

**DEPARTMENT OF TRANSPORTATION**

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CITY OF MORGAN HILL

February 26, 2016

SCLGEN112  
SCL/GEN/VAR  
SCH #: 2015022074

Mr. John Baty  
Planning Division  
City of Morgan Hill  
17575 Peak Avenue  
Morgan Hill, CA 95037

Dear Mr. Baty:

**Morgan Hill 2035 General Plan – Draft Environmental Impact Report**

Thank you for continuing to include the California Department of Transportation (Caltrans) in the environmental review process for the Plan referenced above. The mission of Caltrans is to provide a safe, sustainable, integrated and efficient transportation system to enhance California's economy and livability. Caltrans has reviewed the Draft Environmental Impact Report (DEIR) to ensure consistency with its mission and state planning priorities of infill, conservationism, and efficient development. Please refer to the previous comment letters on this Plan. Caltrans provides these comments consistent with the State's smart mobility goals to support a vibrant economy and build communities, not sprawl.

***Project Understanding***

The City of Morgan Hill (City) is located on the US Highway (US) 101 corridor. For most of the City, including single-family residential neighborhoods and the Downtown area, the current land use designations established by the 2001 General Plan, will remain unchanged. The primary locations where land use designations would change from the existing General Plan are within "opportunity sites," a term developed through the land use alternatives process for the General Plan Update. While the Downtown area is listed as one of the opportunity sites, the land use designations remain the same as established in the Downtown Specific Plan, adopted in 2009. In addition, as described in detail below, new land use designations have been created and assigned to parcels that these new designations suit better than current designations. Several parcels on which existing parks are located or that have been dedicated as open space have been redesignated to Open Space from residential land use so that the designations accurately reflect actual uses.

The horizon-year 2035 projection for net growth plus pipeline projects includes the following:

- 2,360 new single-family residential units
- 5,070 new multi-family residential units
- 22,888 new residents
- 755,550 square feet of new retail space
- 628,700 square feet of new office space
- 1,777,400 square feet of new industrial space
- 417,600 square feet of new service space
- 287,400 square feet of new public facilities space
- 9,300 new jobs

### ***Lead Agency***

As the lead agency, the City of Morgan Hill (City) is responsible for all project mitigation, including any needed improvements to State highways. The Plan's fair share contribution, financing, scheduling, implementation responsibilities and lead agency monitoring should be fully discussed for all proposed mitigation measures.

### ***Traffic Impacts***

1. The Plan does not address the Traffic Forecasting comment in the letter, dated February 5, 2014, on the Southeast Quadrant Land Use Plan DEIR. Specifically:

Appendix H Transportation Impact Analysis (TIA), Turning Traffic Diagrams (see, pages 1 and 29): Table 9 demonstrates AM (PM) generated trip as 2,189 (2,654) vehicles per hour (vph), respectively, resulting from the proposed project. The proposed project consists of both the South County Catholic High School and the Southeast Quad (SEQ) Area. Figure 7 shows AM (PM) generated turning traffic assignment under High School Project Only Conditions. Figure 10 displays AM (PM) turning traffic under Year 2030 General Plan Plus High School Project Only Conditions. However, the TIA and the DEIR do not include AM (PM) generated turning traffic diagrams under: (1) SEQ Project Only Conditions; (2) High School Plus SEQ Project Only Conditions; and (3) 2030 General Plan Plus High School Plus SEQ. Please provide these turning diagrams to Caltrans for review. Caltrans recommends these diagrams be included in the TIA and DEIR.

Please address this comment in this Plan's EIR. In addition, this Plan's Table 3-3 Full Buildout Growth Projections within Sphere of Influence (SOI) shows large scale of land use, which likely generates significant new AM (PM) peak traffic. Caltrans recommends this Plan's TIA include turning traffic per study intersection under Projects or General Plan Only, Cumulative without Projects or General Plan, Cumulative with Projects or General Plan.

2. On pages 4.14-31 through 4.14-34 of the DEIR, Study Intersections 6 and 7 are missing from the 38 listed intersections. Also, in the "Study Area and Study Intersections" (Figure 4.14-4),

the intersection numbering sequence does not correspond to these listed intersections. Caltrans recommends these be corrected in the DEIR.

