September 9, 2013

Kevin Riley
Director of Planning and Inspection
Planning Division
City of Santa Clara
1500 Warburton Avenue
Santa Clara, CA 95050

Re: **Comments to the 49ers Stadium Transportation and Management Operations Plan**

Dear Kevin:

Thank you for the opportunity to review the Draft Transportation Management and Operations Plan (TMOP) for the 49ers stadium on Tasman Drive in Santa Clara. This letter includes the comments to the DEIR from all departments within the City of Sunnyvale, including the Traffic and Transportation Division of Public Works, the Office of the City Attorney, the Department of Public Safety and the Planning Division of the Community Development Department.

Overall

We appreciate the attempt to address the many issues that can occur because of the stadium, and we appreciate being involved in the process of formation of the TMOP.

The TMOP should address the various events that will be held at the stadium. The obvious use of the stadium is for the 49er football games, but other uses include concerts and other large entertainment events, such as the impending Super Bowl. Events may be held during the week, on weekends, daytime and evening. Events may be held while Great America is operating, which could have a significant impact on parking resources.

The draft TMOP discusses how the 49ers can influence season ticket-holders about the best route to the stadium and where to park, but does not identify the responsible parties for other events.

In preparing a plan to handle any type of event at the stadium, the TMOP lays out the expectations for how traffic, parking, and transit pressures will be addressed. It should address all types of event, and should be expansive enough

to ensure the impacts on the surrounding, non-participatory neighborhoods are minimized.

The draft TMOP lists a hierarchy approach to control traffic and parking impacts. It describes minimal efforts used in the beginning, and more aggressive techniques that can be used if the prior attempt is not effective. Rather than a step-up approach as needs arise, the City of Sunnyvale strongly advocates aggressive measures at the start to prevent neighborhood problems and reduce resident concerns. We suggest the TMOP lead with an expanded effort, which could be scaled back if conditions warrant.

Parking

In reviewing the draft TMOP, the adequacy of parking is not certain. The EIR described a requirement for 19,000 parking spaces to meet the demand of a typical 49er football game. The EIR listed 40,000 spaces within a 20-minute walk of the station, and stated it is reasonable to assume half of those spaces would be available for stadium parking. The TMOP, however, shows a map of parking spaces available for events with far fewer parking spaces within a 20 minute walk.

The TMOP shows approximately 16,000 parking spaces, of which approximately 11,000 would be within the 20-minute walk circle. We understand the parking supply has not been finalized, but the parking shown is far below what is stated in the EIR. There are several reasons this is important:

- As mentioned in the EIR, the stadium cannot provide the parking necessary for NFL games or other large events. That means the burden of providing those spaces falls on surrounding areas.
- It is possible that a large event would be scheduled at a time Great America is in operation, which would decrease parking options.
- The TMOP shows approximately 5,000 parking spaces outside the 20-minute walking radius shown in both the EIR and TMOP.
- There are parking areas within the City of Sunnyvale <u>much</u> closer to the stadium than the 5,000 spaces outside the 20-minute walking zone. Stadium attendees will likely park as close to the stadium as possible, and where it is cheaper (or no cost). The industrial area on Reamwood Avenue in Sunnyvale is closer to the stadium than approximately 3,000 spaces south of the stadium near Highway 101.
- The stadium can easily be reached via the bike/pedestrian bridge over Calabazas Creek from the Sunnyvale residential neighborhood into the industrial area west of the stadium. This area is also closer to the stadium than many of the spaces near Highway 101.

Given the above factors, the possible lack of parking near the stadium in Santa Clara could impact areas in Sunnyvale which are easier to reach and closer than some parking identified in the TMOP. Our goal is to minimize the impact of overflow parking on Sunnyvale streets by ensuring that adequate parking will be provided near the stadium in Santa Clara.

Additionally, we understand that the 49ers have agreed that no weekday games (Monday or Thursday night) will be played in the first year. Is there the same restriction that other large events will not be held during the week? This is crucial since the majority of parking spaces are at existing Santa Clara business parks, where existing businesses are anticipated to have their parking available for event parking. Since parking for the stadium relies on surrounding businesses parks, assurance is needed that those parking resources will be available during those weekdays.

