3.13 Transportation

3.13.1 Environmental Setting

This section addresses potential impacts of the proposed project on transportation. CEQA issues evaluated include the following: consistency with plans, ordinances, and policies governing the circulation system; vehicle miles traveled (VMT); hazards from geometric design features; and emergency access. The section first describes the existing environmental setting for transportation facilities and the applicable regulatory framework, then describes the approach to the analysis and evaluates the potential transportation impacts of project construction and operation. Feasible mitigation measures are identified to avoid or reduce potentially significant impacts.

The information in this section is based primarily on the Transportation Analysis for the proposed project conducted by Fehr & Peers in September 2020, provided in **Appendix J1** of this EIR. A separate document, the Local Transportation Analysis (LTA), analyzes non-CEQA transportation issues and is provided in **Appendix J2**. Non-CEQA transportation issues evaluated for informational purposes only in accordance with San José Council Policy 5-1 include local transportation operations; intersection level of service (LOS); site access and circulation; and neighborhood transportation issues such as pedestrian and bicycle access, construction period access/circulation, and recommended transportation improvements. Intersection and freeway locations analyzed in the LTA are listed at the end of this section.

Existing Conditions

The study area for the transportation analysis consists of a multimodal network that includes freeways, other major roadways, bus and light-rail transit (LRT) services, bicycle facilities, and pedestrian facilities. The area in the core of the project site, especially around Diridon Station and the SAP Center, is composed primarily of surface parking lots. In all, approximately 40 percent of the project site is devoted to parking lots, a portion of which includes the SAP Center's Lots A, B, and C, which provide 1,422 stalls. The site also includes the City-owned Lot D, south of West Santa Clara Street between South Montgomery and South Autumn Streets, which provides 228 spaces for use by the SAP Center and for daytime public parking; Santa Clara Valley Transportation Authority (VTA)–owned parking lots west of South Montgomery Street; two large parking lots south of West Santa Clara Street on both sides of Delmas Avenue; and several other smaller parking lots, some publicly available and some dedicated to specific retail, restaurant, and other uses.

The study area for pedestrians, bicycles, and transit includes facilities located within a 0.5-mile radius of the project site.[1] For the evaluation of VMT, the study area consists of trips across the entire nine-county Bay Area that have an origin or destination within the project site. The study area was selected to capture the transportation facilities that would most likely be affected by implementation of the proposed project. Transportation facilities outside of the study area may also experience increases in pedestrian and bicycle volumes, transit ridership, and VMT;

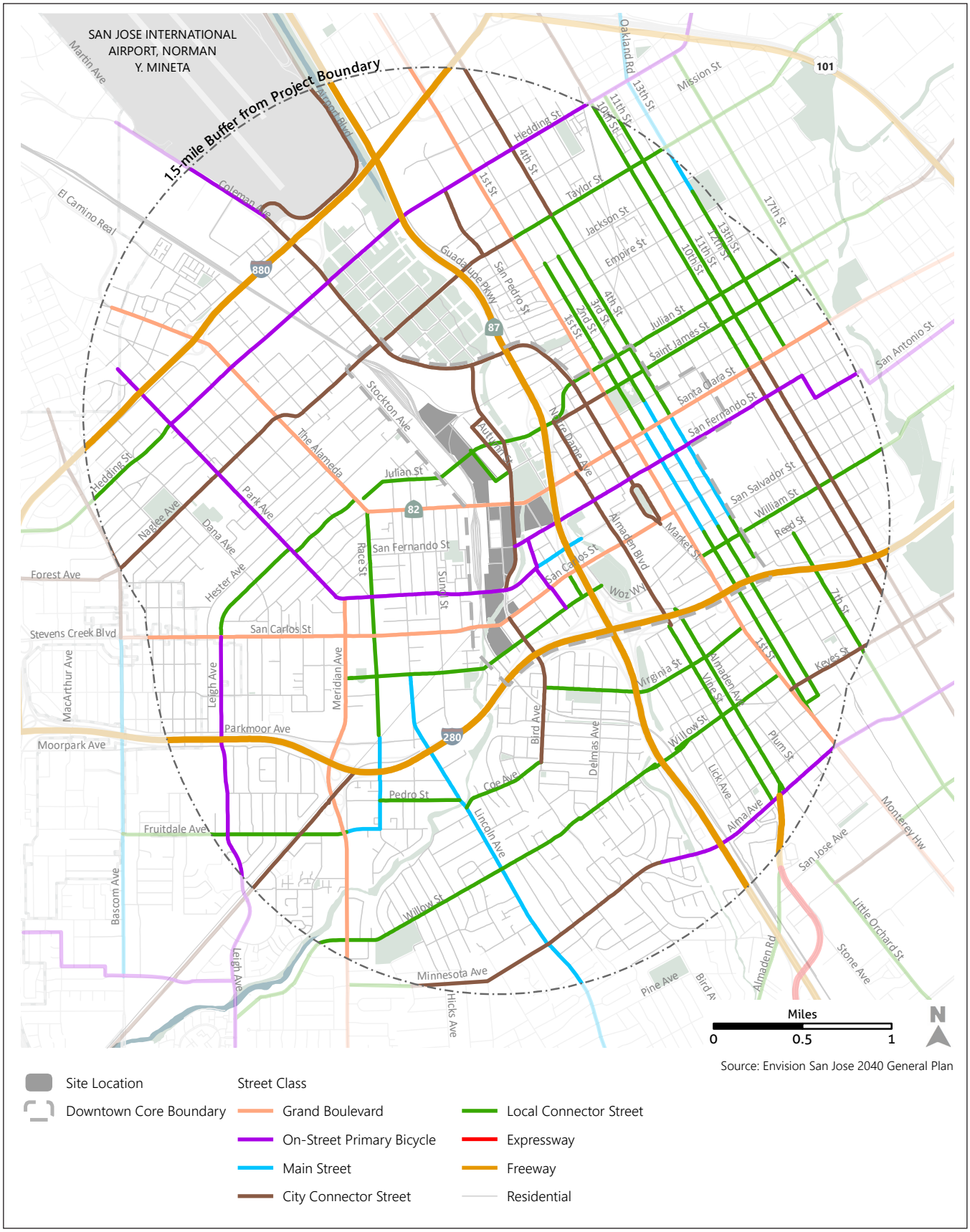
[1] The transit corridor travel speed analysis, conducted as part of the General Plan Amendment analysis, considers transit corridors throughout the city beyond the 0.5-mile radius.

however, those increases would be minimal because as the distance from the project site grows, the increasing number of possible travel routes for people traveling to and from the project site would result in a dispersion of trips.

Existing Roadway Network

The existing network of roadways in the study area and their classifications, as defined in Chapter 5 of the *Envision San José 2040 General Plan* (General Plan) and/or in the Diridon Station Area Plan (DSAP), are shown on **Figure 3.13-1** and described below.

- **State Route (SR) 87** is a north–south State Highway extending from the U.S. Highway (U.S.) 101 interchange north of Norman Y. Mineta San José International Airport south to the SR 85 interchange. It is located directly east of the project site. This state highway has two general-purpose lanes and one high-occupancy vehicle (HOV) lane in each direction. Access to SR 87 from the project site is via West Julian Street, Park Avenue, or Delmas Avenue.
- **Interstate 280 (I-280)** is a north–south Interstate Highway extending north from the Interstate 680 (I-680)/U.S. 101 interchange in San José to San Francisco. It is located directly south of the project site. This interstate highway has four general-purpose lanes and one HOV lane in each direction. Access to I-280 from the project site is via SR 87 or Bird Avenue.
- **Interstate 880 (I-880)** is a north–south Interstate Highway extending north from the I-280/I-880/SR 17 interchange in San José to Oakland. The interstate has three general-purpose lanes and one HOV lane in each direction. Access to I-880 from the project site is via Coleman Avenue or The Alameda.
- **The Alameda** is an east–west Grand Boulevard that is a continuation of Santa Clara Street. It is a four-lane roadway and extends northwest from Stockton Avenue to Santa Clara University.
- **Auzerais Avenue** is an east–west Local Connector street that runs along the southern border of the project site. It is a two-lane roadway that extends from SR 87 to Meridian Avenue.
- **Autumn Street** is a north–south City Connector street that runs through the project site. It operates as a one-way couplet with Montgomery Street between Park Avenue and Santa Clara Street, and operates as a two-way street north of Santa Clara Street.
- **Cahill Street** is a north–south local street (not classified in the General Plan). It is a two-lane roadway that extends from West Santa Clara Street to San Fernando Street and provides access to Diridon Station.
- **Cinnabar Street** is an east–west local street (not classified in the General Plan). It is an approximately 500-foot-long two-lane roadway. To the west it terminates at the railroad tracks and to the east at a cul-de-sac. The section of Cinnabar Street within the project site is only accessible via North Montgomery Street.
- **Crandall Street** is a one-lane, one-way eastbound Local Street that extends between Cahill Street and South Montgomery Street and provides access to Diridon Station. It is part of the Stover Street–Crandall Street one-way couplet.
- **Delmas Avenue** is a north–south Local Connector street south of San Carlos Street and a Main Street north of San Carlos Street. It is a two-lane roadway that extends from Santa Clara Street to Auzerais Avenue and runs through the western edge of the project site.



SOURCE: Fehr & Peers, 2020

Downtown West Mixed-Use Plan

Figure 3.13-1
Roadway Network

- **Julian Street** is an east–west Local Connector street that runs through the northern portion of the project site. It is a four-lane roadway from the SR 87 interchange to Montgomery Street, where it becomes a two-lane roadway. It extends east toward Downtown San José and west toward The Alameda.
- **Montgomery Street** is a disconnected north–south roadway that travels between Cinnabar Street and St. John Street (North Montgomery Street) and between Santa Clara Street and San Carlos Street (South Montgomery Street). North Montgomery Street is defined as a two-lane, two-way Local Connector street between Julian Street and St. John Street, while South Montgomery Street is defined as a two-lane, one-way Grand Boulevard between Santa Clara Street and Park Avenue; and a two-way City Connector street between Park Avenue and San Carlos Avenue. South of San Carlos Avenue, the roadway continues as Bird Avenue, which is defined as a City Connector street.
- **Otterson Street** is a short (approximately 300 feet) east–west, two-lane Local Street that travels west of South Montgomery Street and provides access to light industrial uses along its frontage.
- **Park Avenue** is an east–west On-Street Primary Bike Facility that runs through the center of the project site. It is a two-lane roadway extending west from Market Street in Downtown San José past Diridon Station.
- **Royal Avenue** is a north–south local street (not classified in the General Plan). It is a two-lane roadway that provides a connection between West San Carlos Street and Auzerais Avenue.
- **St. John Street** is an east–west two-lane roadway that extends from Montgomery Street through Downtown San José to Roosevelt Park. It is a Local Connector street between North Montgomery Street and North Autumn Street and a local street (not classified in the General Plan) east of North Autumn Street. It can be accessed from the project site via Montgomery Street.
- **San Carlos Street** is an east–west Grand Boulevard that runs through the southern portion of the project site. It is a four-lane roadway that extends west from San José State University to become Stevens Creek Boulevard.
- **San Fernando Street** is an east–west On-Street Primary Bike Facility that turns into Cahill Street near Diridon Station. It is a two-lane roadway that extends from Diridon Station east through Downtown San José.
- **Santa Clara Street** is an east–west Grand Boulevard that continues as The Alameda through the middle of the project site. It is a four-lane roadway that extends east from Stockton Avenue through Downtown San José and toward Alum Rock Avenue.
- **Stockton Avenue** is a north–south local street (not classified in the General Plan) that runs along the western border of the project site. It is a two-lane roadway that extends from Santa Clara Street to Taylor Street. It can be accessed from the project site via Julian Street.
- **Stover Street** is a one-lane, one-way westbound local street (not classified in the General Plan) that extends between South Montgomery Street and Cahill Street and provides direct access to Diridon Station. It is part of the Stover Street–Crandall Street one-way couplet.

