

**From:** [Hill, Shannon](#)  
**To:** [Pete Choi](#)  
**Cc:** [Keyon, David](#); [Hillary Gitelman](#); [Karl Heisler](#); [Linda S. Peters](#)  
**Subject:** RE: NOP Comments: 4th Batch  
**Attachments:** [Ca HSR Authority\\_rcvd\\_112519.pdf](#)

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Thanks Pete. I'll cross check with my files tomorrow, and I've attached an additional comment letter from the High Speed Rail Authority received in hard copy today.

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

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**From:** Pete Choi <PChoi@esassoc.com>  
**Sent:** Monday, November 25, 2019 4:02 PM  
**To:** Hill, Shannon <Shannon.Hill@sanjoseca.gov>  
**Cc:** Keyon, David <david.keyon@sanjoseca.gov>; Hillary Gitelman <HGitelman@esassoc.com>; Karl Heisler <KHeisler@esassoc.com>; Linda S. Peters <lpeters@esassoc.com>  
**Subject:** RE: NOP Comments: 4th Batch

[External Email]

Shannon,

After the comments received today here is the current NOP commenters list (I just added Caltrain). There are 33 comment letters, emails and comment sheets from agencies, organizations, and individuals. Let us know if we are missing any. If there are any late comments, we can add them to the list. We are in the process of preparing a high-level summary of the comments, including the from the scoping meeting. Also, we will send the transcript over to you for the City's files.

Thanks

**Pete Choi**  
Senior Managing Associate  
ESA | Environmental Science Associates  
415.962.8419

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**From:** Hill, Shannon <[Shannon.Hill@sanjoseca.gov](mailto:Shannon.Hill@sanjoseca.gov)>  
**Sent:** Monday, November 25, 2019 10:24 AM  
**To:** Hillary Gitelman <[HGitelman@esassoc.com](mailto:HGitelman@esassoc.com)>; Karl Heisler <[KHeisler@esassoc.com](mailto:KHeisler@esassoc.com)>; Pete Choi <[PChoi@esassoc.com](mailto:PChoi@esassoc.com)>  
**Cc:** Keyon, David <[david.keyon@sanjoseca.gov](mailto:david.keyon@sanjoseca.gov)>

**Subject:** NOP Comments: 4th Batch

Good morning,

Of course the bulk of the NOP comments came on Friday. The remaining comments are in the attached zip file.

Thanks!

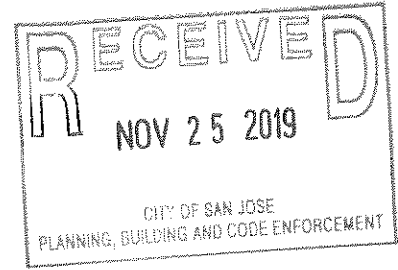
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November 19, 2019

Kim Welsh  
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. Welsh,

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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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

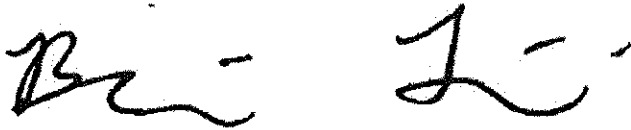
The transit partners are investing tens of billions of dollars to increase regional and statewide accessibility to Diridon Station, with significant economic, social and environmental benefits to the City of San José. However, bringing 20,000 jobs and thousands of housing units to the area will strain 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,

Handwritten signature of Boris Lipkin in black ink.

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.