



**CITY OF SUNNYVALE
DEPARTMENT OF PUBLIC WORKS**

January 13, 2015

VTA Environmental Planning Department
3331 North First Street, Bldg. B
San Jose, CA 95134-1927
Attn: Christina Jaworski

RE: City of Sunnyvale Comments on the Draft Environmental Impact Report of the El Camino Real Bus Rapid Transit Project Released October 29, 2014.

Dear Ms. Jaworski:

Thank you for providing the City of Sunnyvale with the opportunity to review and comment on the Draft Environmental Impact Report of the El Camino Real Bus Rapid Transit Project Released October 29, 2014.

Enclosed are the comments that need to be addressed as part of the Final Environmental Impact Report for this project. The final response to comments is necessary to assure that the City has sufficient information to ultimately support a specific project alternative. We also request that the comments be addressed for all project alternatives. If you would like to discuss these comments or have any questions, you may contact me at (408) 730-7415.

Sincerely,

Manuel Pineda, P.E.
Director of Public Works

Enclosed: City of Sunnyvale Comments on the Draft Environmental Impact Report of the El Camino Real Bus Rapid Transit Project

C: Hanson Hom, City of Sunnyvale Community Development Department Director
Deanna J. Santana, City of Sunnyvale City Manager

City of Sunnyvale Comments on the Draft Environmental Impact Report of the El Camino Real Bus Rapid Transit Project

General Comments

Traffic Analysis

As part of the dedicated lanes alternatives, the traffic analysis states that current traffic on El Camino will divert to other routes within Sunnyvale. These routes include Central Expressway, US 101, I-280, Fremont Avenue, Remington Drive, Evelyn Avenue, and Maude Avenue. Please address the following comments:

- The report does not provide LOS for all the diversion routes such as US-101 and Central Expressway. Please disclose LOS for all diversion routes and analyze possible impacts by diverted traffic.
- The project has significant impacts along Evelyn and Fremont. Will this traffic use other streets instead of corridors that become congested?
- Please explain why vehicles would choose to divert to congested routes such as Evelyn, Fremont, US-101, and Central expressway if the analysis shows that El Camino Real within Sunnyvale would still function at an acceptable LOS.
- Disclose what North-South corridors diverted traffic will use and provide the LOS analysis. Mathilda should be included as part of this analysis.
- If the diversion does not occur as modeled, what will be the LOS for intersections along El Camino?

Operations

The project is proposing existing mid-block left turn closures. These closures will make access to properties more difficult. Please analyze the following:

- How many additional left-turns will be added at each intersection? Will this create queuing safety issues?
- What mitigation measures should be implemented to accommodate additional left and U-turns?

Parking

Off-street parking lots should not be counted towards parking inventory as they are typically designated for corresponding employees and patrons only and should not be considered as "unrestricted parking".

Parking analysis and availability should be completed on a block-by-block basis, not for the entire corridor within Sunnyvale. This will disclose the actual available parking within a reasonable walking distance. Also do not assume parking in residential neighborhoods as available parking for commercial uses.

Transit Ridership

Provide information on existing and projected ridership numbers for all Sunnyvale stations.

Specific Comments

Page: Figure ES-2

Section: Figure ES-2

Comment: This map does not identify all BRT stations as noted in the legend. This comment is also applicable to all other similar maps.

Page: ES-3

Section: ES.4.1 Project Description

Comment: Station Locations. There is little discussion about where the stations will be located. The document assumes the existing 522 station locations will be maintained, but these are not all at the most effective locations along the corridor. For instance, the City of Sunnyvale staff and VTA consultants worked together to identify a better location for the Hollenbeck station location, but the EIR and project assumes the station locations will not change from the existing locations.

