysis must look at the impact of this project in two distinct ways. First, given the discrepancies between the DISC design and the Google design, Google's proposed project may be encroaching on the rail right-of-way necessary to support this level of development. In collaboration with the DISC team, the EIR should identify the land that will be necessary to provide increased rail capacity and transit services. Second, the EIR should also determine the increase in transit ridership that will result from this project and quantify the increase in transit infrastructure necessary to support this development. When that is determined, the project applicant should be required to pay their fair and proportional share and dedicate the land necessary to construct the rail improvements that are required to support the Google Project in its entirety.

Finally, Caltrain recommends that the EIR consider the effects of the proposed project on existing and planned compensatory mitigation/ creek restoration projects in the study area. For example, JPB has constructed riparian habitat mitigation at the Los Gatos Creek Bridge, which is adjacent to a site proposed for development by Google. Such development could have direct or indirect impacts (such as shading of vegetation or stormwater runoff) that could affect JPB's mitigation commitments (which at Los Gatos Creek involve 10-years of monitoring and corrective action requirements if success criteria are not met).

### **Cumulative Impacts**

The evaluation of cumulative environmental impacts in the EIR should incorporate a reasonable future scenario that includes construction of the DISC-recommended concept rail improvements. The NOP notes that existing noise sources (including Caltrain) will be addressed in the noise analysis but does not address how future changes in noise sources will be analyzed. For example, potential noise impacts to new development adjacent to the railroad should account for increased rail service frequency by all operators at Diridon, the change from at-grade to elevated structures and the increase in the number of tracks. Noise mitigation should be required for buildings where noise impacts are anticipated in accordance with City requirements.

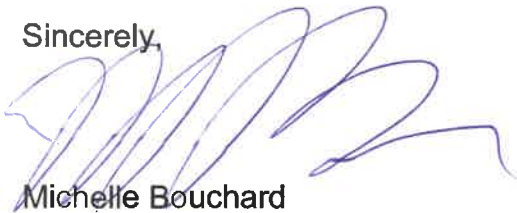


**Responsible Agency**

The NOP identifies JPB as a potential responsible agency. We look forward to receiving additional information from the City during the EIR process on the specific discretionary approvals anticipated to be needed from JPB to facilitate the proposed project.

Caltrain looks forward to continuing to collaborate with the City, the Partner Agencies and with Google. Thank you for allowing Caltrain to provide NOP comments, and feel free to contact me with questions.

Sincerely,



Michelle Bouchard  
Chief Operating Officer, Rail