Existing Public Transit Service

The project site is well served by transit services, including local bus and LRT services, commuter rail services, and inter-city rail services. The existing transit services in the study area are shown on **Figure 3.13-2** and described below.[2]

Bus and Light-Rail Transit

Bus and LRT service in Santa Clara County is operated by VTA. In December 2019, VTA implemented its New Transit Plan, which aims to maximize ridership and enhance geographic coverage. The 2019 New Transit Service Plan is an enhanced version of the Next Network Plan, which targets design changes to the existing transit network.

The project site is served by VTA local bus route 64B; VTA frequent bus routes 22, 23, 64A, 66, 68, 72/73, 500 (Rapid), and 522; VTA express bus routes 103, 168, 181, and 182; and the VTA Green and Blue Lines (light rail). The project site is also served by Santa Cruz Metro Highway 17 Express and Monterey-Salinas Transit routes 55 and 86. Diridon Station acts as the central hub for bus and light rail service in the study area. Route details (origin/destination, operating hours, and service frequency) for the routes listed above are provided in Appendix J1.

Commuter and Intercity Rail

Diridon Station serves as the central passenger rail station for Santa Clara County and Silicon Valley. Currently, Caltrain, Altamont Corridor Express (ACE), Amtrak (Amtrak Capitol Corridor and Amtrak Coast Starlight) operate trains serving Diridon Station.

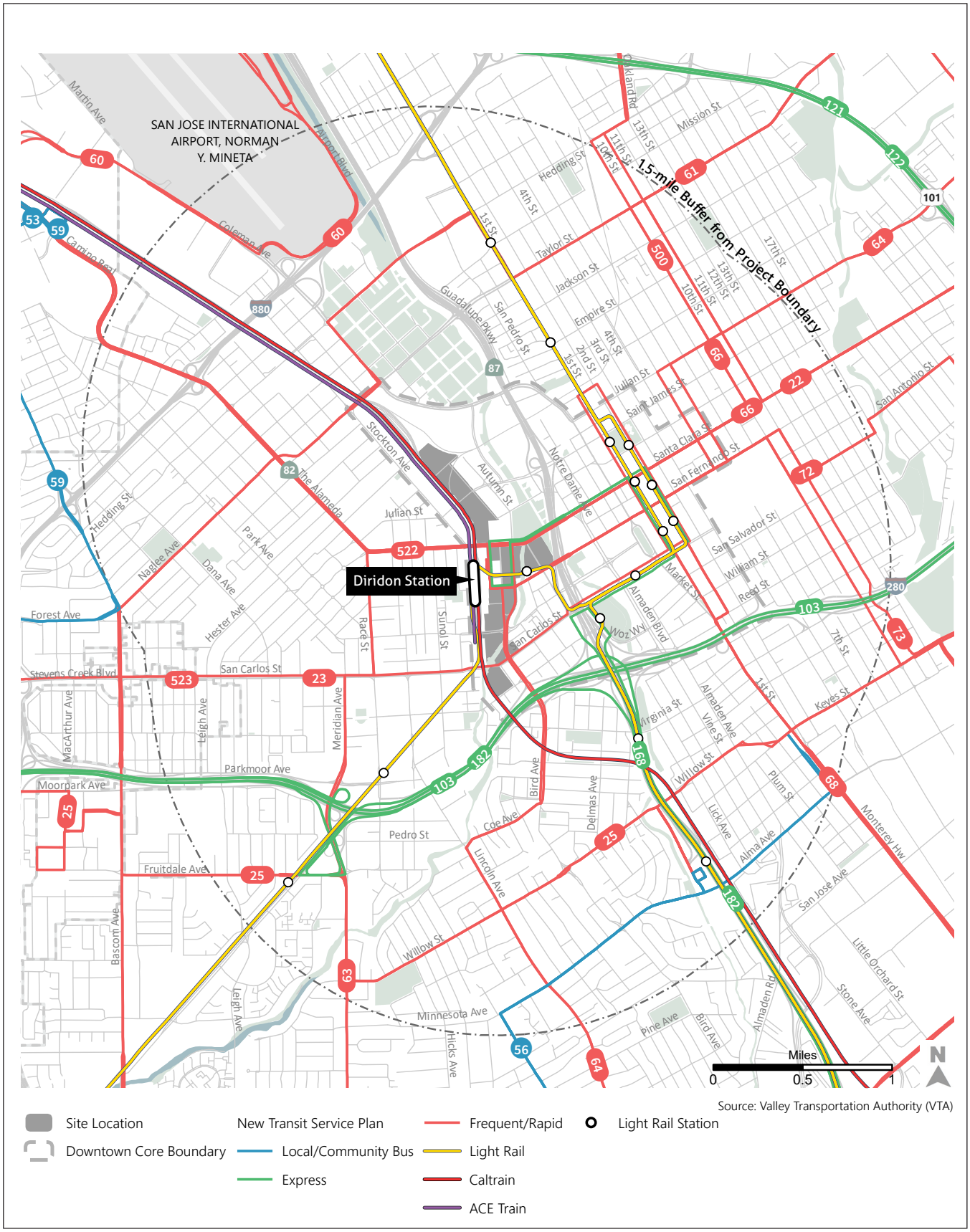
Caltrain

Caltrain operates commuter rail service between San Francisco and Gilroy seven days a week, with 92 trains on weekdays and 68 trains on weekends. The average mid-weekday ridership at Diridon Station in 2019 was approximately 4,800, with systemwide ridership at roughly 64,000. Local, limited-stop, and Baby Bullet Caltrain service all stop at Diridon Station. Trains depart frequently during the weekday a.m. and p.m. peak hours, with hourly service during non-peak hours and weekends.

Altamont Corridor Express

ACE trains provide commuter rail service between Stockton, Tracy, Pleasanton, and San José during commute hours on weekdays. Four westbound trains arrive at Diridon Station between 6:32 a.m. and 9:17 p.m., and four eastbound trains depart Diridon Station between 3:35 p.m. and 6:38 p.m. on weekdays.

[2] Existing transit service and ridership as described in this EIR have been temporarily disrupted as a result of the COVID-19 pandemic, resulting in reduced service by all transit operators and fewer transit riders. Nevertheless, the existing transit service and ridership described in this EIR reflect those at the time the Notice of Preparation was issued and are indicative of the typical service that would otherwise be available under normal circumstances.



SOURCE: Fehr & Peers, 2020

Downtown West Mixed-Use Plan

Figure 3.13-2
Existing Transit Routes/Facilities

Amtrak

Amtrak Capitol Corridor and Amtrak Coast Starlight trains stop at Diridon Station. The Capitol Corridor provides service between San José and the Sacramento region, with seven trains arriving at and seven trains departing from Diridon Station each day. The Coast Starlight provides service along the West Coast with stops in Seattle, Portland, San José, California's Central Coast, and Los Angeles, with one northbound train and one southbound train departing from the station each day. Connecting bus service to the Amtrak San Joaquin service is also provided at Diridon Station.

Future Rail and Bus Service and Improvements

Planned rail service to Diridon Station includes the VTA Bay Area Rapid Transit (BART) Silicon Valley Phase II extension and the proposed California High-Speed Rail (HSR). In addition, the electrification of the Caltrain corridor will enable faster and more frequent service.[3]

Santa Clara Valley Transportation Authority BART Silicon Valley Extension

The VTA BART Silicon Valley Phase II project will extend BART service from its current terminus at Berryessa Station through Downtown San José, with a stop at Diridon Station, and terminate at the Santa Clara Caltrain Station. As of spring 2020, service is expected to begin in 2030 and is projected to serve 9,600 daily passengers at Diridon Station by 2035.

Caltrain Electrification

As part of the Caltrain Modernization Program, the Caltrain corridor will be electrified between the 4th and King and Tamien Stations, is currently under construction and is expected to be completed in 2022. Caltrain electrification will improve train performance because electric trains can accelerate and decelerate more quickly than the currently used diesel-powered trains. This will enable more frequent and faster train service for riders. The number of peak-hour trains in each direction will increase from five to six, increasing combined seating and standing capacity by more than 30 percent.[4] Furthermore, Caltrain electrification will lay the groundwork to provide additional capacity improvements in the new Caltrain Business Plan.

Caltrain Business Plan

Caltrain is creating a business plan to shape the future of the agency. The Caltrain Business Plan addresses four major focus areas: service, business case, community interface, and organization. The Long-Range Service Vision in the Caltrain Business Plan will provide the following peak-hour capacity improvements:

- Eight trains per hour per direction between Tamien Station in San José and San Francisco, extended to the Salesforce Transit Center when the Downtown Extension is completed;
- Four trains per hour per direction between the Blossom Hill and Tamien Stations, subject to securing the necessary operating rights from Union Pacific Railroad (UPRR); and

[3] Temporarily reduced public agency revenues because of the COVID-19 pandemic may affect the funding and/or timelines of the planned future rail and bus service improvements identified in this EIR.

[4] Caltrain, CalMod: Project Benefits, Rider Benefits. Available at https://calmod.org/project-benefits/rider-benefits/. Accessed February 22, 2020.

- Two trains per hour per direction between the Gilroy and Blossom Hill Stations, subject to securing the necessary operating rights from UPRR.

Diridon Integrated Station Concept

The Diridon Integrated Station Concept (DISC) Plan is being prepared in a joint effort by the City of San José, Caltrain, VTA, the California High-Speed Rail Authority, and the Metropolitan Transportation Commission (MTC). The DISC Plan will evaluate how to expand and redesign Diridon Station as a world-class transit center that provides intermodal connections and integration with the surrounding neighborhoods. The DISC Plan will not propose any land use changes, but will focus on station design, including a spatial configuration determining how the various track and station elements will fit together and relate to the surrounding neighborhood. In spring 2020, the City Council, Caltrain Board, VTA Board, and the California High-Speed Rail Authority each endorsed a Concept Layout for the DISC Plan.[5] The DISC Plan is described in more detail in Chapter 2, *Project Description*.

