

**RESPONSES TO COMMENTS ON THE CITY-OWNED DOWNTOWN AFFORDABLE  
HOUSING AND PARKING GARAGE SITE**  
**GENERAL PLAN CONFORMANCE TRANSPORTATION ANALYSIS**  
**PA19-033**

**I. INTRODUCTION**

This memorandum addresses the issues raised in public comments received by the City of San Mateo on the General Plan Conformance Transportation Analysis report prepared for the proposed “City-Owned Downtown Affordable Housing and Parking Garage Site” project.

**II. BACKGROUND**

The project involves redevelopment of two City-owned properties into 225 affordable housing residential apartments (480 East 4th Avenue) and a separate above-grade 696-space parking garage (400 East 5th Avenue). The project site is currently used as surface parking lots and are operated by the City as part of the overall Downtown parking supply. The project requires a Site Plan and Architectural Review (SPAR) for demolition of the existing improvements and the construction of a new seven-story residential building and five-level parking garage. In addition, the project requires a Site Development Planning Application (SDPA) for the removal of major vegetation including heritage trees and a Special Use Permit (SUP) for the parking garage.

The Initial Study/Environmental Assessment and draft Mitigated Negative Declaration (MND) were circulated for public review for 30 days, from May 26, 2020 through June 24, 2020. A separate memo addressing public comments pertaining to the IS/EA and draft MND was prepared for inclusion in the staff report packet. This memorandum addresses public comments received on the transportation study evaluating the project’s effects on intersection delay, which are outside the scope of CEQA, as explained in more detail in the following section.

**III. SENATE BILL 743**

SB 743 establishes criteria for determining the significance of transportation impacts using a vehicle miles traveled (VMT) metric intended to promote the reduction of GHG emissions, the development of multimodal transportation networks, and a diversity of land uses. Specifically, SB 743 requires the replacement of automobile delay—described solely by level of service (LOS) or similar measures of vehicular capacity or traffic congestion—with VMT as the recommended metric for determining the significance of transportation impacts. The Governor’s Office of Planning and Research (OPR) approved the California Environmental Quality Act (CEQA) Guidelines implementing SB 743 on December 28, 2018. Local jurisdictions are required to implement a VMT policy by July 1, 2020.

The City has traditionally used level of service or LOS (i.e. vehicle delay or congestion) as the basis for determining a project’s traffic impacts. However, with the passage of SB 743 and the adoption of related Guidelines implementing SB 743 (see Guidelines Section 15604.3), the City’s approach to evaluating project traffic impacts under CEQA must change. SB 743, amending state law (CEQA), takes precedence over the City’s General Plan, and now requires that LOS no longer be used after December 28, 2018. Upon the December 28, 2018 effective date of the new Guidelines, this project’s LOS traffic impacts (i.e. increased vehicle delay) are required to be considered insignificant under

CEQA. The relevant question under CEQA, as amended by SB 743, is whether any physical roadway improvements required of a project to maintain or restore acceptable LOS conditions would have negative environmental consequences from construction or operation of the modified roadway.

#### **IV. GENERAL PLAN CONFORMANCE ANALYSIS**

Hexagon Transportation Consultants, Inc. completed a General Plan Conformance Transportation Analysis for the project, in accordance with City requirements.

#### **V. RESPONSE TO PUBLIC COMMENTS RECEIVED ON THE GENERAL PLAN CONFORMANCE TRANSPORTATION ANALYSIS**

One comment letter on the General Plan Conformance Transportation Analysis was received during the public comment period. The comments raised on the General Plan Conformance Transportation Analysis do not raise specific environmental issues related to the adequacy of the Initial Study/Environmental Assessment. Responses to the issues raised in the comment letter are provided below for informational purposes. The comment letter is also attached to this memo.

##### **A. Peter Mandle, June 23, 2020**

**Comment A.1:** What is the plan for replacing the existing on-street parking spaces along 5th Avenue which are to be removed to allow for the recommended physical improvements/traffic remediation?

