



June 17, 2020

To: Debby Fernandez

From: David J. Powers & Associates and Hexagon Transportation Consultants

**2200 Lawson Lane West Expansion Project
PLN2018-13593 (Rezone)
CEQ2018- 01064 (Addendum)**

This memorandum addresses the environmental issues raised in public comments received by the City of Santa Clara on the Addendum for the Lawson Lane West Campus Expansion Project.

Responses to Environmental Issues Raised in Public Comments

The Response to Comment A-2 was responded to prior to the April 8th Planning Commission Hearing. The A-2 comment and response are included in this memo for background information. Responses to these comments are discussed below.

Comment A-2: The analysis for the traffic impact due to this project is not adequate. This Lawson West Campus, Phase 1 plus Phase 2, is a very high density building by adding 1,445 parking spaces with a relative smaller land lot. Considering the adjacent high density office buildings such as Service Now's buildings plus the 3200 Scott Blvd building (6-story office plus 800+ parking spaces on the even smaller land lot), the proposed 2200 Lawson expansion project will have significant impacts on the local traffic, which is already very congested. Also, please note that Olcott Street, Lawson Lane, and other nearby streets impacted are all single lane roads. We didn't see the Addendum document has addressed the potential traffic jamming issues due to the very high density of parking spaces added to the neighborhood.

Response A-2: The Traffic Impact Analysis, completed by Hexagon in December 2019, analyzed traffic impacts associated with the proposed increase in office space on the project site. The results of the intersection level of service (LOS) analysis showed that none of the study intersections would be significantly impacted by the project. Five of the study intersections currently operate at an unacceptable LOS F and would continue to operate at this level with the project in place. The project traffic would increase the delay at these intersections, but the increase would be lower than the thresholds of significance adopted by the City and CMP (an increase in critical-movement delay of four or more seconds).

Additionally, as mentioned under Response A-1, the proposed project would comply with mitigation measures required by the 2013 Initial Study, which are listed below.

- As a condition of approval, the project will pay a fair share contribution toward improvement programs currently approved Tier 1 by the County of Santa Clara. Identified improvements for intersections and/or roadway segments which are listed as proposed mitigation and are not controlled by the City of Santa Clara, and are subject to financial contributions from Santa Clara, must complete the necessary environmental review and be certified by the Lead Agency with jurisdiction over the intersection/roadway in conformance with CEQA prior to the payment of fees toward those improvements.
 - San Tomas Expressway and Walsh Avenue: The significant impact at this intersection would be mitigated by adding a second left turn lane to both the east and west approaches. This improvement would reduce the average delay for vehicular traffic to acceptable levels (LOS E for expressway intersections) during the PM peak hour. The project applicant will pay a fair share contribution to the City towards their construction of the additional turn lane.
 - San Tomas Expressway and El Camino Real: The significant impact at this intersection would be satisfactorily mitigated by the addition of a second eastbound left-turn lane on El Camino Real. This improvement was identified by the City as part of their Capital Improvement Program (June 08). The project applicant will pay a fair share contribution to the City towards their construction of the additional turn lane. This improvement would reduce the average delay for vehicular traffic to an acceptable level (LOS E) during both the AM and PM peak hours.
 - San Tomas Expressway and Benton Street: This intersection's LOS would be improved by adding a fourth through lane to both the north and south approaches. The Comprehensive County Expressway Planning Study identifies the widening of San Tomas Expressway to eight lanes as a Tier 1A priority. This improvement would reduce the average delay for vehicular traffic to an acceptable level (LOS D) during the AM peak hour. The project applicant will pay a fair share contribution to the City towards the County's construction of the additional lanes.
 - San Tomas Expressway and Homestead Road: The significant impact at this intersection would be satisfactorily mitigated by adding a fourth through lane to both the north and south approaches. This improvement was identified as a Tier 1A priority in the Comprehensive County Expressway Planning Study. With the improvement, the intersection would operate at an acceptable level (LOS D) during the AM peak hour. The project applicant will pay a fair share contribution to the City towards the County's construction of the additional lanes.