California High-Speed Rail

The California HSR Project plans to connect the Los Angeles metropolitan area, the Central Valley, and the San Francisco Bay Area, and is currently under construction in the Central Valley between Merced and Bakersfield. California HSR plans to serve Diridon Station before continuing north to San Francisco. The Draft Environmental Impact Statement (EIS)/EIR for that project's San José to Merced Project Section was published in April 2020. The California High-Speed Rail Authority's Preferred Alternative, Alternative 4, envisions at-grade tracks through the Diridon Station area and an at-grade station.[6] The Draft EIS/EIR for the project does not currently identify a date for the beginning of operations at Diridon Station, but does indicate that service on the Central Valley segment is planned for 2028–2029. The Draft EIS/EIR for the San Francisco to San José Project Section was published in July 2020. The California High-Speed Rail Authority's Preferred Alternative, Alternative A, also envisions at-grade tracks through the Diridon Station area and an at-grade station.[7]

Bus Rapid Transit

A Bus Rapid Transit (BRT) line currently operates between the Eastridge Transit Center and Downtown San Jose. The BRT line includes limited-stop, frequent service in exclusive center-running bus lanes with boarding platforms on Alum Rock Avenue between the Eastridge Transit Center and U.S. 101. VTA and the City of San José plan to implement enhancements to the BRT line along Santa Clara Street and The Alameda from 17th Street to I-880. The implementation timeline for the BRT enhancements in this corridor is unknown at this time.

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5 City of San José, City Council Meeting Minutes, February 4, 2020. Available at https://sanjose.legistar.com/MeetingDetail.aspx?ID=712175&GUID=42B7D295-2384-4896-AA46-B400D3F914C6&Options=info&Search=. Accessed March 20, 2020.

6 California High-Speed Rail Authority, *California High-Speed Rail Project, San Jose to Merced Project Section, Draft Environmental Impact Report/Environmental Impact Statement*, April 2020. Available at https://hsr.ca.gov/programs/environmental/eis_eir/draft_san_jose_merced.aspx.

7 California High-Speed Rail Authority, *California High-Speed Rail Project, San Francisco to San José Project Section, Draft Environmental Impact Report/Environmental Impact Statement*, July 2020. Available at https://hsr.ca.gov/programs/environmental/eis_eir/draft_san_francisco_san_jose.aspx.

Existing Freight Rail

As shown in Chapter 2, *Project Description*, Figure 2-1, UPRR owns the railroad tracks along the northern boundary of the project site near Lenzen Avenue and Cinnabar Street and one of the three railroad tracks that run along the western boundary of the project site. Caltrain owns the other two railroad tracks that run along the western boundary of the project site. Freight trains operate westbound up the San Francisco Peninsula in the Caltrain corridor, and eastbound on dedicated freight tracks parallel to I-880 through the East Bay and points farther north and east. UPRR also owns the short (approximately 1,000 feet) connector track that bisects the project site between Cinnabar Street and West Julian Street, allowing freight trains traveling northbound in the Caltrain corridor to transition to the eastbound UPRR tracks, and freight trains traveling westbound on the UPRR tracks to transition to the southbound Caltrain corridor tracks.

Existing Pedestrian Facilities

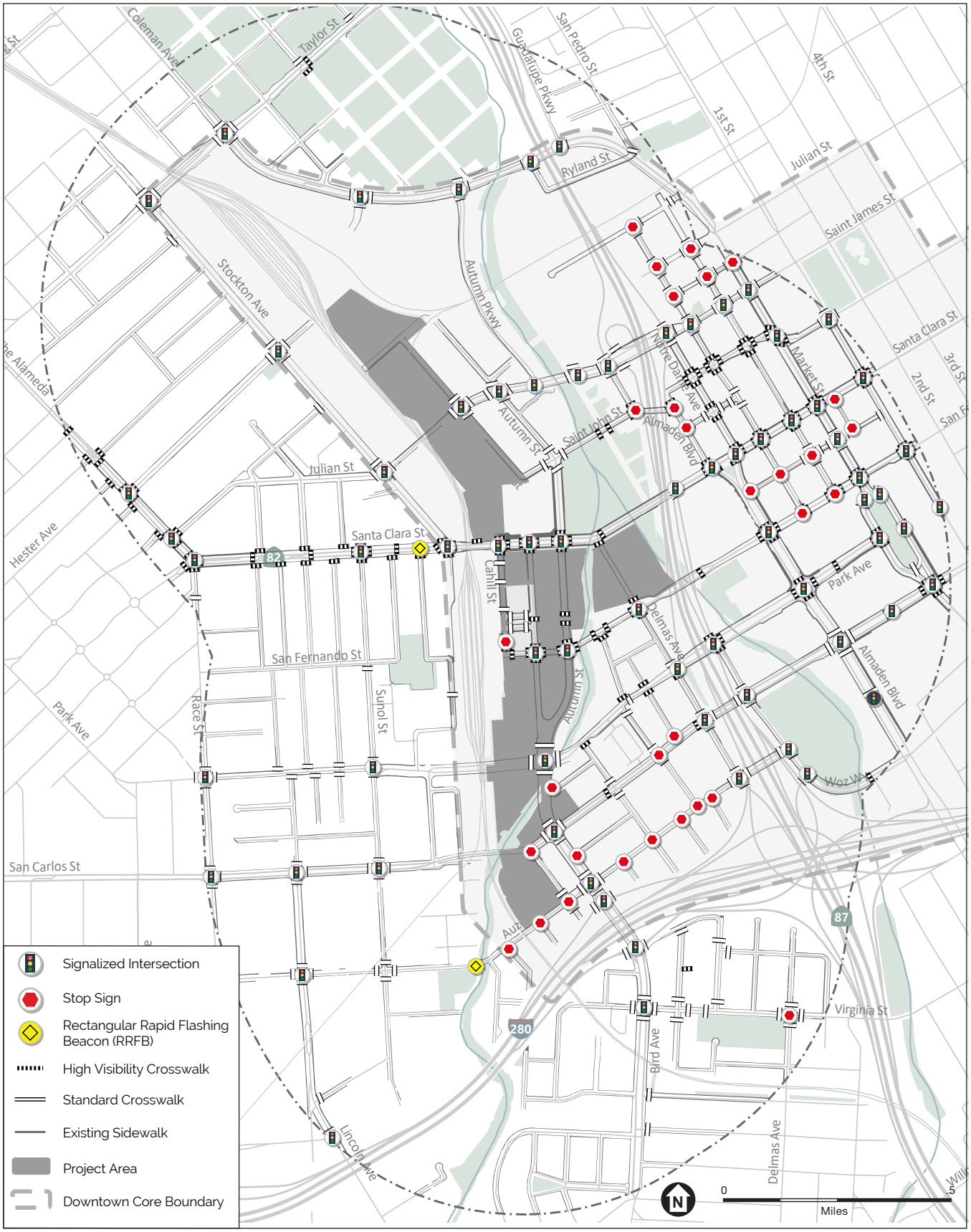
Pedestrian facilities such as sidewalks, crosswalks, curb ramps, and pedestrian signals are provided throughout the study area. Sidewalks are generally provided along all surface roadways within the boundaries of the project site. A notable gap in the sidewalk network is along the south side of West Julian Street between Stockton Avenue and North Montgomery Street. Pedestrian signals and crosswalks are provided at all signalized intersections on the project site. Curb ramps are also generally provided at all intersections on the site. **Figure 3.13-3** shows existing pedestrian facilities in the study area.

Existing Bicycle Facilities

The City's existing bicycle facilities are illustrated on **Figure 3.13-4** and summarized below. The San José Bike Plan 2020 defines three distinct types of bikeway facilities: Class I bikeway (trail or path), Class II bikeway (bicycle lane), and Class III bikeway (bicycle route). In addition, the California Department of Transportation (Caltrans) defines one additional type of bikeway facility: Class IV bikeway (Cycle Track/Separated Bikeway).

Class I Bikeways

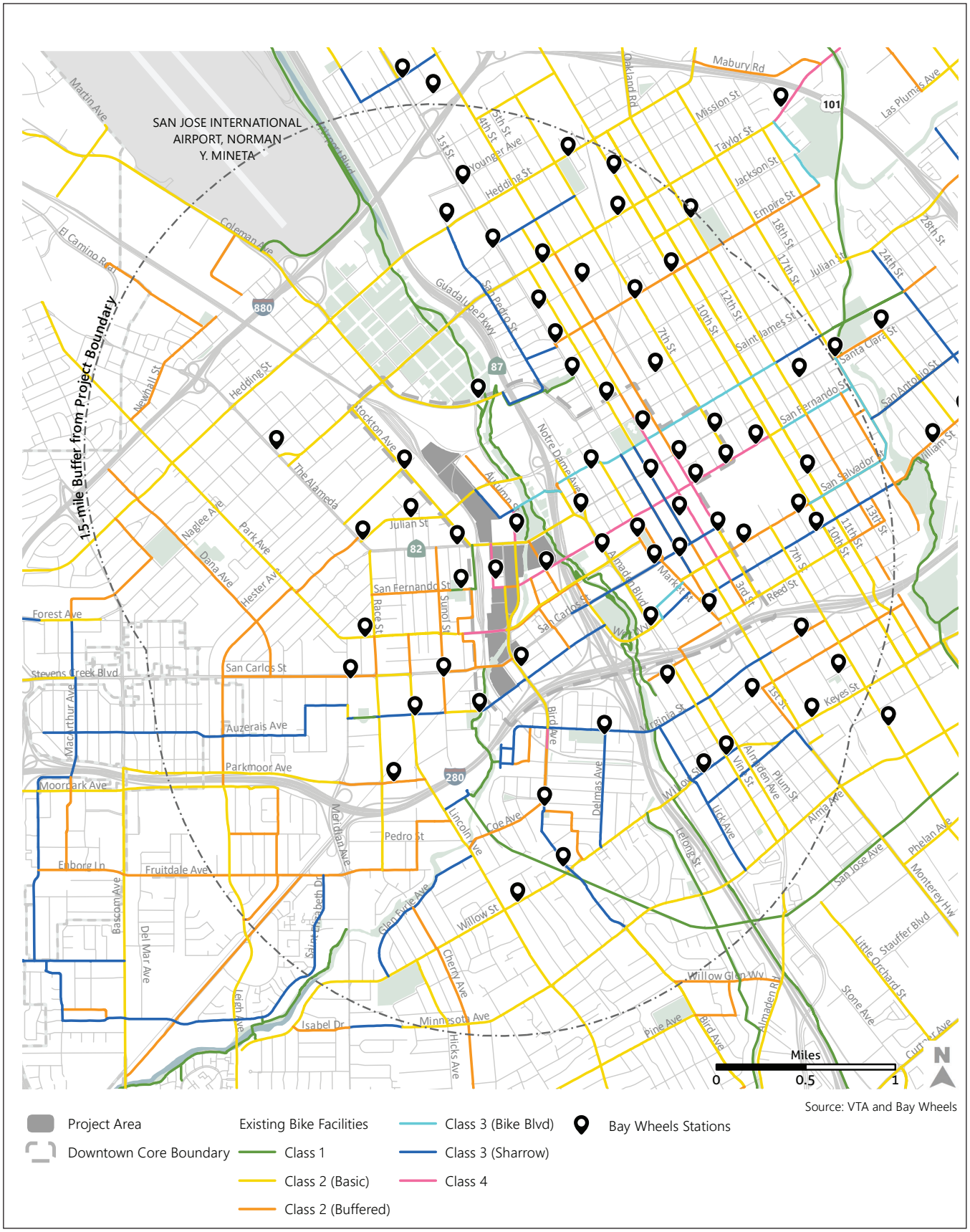
Class I bikeways are characterized by a completely separate right-of-way for the exclusive use of bicycles and pedestrians. The Guadalupe River Trail is located directly east of the project site, and the Los Gatos Creek Trail is located directly south of the site. The Guadalupe River Trail is a 9-mile north–south trail that stretches from Virginia Street south of Downtown San José to Gold Street in the Alviso neighborhood. This trail can be accessed from the project site via bike facilities on Julian Street, West St. John Street, Santa Clara Street, San Fernando Street, and/or Park Avenue. The Los Gatos Creek Trail is a 1.9-mile north–south trail that stretches from San Carlos Street to Lonus Street on the south side of I-280. The trail can be accessed from the project site via either a staircase located on the elevated portion of eastbound San Carlos Street that crosses the railroad tracks, or at the dead end of Dupont Street, which can be accessed via Park Avenue and McEvoy Street. Both trails are part of the major trail system along creeks and rivers in San José that supports recreational and commuting trips by bike or foot.



