



March 11, 2016

City of Morgan Hill
Community Development Department
17555 Peak Avenue
Morgan Hill, CA 95037-4128

Attention: John Baty

Subject: Morgan Hill 2035 General Plan Update

Dear Mr. Baty:

Santa Clara Valley Transportation Authority (VTA) staff have reviewed the Draft EIR (DEIR) for a comprehensive update to the City of Morgan Hill General Plan. We have the following comments.

DEIR and Draft General Plan - Land Use and Alternatives Analysis

In VTA's comment letter on the Notice of Preparation (NOP), VTA supported "Alternative C" presented in the *Morgan Hill 2035 Growth Alternatives Evaluation*. This alternative, which "proposes the most residential and non-residential development in the urban core," (*Growth Alternatives*, p. 54) was shown in the transportation analysis to result in the lowest vehicle miles traveled per capita (p. 120) and the greatest increase in transit ridership (p. 131) among the alternatives studied. This alternative is consistent with the VTA Community Design & Transportation (CDT) Program Cores, Corridors and Station Areas framework, which shows VTA and local jurisdiction priorities for supporting concentrated development in the County, and identifies Downtown Morgan Hill as a "Local Core." The CDT Program was developed through an extensive community outreach strategy in partnership with VTA Member Agencies, and was endorsed by all 15 Santa Clara County cities and the county.

The Preferred Alternative presented in the Draft General Plan and DEIR appears to be closer to Alternative C than Alternatives A or B, in terms of jobs/housing balance, ratio of multi-family to single-family housing units, and concentration of mixed use and medium- to high-density residential uses near existing transit services along Monterey Street and near the Morgan Hill Caltrain Station. The City's advancement of this Preferred Alternative is consistent with VTA's previous comments supporting Alternative C.

The DEIR also includes an analysis of Alternatives to the Proposed Project (DEIR, Chapter 6), including "Low Growth" and "Compact Development" Alternatives. Of the project alternatives presented, the Proposed Project includes the greatest increase in jobs as compared to housing development, which would improve Morgan Hill's jobs/housing balance and could thereby

reduce the City's overall vehicle miles traveled per service population. VTA encourages the City to work with project applicants to increase development densities near existing transit services along Monterey Road and near the Caltrain station, consistent with the Compact Development Alternative, while still retaining opportunities for employment development consistent with the Proposed Project.

DEIR - VMT Analysis

VTA supports the City's progressive approach to transportation analysis in the DEIR, including the vehicle miles traveled (VMT) analysis provided for informational purposes, consistent with recent state legislation (p. 4.14-41). VTA is pleased that the VMT analysis shows that the 2035 General Plan would result in lower VMT/Service Population than Existing Conditions.

DEIR - Freeway Analysis

The DEIR identifies significant impacts to seven directional segments of US 101, based on Congestion Management Program (CMP) criteria. The DEIR notes in Mitigation Measure TRAF-2 that, "A fair share contribution from the City of Morgan Hill towards freeway improvement costs is an acceptable mitigation measure. However, the City of Morgan Hill does not have a funding strategy in place to contribute towards regional improvements. City representatives should work collaboratively with San Jose, Gilroy, Santa Clara County, counties to the south (Monterey, San Benito, and Merced Counties), the Valley Transportation Authority, and Caltrans to prepare and develop a funding strategy for South County roadway improvements." (p. 4.14-55)

VTA agrees that contributions towards freeway improvements (in particular, the US 101 Express Lanes project) would be an acceptable mitigation measure, and would be open to developing a funding strategy in collaboration with the City of Morgan Hill and other parties, as described in the mitigation measure. However, VTA also notes that voluntary contributions to regional transportation improvements can be included as mitigation measures in CEQA documents even in the absence of a comprehensive funding strategy as described. VTA notes that certain Cities in Santa Clara County have included such mitigation measures, which were executed via ad hoc funding agreements between the City and VTA, triggered when the project applied for a building permit or other approval milestones.

VTA requests that the City strengthen Mitigation Measure TRAF-2 by including a commitment that the City will make every effort to negotiate with project applicants to provide voluntary contributions to regional transportation improvements identified in VTP 2040/Plan Bay Area on the impacted freeway or parallel corridors in the interim period before the adoption of a funding strategy as described in the mitigation measure.

DEIR - Transportation Impact Analysis (TIA) Report

VTA's Congestion Management Program (CMP) requires a Transportation Impact Analysis (TIA) for any project that is expected to generate 100 or more net new peak-hour trips. VTA's understanding is that this General Plan Amendment does not grant a specific development entitlement and therefore a CMP TIA is not required at this time (per Section 2.2 of the *TIA Guidelines*). It is our understanding that future specific developments within the project area would require separate discretionary approvals, and therefore would require CMP TIAs at that time. The October 2014 VTA *TIA Guidelines*, which can be found at <http://www.vta.org/cmp/tia-guidelines>, include updated procedures for documenting auto trip reductions, analyzing non-auto modes, and evaluating mitigation measures and improvements to address project impacts and effects on the transportation system. For any questions about the updated *TIA Guidelines*, please contact Robert Swierk of the VTA Planning and Program Development Division at 408-321-5949 or Robert.Swierk@vta.org.

DEIR and Draft General Plan - Transportation Demand Management/Trip Reduction

VTA recommends including goals and policies related to Transportation Demand Management (TDM) programs in the General Plan, such as incentivizing or requiring employers and residential developments to adopt TDM programs to reach specific vehicle trip or vehicle miles traveled reduction goals, which would help mitigate associated Transportation and Air Quality impacts identified in the DEIR. TDM programs could be made more effective by including a specific target, monitoring, an enforcement component, and a requirement for future developments to participate in a Transportation Management Association (TMA). In addition, VTA recommends that the TDM programs include financial incentives for non-automobile travel such as transit fare incentives, parking cash out or parking pricing.

Draft General Plan – Roadway Connectivity

The updated Transportation Element does not identify new east-west crossings of US 101. VTA recommends that new crossings be considered as a priority to provide additional east-west travel options, increase network connectivity and improve bicycle and pedestrian access across the freeway. New crossings could also reduce congestion at existing US 101 interchanges by diverting local traffic away from freeway facilities. As such, VTA recommends that the City of Morgan Hill consider one or more potential east-west crossings of US 101 to improve connectivity: Maple Avenue, Diana Avenue, Half Road, San Pedro Avenue, and Fisher Avenue.

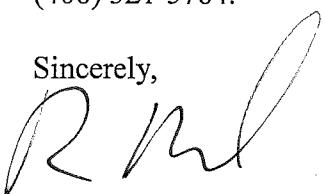
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Thank you for the opportunity to review this project. If you have any questions, please call me at (408) 321-5784.

Sincerely,

A handwritten signature in black ink, appearing to read "R Molseed".

Roy Molseed
Senior Environmental Planner

cc: Patricia Maurice, Caltrans
Brian Ashurst, Caltrans

MH1501