3. Mitigation for any roadway sections or intersections with increasing VMT should be identified. Mitigation may include contributions to the Santa Clara Valley Transportation Authority's (VTA) voluntary contribution program, and should support the use of transit and active transportation modes. Also, Caltrans recommends the City mitigate by: 1) paying a fair share contribution toward VTA Express Lane project on US 101 from San Mateo County to Cochrane Road in Morgan Hill (eventually to be extended to 10<sup>th</sup> Street and State Route 25); 2) installing ramp metering on the impacted on-ramps; and 3) widening the ramps that have already been metered. The added ramp capacity will allow more storage on the on-ramps so that the ramp meter flow can be more restrictive, thereby reducing the congestion on the freeway. 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.

### ***Vehicle Trip Reduction***

Caltrans encourages the City to locate future housing, jobs, and employee-related services near major mass transit centers with connecting streets configured to facilitate walking and biking. This would promote mass transit use thereby reducing regional VMT and traffic impacts. Suggested Transportation Demand Management (TDM) strategies include bicycle parking, unbundling of residential parking, and providing transit passes and/or transit subsidies to residents. The project proponent should also work with VTA to decrease headway times and improve way-finding on bus lines to provide better connections throughout the City and regionally. TDM programs should be documented with annual monitoring reports by an onsite TDM coordinator to demonstrate effectiveness.

Regarding the proposed alternatives, the Compact Development Alternative would have fewer environmental impacts than the preferred alternative. Caltrans recommends further clarification as to why the Environmentally Superior Alternative with fewer environmental impacts was not selected as the preferred alternative. Also, the Low-Growth Alternative is likely to result in lower VMT and fewer traffic impacts, thereby reducing impacts to the State Highway System (SHS). Caltrans recommends that this alternative be reconsidered as the preferred alternative.

Permitting less growth in exurbs (such as the City) can reduce average trip length. Caltrans does not consider freeway widening, as identified on page 4.14-55, as appropriate mitigation as it encourages further vehicular travel and would not meet Caltrans goals to reduce VMT and greenhouse gas emissions. Caltrans recommends the City focus the Plan on mitigation through multimodal transportation improvements, instead of the proposed sprawl-inducing development. No amount of multimodal improvements would sufficiently offset the significant impacts to US 101 caused by such large-scale sprawl by the City.

These smart growth approaches are consistent with the Metropolitan Transportation Commission's (MTC) Regional Transportation Plan/Sustainable Communities Strategy goals of both increasing non-auto mode transportation, and reducing per capita VMT by 10 percent. Also, these would meet Caltrans Strategic Management Plan target of increasing by 2020 non-auto modes in tripling bicycle and doubling both pedestrian and transit. Please refer to "Reforming Parking Policies to Support Smart Growth," a MTC study funded by Caltrans, for sample parking ratios and strategies that support compact growth. Reducing parking supply can encourage alternate forms of transportation, reduce regional VMT, and lessen future traffic impacts on US 101 and the SHS.

***Traffic Impact Fees***

Given the project's contribution to area traffic and its proximity to US 101, the project should contribute fair share traffic impact fees. These contributions would be used to lessen future traffic congestion and improve transit in the project vicinity.

***Encroachment Permit***

Please be advised that any work or traffic control that encroaches onto the State ROW requires an encroachment permit that is issued by Caltrans. To apply, a completed encroachment permit application, environmental documentation, and five (5) sets of plans clearly indicating State ROW must be submitted to: David Salladay, District Office Chief, Office of Permits, California Department of Transportation, District 4, P.O. Box 23660, Oakland, CA 94623-0660. Traffic-related mitigation measures should be incorporated into the construction plans prior to the encroachment permit process. See this website for more information: [www.dot.ca.gov/hq/traffops/developserv/permits](http://www.dot.ca.gov/hq/traffops/developserv/permits).

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

Sincerely,



PATRICIA MAURICE  
District Branch Chief  
Local Development - Intergovernmental Review

- c: Scott Morgan, State Clearinghouse
- Robert Swierk, Santa Clara Valley Transportation Authority (VTA) – electronic copy
- Robert Cunningham, Santa Clara Valley Transportation Authority (VTA) – electronic copy