Comment A-3: Response A-2 does not address the concerns as stated in Comment A-2. Comment A-2 states "We didn't see the Addendum document has addressed the potential traffic jamming issues due to the very high density of parking spaces added to the neighborhood." And the word "neighborhood" used here is referred to the adjacent area within 2000 feet from the project site (2200 Lawson Lane):

2200 Lawson to Owen Exit/Entrance on San Tomas: 0.11 miles (594.22 feet)

2200 Lawson to Owen and Olcott: 0.16 miles (851.59 feet)

2200 Lawson to Owen Exit/Entrance on Central Expressway: 0.20 miles (1072.09 feet)

2200 Lawson to Olcott and Scott: 0.30 miles (1564.11 feet)

As stated in Comment A-2, 1,445 parking spaces will be created from 2200 Lawson expansion projects (Phase 1 and Phase 2) and 800 more parking spaces will be made from the undergoing 3200 Scott construction, plus thousands of more parking spaces from Service Now building (either built or under construction) on both side of Lawson lane and the Santa Clara Square apartments nearby. Accumulatively, all the constructions (built, under construction and proposed expansions) will have significant impacts on the traffic in the immediate neighborhood and will make the congestions worse. For instances, the vehicles existing or entering Olcott street will have longer waiting time. Since both Olcott Street and are single-lane roads, vehicles existing from or entering to building on both roads will experience much longer delay; because of no traffic lights or stop signs at the “T” junction at Owen and Olcott. Also, the incoming traffic from both directions into Owen will take vehicles much longer time to turn either into west or east into Owen street, which is the essential route for those vehicles to travel either onto Central Expressway west bound or San Tomas Expressway south bound. As one of the impacted neighbors in this region, Newnex wanted to see traffic analysis and mitigation measures for the intersections and highway exits/entrances as described above. That is why we made Comment A-2.

Unfortunately, Response A-2 fails to address the concerns as stated in Comment A-2 since it pretty much just repeats what had been already stated in the Addendum document without containing new contents to answer questions raised in Comment A-2. For example, the four study intersections quoted in Response A-2 was old information from 2012 TIA report for approval of Phase 1 expansion of the project:

- San Tomas Expressway and Walsh Avenue
- San Tomas Expressway and Benton Street
- San Tomas Expressway and El Camino Real
- San Tomas Expressway and Homestead Road

Even for perspective of an old analysis, selecting those four intersections for study is not adequate due to the following reasons:

1. They are less relevant for study since they are not near the project site. The closest intersection (San Tomas and Walsh) is 0.5 miles away and the furthest intersection (San Tomas and Homestead) is 2.6 miles away. Two out of those four intersections (San Tomas and Benton, San Tomas and Homestead) were not even included in the newer 2020 TIA report.
2. Two out of the four intersections (San Tomas and Walsh, San Tomas and Benton) are not CMP intersection.

Based on what we stated above, we hereby request the project or developer to provide traffic analysis and mitigation measures for the intersections and highway exits/entrances in the impacted immediate neighborhood near the propose project site before city council adopts this expansion plan.

Response A-3: The study intersections selected in the 2008 EIR, 2013 IS/MND and 2020 Addendum were identified according to the VTA’s Transportation Impact Analysis Guidelines, which direct lead agencies to select intersections based upon the number of project trips estimated to travel through the intersections. Although the City selected a broad study area, not every street or intersection met the

minimum number of trips required to trigger an analysis. The study area was also reviewed by the City and the County.

The following describes the roadways and intersections identified by the Commenter:

Olcott and Scott: The project is not expected to add any trips to Olcott Street, and the added project trips on Scott Boulevard would be small in number (10 peak hour trips or fewer). Therefore, according the VTA guidelines, the signalized intersection of Olcott Street and Scott Boulevard was not studied. Based on the estimated project trips at the intersection, the project is not expected to substantially affect the operations of the intersection.

Owen and San Tomas; Owen and Central: Owen Street is a connector ramp to access southbound San Tomas Expressway and westbound Central Expressway. It is not signal- or stop-controlled at either end. There is an exclusive lane to access Owen Street from westbound Central Expressway and a merging lane to access southbound San Tomas Expressway from Owen Street. The existing peak-hour traffic volumes on eastbound Owen Street at San Tomas Expressway were 158 and 358 vehicles in the AM and PM peak hours, respectively. A two-way local street typically has a capacity of 900 vehicles per lane. Therefore, even with the added gross project traffic of 26 and 152 vehicles in the AM and PM peak hours, respectively, Owen Street would still operate adequately.

Owen and Olcott: At the Owen Street/Olcott Street intersection, the two-way traffic volumes on Owen Street under existing conditions were 393 and 595 vehicles in the AM and PM peak hours, and there is a two-way left-turn lane on Owen Street for traffic to turn to and from Olcott Street. The small amount of traffic with the added project trips (26 and 152 vehicles in the AM and PM peak hours, respectively) would not substantially degrade the intersection operations or substantially increase the delay on Olcott Street.