SOURCE: Fehr & Peers, 2020

Downtown West Mixed-Use Plan

Figure 3.13-3
Existing Pedestrian Facilities



SOURCE: Fehr & Peers, 2020

Downtown West Mixed-Use Plan

Figure 3.13-4
Existing Bicycle and Shared Mobility Facilities

Class II Bikeways

Class II bikeways are characterized by on-street striped lanes for one-way bike travel, and are found on Julian Street, Santa Clara Street, Park Avenue, Autumn Street, and Stockton Avenue. The network of Class II bikeways in the study area provides north–south and east–west bicycle access to the surrounding areas.

Class III Bikeways

Class III bikeways are characterized by shared on-street operations with vehicles, and are found on Laurel Grove Lane west of Diridon Station, parts of West San Carlos Street, Dupont Street, and West St. John Street. Class III bikeways, along with Class I and Class II bikeway facilities, complete the bikeway network in the study area.

Class IV Bikeways

Class IV bikeways are characterized by physically separated bike lanes. There are currently Class IV bikeways in the study area on Cahill Street between Santa Clara Street and San Fernando Street, and on San Fernando Street between Cahill Street and 10th Street.

Bike/Scooter Share

There are several bike/scooter share options in the study area that provide first-mile/last-mile transportation solutions. Bike share services are provided by Bay Wheels, a regional bike sharing system that operates in the Bay Area and is managed by the Metropolitan Transportation Commission (MTC). Bay Wheels operates as a system of fixed stations where users can rent and return Bay Wheels bicycles and hybrid dockless/dockable electric bikes. Figure 3.13-4 shows the locations of Bay Wheels stations.

Numerous companies, including Lyft and CLEVR, currently provide scooter rental services. Scooter rental services are free-floating, which allows users to be flexible in where they can rent and park scooters in appropriate locations in the public right-of-way.

Existing Vehicle Miles Traveled

VMT is a useful metric for understanding the overall effects of a project on the transportation system. As stated in San José Council Policy 5-1 (refer to Section 3.13.2, *Regulatory Framework*), VMT is measured by multiplying total vehicle trips by the average distance of those trips, adjusted for the number of people in the vehicles. For residential and employment land uses, VMT is measured for each person who will occupy or use a project. For large retail and transportation projects, the net amount of VMT is measured.

Senate Bill (SB) 743 is California's law to replace LOS with VMT in environmental review. This shift toward VMT aligns with San José's long-term General Plan goal of reducing drive-alone trips and increasing the use of walking, bicycling, and transit modes. As stated in the General Plan, the benefits of reducing drive-alone trips and increasing the use of other modes include

reduced energy consumption, reduced greenhouse gas (GHG) emissions, and support of healthier communities. General Plan policies addressing VMT include:

- **Policy TR-9.1**, which calls for enhancing and expanding walking and bicycle facilities to facilitate non-automobile trips.
- **Policies TR-8.3 through TR-8.10**, which call for supporting parking strategies such as parking supply limits, pricing, car share programs, and unbundled private off-street parking to encourage the use of non-automobile modes.
- **Policy TR-7.1** calls for requiring large employers to develop and maintain Transportation Demand Management (TDM) programs to reduce vehicle trips.
- **Policy TR-3.5** calls for increasing transit frequency and service along major corridors and to major destinations.

The City's Travel Demand Forecasting Model was used to determine existing VMT, with 2015 used as the model's base year. This is the best tool available and the most recent available information. **Table 3.13-1** summarizes existing VMT for the project site. Please note that this information is provided for informational purposes only, and is not used as the basis for the VMT impact analysis. The VMT impact analysis compares averages of citywide or regional VMT with and without the proposed project, rather than VMT for the project site (refer to Section 3.13.3, *Impacts and Mitigation Measures*, for additional detail on the VMT impact analysis methodology).

TABLE 3.13-1
EXISTING (2015) VEHICLE MILES TRAVELED*

Land Use	VMT
Residential	7.04 per capita
Office (General Employment)	12.25 per employee
Retail/Hotel	N/A

NOTES:
N/A = not available; VMT = vehicle miles traveled
* Existing VMT is provided for informational purposes only, and is not used as the basis for the impact analysis.
SOURCE: Data compiled by Fehr & Peers in 2020.

3.13.2 Regulatory Framework

State

California Department of Transportation

Caltrans has authority over the state highway system, including freeways, interchanges, and certain arterial routes. Caltrans operates and maintains state and interstate highways in San José. The *Guide for the Preparation of Traffic Impact Studies*[8] provides information that Caltrans uses to review impacts on state highway facilities, including freeway segments. However, as the

[8] California Department of Transportation, *Guide for the Preparation of Traffic Impact Studies*, 2002. Available at https://nacto.org/docs/usdg/guide_preparation_traffic_impact_studies_caltrans.pdf. Accessed July 15, 2019.

Congestion Management Agency, VTA is responsible for monitoring operations on Caltrans facilities in Santa Clara County, and VTA's *Transportation Impact Analysis Guidelines*[9] are applied to the evaluation of freeway facilities in Santa Clara County.

Regional

Metropolitan Transportation Commission

The MTC is the Bay Area's regional transportation planning agency and federally designated Metropolitan Planning Organization. The MTC is responsible for preparing the Regional Transportation Plan (RTP), a comprehensive blueprint for the development of mass transit, highway, airport, seaport, railroad, bicycle, and pedestrian facilities. The RTP is a 20-year plan that is updated every three years to reflect new planning priorities and changing projections of future growth and travel demand. The long-range plan must be based on a realistic forecast of future revenues, and the transportation projects taken must also help improve regional air quality. The MTC also screens requests from local agencies for federal and state grants for transportation projects to determine compatibility with the RTP.

Plan Bay Area 2040

Plan Bay Area is overseen by the MTC and the Association of Bay Area Governments (ABAG). It serves as the region's Sustainable Communities Strategy (SCS) pursuant to SB 375 and the 2040 RTP (preceded by *Transportation 2035*), integrating transportation and land use strategies to manage GHG emissions and plan for future population growth. The RTP and SCS include policies that call for shifting more travel demand to transit and accommodating growth along transit corridors in "Priority Development Areas." ABAG and the MTC adopted *Plan Bay Area 2040* in July 2013. The update to *Plan Bay Area*, known as *Plan Bay Area 2040*,[10] was subsequently developed by the MTC and adopted in July 2017.

Major transit projects included in *Plan Bay Area 2040* include the BART extension to San José/ Santa Clara, Caltrain electrification, enhanced service along the Amtrak Capitol Corridor, and improvements to local and express bus services.

Santa Clara Valley Transportation Authority

VTA serves two roles in Santa Clara County: as the primary transit service operator and as the congestion management agency. In its role as a transit service operator, VTA is responsible for development, operation, and maintenance of the bus and light rail system in the county. VTA operates more than 70 bus lines and 3 light rail lines, in addition to shuttle and paratransit service. It also provides transit service to major regional destinations and transfer centers in adjoining counties.

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9 Santa Clara Valley Transportation Authority, *Transportation Impact Analysis Guidelines*, adopted October 2014. Available at https://www.vta.org/sites/default/files/documents/VTA_TIA_Guidelines_2014_Full_FINAL.pdf. Accessed July 15, 2019.

10 Metropolitan Transportation Commission and Association of Bay Area Governments, *Plan Bay Area 2040,* Final, adopted July 26, 2017. Available at http://2040.planbayarea.org/cdn/ff/buje2Q801oUV3Vpib-FoJ6mkOfWC9S9sgrSgJrwFBgo/1510696833/public/2017-11/Final_Plan_Bay_Area_2040.pdf. Accessed September 22, 2019.

As Santa Clara County's (County's) congestion management agency, VTA is responsible for developing the County's comprehensive transportation improvement program among local jurisdictions that will improve the performance of the multimodal transportation system, land use decision-making, and air quality. VTA is authorized to set federal and state funding priorities for transportation improvements that affect the Santa Clara Congestion Management Program (CMP)[11] transportation system. The CMP roadway network includes all freeways and expressways in Santa Clara County, in addition to 252 intersections throughout the county. As a result, VTA is responsible for monitoring operations on most Caltrans freeway facilities and County expressways in the county.

Guidelines for Analysis of Transportation Impacts

VTA requires local jurisdictions to analyze the impacts of new developments, or land use policy changes, on CMP facilities if they are expected to generate 100 or more new peak-hour trips. The CMP requires each jurisdiction to identify existing and future transportation facilities that will operate at an acceptable service level and provide mitigation where future growth degrades that service level.

VTA developed the *Transportation Impact Analysis Guidelines* (March 2009), which were adopted by the County and all cities in Santa Clara County, to provide local jurisdictions with a uniform program for evaluating the transportation impacts of land use decisions on the designated CMP system. The guidelines establish data needs and methodologies that should be used to assess the transportation impacts of land development projects and to assist in identifying improvements to minimize a development project's impacts. VTA updated the guidelines in 2014. Because these guidelines are LOS-based, they are relevant only to CMP compliance and not to CEQA compliance. (Refer to *City of San José Transportation Analysis Policy* below.)

Valley Transportation Plan 2040

As the congestion management agency for Santa Clara County, VTA is responsible for developing a long-range countywide transportation plan, called Valley Transportation Plan (VTP) 2040.[12] The projects included in the VTP serve as VTA's recommendations for inclusion in *Plan Bay Area,* and are updated on a four-year cycle coinciding with updates to that plan (refer to *Plan Bay Area 2040,* above). VTP 2040 provides programs, projects, and policies for roadways, transit, Intelligent Transportation Systems and Systems Operations Management, bicycle facilities, pedestrian facilities, and the integration of land use and transportation. The VTA Board of Directors adopted VTP 2040 in September 2014.

[11] Santa Clara Valley Transportation Authority, *Santa Clara Congestion Management Program (CMP) Document*, December 2017. Available at http://vtaorgcontent.s3-us-west-1.amazonaws.com/Site_Content/2017_CMP_Document.pdf.

[12] Santa Clara Valley Transportation Authority, *VTP2040: The Long-Range Transportation Plan for Santa Clara County*, Available at http://vtaorgcontent.s3-us-west-1.amazonaws.com/Site_Content/VTP2040_final_hi%20res_030315.pdf. Accessed September 23, 2019.