Action Requested

A. The TMOP should provide a contingency plan for how parking will be provided if the business park areas in Santa Clara cannot provide the necessary spaces.
B. The TMOP should exclude parking areas outside the 20-minute walking zone. Including those spaces goes beyond the assumption that the stadium has sufficient parking and will reduce pressure on the Stadium Authority to provide parking closer to the stadium. The Stadium Authority and City should require all parking for stadium events within a 20-minute walk, as discussed in the EIR.
C. The TMOP should provide provisions for assisting Sunnyvale in controlling parking in its jurisdiction. Items include:
    1. Provide funding to extend the sidewalk along Tasman Drive from Calabazas Creek to Reamwood Avenue. This will ensure safe access for any patron that attempts to park in the Sunnyvale industrial area.
    2. Provide contingency funding for implementation and maintenance of any future parking programs (e.g. permit parking) in the adjoining Sunnyvale neighborhoods which are necessary due to stadium events.
D. The TMOP describes event-related vehicle access restrictions and on-street parking restrictions on Reamwood Avenue, but this is an incomplete solution for several reasons. First, Reamwood Avenue leads to an industrial area where on-street parking restrictions would be difficult to enforce given that businesses have many visitors. While access to Reamwood Avenue could be controlled, it would be very easy for stadium attendees to exit Highway 237 onto Lawrence Expressway, turn left on Elko Drive and then right on any north/south road (including Reamwood Avenue) to walk down Tasman Drive to the stadium. The following options should be considered in the TMOP:

1. Provide additional traffic control at Elko Drive and Lawrence Expressway during events. Note: this would be very difficult to require during weekday events.
2. Extend the sidewalk along Tasman Drive past Calabazas Creek. Any parking in the Sunnyvale industrial area could result in pedestrians walking down Tasman Drive, where sidewalks are not consistently available, creating an unsafe condition (especially after events).

E. Work with Sunnyvale on methods to prevent event parking in the residential neighborhoods, especially those near the bridge over Calabazas Creek. Closing the bridge in the evenings may be feasible, but closing during the day would preclude use of the Calabazas Creek trail by the general public.

F. Discuss how weekday events would be managed given the existing uses that would be operating during those times.

Traffic Control

The EIR thoroughly discussed how to handle event traffic, and made some clear assumptions as a part of the review and subsequent findings. The EIR discussed how to control intersections in Sunnyvale, and described appropriate measures to include in the TMOP. These intersection controls would also serve to prevent parking in unwanted areas.

Traffic control is necessary to prevent neighborhood intrusion and needs to be a critical element of the TMOP. There are, however, inconsistencies between the Final EIR (FEIR) and the TMOP. The TMOP proposes a hierarchy approach to control neighborhood intrusion. As shown on page 29 of the draft TMOP, the first approach would be to use cones and signs to prevent attendees from using the neighborhoods for access and parking. The final solution would be to provide officer control at neighborhood entrances and to institute residential parking programs. The concern with this incremental approach is that it reacts to problems that may arise versus anticipating and does not proactively prevent problems from occurring at the onset.

The following recommended action items are suggested to ensure the traffic and neighborhood intrusion issues are addressed:

Action Requested

A. Revise the TMOP and begin with a maximum effort to prevent neighborhood intrusion, rather than one which starts minimally and gets more aggressive if the first attempt fails. This would improve the community confidence that their concerns are being fully considered. The TMOP should be monitored and could be adjusted over time should certain efforts appear unnecessary.

B. Correct the draft TMOP: Page 6 of the draft TMOP lists event-related access and on-street parking restrictions for streets near the stadium,

including Palamos Avenue, Sandia Avenue, Bridgewood Way and Wildwood Avenue, but Figure 2-1 (the next page) does not show restrictions at Palamos, Sandia or Bridgewood.

C. The FEIR responds to a question from the City of Sunnyvale with the following comment (Response J-36): "It is reasonable to assume that patrons will not find the Fairwood neighborhood a viable parking option. Nevertheless, to ensure the neighborhood is not impacted by game day traffic and parking, *the intersections of Lawrence Expressway and Palamos Avenue, Lawrence and Sandia Avenue, and Lawrence and Bridgewood Way would be officer controlled and monitored for residential intrusion control* (as shown in Figure 61 of the DEIR)." The TMOP must be consistent with the FEIR and include the above actions with the initial large event.

D. The Stadium Authority should be required to provide the funding and resources necessary to provide officer controls at intersections listed and any other measure necessary to control neighborhood intrusion, such as residential parking programs.

The City of Sunnyvale **strongly** suggests the TMOP not use a four-prong approach to neighborhood intrusion that begins with the least effort and ratchets up from there. We should provide neighborhoods with a clearly aggressive approach to traffic and parking controls to build positive stadium and community relations at the onset of operations.