The Hollenbeck station is an inferior location along the corridor in Sunnyvale and should BRT be implemented, the station should be moved closer to a far more active and better connected location closer to Sunnyvale Avenue. In its current location at Hollenbeck/Pastoria Avenues, the station would not provide an easy connection to the Downtown area, nor the Caltrain station, and would be further from the busiest part of Sunnyvale along El Camino Real. A location near Sunnyvale Avenue would:

- Place the station with a direct connection to be able to walk, bike or shuttle to the Caltrain station, multi-modal station and downtown area;
 - Be located closer to three existing large retail centers and multi-family residential developments; and,
 - Provide better service for employees and patients of the Palo Alto Medical Foundation complex.
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Page: 3-10

Section: 3.2 Alternatives Considered

Comment: This section describes how stations were chosen, and it states, in part: "Locations were chosen based on level of use of the existing bus stations, proximity to major destinations such as schools, grocery stores, or other popular commercial areas...and proximity to existing multi-modal transit areas..."

Given these facts, the station should be located closer to Sunnyvale Avenue, or closer to Mathilda Avenue to provide maximum service to an active area of Sunnyvale. Additionally, enhanced north/south bus service improvements should be considered for the Sunnyvale-Saratoga Avenue corridor, and extending down Sunnyvale Avenue towards the downtown area and Caltrain station. Having the BRT station close to the Sunnyvale Avenue/El Camino Real intersection along with the future enhanced bus service along that corridor would ensure the important shopping, employment and multi-modal areas are included in the planning of the stations.

Although the Hollenbeck station provides a better separation between stations along the corridor, that aspect should not preempt a more important location in serving the Sunnyvale community. Moving the station closer to Sunnyvale Avenue or Mathilda Avenue would place access to BRT in the Downtown Node, as designated by the

Precise Plan for El Camino Real. The Hollenbeck location is not located inside one of the four nodes as identified in the Sunnyvale Precise Plan for El Camino Real.

The Implementation section of the Precise Plan for El Camino Real supports this change as shown below:

5.8.1 Strengthening the Physical, Visual and Functional Connections Between El Camino Real and Downtown Sunnyvale. It reads (in part), "Physical linkage could include shuttle service or increased bus service, or enhanced sidewalks connecting the two areas along Mathilda Avenue and Sunnyvale Avenue."

Page: 4.2-1

Section: 4.2 Aesthetics and Visual Quality

Comment: This section considers the effect BRT stations would have on visual impacts to the area. The impact from the stations has been the only aspect considered as part of this review. One aspect that remains a concern for the Sunnyvale community would be the visual impact a dedicated middle lane would have on median landscaping along the entire stretch of roadway, not just at stations.

Page: 4.4-7

Section: Table 4.4-1 Total Number of Trees Removed by Alternative and City

Comment: This table details 130 trees removed as part of the Alternatives 4a, 4b and 4c. Although the biological impact may be reduced through replanting of trees or the payment of in-lieu fees, the loss could represent a significant impact to the visual quality of an important element of the look and feel of El Camino Real in Sunnyvale. This section should be revised to determine the effect the loss of trees will have on the aesthetics and visual quality of the corridor through Sunnyvale.

Page: 4.12-1

Section: Regulatory Setting

Comment: This section should note why the VTA TIA Guidelines are not a regulatory document applicable for this project, but are still used as guidance for some of the analysis.

Page: 4.12-3

Section: Table 4.12-1 Rapid 522 and Local 22 Weekday Ridership (Year 2013)

Comment: This table should identify ridership by City.

Page: 4.12-5

Section: Table 4.12-3 Transit Connections within Project Corridor

Comment: VTA bus 54 has connections at El Camino Real via Pastoria/Hollenbeck, not Mathilda.

Page: 4.12-7

Section: Intersection Traffic Operation

Comment: Note why 2010 Highway Capacity Manual was not used for traffic analysis rather than the 2000 Highway Capacity Manual

Page: 4.12-8

Section: Table 4.12-4 Existing (2013) Level of Service for Study Intersections along the Project Corridor

Comment: This table identifies the intersection of Mathilda Avenue at El Camino Real as having an existing LOS F during the morning commute hour. Recent studies done for Sunnyvale developments identify this intersection as having an LOS D during the morning commute hours. There is a variance of 20-30 second delay per vehicle between VTA analysis and other recent studies. Please verify this variance.