Transportation projects relevant to the proposed project include the following:

- **Caltrain/HSR Station Improvements at Diridon Station:** Provide future station improvements needed to accommodate and support the subsequent introduction of HSR service.
- **I-880 Express Lanes between U.S. 101 and I-280:** Build a new express lane on I-880.
- **I-280 Express Lanes from Magdalena Avenue to U.S. 101:** Convert the existing HOV lanes to express lanes on I-280 between Leland Avenue and Magdalena Avenue (Los Altos Hills); and convert one general-purpose lane in each direction on I-280 between U.S. 101 and Leland Avenue.
- **SR 87 Express Lanes from SR 85 to U.S. 101:** Convert the existing HOV lanes to express lanes.
- **Autumn Parkway Improvement from UPRR to San Carlos Street:** Extend a new four-lane multimodal street from the UPRR crossing to Julian Street (completed in 2017) and improve the existing Autumn Street from Julian Street to San Carlos Street. This project improves multimodal access and circulation to support the planned transit-oriented development near Diridon Station.
- **San Carlos Street Bridge Replacement and Widening at Caltrain/Vasona Light Rail:** Replace the structurally deficient bridge with improved facilities for biking and walking.
- **Santa Clara Alum Rock BRT:** Add new BRT route between Downtown San José and the Eastridge Transit Center, including two miles of dedicated lanes on the eastern half of the corridor and mixed-flow operations in the western segments (completed in 2017).
- **Los Gatos Creek Trail:** Complete the Los Gatos Creek Trail between Auzerais Avenue (south of West San Carlos Avenue) and Santa Clara Street including design, land acquisition, and environmental review.
- **Auzerais Avenue Bicycle and Pedestrian Improvements from Sunol Street to Race Street:** Construct Class II bikeways, sidewalk improvements, crossing improvements, and bicycle parking.

Complete Streets Program

VTA, in a collaborative effort with Caltrans, the MTC, and others, has developed a Complete Streets Program for Santa Clara County. The objective of this program is to develop a process for instituting incremental "complete street" improvements in Santa Clara County. VTA, in collaboration with the Cities of Campbell, Milpitas, San José, Santa Clara, and Sunnyvale, recently completed or is nearing completion of Complete Street Corridor Studies along the following corridors: Story Road–Keyes Avenue (February 2018[13]), Tasman Drive (estimated 2020), and Bascom Avenue (estimated 2020). These corridor studies developed conceptual designs of improvements to accommodate bicyclists, pedestrians, transit passengers, and vehicles. No corridors near the project site have been identified for evaluation as part of the Complete Streets Program.

[13] Santa Clara Valley Transportation Authority and City of San José, *Story–Keyes Corridor Complete Streets Study*, February 2018. Available at https://www.vta.org/sites/default/files/documents/Story%2520Keyes%2520Attachment%2520B.pdf.

Safe Routes to Transit

In 2017, VTA adopted a Pedestrian Access to Transit Plan,[14] the first countywide pedestrian plan for Santa Clara County. VTA worked with community members and stakeholders to identify projects, such as pedestrian bridge, streetscape improvement, bicycle and pedestrian path, street crossing, and sidewalk projects, that will improve rider safety and comfort on VTA trains and buses. The plan includes a list of projects that can be funded through federal, state, or local funding. Portions of the project site fall within Focus Area H–Downtown San José/Diridon Station. Several intersection, crossing, and streetscape improvements were identified both within and in the immediate vicinity of the project site:

- **Pathway and Uncontrolled Crossing to San Fernando VTA LRT Station:** Add a striped ladder-style crossing of South Montgomery Street at Crandall Street, and designate a pedestrian corridor to the San Fernando Station with new paving, landscaping, and/or paint on existing walkways.
- **Curb Cuts and Crosswalk Improvements at Diridon Station:** Add curb cuts and replace the existing crosswalks with ladder crosswalks for higher visibility at pedestrian crossings of Cahill Street (completed 2018).
- **San Fernando Street/Delmas Avenue VTA Improvement Alternatives:** (1) Restrict and formalize access at Delmas Avenue/San Fernando Street by adding public art landscaping, planters, and/or improved fence treatment; add a striped ladder crosswalk on the west side of the pedestrian crossing of the tracks on Delmas Avenue (completed 2018); and replace the bollards with swing gates. (2) Add traffic calming treatments to slow all traffic on San Fernando Street between Autumn Street and the SR 87 undercrossing.
- **San Fernando Street Signalized Pedestrian Crossing West of SR 87 Underpass:** Add a signalized pedestrian crossing immediately east of the signal at the rail crossing on San Fernando Street, including a striped ladder crosswalk, pedestrian signal heads, curb cuts, and removal of a portion of the raised median.
- **Santa Clara Street/Cahill Street Intersection Improvements:** Add a striped ladder crosswalk and add a pedestrian signal head to the west leg; consider adding pedestrian actuation and reducing signal lengths to reduce pedestrian wait times.
- **Santa Clara Street/Montgomery Street Pedestrian Scramble:** Restripe the existing crosswalks to provide a pedestrian scramble, with an opportunity for public art/place-making similar to the midblock crosswalks at Paseo de San Antonio; consider a signalized pedestrian scramble phase.
- **Santa Clara Street/Delmas Avenue Uncontrolled Crossing Improvements:** Relocate the uncontrolled ladder crosswalk to the west side of the intersection; add advance yield lines ("shark's teeth") for advance stop lines; add curb extensions to reduce pedestrian crossing distance; consider adding a Rectangular Rapid Flash Beacon or Pedestrian Hybrid Beacon to improve driver yield rates; consider adding a median refuge for pedestrians crossing Santa Clara Street.

[14] Santa Clara Valley Transportation Authority, *Pedestrian Access to Transit Plan*, Draft Final Plan, 2017. Available at http://vtaorgcontent.s3-us-west-1.amazonaws.com/Site_Content/PedestrianPlan-07-17-2017FINALDRAFT.pdf. Accessed September 23, 2019.

- **West Julian Street Railway Undercrossing:** Add pedestrian-scale lighting, a mural, and/or other public art to the existing pedestrian undercrossing of the railway tracks; evaluate the possibility of adding a pedestrian crossing on the south side of West Julian Street.

These improvements were identified for implementation by the City of San José in partnership with VTA, as funding becomes available.

Santa Clara Countywide Bicycle Plan

VTA adopted the updated Santa Clara Countywide Bicycle Plan[15] in May 2018, which includes a vision of 10 bicycle superhighways and 57 identified cross-county bicycle corridors. The Santa Clara Countywide Bicycle Plan synthesizes other local and County plans into a comprehensive 20-year, cross-county bicycle corridor network and expenditure plan. Near the project site, the updated plan currently identifies the Guadalupe River Trail, the Los Gatos Creek Trail, San Fernando Street (South 17th Street to Gifford Avenue), Gifford Avenue (West San Fernando Street to Park Avenue), Park Avenue (Gifford Avenue to West Hedding Street), and Coleman Avenue (West St. John Street to De La Cruz Boulevard) as priority cross-county bicycle corridors. Prioritization for funding of countywide bicycle facilities is documented in VTP 2040.

Local

City of San José Transportation Analysis Policy

Historically, transportation analyses prepared under CEQA have used delay and congestion on the roadway system as the primary metrics for identifying traffic impacts and potential roadway improvements to relieve traffic congestion that may result from a project. However, the State of California has recognized the limitations of measuring and mitigating only vehicle delay at intersections. Therefore, in 2013, SB 743 was enacted, stating that upon certification of guidelines by the Natural Resources Agency, jurisdictions must stop using congestion and delay metrics such as LOS as the measurement for CEQA impacts in transportation analyses. On December 28, 2018, the Natural Resources Agency certified CEQA Guidelines Section 15064.3(b), which required, among other things, that by July 2020, all public agencies must base the determination of transportation impacts under CEQA on VMT rather than LOS.[16] Jurisdictions were also allowed to use VMT before that date.

In February 2018, pursuant to SB 743, the City of San José adopted its new Transportation Analysis Policy, Council Policy 5-1. The policy replaced its predecessor (Policy 5-3) and established thresholds for transportation impacts under CEQA based on VMT instead of LOS. The intent of this change was to shift the focus of transportation analysis under CEQA from vehicle delay and roadway auto capacity to the reduction of vehicular emissions and creation of robust multimodal networks supporting integrated land uses. VMT is measured by multiplying the total vehicle trips by the average distance of those trips, adjusted for the number of people in the vehicles. For residential and employment land uses, VMT is measured for each person who

[15] Santa Clara Valley Transportation Authority, *Santa Clara Countywide Bicycle Plan*, Final Draft, May 2018. Available at https://www.vta.org/sites/default/files/2019-05/SCCBP_Final%20Plan%20_05.23.2018.pdf.

[16] VMT measures the amount and distance people drive by personal vehicle to a destination. VMT is measured by multiplying the total vehicle trips by the average distance of those trips.

will occupy or use a project site. For large retail and transportation projects, the net amount of VMT is measured. All new development and transportation projects are required to analyze transportation impacts using VMT and conform to Council Policy 5-1. The evaluation of the project's impact on LOS at intersections under the jurisdiction of the City of San José is no longer allowed under CEQA.

Transportation Analysis Policy 5-1 and its accompanying *Transportation Analysis Handbook*[17] provide screening criteria that determine whether a CEQA transportation analysis is required for both new development and transportation projects. The criteria are based on the type of project and its resulting changes to the transportation system. If a project meets the City's screening criteria, the project is presumed to result in less-than-significant VMT impacts and a detailed VMT analysis is not required under CEQA.

Council Policy 5-1 also requires that an LTA be prepared to analyze non-CEQA transportation issues, including local transportation operations, intersection LOS, site access and circulation, and neighborhood transportation issues such as pedestrian and bicycle access, and to recommend needed transportation improvements.

Envision San José 2040 General Plan

The General Plan includes goals, policies, and strategies regarding land use and community design, transportation, housing, environmental resources, and provision of municipal services to the year 2040. The General Plan was approved in November 2011 and amended in December 2016 as part of a four-year review cycle. The Land Use and Transportation Element establishes the link between land use and transportation, with an emphasis on encouraging growth in compact mixed-use developments and a balanced transportation system. Other key themes in the General Plan are: (1) constructing a comprehensive, safe, direct, and well-maintained citywide bikeway network; (2) supporting the development of amenities and land uses that contribute to increased transit ridership; and (3) reducing the number of VMT. It also recognizes that under SB 743, automobile LOS will be replaced with VMT as the City's metric for CEQA transportation analysis. **Table 3.13-2** lists the goals and policies that are applicable to the proposed project.

TABLE 3.13-2
LAND USE AND TRANSPORTATION GOALS AND POLICIES IN THE ENVISION SAN JOSÉ 2040 GENERAL PLAN

Land Use	
Goal LU-1	**Establish a land use pattern that fosters a more fiscally and environmentally sustainable, safe, and livable city.**
LU-1.1	Foster development patterns that will achieve a complete community in San José, particularly with respect to increasing jobs and economic development and increasing the City's jobs-to-employed resident ratio while recognizing the importance of housing and a resident workforce.
LU-1.2	Encourage Walking. Create safe, attractive, and accessible pedestrian connections between developments and to adjacent public streets to minimize vehicular miles traveled.
LU-1.3	Create safe, attractive, and accessible pedestrian connections between developments and to adjacent public streets to minimize vehicular miles traveled.

[17] City of San José, *Transportation Analysis Handbook*, April 2018. Available at https://www.sanjoseca.gov/home/showdocument?id=28461. Accessed July 15, 2019.