Neighborhood Input

A key element for any successful program is good communication. We suggest the Stadium Authority conduct public meetings for the Sunnyvale community, particularly for those neighborhoods and businesses in proximity to the new stadium. These meetings would be an opportunity for the Stadium Authority to inform the community about the TMOP and stadium operations, and for the public to provide their ideas and concerns for consideration. While the City of Sunnyvale can assist with identifying target neighborhoods and businesses and widely promote the meetings, we see the most effective meetings as being those in which the Stadium Authority leads and dialogues directly with the community.

Action Requested

A. Develop a plan to inform the Sunnyvale community about the TMOP and stadium operations to include how and when public meetings will be noticed and held, and how outcomes will be addressed.

B. Work with the City of Sunnyvale in preparing a notification/mailing list for public meetings. We suggest at least two meetings- an evening meeting for residents and a daytime meeting for industrial property owners and tenants.

Transit Concerns

A key element of the TMOP's success depends on the use of alternative transportation to events. We understand that the City of Santa Clara and Stadium Authority have worked closely with VTA on maximizing the use and success of the light-rail system for events.

One key idea that relates to Sunnyvale would be that attendees would take Caltrain from San Francisco and the Peninsula to the Mountain View station and transfer to the light rail to arrive at the stadium. We assume the Caltrain and light rail schedules would be coordinated to assure the most efficient transfer of people between the two lines. This approach could work efficiently during weekend events, but how would that work during weekday events? We understand that the 49ers have agreed that no weekday games will be played in the first year, but is there the same assurance that other large weekday events will not be held?

Action Requested

A. Please clarify in the TMOP whether there will be *any* weekday events. If so, explain how typical commuter transit use would be handled if events occur during those times.
B. Explain the security measures that will be employed at the Caltrain and VTA stations. How will stadium ridership be controlled, especially on weekdays and after events?
C. Will the light rail line from Mountain View station be a non-stop line to the stadium? If not, extra security should be considered at the VTA stations in Sunnyvale. As an example, the Moffett Park light rail station has public parking for light rail users, but the lot is a part of a private business park site. Security measures should include monitoring the use of private lots by attendees.

Other Concerns

In reviewing the draft TMOP, we have several other questions and concerns. The bulk of this letter is to discuss the larger over-arching issues. Attached to this letter is a list of other items for which we would like consideration and/or feedback.

Conclusion

The City of Sunnyvale greatly appreciates the spirit in which the City of Santa Clara, the Stadium Authority and the 49ers have requested feedback on the draft TMOP. Our comments are provided with the overall objective of ensuring a positive relationship between the stadium and the adjoining Sunnyvale community. We are open to further discussion and look forward to the stadium's success. We remain confident that the success of the stadium will benefit all nearby communities and the entire Bay Area.

Thank you for your consideration in this matter. We request an opportunity to meet to follow up on the items listed in this letter. Please contact Andrew Miner, Principal Planner, at (408) 730-7707, if you have any questions or to set up a meeting.

Sincerely,

Hanson Hom
Director, Community Development Department

cc: Gary Luebbers, City Manager
Frank Grgurina, Director of Public Safety
Kent Steffens, Director of Public Works
Dayton Pang, Deputy Chief
Trudi Ryan, Planning Officer
Jack Witthaus, Transportation and Traffic Manager
Jennifer Garnett, Communications Officer
Carla Villarreal, Traffic Engineer
Andrew Miner, Principal Planner

Attachment

Page	Section	Section or Subsection Name	*Comments*
6	2.2.2	Avoid Intrusions into Residential Neighborhoods	*A short-term schedule for data collection should be done prior to the opening of the stadium.*
9	2.2.5	Ensure Safety	*Will the "unique identification number" be included in collision reports related to stadium traffic as well?*
10	2.2.9	Non-Permitted Parking	*Include weekday analysis*
17	4.1	Table 4-1: Potential Stadium Events	*The estimated attendance that classifies a "small event" is very vague ("500+"). See page 19, table 4-2 for different classification. Also, the estimated attendance for concert is 37,500, but table 4-2 lists three different concert sizes, from 55,000 to 20,000.*
17	4.1	Annual Events Calendar	*Specify approval process that will be required for each.*
19	4.4	Table 4-2: Anticipated Transit and Automobile Use for Events of Different Size	*Small event now defined as 10,000 attendance? See table 4.1 which notes attendance for small event as "50-500+". This needs to be more specific.*
21	4.4.3	Transit Access	*Where are these charter buses expected to be coming from?*
21	4.4.5	Pedestrian Access	*The TYPE of event should also be taken into consideration. At a concert there will likely be a large concentration of pedestrians when the concert ends. At an all-day event (e.g. a festival with the same number of attendees) there may be a lower concentration of pedestrians at any time, but will likely need longer pre/post event plans as people come and go throughout the day.*
22	4.4.6	Emergency Vehicle Access	*"Traffic control officers would be directed to prioritize emergency vehicle access through officer-controlled intersections during game day events" – How will they do this?*
25	5.1.1	Vehicle Ingress – Hours of Implementation	*Include weekday plan*
26	5.1.1	Directional Signage	*It states that 75% ofstadium patrons will have assigned parking lots to park in; is that 75% of 49er game attendees? What about other large events?*
31	5.1.1	Vehicle Ingress - Traffic Signal Timing/Phasing modifications	*"it may be occasionally necessary to prematurely terminate conflicting traffic phases at some intersections to facilitate...." this will have to be done through a pre-set timing plan and will not be able to change based on real-time conditions.*