Page: 4.12-10

Section: Pedestrian Facilities at Bus Stop Areas

Comment: Are intersections near bus stops ADA compliant?

Page: 4.12-11

Section: Table 4.12-5 Bicycle Facilities Connected to Project Corridor

Comment: Class II bike lanes on Mathilda Avenue only exist south of El Camino Real. Include bike lanes on Cezanne Drive. Please also identify bike routes.

Page: 4.12-14

Section: Transit Service

Comment: This section notes that the project would have a beneficial impact on the performance of the transportation system if the project results in a decrease in VMT. Is this VMT measured regionally, locally, or on the project corridor only?

Page: 4.12-15

Section: Traffic Operation

Comment: Identify the version of CA MUTCD used for signal warrants (e.g. 2010, 2012, 2014)

Page: 4.12-19

Section: Study Intersections Selection

Comment: Did intersections have to meet all three criteria items to be analyzed? Were any intersections that met the 50 vph threshold, but not already in the travel demand model not analyzed?

Page: 4.12-35

Section: MM TRA-A: Implement signal optimization, traffic signal installation, and roadway striping improvements at impacted intersections.

Comment: Signal coordination optimization should be applicable to all affected coordinated signals, not just those that are closely spaced intersections

Page: 4.12-41

Section: Parking Occupancy

Comment: Do post-project estimated parking occupancy rates consider a possible increase in parking demand of for potential park-n-ride for BRT?

Page: 4.14-6

Section: Table 4.14-2 Projects considered for Potential Cumulative Impacts

Comment: The proposed development at 871 E Fremont Ave, Sunnyvale, CA (i.e. The Butcher's Corner) should be included as part of the cumulative project analysis. The estimated construction schedule for this project is unknown, likely before 2018.

Page: Appendix H, TOA, p.3

Section: Table 2 Summary of Results Compared to the Project's Purpose

Comment: This table notes that there will be a five minute headway reduction as a result of SCAR BRT. Does this mean that there will be no further headway improvements as part of ECR BRT? Furthermore, how is the Alternative 1, travel time compare to current travel times (please include percentage)? This same question applies to transit ridership. Please clarify whether these measures are relative to 2018 or existing 2013 as noted in the text.

Page: Appendix H, TOA, p.13

Section: 2.3 Traffic Operations Analysis Methodology

Comment: This section should note the following:

- Explanation of why the VTA TIA Guidelines are not followed for analysis.
- Explanation of why the analysis was performed using Synchro instead of Traffixx (VTA's designated standard software package).
- Explanation of why the analysis was done per HCM 2000 rather than the latest version (HCM 2010).
- Explanation of why signal optimization was done prior to, rather than after, the analysis

Page: Appendix H, TOA, p.17-18

Section: 2.3 Traffic Operations Analysis Methodology

Comment: This section notes "However, Sunnyvale does not use the 4-second threshold." Sunnyvale does use the 4-second threshold.

Page: Appendix H, TOA, p.21 & TOA Appendix B

Section: Existing Level of Service

Comment: Existing Level of Services need to be field verified. Staff found some intersections that are not consistent with other analyses or observed conditions. (e.g. AM LOS at Mathilda Avenue and El Camino Real is noted as "F" with an 80.2 sec/veh delay. This is inconsistent with recent analyses with significantly less calculated and observed delay [approximately 30 seconds/veh less]).

Page: Appendix H, TOA, p.96

Section: 10.2 Diversion Route Intersections

Comment: VTA shall fully fund all measures needed to mitigate impacts of the project. As a matter of fact, because all traffic models have limitations, particularly in determining what new routes motorists would select, staff recommends that VTA conduct pre-project and post-project traffic studies be performed to measure the effects of the project. If post-project studies identify unanticipated traffic problems, VTA should commit to provide additional traffic mitigation.