**Response A.1:** The recommended physical improvement would result in the removal of approximately 22 on-street parking spaces (9 marked on-street parking space west of Claremont Street, and approximately 320 feet or 13 vehicles spaces east of Claremont Street). Parking stalls are not environmental resources, they are physical features to accommodate vehicle trips to/from a site or that exist in the public right-of-way to support adjacent land uses. Parking supply was removed from the CEQA Appendix G Checklist as an impact topic for analysis in the prior decade.

The project proposes to construct a 696-space parking garage. In addition to providing parking for the residential component (164 spaces), the parking garage would provide 298 new parking spaces for the downtown and thereby adequately replacing the 22 lost on-street spaces.

**Comment A.2:** How many on-street spaces adjacent to the site will be converted into a loading zone (as recommended by Hexagon Consultants)? Where will the replacement spaces be located?

**Response A.2:** As indicated in the General Plan Conformance Transportation Analysis report, the project site should provide one loading zone, consistent with City of San Mateo Municipal Code Section 27.64.390. The site plan does not indicate a loading zone. However, the municipal code (Section 27.64.390 a1) allows the Development Review Board to modify the loading requirements if there is adequate on-street parking along the project frontage to accommodate a loading vehicle. The residential building is surrounded by on-street parking spaces along its building frontage on 4th Avenue, 5th Avenue, and Claremont Street. Therefore, there are

opportunities to create an on-street loading zone. Creation of the loading zone would result in the loss of approximately two regular on-street parking spaces. Any lost on-street parking would be adequately replaced by the 298 new parking spaces to be provided by the proposed parking garage.

**Comment A.3:** 3. How will the proposed traffic remediation (adding a left turn lane, creating two travel lanes, and removing on-street parking along 5th Avenue) avoid interfering with operation of the Bike Lane along 5th Avenue?

**Response A.3:** There appears to be sufficient right-of-way to accommodate the recommended improvements and the proposed bike lanes through the removal of on-street parking.

**Comment A.4:** How will project-generated traffic avoid interfering with the operation and safety of the planned Bike Boulevard to be located along Claremont Avenue?

**Response A.4:** The project is reducing the number of driveways on Claremont Street from two to zero along its project frontage. Eliminating mid-block turning vehicles would minimize vehicle-bicycle conflicts and would improve bicycle safety.

Vehicular traffic is expected to share the road with bicycles on bicycle boulevards.

**Comment A.5:** How does improving traffic operations on 5th Avenue and at a single intersection result in improved traffic operations throughout downtown/at the other intersections shown to operate at unsatisfactory levels of service under future conditions with project-related traffic? Please expand upon and provide further documentation supporting the statement in the Hexagon Consultants report indicating that the recommended physical improvements (i.e., re-striping eastbound 5th Avenue to create two through lanes) would “eliminate gridlock issues observed in downtown San Mateo” and “eliminate substantial increase in intersection delays at the El Camino Real intersections (at 3rd, 4th, and 5th Avenues) and at the Humboldt/3rd Avenue intersection

**Response A.5:** Micro-simulation models were used to simulate traffic conditions along the downtown corridors under all study scenarios. The simulations found that under background plus project conditions, the project generated outbound traffic would result in long queues on eastbound 5th Avenue that would extend into the upstream intersections, causing simulated gridlock conditions in downtown, resulting in substantial increases in delays at five intersections. The simulations also found that by allowing more throughput on eastbound 5th Avenue at the Claremont Street intersection and providing more queuing space on eastbound 5th Avenue between Claremont Street and Delaware Street (through the addition of a dedicated left-turn lane), the project-generated queuing issue could be resolved, eliminating the substantial increases in intersection delays at intersections that were affected by the queuing issue.

**Comment A.6:** How does the developer plan to address the shortage of day-time residential parking described in the report prepared by Hexagon Consultants?

**Response A.6:** The residential project is an affordable housing project and qualifies for the State Density Bonus Law parking requirement of 0.5 space per unit. Therefore, the project proposing 225 residential units would be required to provide 113 parking spaces. The project is proposing 164 spaces, which would meet the parking requirement.