32	5.1	Figure 5.1-3: Proposed Inbound Lane Configurations and Control	*This figure shows two officers listed at Adobe Wells/Tasman, but only one officer is listed on Page 30. Adobe Wells entrance is relatively narrow, and there will be no public access at this location. There are no marked crosswalks crossing Tasman and there are no VTA boarding islands. Only one officer should be necessary. Additional officer can be deployed to Reamwood/Tasman instead. This intersection has VTA boarding island with marked crosswalks crossing Tasman and left-turn pockets on two of the three approaches. Reamwood will be closed and U-turns are permitted from EB Tasman to WB Tasman.*
32	5.1	Figure 5.1-3: Proposed Inbound Lane Configurations and Control	*Lawrence/Tasman - two officers listed. Due to proximity to 237, recommending at least three officers during weekday games*
32	5.1	Figure 5.1-3: Proposed Inbound Lane Configurations and Control	*Since there no planned/street closures at Lawrence/Sandia, officers may not be necessary at this intersection. Rather deploy officers to Lawrence intersections with 101/237*
35	5.1.1	Vehicle Ingress - Traffic Control Center Coordination	*"Stadium will be used to manually manage traffic signal operations" - how will this be accomplished? Will there be intersections that will not get upgrades, that will be controlled from the Traffic Control Center?*
36	5.1.1.	Table 5.1-2: Encroachment Permit Needs	*Include "Signal Access" to signalized intersections within City of Sunnyvale jurisdiction*
38	5.1.1	Jurisdictional Permissions	*Include Sunnyvale*
40	5.1.1	Vehicle Ingress - Passenger Drop Off/Pick Up Areas	*This should include a plan for bus/taxi passenger loading and unloading at major transit centers, including the Mountain View, Sunnyvale, and Lawrence Caltrain Stations*
54	5.2	Coordination with Caltrain (and BART eventually)	*Police enforcement should be deployed to Caltrain stations to pedestrian crowds and intersections near the stations, especially on weekday events*
71	5.2.5	Caltrain	*Include Sunnyvale and Lawrence stations.*
71	5.2.5	Operations Plan	*"will hold trains for a short time (up to 15 minutes) to provide departure flexibility." Not likely to happen here. Not only are these not terminal stations, but the stadium is not within walking distance of the station.*
73	5.2.5	Train Size	*Platform length and parking availability will also limit capacity*
73	5.2.5	Access to Stadium	*Include Sunnyvale station*

73	5.2.5	Loading/Unloading/Schedule	*Include plan for bus/taxi loading and unloading at Sunnyvale and Lawrence stations. Also take into account loading/loading on weekday vs. weekend events*
100	5.5.2	Patron Parking Areas	*What about weekdays when a large part of those parking facilities are occupied by their tenants?*
107	5.5.2	Measures to Protect Property Owners	*Outreach to residential neighborhoods to see what they want to see implemented. Who would pay for a residential parking program?*
115	6.1.2	Area Businesses	*Where are the motorists who are vacating the premises supposed to go?*
General Comment	n/a	n/a	*Overall the plan emphasizes on the need for different plans based on the event size at the stadium; however there should be more emphasis on the effects of events based on the day of the week and the type of event. For example, Fig. 4-1 (p.23) shows the area of influence by event size, however the extents of this area may be different on weekday events, when commuter traffic is mixed with event traffic and shown parking areas are occupied by office tenants*
General Comment	n/a	n/a	*Data collection: data should be collected before stadium opens, after the beginning of the season (non-game days), on game-days (as noted). This will help measure the behavior of commuters once the stadium is open.*