



Loma Prieta Chapter serving San Mateo, Santa Clara & San Benito Counties

June 21, 2016

Mr. Stephen Eimer
The Related Companies
via email <SEimer@Related.com>

Dear Mr. Eimer,

The Sierra Club Loma Prieta is pleased to note that the revised project recognizes

- the importance of a public park and open space in north Santa Clara.
- An MIP for traffic mitigation.

While we continue to maintain many of the other concerns expressed in our letters in response to the DEIR and study sessions, in this letter we would like to particularly focus on a few items that we believe need be addressed.

- Parking ratio and F.A.R. for Office Land Use
- a well defined goal for Transportation Demand Management
- Recognition of the probable need for a multi-modal station

1. Parking ratios and F.A.R. for Parcels 1&2

Transit Oriented Development (TOD) like City Place requires compact development to make transit attractive. Therefore, it is important to work to a **minimum FAR**, instead of maximum, in order to achieve density that allows transit to work, walk times to be short and shuttles to be fast and effective.

As an example, at Millbrae Station Area Specific Plan 2015 (See chart on pg 3)

- In TOD zone: minimum FAR 2.0 and maximum FAR 2.5.
- In Residential Mixed Use: min FAR 1.0; maximum FAR 2.0

At Parcels 1& 2 -both purely planned for office buildings, we strongly recommend:

1. Minimum FAR of 2.0 for office use - this collects the allowed maximum area into a smaller footprint, allowing buildings to be nearer to transit along the West side. It also opens up more open space along the East side for public use- for a green strip along the Guadalupe River.
2. No surface parking allowed in TOD. TOD developments, by definition, are pedestrian priority areas with ground space used for pedestrians. In TOD, no ground space should be wasted on asphalt auto parking lots. All parking should be accumulated into multi-level parking garages hopefully with green roofs with public or employee access.
3. Reduce parking ratio to 1.5 spaces/1,000 sf office. Providing an excess amount of parking encourages auto use.
 - **Encourages driving:** The current 3 spaces/ 1,000sf is almost one space per employee. The EIR calculates that, given the parking ratio, the project assumes 82% drive- alone. This is a higher drive-alone rate than the peninsula average of 74%.
 - **1,000sf office= 1,000sf garage:** Each parking space in a garage needs +/- 350sf. (see footnote on pg. 2) Therefore, the current 3 spaces/1,000sf means

1,050sf of parking garage for each 1,000sf of office.¹ This is not acceptable for TOD.

- **Empty garages= wasted land:** If TDM strategies actually are planned to work, the parking garages will be partially empty. This is a waste of construction dollars and priceless land.
- **Save millions in construction costs:** Since each parking space costs around \$60,000 in structured parking, with special foundations, building half as much parking results in a savings in Parcel 1 of \$130 million and in Parcel 2 of \$216 million.
- Open Space is priceless in Santa Clara: It also frees up land that can be collected for public open space - for a linear green zone along the river at Parcels 1&2.



Phase	Parcel #	sf	parcel acres	FAR	parking spaces	parking 3:1000sf/ \$60K	cost savings
ph 5	1	1,440,000	49.6	0.83	4,320	259 million	\$130 million
ph 6 (last)	2	2,592,000	60.9	0.88	7,776	466 million	233 million
ph 2A park	3	0	35				
ph 2,3,4	4	4,259,000	86.6	1.13			
ph 1	5	873,000	8	2.51			

¹ **Parking space in sf**

Area in sf required per parking space in a garage or parking lot.

See standards in diagram at end on pg.6:

60' x 9' x 15% structure space=594 sf for 2 spaces

That is 300 sf per space + ramps or access drives at 10% or 15% =

Each parking space requires 330sf to 350sf per space

Therefore

3 spaces per 1,000sf of office = 999sf to 1050sf of parking space per 1,000 sf office.

Parking fact #1: **3 parking spaces/1,000sf office = 1,000 sf parking garage**

Table 5.2 Page 57 of **Millbrae Station Area Specific Plan 2015**

Note that F.A.R. for TOD is **minimum 2.0** and maximum 2.5

Height limits are set by proximity to airport and flight paths.