As noted in the comment, Hexagon's analysis determined that the project would generate a peak demand of 180 parking spaces, which exceeds the 164 spaces to be restricted for the residential component. However, the parking garage would remain open to the public overnight and could be used by future residents to meet additional residential parking demand. It would be expected that these vehicles would vacate the garage in the early morning hours before free parking ends. Since the parking garage would be located on the periphery of downtown, it is assumed that it would not be as heavily utilized as the more centrally located garages and could accommodate the unmet residential demand of 26 vehicles within the 532 public parking spaces during the evening hours when residential parking demand peaks.

In addition, the project would implement a Transportation Demand Management (TDM) program to facilitate residents using alternative modes of transportation and to encourage forgoing vehicle ownership. The project's TDM plan includes measures such as encouraging walking and transit use through building design and orientation, car sharing programs, provision of SamsTrans bus passes, on-site bicycle repair station, transportation information kiosk/board, promotional programs to ensure new tenants use available transportation options, and a designation of TDM Coordinator.

## **Appendix A: General Plan Conformance Transportation Analysis Comment Letters**

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**From:** Phillip Brennan  
**To:** Natalie Noyes  
**Cc:** Charity Wagner  
**Subject:** FW: MidPen Housing & Garage - General Plan Traffic Analysis  
**Date:** Tuesday, June 23, 2020 6:32:37 PM  
**Attachments:** [image001.png](#), [image013.png](#), [image014.png](#), [image015.png](#), [image016.png](#), [image017.png](#), [image018.png](#)

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Hi Natalie,

I received this inquiry today (see correspondence below) regarding the General Plan Conformance Traffic Analysis. I know it's not part of the CEQA related analysis but let's talk about coordinating a response when we talk this Thursday.

Best-  
Phillip B.

Phillip Brennan  
Associate Planner | Community Development Department  
330 W. 20th Ave., San Mateo, CA 94403  
650-522-7218 | pbrennan@cityofsanmateo.org



**From:** Peter Mandle <peter.mandle@gmail.com>  
**Sent:** Tuesday, June 23, 2020 2:43 PM  
**To:** Phillip Brennan <pbrennan@cityofsanmateo.org>  
**Subject:** MidPen Housing & Garage - General Plan Traffic Analysis

Hi Mr. Brennan:

I had the questions listed below regarding General Plan Traffic Analysis Conformance for the MidPen Housing & Garage Plan. Should these questions be submitted to you, the developer, or someone else? Thanks for your help.

1. What is the plan for replacing the existing on-street parking spaces along 5<sup>th</sup> Avenue which are to be removed to allow for the recommended physical improvements/traffic remediation?
2. How many on-street spaces adjacent to the site will be converted into a loading zone (as recommended by Hexagon Consultants)? Where will the replacement spaces be located?
3. How will the proposed traffic remediation (adding a left turn lane, creating two travel lanes, and removing on-street parking along 5<sup>th</sup> Avenue) avoid interfering with

operation of the Bike Lane along 5<sup>th</sup> Avenue?

4. How will project-generated traffic avoid interfering with the operation and safety of the planned Bike Boulevard to be located along Claremont Avenue?
5. How does improving traffic operations on 5th Avenue and at a single intersection result in improved traffic operations throughout downtown/at the other intersections shown to operate at unsatisfactory levels of service under future conditions with project-related traffic? Please expand upon and provide further documentation supporting the statement in the Hexagon Consultants report indicating that the recommended physical improvements (i.e., re-striping eastbound 5th Avenue to create two through lanes) would “eliminate gridlock issues observed in downtown San Mateo” and “eliminate substantial increase in intersection delays at the El Camino Real intersections (at 3rd, 4th, and 5th Avenues) and at the Humboldt/3rd Avenue intersection.
6. How does the developer plan to address the shortage of day-time residential parking described in the report prepared by Hexagon Consultants?

Regards,

Peter

478 Fairfax Avenue

San Mateo, CA

Regards,

Peter

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