TABLE 3.13-2
LAND USE AND TRANSPORTATION GOALS AND POLICIES IN THE ENVISION SAN JOSÉ 2040 GENERAL PLAN

LU-1.7	Locate employee-intensive commercial and industrial uses within walking distance of transit stops. Encourage public transit providers to provide or increase services to areas with high concentrations of residents, workers, or visitors.
Goal LU-3	**Strengthen Downtown as a regional job, entertainment, and cultural destination and as the symbolic heart of San José.**
LU-3.1	Provide maximum flexibility in mixing uses throughout the Downtown area. Support intensive employment, entertainment, cultural, public/quasi-public, and residential uses in compact, intensive forms to maximize social interaction; to serve as a focal point for residents, businesses, and visitors; and to further the Vision of the Envision General Plan.
LU-3.2	Support Downtown as a primary employment center in the region, especially for financial institutions, insurance companies, government offices, professional services, information and communication technology companies, and businesses related to conventions.
LU-3.3	Support the development of Downtown as an art, cultural, and entertainment center for San José and the region. Promote special events, parades, celebrations, performances, concerts, and festivals.
LU-3.4	Facilitate development of retail and service establishments in Downtown and support regional- and local-serving businesses to further primary objectives of this Plan.
LU-3.5	Balance the need for parking to support a thriving Downtown with the need to minimize the impacts of parking upon a vibrant pedestrian and transit oriented urban environment. Provide for the needs of bicyclists and pedestrians, including adequate bicycle parking areas and design measures to promote bicyclist and pedestrian safety.
LU-3.8	Leverage Downtown's urban nature and promote projects that will help achieve economic, fiscal, environmental, cultural, transportation, social, or other objectives of this plan.
Goal LU-5	**Locate viable neighborhood-serving commercial uses throughout the City in order to stimulate economic development, create complete neighborhoods, and minimize VMT.**
LU-5.1	In order to create complete communities, promote new commercial uses and revitalize existing commercial areas in locations that provide safe and convenient multimodal access to a full range of goods and services.
LU-5.7	Encourage retail, restaurant, and other active uses as ground-floor occupants in identified growth areas and other locations with high concentrations of development.
Goal LU-9	**Provide high quality living environments for San José's residents.**
LU-9.1	Create a pedestrian-friendly environment by connecting new residential development with safe, convenient, accessible, and pleasant pedestrian facilities. Provide such connections between new development, its adjoining neighborhood, transit access points, schools, parks, and nearby commercial areas. Consistent with Transportation Policy TR-2.11, prohibit the development of new cul-de-sacs, unless it is the only feasible means of providing access to a property or properties, or gated communities, that do not provide through- and publicly accessible bicycle and pedestrian connections.
LU-9.2	Facilitate the development of complete neighborhoods by allowing appropriate commercial uses within or adjacent to residential and mixed-use neighborhoods.
LU-9.3	Integrate housing development with our City's transportation system, including transit, roads, and bicycle and pedestrian facilities.
LU-9.6	Require residential developments to include adequate open spaces in either private or common areas to partially provide for residents' open space and recreation needs.
Goal LU-10	**Meet the housing needs of existing and future residents by fully and efficiently utilizing lands planned for residential and mixed-use and by maximizing housing opportunities in locations within a half mile of transit, with good access to employment areas, neighborhood services, and public facilities.**
LU-10.3	Develop residentially- and mixed-use-designated lands adjacent to major transit facilities at high densities to reduce motor vehicle travel by encouraging the use of public transit.
LU-10.4	Within identified growth areas, develop residential projects at densities sufficient to support neighborhood retail in walkable, main street type development.
LU-10.5	Facilitate the development of housing close to jobs to provide residents with the opportunity to live and work in the same community.

TABLE 3.13-2
LAND USE AND TRANSPORTATION GOALS AND POLICIES IN THE ENVISION SAN JOSÉ 2040 GENERAL PLAN

LU-10.7	Encourage consolidation of parcels to promote mixed-use and high-density development at locations identified in the Land Use/Transportation Diagram.
LU-10.8	Encourage the location of schools, private community gathering facilities, and other public/quasi-public uses within or adjacent to Urban Villages and other growth areas and encourage these uses to be developed in an urban form and in a mixed-use configuration.
Transportation	
Goal TR-1	**Complete and maintain a multimodal transportation system that gives priority to the mobility needs of bicyclists, pedestrians, and public transit users while also providing for the safe and efficient movement of automobiles, buses, and trucks.**
TR-1.1	Accommodate and encourage use of non-automobile transportation modes to achieve San José's mobility goals and reduce vehicle trip generation and VMT.
TR-1.2	Consider impacts on overall mobility and all travel modes when evaluating transportation impacts of new developments or infrastructure projects.
TR-1.3	Increase substantially the proportion of commute travel using modes other than the single-occupant vehicle. The 2040 commute mode split targets for San José residents and workers are presented in the following table.
TR-1.6	Require that public street improvements provide safe access for motorists and pedestrians along development frontages per current City design standards.
Goal TR-2	**Improve walking and bicycling facilities to be more convenient, comfortable, and safe, so that they become primary transportation modes in San José.**
TR-2.11	Prohibit the development of new cul-de-sacs, unless it is the only feasible means of providing access to a property or properties, or gated communities that do not provide through and publicly accessible bicycle and pedestrian connections. Pursue the development of new through bicycle and pedestrian connections in existing cul-de-sac areas where feasible.
Goal TR-4	**Provide maximum opportunities for upgrading passenger rail service for faster and more frequent trains, while making this improved service a positive asset to San José that is attractive, accessible, and safe.**
TR-4.1	Support the development of amenities and land use and development types and intensities that increase daily ridership on the VTA, BART, Caltrain, ACE and Amtrak California systems and provide positive fiscal, economic, and environmental benefits to the community.
TR-4.3	Support the development of amenities and land use and development types and intensities that contribute to increased ridership on the potential high-speed rail system, and also provide positive benefits to the community.
Goal TR-8	**Parking Strategies**
TR-8.1	Promote transit-oriented development with reduced parking requirements and promote amenities around appropriate transit hubs and stations to facilitate the use of available transit services.
TR-8.11	Establish a program and provide incentives for private property owners to share their underutilized parking with the general public and/or other adjacent private developments.
Goal TR-9	**Reduce VMT by 10 percent per service population, from 2009 levels, as an interim goal.**
TR-9.1	Enhance, expand and maintain facilities for walking and bicycling, particularly to connect with and ensure access to transit and to provide a safe and complete alternative transportation network that facilitates non-automobile trips.
Trail Network	
Goal TN-1	**Develop the nation's largest urban network of trails. Become a national model for trail development and use. Remain a national leader in terms of the scale and quality of trails.**
TN-1.2	Minimize environmental disturbance in the design, construction and management of trails.
TN-1.3	Design trail system alignments to minimize impacts and enhance the environment within sensitive riparian and other natural areas. Follow Riparian Corridor Goals, Policies, and Actions regarding trail design and development in proximity to riparian areas.
TN-1.4	Provide gateway elements, interpretive signage, public art, and other amenities along trails to promote use and enhance the user experience.

TABLE 3.13-2
LAND USE AND TRANSPORTATION GOALS AND POLICIES IN THE ENVISION SAN JOSÉ 2040 GENERAL PLAN

Goal TN-2	**Develop a safe and accessible Trail Network to serve as a primary means of active transportation and recreation within an integrated multimodal transportation system.**
TN-2.1	Support off-street travel by interconnecting individual trail systems to each other and to regional trail systems.
TN-2.2	Provide direct, safe and convenient bicycle and pedestrian connections between the trail system and adjacent neighborhoods, schools, employment areas and shopping areas.
TN-2.7	Encourage all developers to install and maintain trails when new development occurs adjacent to a designated trail location, in accordance with Policy PR-8.5.
TN-2.8	Coordinate and connect the trail system with the on-street bikeway system, and consider policies from the Circulation and the Parks, Trails, Open Space, and Recreation Amenities/Programs sections of this Plan to create a complete BikeWeb to serve the needs of San José's diverse community.
Goal TN-3	**Design an accessible, safe, and well-functioning trail network that attracts diverse users of varying abilities.**
TN-3.4	Design new and retrofit existing public and private developments to provide significant visibility of and access to existing and planned trails to promote safety and trail use.

NOTES: ACE = Altamont Corridor Express; BART = Bay Area Rapid Transit; VMT = vehicle miles traveled; VTA = Santa Clara Valley Transportation Authority

SOURCE: City of San José, *Envision San José 2040 General Plan*, November 2011 (amended March 16, 2020). Available at https://www.sanjoseca.gov/home/showdocument?id=22359. Accessed January 16, 2020.

Downtown Strategy 2040

The Downtown Strategy 2040[18] is an integrated strategic design plan focused on revitalizing Downtown San José by developing underused land and increasing the density of infill developments within the Downtown boundary. The Downtown Strategy 2040 updated the 2000 Downtown Strategy in December 2018, increasing the number of residential units in Downtown San José by 4,000 units compared to what was planned in the General Plan and Downtown Strategy 2000, and shifting 3,000,000 square feet of office development from Coyote Valley to Downtown. The project site is located wholly within the Downtown boundary.

Diridon Station Area Plan

The DSAP[19] was approved by the San José City Council on June 17, 2014, and incorporated into the General Plan. The DSAP establishes a vision for Diridon Station and the surrounding area in response to the planned extension of BART and HSR service to San José. The City initiated amendments to the DSAP in 2019, in light of the following changes in planning assumptions:

- New uses contemplated for a site (located within the boundary of the project site analyzed in this EIR) previously identified for a proposed Major League Baseball ballpark.
- The City policy, adopted in March 2019, to allow greater building height limits in the station area.
- The City's focus on environmental sustainability through *Climate Smart San José*, adopted in 2018.

[18] City of San José, *Downtown Strategy 2040, Integrated Final EIR*, December 2018. Available at https://www.sanjoseca.gov/Home/ShowDocument?id=44054.
[19] City of San José, *Diridon Station Area Plan*, Final Plan Report, June 2014. Available at https://www.sanjoseca.gov/Home/ShowDocument?id=15739. Accessed September 23, 2019.

- The adopted Downtown Design Guidelines and proposed Downtown Transportation Plan.
- The City's participation, along with Caltrain, the California High-Speed Rail Authority, and VTA, in the DISC Plan process, which will evaluate how to expand and redesign Diridon Station as a world-class center of transit and public life that provides for intermodal connections and integration with the surrounding neighborhoods.[20]

The DSAP amendments are intended to adapt the DSAP to updated circumstances; align with and complement other adopted and ongoing plans, including the DISC Plan; and support and facilitate implementation of the DSAP relative to both private development and public investment. The City does not expect to make major changes to the primary objectives of the DSAP. Anticipated changes include reallocating development capacity from elsewhere in the City's development capacity and updating the plan sections addressing land use, design, transportation, and public spaces. The City will also prepare area-wide implementation strategies for shared parking, infrastructure financing, and affordable housing.

Specific goals of the DSAP that relate to transportation include:

- **Connectivity:** Establish and strengthen connections to surrounding districts and within the planning area for pedestrians, bicyclists, and motorists, with emphasis on east–west connectivity across SR 87 and the rail corridor.
- **Transportation:** Prioritize pedestrian circulation and transit. Improve pedestrian and bicycle connections to the Guadalupe River from the area.
- **Parking:** Disperse parking in different locations in the planning area and beyond to ensure easy walking access to destinations.

