

DEPARTMENT OF TRANSPORTATION

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May 14, 2004

SCR-001-var
SCH 2004042081

Juliana Rebagliati
Redevelopment Agency
City of Santa Cruz
809 Center Street
Santa Cruz, CA 95060

SUBJECT: Coast Hotel Notice of Preparation

Dear Ms. Rebagliati:

The California Department of Transportation (Department) District 5 has reviewed the Notice of Preparation (NOP) for the proposed Coast Hotel redevelopment. The project site is located in the Beach/South of Laurel Area. Regional access will be obtained from both State Routes 1 and 17. The project will increase the number of rooms by 105 and construct a 1000-seat conference center. District 5 staff offers the following comments for your consideration:

- 1) The initial study, section 15, transportation/traffic appears to focus on local intersections and streets and the specific planning area of Beach and South of Laurel. This project by its very nature will be an attractor of regional and interregional trips. These trips will use either State Route (SR) 1 or 17 or both. This project's traffic analysis must provide a thorough level of service and operational analysis upon these highways. Both facilities experience heavy congestion. SR 1 (freeway) is the subject of current widening project. The 1/17 interchange is also the subject of an improvement project. The SR 1/9 intersection is the subject of an project initiation document, which remains unfunded. SR 1 (Mission St) recently received treatment within the City's Master Transportation Plan and certain improvements were identified therein. The traffic study must include project impact analysis and mitigation requirements for all of these facilities.
- 2) The Department is responsible for the safety, operations, and maintenance of the State highway system pursuant to the California Streets and Highways Code. The Department and the City have acknowledged previously differences in LOS policies, standards and impact thresholds. While it is appropriate to apply the City's standards to City roadways, the Department's LOS policies should be used in the traffic analysis to determine the significance of the project's traffic impact to the State highway system. Nor should the City's 3% ratio theory of traffic impact threshold be applied to state facilities analyses. This would include local intersections which lie upon SR 1 (Mission St). Our Department endeavors to

maintain a target LOS at the transition between LOS C and LOS D (i.e. not worse than LOS C) on State highway facilities.

- 3) To mitigate this project's cumulative traffic impacts upon the State highway system, the City should condition the applicant to pay a "fair share" towards the cost of the SR 1 project, the SR 1/17 interchange/merge lane project, the SR 1/9 intersection project and Mission St improvements as appropriate by sound and reasonable cumulative analysis. The payment of a "fair share" contribution towards these improvements should render the project's contribution to less than cumulatively considerable levels in accordance with Section 15064 of the California Environmental Quality Act (CEQA) Guidelines.

Since this "fair share" fee is specifically intended for a State highway improvement, proof of payment of this fee should be provided to the District 5 Development Review Branch as part of the project's mitigation monitoring program. The amount and method used to calculate this "fair share" should be made in consultation with District 5 staff and SCCRTC.

- 4) Methodology: Analysis performed upon the State highway system should be consistent with the current version of the Highway Capacity Manual. The Draft EIR technical appendix for traffic should include these calculations and be available for review with the DEIR.

We also encourage the City to establish a pro-rata share program for regional highway improvements that all development projects will participate in. Such a program would assist development mitigation requirements. For State highway impacts, the basis of the program could be the City's Master Transportation Plan and the highway projects discussed in this comment letter.

If you have any questions, you may call me at (805) 542-4751.

Sincerely,

Chris Shaeffer
District 5 Development Review Branch

cc: Sean Co, SCCRTC;
David Murray; Roger Barnes: Caltrans District 5

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