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November 3, 2017

SCH# 2017102016

04-SON-20017-00201

GTS ID 8140

Mr. Patrick Streeter
City of Santa Rosa
Planning & Economic Development
100 Santa Rosa Avenue, Room 3
Santa Rosa, CA 95404

Santa Rosa Memorial Office Building and Parking Structure Project – Mitigated Negative Declaration (MND)

Dear Mr. Streeter:

Thank you for including the California Department of Transportation (Caltrans) in the environmental review process for the above-referenced project. In tandem with the Metropolitan Transportation Commission's (MTC) Sustainable Communities Strategy (SCS), Caltrans mission signals a modernization of our approach to evaluating and mitigating impacts to the State Transportation Network (STN). Caltrans' *Strategic Management Plan 2015-2020* aims to reduce Vehicle Miles Travelled (VMT) by tripling bicycle and doubling both pedestrian and transit travel by 2020. Our comments are based on the MND.

Project Understanding

The applicant requests a Lot Line Adjustment, Design Review, and Conditional Use Permit to demolish all existing structures and construct a 92,000 square foot (sf) four-story Medical Office Building (MOB), a six-level parking structure with approximately 600 parking spaces, and 16 surface parking spaces on approximately 2.98 acres consisting of 14 land parcels. The first floor will contain a licensed hospital outpatient diagnostic imaging clinic, a small café/restaurant, and a credit union. The second, third, and fourth floors will contain medical offices. The proposed height of the MOB is 61-feet (ft) including a metal screen parapet used to shield the mechanical equipment. The parking structure is 70-ft. in height including solar panels. The applicant seeks a Design Review for MOB and associated Parking Structure, Conditional Use Permit to Increase the height of the MOB and Parking Structure, and a Lot line Adjustment to merge and reconfigure parcels to respond to project's final design.

Access to the site is provided via two proposed driveway on Sotoyome Street and Montgomery Drive, respectively. The project site is regionally accessed approximately 0.6 miles northeast of the State Route (SR) 12/Maple Avenue and Broadway Avenue interchange.

Project Description:

Please clarify the total number of employees expected to occupy the MOB.

Lead Agency

As the Lead Agency, the City of Santa Rosa is responsible for all project mitigation, including any needed improvements to the STN or reduction in VMT. The project's fair share contribution, financing, scheduling, implementation responsibilities and Lead Agency monitoring should be fully discussed for all proposed mitigation measures.

Travel Demand Analysis

With the enactment of Senate Bill (SB) 743, Caltrans is focusing on transportation infrastructure that supports smart growth and efficient development. Recently approved guidance for incorporating SB 743 (*Local Development-Intergovernmental Review Program Interim Guidance, November 2016*) intends to ensure that development projects align with State policies through the use of efficient development patterns, innovative travel demand reduction strategies, and necessary multimodal roadway improvements. Though OPR's guidelines regarding SB 743 are currently a technical advisory, these changes will go into effect once the rulemaking process is complete and VMT analysis for similar projects may be required.

In Caltrans' *Smart Mobility 2010: A Call to Action for the New Decade*, this project falls under **Place Type 1 Urban Centers**, which includes areas with high density, mixed use places with high jobs-housing ratios, well-connected streets network, high levels of transit service and pedestrian supportive environments with major activity centers and full range of horizontally-and-vertically mixed land uses and with high capacity transit stations/corridors present/planned. Given this Place Type and intensification of use, which typically leads to high levels of VMT and corresponding low levels of active transportation, please analyze VMT resulting from the proposed project including:

- A vicinity map, regional location map, and site plan clearly showing the project's location in relation to the STN. Clearly identify State ROW, bicycle paths, and transit facilities within the study area.
- A VMT analysis pursuant to the City's guidelines or, if the City has no guidelines, the Office of Planning and Research's Draft Guidelines. Projects that result in automobile VMT per capita greater than 15 percent below existing (i.e. baseline) city-wide or regional values for similar land use types may indicate a significant impact. If necessary, mitigation for increasing VMT should be identified. Mitigation should support the use of transit and active transportation modes. Potential mitigation measures that include the requirements of other agencies—such as Caltrans—are fully enforceable through permit conditions, agreements, or other legally-binding instruments under the control of the City.
- Potential safety issues for all road users should be identified and fully mitigated.
- The project's primary and secondary effects on pedestrians, bicycles, disabled travelers and transit performance should be evaluated, including countermeasures and trade-offs resulting from mitigating VMT increases. Access to pedestrians, bicycle, and transit facilities must be

maintained.

Operations Analysis

We are concerned with the projected increase in generated trips, which have the potential to create significant speed differentials and increase the number of conflicts on the STN. Queuing vehicles can potentially encroach on the mainline from the SR 12 (Farmers Lane)/Sonoma Avenue and US 101/3rd Street ramps, and left-turning vehicles can overflow beyond the available storage. This could present a significant conflict due to the speed differential between exiting vehicles and highway traffic. Please provide a Travel Demand Analysis (TDA) which analyzes trip generation, distribution, and storage capacity at SR 12 (Farmers Lane)/Sonoma Avenue and US 101/3rd Street ramps. A TDA is necessary to determine the scope and significance of issues that may arise from the project's potential conflicts. The California Environmental Quality Act (CEQA) does not exempt these types of operational concerns from evaluation.