TABLE 5-2. DEVELOPMENT STANDARDS BY PLANNING AND OVERLAY ZONE

	TOD	Residential Mixed Use	Employment Center / Light Industrial	Residential Overlay	Retail Commercial	Public Facilities
Height						
Height (Max.) [1]	See Figure 5-2, Height Limits					
Height (Min.)	2 stories	2 stories	2 stories	-	-	-
Ground floor Height (Min.) [2]	15'	15'	15'	-	15'	-
Baseline FAR and Residential Density						
Minimum FAR [3]	2.0	1.0	0.5	-	0.5	-
Maximum FAR	2.5	2.0	2.0	-	2.0	0.3
Maximum Residential Density (dwelling units per acre)	80 [4]	60 [4]	40 [4]	30	-	-
FAR and Residential Density if Community Benefits are Provided						
Maximum FAR if Community Benefits are Provided [5]	[6]	2.5	2.5	-	-	-
Maximum Residential Density if Community Benefits are Provided (dwelling units per acre) [5]	[6]	80 [4]	60 [4]	-	-	-
Setbacks						
Front Setback	See Section 5.3. (Street-Based Frontage)					
Minimum Interior Setback (side, rear)	5'	5'	10'	10'	-	N/A
Minimum Required Publicly Accessible Open Space (% of Lot Area) [7]	10%	10%	10%	10%	10%	N/A
Minimum Percentage of Total Number of Residential Units to be Affordable Housing for Very Low, Low, and Moderate Income Households [8]	15%	15%	15%	15%	N/A	N/A
Utility Infrastructure [9]	See Chapter 8					
<p>NOTES:</p> <p>[1] Heights must be compatible with the San Francisco International Airport Land Use Compatibility Plan. Minor adjustments that pertain to building height increase within the maximum height range of 108 to 121 feet are also subject to compatibility and consistency determination with the Airport Land Use Compatibility Plan (ALUCP).</p> <p>[2] Measured floor plate to floor plate.</p> <p>[3] Community Benefits are required if the Baseline Minimum for FAR is not met. See Chapter 10 for Community Benefits Program.</p> <p>[4] Dwelling units count towards FAR</p> <p>[5] Community Benefits are required if the development proposes to exceed the Baseline Maximum FAR or Residential Density. See Chapter 10 for Community Benefits Program.</p> <p>[6] Maximum FAR and Residential Density if Community Benefits are provided in the TOD zone are determined by height limits and setbacks.</p> <p>[7] Open Space shall be calculated as the Gross Lot Area multiplied by the required Open Space Ratio.</p> <p>[8] Affordable housing requirement shall be compatible with applicable law and implemented through an agreement negotiated with the City.</p> <p>[9] All development projects shall install recycled water facilities for irrigation and provide connections to the City's fiber optic network as described in Chapter 8.</p>						

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Highlight All Match Case 2 of 2 matches



Office complex with waterfront public green zone and Bay Trail at Redwood City

2. TDM in MCP Supplement is lacking a critical item- a goal.

The one item that is missing in the MIP and TDM is the goal - this is critical, otherwise the consultant has no guidelines to design options to change existing behavior..

For example:

1. A drive alone goal of 82% (per currently EIR) - means a steady growth of auto traffic as buildings come online, TDM is oriented towards increasing auto capacity and also to address the 18% of alternate modes. However, traffic will become untenable as cars are added to already congested freeways & roads.
2. A drive- alone goal of 67% (25% reduction in drive alone rate) - This will give the MIP study consultants a target to design strategies and distribute TDM dollars appropriately between transportation modes with focus shifting to more dollars being used for alternative modes.
3. A drive -alone goal of "no net new auto traffic"² - This could result in a different distribution. As new leasable buildings come online, and no additional autos are added, the drive-alone % will keep decreasing relative to the total number of trips, while the alternate mode share will need to keep increasing. No (or relatively few) dollars go towards road widening or freeway alterations to increase auto capacity. Instead dollars are channeled towards infrastructure that supports other modes.
4. A goal of zero drive alone (as in Venice), for example, would have a completely different set of strategies.

This is to clarify that setting a goal changes the strategies that are prioritized and allocates expenditures differently for most effective use of funds.

It also allows the MIP to arrive at preliminary budget estimates giving cost comparisons for different strategies needed to achieve the goal.

3. Recognize need for a multi-modal station

A gateway to the project will increasingly be by transit. Therefore, the MCP should include the following:

- Indicate possible need for a multi-modal joint train station at intersection of Tasman and Lafayette for VTA and ACE/Capital Corridor
- Indicate zone to be provided for shuttles - stacking and waiting
- Plan for drop off and pick up space for car-share & taxi services near station
- Bike share and storage or valet

This multi-modal entry point will be a GATEWAY as an increasing number of visitors and employees will enter here over time, as pedestrians using transit.