San José Bike Plan 2020

The City of San José Bike Plan 2020[21] was adopted in November 2009 and recommends policies, projects, and programs to achieve a vision where bicycling is an integral part of life in San José. The bike plan defines 500 miles of bikeways—400 miles on-street plus a 100-mile trail network—and emphasizes connection between the on-street and off-street bikeway networks. The San José Better Bike Plan 2025 will update the existing bike plan and is expected to be finalized in the fall of 2020.

Projects listed in the current bike plan that are near the project site include implementing a Class II bikeway (bike lanes) on Park Avenue between Sunol Street and Market Street and a Class II bikeway on Santa Clara Street between Montgomery Street and Almaden Boulevard. Both of these projects have been completed.

Complete Streets Design Standards and Guidelines

The San José Complete Streets Design Standards and Guidelines[22] were developed as a comprehensive set of street design standards and guidelines to inform how the City builds and

[20] The DISC Plan is not a land use plan. Instead, the plan will include a physical layout showing how the various track and station elements will fit together and relate to the surrounding neighborhood and a governing structure to implement the vision for the station and operate the station in the long term.

[21] City of San José, *San José Bike Plan 2020*, November 17, 2009. Available at http://www3.sanjoseca.gov/clerk/Agenda/20091117/20091117_0602att.pdf. Accessed September 23, 2019.

[22] City of San José, *San Jose Complete Streets Design Standards & Guidelines*, May 2018. Available at https://www.sanjoseca.gov/home/showdocument?id=33113.

retrofits streets. The guidelines in the document present standards for the design and implementation of streets that are comfortable and welcoming for all modes of travel in accordance with the City's Vision Zero initiative.

The guidance provided in the Complete Streets Design Standards and Guidelines varies depending on roadway typology and the context of the built environment. For example, Downtown Areas are characterized by intensive office, retail, service, residential, and entertainment land uses. Transit usage and pedestrian activity are given primary emphasis over automobile activity in this context. The design standards and guidelines refer to the 2003 Downtown Streetscape Master Plan[23] for identified pedestrian networks in the Downtown area for public streets lacking a typology designation in the 2040 General Plan.

Downtown Transportation Plan

In late 2019, the City initiated the Downtown Transportation Plan, which will identify a comprehensive circulation network and advance the big transportation moves that will help shape the desired future of Downtown San José. The Plan will provide clear, well-vetted direction to improve access, mobility, circulation, navigability, streetscapes, and public life throughout the Downtown area. Comprehensive community engagement will be used to identify and establish network-level transportation plans designed to complement adjacent land uses and accommodate all travel modes. In addition, the plan will develop methods for ranking transportation projects and programs and producing conceptual designs and implementation strategies for high-priority improvements. Development of the Downtown Transportation Plan is expected to be completed in 2021.

3.13.3 Impacts and Mitigation Measures

Significance Criteria

For the purposes of this EIR, based on the questions in Appendix G of the CEQA Guidelines, an impact related to transportation would be significant if implementing the proposed project would:

- Conflict with a program plan, ordinance, or policy addressing the circulation system, including transit, roadway, bicycle, and pedestrian facilities;
- Conflict or be inconsistent with CEQA Guidelines Section 15064.3(b);
- Substantially increase hazards due to a geometric design feature (e.g., sharp curves or dangerous intersections) or incompatible uses (e.g., farm equipment); or
- Result in inadequate emergency access.

San José Policy 5-1 Significance Criteria

As discussed in Section 3.13.2, *Regulatory Framework*, the City adopted its new Transportation Analysis Policy, Council Policy 5-1, in February 2018. The policy replaced its predecessor (Policy 5-3) and established thresholds for transportation impacts under CEQA based on VMT

[23] City of San José, *San José Downtown Streetscape Master Plan*, October 2003. Prepared for the Redevelopment Agency of the City of San José [now defunct].

instead of LOS. The VMT analysis is conducted to evaluate the proposed project's VMT against the appropriate thresholds of significance. The City designates VMT threshold by land use as summarized in **Table 3.13-3**.

TABLE 3.13-3
THRESHOLDS OF SIGNIFICANCE FOR VEHICLE MILES TRAVELED

Project Type	Significance Criteria	Current Level	Threshold
Residential Uses	Project VMT per capita exceeds existing Citywide average VMT per capita minus 15 percent **OR** existing regional average VMT per capita minus 15 percent, whichever is lower.	11.91 VMT per capita (citywide average)	10.12 VMT per capita
General Employment Uses	Project VMT per employee exceeds existing regional average VMT per employee minus 15 percent.	14.37 VMT per employee (regional average)	12.21 VMT per employee
Industrial Employment Uses	Project VMT per employee exceeds existing regional VMT per employee.	14.37 VMT per employee (regional average)	14.37 VMT per employee
Retail/Hotel/School Uses	Net increase in existing regional total VMT.	Regional total VMT	Net increase
Public/Quasi-Public Uses	In accordance with the most appropriate type(s) as determined by Public Works Director.	Appropriate levels listed above	Appropriate thresholds listed above
Mixed Uses	Evaluate each land use component of a mixed-use project independently, and apply the threshold of significance for each land use type included.	Appropriate levels listed above	Appropriate thresholds listed above
Change of Use/ Additions to Existing Development	Evaluate the full site with the change of use or additions to existing development, and apply the threshold of significance for each project type included.	Appropriate levels listed above	Appropriate thresholds listed above
Area Plans	Evaluate each land use component of the area plan independently, and apply the threshold of significance for each land uses type included.	Appropriate levels listed above	Appropriate thresholds listed above

NOTES:

VMT = vehicle miles traveled

The regional average for residential uses in the Bay Area was 17.33 VMT per capita and 13.08 for Santa Clara County, according to the latest data available (2015) from the 2015 Santa Clara Valley Transportation Authority Travel Model.[24]

SOURCES: Data compiled by Fehr & Peers in 2020; City of San José, *Transportation Analysis Handbook*, April 2018. Available at https://www.sanjoseca.gov/home/showdocument?id=28461. Accessed July 15, 2019.

If a project is found to have a significant impact on VMT, the EIR must identify potentially feasible mitigation measures such as modifying the project to reduce its VMT to an acceptable level (i.e., below the established thresholds of significance) and/or mitigating the impact through multimodal transportation improvements or establishing a TDM program and associated monitoring requirements.

General Plan Amendment Significance Criteria

In addition to the criteria listed above, the City requires that the following criteria be evaluated because the proposed project would require a General Plan Amendment. Guidelines and

[24] Fehr & Peers, *Stanford 2018 General Use Permit: SB 743 VMT Analysis*, August 2017. Available at https://www.sccgov.org/sites/dpd/DocsForms/Documents/SU_2018GUP_App_Tab8_VMT.pdf.

thresholds set by the General Plan were used to evaluate the potential impacts of the proposed project. Based on those guidelines and thresholds, an impact related to transportation would be significant if the proposed project would:

- Cause an increase in VMT per service population over Year 2040 General Plan/Cumulative No Project conditions;[25]
- Cause an increase in journey-to-work drive-alone mode share over Year 2040 General Plan/Cumulative No Project conditions;
- Cause a decrease in average travel speed on a transit corridor below Year 2040 General Plan/Cumulative No Project conditions in the a.m. peak 1-hour period when:
  - The average speed drops below 15 miles per hour (mph) or decreases by 25 percent or more; OR
  - The average speed drops by 1 mph or more for a transit corridor with average speed below 15 mph under Year 2040 General Plan/Cumulative No Project conditions.

One additional General Plan Amendment significance criterion was evaluated for the proposed project. However, that evaluation is based on the measures of delay/LOS, which are no longer allowed under CEQA. Therefore, a non-CEQA analysis of the following significance criterion is provided only in Appendix J1:

- Result in deficient operations on adjacent jurisdiction roadway segments when 25 percent or more of total deficient-lane miles are attributable to the city during the a.m. 4-hour peak period such that:
  - Total deficient-lane miles are total lane-miles of street segments with volume-to-capacity (V/C) ratios of 1.0 or greater; and
  - A deficient roadway segment is attributed to the city when trips from the city are 10 percent or more on the deficient segment.

Approach to Analysis

As part of the Assembly Bill (AB) 900 application prepared for the proposed project, which the Governor certified on December 30, 2019, trip reduction measures were quantified to demonstrate that the project could achieve a 15 percent improvement in transportation efficiency compared to a comparable project, as required by the law. The application demonstrated that through a combination of high-quality walkable urbanism, and investment in a comprehensive TDM program, the proposed project would reduce vehicle trips between 17.7 and 24.4 percent as compared to a project with the same size, mix of land uses, and location, but without the proposed project's trip reduction features. Although AB 900 requires the City to ensure that the proposed project would achieve the 15 percent transportation efficiency improvement, the impact analysis/evaluation provided below does not re-evaluate whether that goal would be met or include the trip reduction measures quantified in the AB 900 analysis. The purpose of doing a separate analysis using the City's transportation model, as described in this section, is to provide a conservative analysis consistent with those prepared for other EIRs, with results that can be compared to other analyses

[25] The VMT per service population General Plan Amendment significance criterion is different than the VMT metrics analyzed pursuant to CEQA Guidelines Section 15064.3(b), as discussed in the Impact Analysis.

conducted by the City. Accordingly, although Chapter 2, *Project Description*, describes the project applicant's trip reduction features analyzed under AB 900, this EIR excludes those features from "project" conditions for the purposes of this transportation analysis.

The proposed project is required to complete a VMT analysis for the purposes of CEQA (i.e., consistency with CEQA Guidelines Section 15064.3(b) and Council Policy 5-1), not the AB 900 application.

Potential transportation impacts were evaluated for the following four scenarios:

- **Scenario 1: Year 2015 Existing Conditions.** The City's Travel Demand Forecasting Model was used to determine baseline VMT and traffic volumes. The year 2015 is the base year for the City of San José Travel Demand Forecasting Model, and the City's model is the best tool available for identifying project VMT impacts. Year 2015 conditions are reasonably representative of current conditions, and they are used in Scenarios 1 and 2 to isolate changes in VMT attributable to the project.
- **Scenario 2: Year 2015 Existing Plus Project Conditions.** Project impacts were evaluated using the City's model to develop VMT projections with development of the proposed project. The use of the City's model represents a conservative estimate, as the model does not account for project-specific features (such as TDM elements) that would reduce the trips and associated VMT generated by the proposed project. The scenario also assumes the base year 2015 transportation network and does not account for any anticipated enhancements to transit service, such as BART Phase II and Caltrain electrification, that would also reduce the trips and associated VMT generated by the proposed project.
- **Scenario 3: Year 2040 Cumulative Conditions (No Project).** The City's model was used to develop VMT per capita/per service population projections for the year 2040 and forecast traffic volumes, using the land use and transportation assumptions consistent with the General Plan. Those assumptions include land use reallocations currently contemplated as part of the City-initiated DSAP amendments (described in Section 2.4.4, *Proposed Changes to the General Plan Growth Allocations by Area*, in Chapter 2, *Project Description*) and those proposed as part of the project's General Plan Amendment. Land uses associated with buildout of the project were then "backed out" of the model to determine 2040 cumulative conditions without the project. This scenario assumes future transit service enhancements associated with BART Phase II and Caltrain electrification.
- **Scenario 4: Year 2040 Cumulative Conditions (With Project).** This scenario includes Scenario 3 volumes without subtracting project land uses and includes street network modifications proposed as part of the project.