Vehicle Trip Reduction

Given this Urban Centers Place Type and the opportunities to reduce VMT, we encourage the City to establish a Transportation Management Association in partnership with the hospital and other developments in the area to pursue aggressive trip reduction targets with Lead Agency monitoring and enforcement. In addition, the Transportation Demand Management (TDM) elements described below should be included in the program to promote smart mobility and reduce regional VMT and traffic impacts to the STN:

- Ten percent vehicle parking reduction;
- Project design to encourage walking, bicycling, and convenient transit access;
- Commuter subsidy for transit, carpool, vanpool, and bicycle use for patients, patrons, and employees on an ongoing basis;
- Carpooling incentives, dedicated parking spaces and guaranteed ride home for carpooling employees;
- Onsite TDM coordinator;
- Transit and trip planning information kiosk;
- Enhanced bus stops including bus shelters;
- Electrical vehicle (EV) charging stations and designated parking spaces for EVs and clean fuel vehicles;
- Secured bicycle storage facilities;
- Bicycles for employees to access nearby destinations;
- Showers, changing rooms and clothing lockers;
- Bicycle route mapping resources and bicycle parking incentives;
- Bicycle share membership;
- Fix-it bicycle repair station(s); and
- Decrease headway times and improve way-finding for Santa Rosa CityBus bus routes 4,4B, 8 and 18, and Sonoma County Transit bus routes 30, 30X, and 34 to provide a better connection

between the project, the nearby Santa Rosa Downtown Sonoma-Marín Area Rail Transit (SMART) Station, and regional destinations.

Transportation Demand Management programs should be documented with annual monitoring reports by an onsite TDM coordinator to demonstrate effectiveness. If the project does not achieve the VMT reduction goals, the reports should also include next steps to take in order to achieve those targets. Since reducing parking encourages active transportation, the project's surplus parking should be eliminated and further parking reduction should be sought. These smart growth approaches are consistent with the MTC's RTP/SCS goals and would meet Caltrans Strategic Management Plan sustainability goals.

Furthermore, the Traffic Impact Study (TIS) describes the parking structure capacity as "substantially (exceeding) the minimum requirement under the City's code." There is no rationale or justification for providing an oversupply parking spaces. There is a strong correlation between the availability of parking, the cost of parking, and the choice of commute mode. The proposed parking structure with approximately 600 parking spaces should be managed effectively to discourage drive-alone commuters. Research suggests that at least 20 percent of commuters who drive alone would choose to carpool or use public transit if free parking was changed to paid parking. The project should be conditioned to include an operations and maintenance (O&M) plan for the parking structure. The O&M plan will help determine the effectiveness of TDM measures proposed for the project.

The national trends in lowering car ownership and increasing use of transportation network companies (TNC), such as Uber and Lyft should be factored into determining the appropriate size of the parking structure. The project should be conditioned to include well designed designated drop-off/pick-up locations to accommodate TNC's and shuttle services. The project should consider potential shuttle service to the Santa Rosa Downtown SMART Station.

For additional TDM options, please refer to Chapter 8 of Federal Highway Administration's *Integrating Demand Management into the Transportation Planning Process: A Desk Reference*, regarding TDM at the local planning level. The reference is available online at: <http://www.ops.fhwa.dot.gov/publications/fhwahop12035/fhwahop12035.pdf>.

For information about parking ratios, please see MTC's report, *Reforming Parking Policies to Support Smart Growth*, or visit the MTC parking webpage: http://www.mtc.ca.gov/planning/smart_growth/parking.

Multimodal Planning

The City of Santa Rosa should encourage land use development that promotes more incentives to lower Green House Gas (GHG) emissions. The incentives will support State of California's goals stated in SB 375 and in the City's Resolution 26341. This project is located within close proximity of a Priority Development Area (PDA) in the City of Santa Rosa. PDA's are identified by the Association of Bay Area Governments as areas for investment, new homes, and job growth. To support PDA goals, the project should be conditioned to ensure connections to existing bike lanes and multi-use trails to facilitate walking and biking to the project site. Specifically, the proposed project should provide connections to the existing Class II bike lanes on Sonoma Avenue, the 2nd Street Transit Mall, and Santa Rosa – Sonoma County Transit Highway 12/Brookwood Avenue Transit Center, as shown in the *City of Santa Rosa Bicycle and Pedestrian Plan 2010*. The project should be conditioned to make a fair-share contribution toward the planned Class II bike lanes on Montgomery Drive between 3rd Street and Talbot Avenue. Providing these connections with streets configured for alternative transportation modes will reduce VMT by promoting usage of nearby Santa Rosa CityBus bus routes 4, 4B, 8 and 18, Sonoma County Transit bus routes 30, 30X, and 34, and Santa Rosa Downtown Sonoma-Marin Area Rail Transit (SMART) Station.

The existing bus routes that service the hospital have 30-120 minute headways (TIS page 7). Providing a higher quality bus stop along the frontage of proposed project would be appropriate for this location with the long wait times. Improving the transit experience will help promote more transit users.

Travel Demand Fees

Given the potential increase in VMT and proximity to SR 12 and US 101, the project should be conditioned to contribute fair share travel demand impact fees toward multi-modal and regional transit improvements to fully mitigate cumulative impacts to regional transportation. These contributions would be used to lessen future traffic congestion and improve multimodal transportation facilities in the project vicinity. Caltrans strongly supports measures to increase sustainable mode shares, thereby reducing VMT. The fair share information should also be presented in the Mitigation Monitoring and Reporting Plan of the Final Environmental Document. Required roadway improvements should be completed prior to the issuance of the Certificate of Occupancy. To reduce these potential impacts, the applicant should work with Caltrans in order to determine a fair-share contribution.

Mr. Patrick Streeter, City of Santa Rosa
November 3, 2017
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Should you have any questions regarding this letter, please contact Stephen Conteh at 510-286-5534 or stephen.conteh@dot.ca.gov.

Sincerely,

A handwritten signature in blue ink, appearing to read "Patricia".

PATRICIA MAURICE
District Branch Chief
Local Development - Intergovernmental Review

c: State Clearinghouse