² This was the goal set by Mountain View for North Bayshore area. See [Final TDM Plan for North Bayshore](http://www.mountainview.gov/civicax/filebank/blobdload.aspx?BlobID=15164) (<http://www.mountainview.gov/civicax/filebank/blobdload.aspx?BlobID=15164>)

Millbrae Station Area Parking Standards:

Page: 94 of 192 130% Zoom

TABLE 5-4. MINIMUM OFF-STREET PARKING REQUIREMENTS

Land Use	Parking Ratios	
	Transit-Oriented	General
Office	(within 800' of station) 1.5 spaces per 1,000 gsf [1]	2.5 spaces per 1,000 gsf
Hotel	(within 800' of station) 0.4 space per room	1 space per room
Residential	(within 600' of station) 1 space per unit	1.25 spaces per unit
Restaurant	(within 600' of station) 5.0 spaces per 1,000 gsf	6.5 spaces per 1,000 gsf
Retail	(within 600' of station) 1.5 spaces per 1,000 gsf	3 spaces per 1,000 gsf

Source: Fehr & Peers, 2015; Metropolitan Transportation Commission, 2007; Contra Costa County Board of Supervisors, 1998; City of Millbrae, 1998.
 [1] Gsf = Gross square feet
 [2] "Station" is the Millbrae BART/Caltrain Station as shown on Figure 1-2, Millbrae Specific Plan Area.
 [3] The maximum amount of parking provided shall not be greater than five percent more than the minimum off-street parking requirements (for retail uses, 10 percent more than the minimum) as set out in this table unless, based on a parking study, the project sponsor demonstrates that additional parking is required because of the specific nature of the proposed land use, or prevailing parking demand at the Millbrae Station.

BIKE PARKING REQUIREMENTS

Bicycle parking generally falls into two categories: long-term (Class I) and short-term (Class II). Long-term bicycle parking serves parking needs of longer than two hours and is used by bicyclists who prioritize greater security and protection from the elements. Short-term bicycle parking serves parking needs of shorter than two hours and is used by bicyclists who prioritize convenience and accessibility.

Long-Term Bicycle Parking

Long-term bicycle parking offers a secure and sheltered facility for an extended period of use. The provision of high-quality long-term bicycle parking has been shown to increase bicycle mode share among individuals who might otherwise be discouraged for fear of theft or exposing their bicycle to the elements.

Long-term bicycle parking can be provided in a number of different forms, including bicycle rooms or cages, bicycle stations, and bicycle lockers. There are a wide variety of possible site plan layouts for long-term bicycle parking facilities, and all should focus on ensuring the safety of users and maintaining exclusive and easy access to the area.

Long-term bicycle parking should have:

parking ratio Highlight All Match Case

Santa Clara City Place Parking Standards

61 of 272 150%

TABLE 3-3: CITYPLACE PARKING SUPPLY REQUIREMENTS

Land Use	City Place Parking Supply Rate
Residential	1.5 per unit
Retail	4.5 per 1,000 sq.ft.*
Office	3.0 per 1,000 sq.ft.
Restaurants	1.5 per 1,000 sq.ft.*
Entertainment	2.5 per 1,000 sq.ft.*
Hotel	1.0 per room

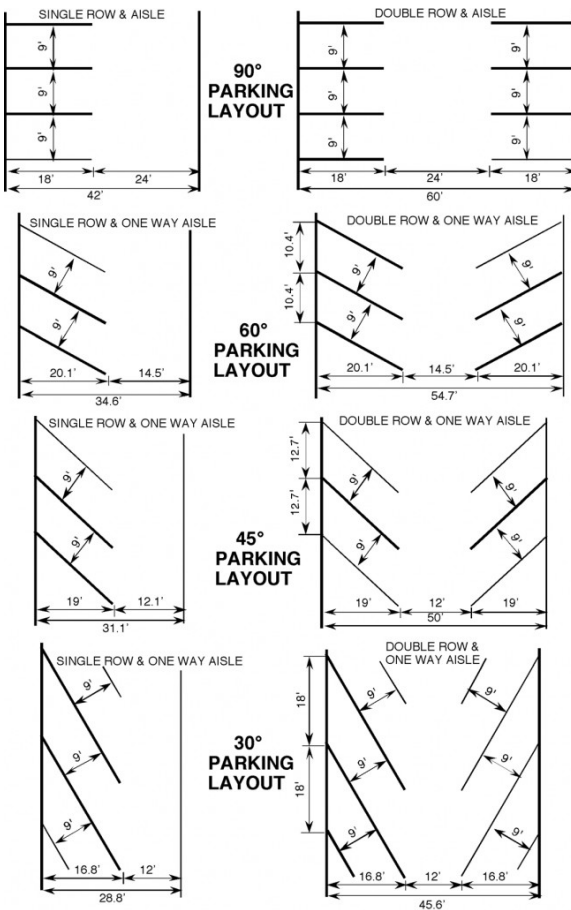
*Additional parking spaces would be shared with adjacent land uses.

* Reference Appendix 3.3 F Travel Demand Model Validation of the EIR for full parking analysis.

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Current link between Lafayette & Tasman streets is unsafe at Tasman



Parking standards - dimensions