The City's Travel Demand Forecasting Model was developed based on 2015 travel data and land use inputs. Since that time, the prevalence of for-hire vehicles has increased in the Bay Area, including San José, mostly as a result of growth in the number of and demand for transportation network company (TNC) services, such as Lyft and Uber. The model estimates the probability of driving based on auto ownership, household income, and other variables, however, available travel data do not directly account for the increased availability of TNCs. To the extent that people previously would have traveled in another personal or for-hire vehicle (e.g., taxi) but now travel using a TNC service, this is accounted for in the previous travel data.

Several recent studies have evaluated the impact of TNCs on VMT and overall trip generation. A study published in 2019 found that approximately 3 percent of all roadway VMT in the nine-county San Francisco Bay Area was attributable to TNCs.[26] A study of TNC use in major metro areas in California suggests that 25 to 55 percent of trips made via TNCs would have otherwise been made via walking, transit, or bicycle, and that up to 20 percent of all TNC trips would not have occurred without the presence of TNCs.[27]

Although the City's Travel Demand Forecasting Model does not specifically include trips made by TNCs because of a lack of available travel survey data during development of the model itself, trips made using TNCs are likely shorter than average vehicle trips that currently occur in the area; have higher average vehicle occupancy; and are generally not associated with travel for work purposes.[28]

Project Construction

The potential for construction of the proposed project to result in impacts on transportation services and facilities in the study area is addressed in the LTA, which is provided in Appendix J2 of this EIR and summarized in the impact analysis below.

Impact Analysis

Impact TR-1: The proposed project would not conflict with a program, plan, ordinance, or policy addressing the circulation system, including transit, roadway, bicycle, and pedestrian facilities. *(Less than Significant)*

Project Construction

Construction of the proposed project could result in conflicts with applicable plans or policies, especially those that relate to transit, pedestrian, and bicycle facilities/operations. The LTA (refer to Appendix J2 of this EIR) discusses specific steps that would be required to minimize those effects as much as possible during construction to provide for the safe and efficient movement of all transportation modes including walking, bicycling, vehicles, and transit. These steps would be part of a required comprehensive traffic control plan, which would include City best practices and any additional best practices relevant to the proposed project.

The City has a Recommended Temporary Traffic Control Plan (RTTCP) that was developed in accordance with California Vehicle Code Section 21400.[29] The plan provides high-level guidance on construction management and approves various devices that can be used on a construction site. The project applicant would be required to prepare and submit a project-specific RTTCP to the San

[26] Fehr & Peers, *Estimated TNC Share of VMT in Six US Metropolitan Regions*, August 2019. Available at https://www.fehrandpeers.com/what-are-tncs-share-of-vmt/
[27] Travel Behaviour and Society, *What Influences Travelers to Use Uber? Exploring the Factors Affecting the Adoption of On-Demand Ride Services in California*, October 2018.
[28] Fehr & Peers, *Use of the City of San José Model and Ridehail Services*, May 2020.
[29] City of San José, *City of San José Recommended Temporary Traffic Control Plans*, undated. Available at https://www.sanjoseca.gov/home/showdocument?id=19947.

José Department of Public Works for approval before beginning project construction. The components of the RTTCP and the potential effects that they would address are summarized below:

- **Temporary Traffic Control Plan Elements:** The RTTCP specifies that work area planning should be done any time a roadway's normal function is suspended. Temporary traffic control planning must provide continuity of movement for traffic, pedestrians, bicyclists, transit operations, and access to property/utilities. To reduce potential conflicts between construction activities and pedestrians, bicyclists, transit, and autos, the project applicant must require the construction contractor(s) to prepare a traffic control plan for major construction phases (e.g., demolition and grading, construction, or renovation of individual buildings). The project applicant and their construction contractor(s) must meet with relevant City agencies to coordinate feasible measures for reducing traffic congestion. The Plan shall include consideration of SAP Center ingress and egress for event days and allow for efficient movement and safe conditions for patrons of the arena.

  Construction of the proposed project may overlap with the construction of BART Phase II, the new Diridon Station, and other nearby developments. If the construction time frames of the major phases and other development projects adjacent to the project site overlap, the project applicant must coordinate with City agencies through the adjacent developers to minimize the severity of any disruption to adjacent land uses and transportation facilities from the overlapping construction transportation effects. The project applicant, in conjunction with the adjacent developer(s), must propose a construction traffic control plan that includes measures to reduce potential construction traffic conflicts, such as coordinated material drop-offs, collective worker parking, SAP Center ingress/egress, and transit to the job site.

- **Traffic Construction Management:** Construction of the proposed project would have an adverse effect if it would cause traffic hazards, delays, or disruptions. According to the RTTCP, vehicular circulation should be maintained to the greatest extent possible, depending on the work area. Care should be taken to ensure that drivers are made aware of any traffic pattern changes well in advance of the deviation, using signs, flaggers, barricades, flags, flashers, or traffic cones. A combination of treatments may be necessary, depending on the circumstances and visibility.

- **Transit Construction Management:** Construction of the proposed project would cause direct effects on the operation of VTA bus and light rail in the project study area, as identified in Section 3.13.1, *Environmental Setting*. Specifically, construction activities would affect the Green Line (light rail) and bus routes 17, 64A, 22, and Rapid 522. According to the City's RTTCP, VTA should be notified of the proposed project and a plan should be developed to accommodate the affected stations and stops in the construction area.

- **Pedestrian Construction Management:** Construction of the proposed project would cause direct effects on the sidewalks and walking paths throughout the project study area. According to the City's RTTCP, adequate protection for the safety of pedestrians must be provided when the work area encroaches on a sidewalk, walkway, or crosswalk area.

- **Bicycle Construction Management:** Construction of the proposed project would cause direct effects on bike routes throughout the project study area. The bike routes most likely to be affected are those on Cahill Street, Montgomery Street, Crandall Street, Autumn Street, Santa Clara Street, and San Fernando Street, although there could be others. There is also a Bay Wheels bike sharing station on Crandall Street. The City's RTTCP states that whenever possible, bicycle lanes should be maintained throughout a construction area. The project applicant must coordinate with the City to develop a component of the Temporary

Traffic Control Plan that addresses bicycle routes. If a bicycle route is disrupted during project construction, the project applicant must provide a reasonable and accessible alternative and create clear wayfinding to the alternative route.

- **Freight/Delivery Truck Loading Construction Management:** Construction of the proposed project would cause direct effects on loading throughout the project study area. The City's RTTCP suggests that freight and delivery truck loading be accommodated in a construction area by providing alternative routes, if necessary because of possible constraints (i.e., bridge, weight, clearance, or geometric restriction). The project applicant must develop an inventory of merchants in the project study area to assess freight needs, schedules, and locations.
- **Parking Construction Management:** Construction of the proposed project would cause direct effects on on-street parking availability and off-street parking lots—specifically, parking on Autumn Street and in the Diridon Station off-street lots directly east of the station. The City does not have guidance on accommodating parking in construction zones. The project applicant must include a plan for accommodating parking during construction, both for the construction workers and for people wishing to access the area's amenities including the SAP Center and transit.
- **Emergency Access Construction Management:** Construction of the proposed project would cause direct effects on emergency vehicles moving into, out of, and throughout the construction area. An essential part of fire, rescue, spill cleanup, highway agency, and enforcement activity involves properly controlling road users through the traffic incident management area to protect responders, victims, and other personnel at the site. The project applicant must include a plan for maintaining emergency vehicle access during construction, which would include coordination with police and other emergency service providers.

In summary, the project applicant would be required to develop a robust Traffic Control Plan that addresses each major phase and is coordinated with adjacent construction activities, as appropriate, and that holistically addresses vehicular, bicycle, pedestrian, transit, parking, loading, and emergency vehicle access and circulation. Therefore, construction of the proposed project would not conflict with any applicable plan, policy, or ordinance addressing the circulation system, and this impact would be **less than significant**.

Project Operation

Conflicts with the Envision San José 2040 General Plan

Plans and Policies

As detailed in Table 3.13-2, the General Plan includes several policies pertaining to the City's transportation network. The determination of consistency with the General Plan involves assessing the project's density, design, and conformance to the goals and policies set forth in the General Plan.

The General Plan's goals for residential, commercial, and mixed-use projects include providing a high-quality living environment for San José residents; strengthening Downtown as a regional job, entertainment, and cultural destination; maximizing housing opportunities in locations within 0.5 miles of transit with good access to employment areas; and leveraging neighborhood-serving commercial uses to reduce VMT. The proposed project is consistent with the General Plan's land use goals in that it proposes developing underused land in the Downtown area near major transit facilities including Diridon Station; integrating housing, retail, and office land uses;

encouraging walking through attractive and accessible pedestrian connections, both within the development and within the surrounding area; and supporting cultural events.

The General Plan's transportation goals aim to complete and maintain a multimodal transportation system, with an emphasis on improving pedestrian and bicycle facilities, maximizing the efficiency of the existing street system, and reducing VMT. The project site is located within a 0.5-mile radius of major VTA bus and light rail stops; Diridon Station, with existing Caltrain, ACE, and Amtrak service; and future HSR, BART, and proposed enhanced BRT service along Santa Clara Street and both the Guadalupe River and Los Gatos Creek Trails. The proposed project would leverage transit synergy from its location near Diridon Station and through pedestrian and bicycling improvements. The project's pedestrian and bicycle improvements would include enhancing local pedestrian circulation, improving bicycling linkages to Downtown for residents and visitors, and enhancing access to the nearby trail network. In addition, a new districtwide parking program throughout the project site would accommodate site-specific parking demands while also managing public parking.

The proposed project would be consistent with the General Plan's land use and transportation goals described above and, on balance, would conform to the policies of the General Plan, including those identified in Table 3.13-2. If the City identifies proposed project features that could directly or indirectly conflict with one or more individual policies (e.g., by locating more jobs and/or residents in the project area than contemplated by the General Plan, which could indirectly affect transportation facilities), these conflicts either would not preclude a determination of General Plan conformity or would be resolved with the General Plan Amendment proposed as part of the project. For these reasons, the impact of the proposed project related to the potential for conflicts with the General Plan's Land Use and Transportation Elements would be **less than significant**. (The transit, bicycle, and pedestrian policies in the DSAP, Bike Plan, and Downtown Strategy are analyzed further below.)

Transportation Network Diagram

Portions of many streets in the project area are currently assigned various typologies in the General Plan Transportation Network Diagram: Grand Boulevards, On-Street Primary Bicycle Facilities, Main Streets, City Connector Streets, and Local Connector Streets. Under the proposed project, South Montgomery Street would be re-designated from a Grand Boulevard to a Main Street from West Santa Clara Street to West San Fernando Street. In addition, the following streets would be vacated under the proposed project, necessitating removal from the General Plan Transportation Network Diagram: a portion of North Montgomery Street just north of the SAP Center; Delmas Avenue between West Santa Clara Street and West San Fernando Street; and South Montgomery Street between West San Fernando and Park Avenue.

According to the General Plan, street typologies are intended to reflect a roadway's adjacent land uses, appropriate travel speeds, and the need to accommodate multiple travel modes. