



March 17, 2014

Yen Chen, Associate Planner
City of Santa Clara
Planning Division
1500 Warburton Avenue
Santa Clara, CA 95050

Re: Comments to Draft Environmental Impact Report for Monticello Village (Irvine Company)

Dear Yen:

Thank you for the opportunity to review the Draft Environmental Impact Report for the proposed mixed-use project at Lawrence Expressway and Monroe Street in Santa Clara. This letter includes all City of Sunnyvale comments to the project NOP.

A. Lawrence Station Area Plan:

The Cities of Sunnyvale and Santa Clara have worked jointly to create the context of the Lawrence Station Area Plan (LSAP). The plan area includes the area ½ mile from the Caltrain station, and includes the project site. A Technical Advisory Group (TAG) is included as part of the LSAP efforts to ensure applicable agencies are included in the discussion of the plan. Agencies include the City of Santa Clara, County of Santa Clara, VTA, ABAG and MTC, Caltrain and the Bay Area Air Quality Management District.

During the first phases of the LSAP preparation, the cities of Sunnyvale and Santa Clara would hold joint public outreach meetings to gain an understanding of the community's goals and expectations for the plan area. A key component of these community discussions was how to improve area-wide access to an underutilized train station. The Lawrence Caltrain station is difficult to reach because of a poor circulation pattern in the area. There is no bus access to the station due, in part, because of the poor road systems in the area.

The LSAP was created for two main purposes: create land use allowances to bring more activity to the station area, and to improve circulation in the area. Given the difficulty in providing new and improved roads, the expectations have been that future redevelopment of the area would provide opportunities to improve the circulation. The adopted first phase of the LSAP identified the poor access to the Caltrain station from as a key area to be addressed. Consequently, the circulation framework for the LSAP shows methods for improving circulation to the station and in the area in general. This circulation framework for the area south of the train tracks shows the need for a future road on the old Extreme Network site which would connect Nobili Avenue in Santa Clara to French Street in order to provide improved multi-modal access for the community to the Lawrence Caltrain station. Redevelopment of the site would provide the opportunity to meet the goals of the community and LSAP.

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The first phase of the Lawrence Station Area Plan was adopted by the Sunnyvale City Council in fall of 2011. The formal station plan and EIR are currently in preparation based on elements from the first phase. The plan adoption is expected later this year.

B. Project Description:

1. 3.8.5 Sustainable Development Features: Improving alternative access to major transit stops, such as Lawrence Caltrain station, is an important sustainable goal. While the addition of high-density housing near the station is a key element, providing improved access to the station to the community is also an important sustainable goal.

The proposed project has the opportunity to greatly improve access to the station by allowing a road to extend through the project site to access French Street at the north side of the site. Aligning a road with Nobili Avenue and running along the rear of the project would allow another point of access to the station.

The project, instead, maintains French Street as the only road to the station, a one-way street in the current location. The French Street location is severely hampered by the close proximity to Lawrence Expressway. This close proximity prevents a signal being placed at French Street and Monroe Street and reduces the transportation opportunities for the site.

The DEIR mentions the project's accessibility to multiple transportation modes, including on-site improvements and transit programs, but all programs being included will only address those that affect the project site. They do not improve access to the station from the surrounding community. A major element of the Lawrence Station Area Plan is to provide multiple modes of transit options in the area, which this project does not do.

B. 4.0 Environmental Impact Analysis:

1. 4.8.1 Introduction: The comment to the second bullet point that the project be analyzed within the context of the LSAP incorrectly states that the project site falls outside the LSAP. The LSAP boundary is a ½ mile radius from the Caltrain station, and the project site is approximately ¼ mile from the station. It is acknowledged that the policies of the LSAP will only affect property in Sunnyvale, but the initial concept of the LSAP was developed in conjunction with the City of Santa Clara, including the initial circulation framework that included a road connecting Nobili to French Street. This framework still shows the internal street layout through the project site.
2. 4.8.3.2 Local Plans: The Lawrence Station Area Plan (LSAP) is a local adopted plan that should be included in the description of local plans.
3. 4.8.4.3 Projected Impacts and Mitigation Measures, Impact LU-1: The proposed project would not physically divide an established community: While the project would not exacerbate the physical divide the project site creates by limiting access from the adjacent community, it also does not take advantage of the opportunity to improve the situation. Providing an internal road from Nobili Avenue to French Street would improve access from the surrounding

neighborhoods to the station for all types of transportation uses, including transit, cars, bicycles and pedestrian.

Also, the project is designed with a large footprint effectively spanning the entire site. Land use plans, including the LSAP, calls for large blocks to be broken into 300 foot lengths to allow for pedestrian access throughout the site and the avoidance of large, bulky developments. If the scaled plan on Figure 3.0-2 is accurate, the ground floor development extends over 900 feet across the site. Although this is not dividing an established community, it is preventing the entire site to feel like a part of the existing area since it is designed to look into itself, and not relate as much to the surrounding area.

4. 4.11.1 Introduction: The final bullet point on page 4.11-3 asks that a corridor progression analysis be performed on Lawrence Expressway traffic, and the response is that this type of analysis is not typically performed to evaluate the impact of new land use development projects. The City of Sunnyvale has included this type of study of the DEIR for the project known as "Landbank" at North Wolfe Road and Arques Avenue. Use of this technique could better characterize the traffic impacts of the Monticello project in this location.

Thank you for the opportunity to review the DEIR for the project. Please contact me at 408 730-7707 or aminers@sunnyvale.ca.gov if you have any questions or concerns about items discussed in this letter.

Sincerely,



Andrew Miner
Principal Planner, Community Development Department

cc: Hanson Hom, CDD Director
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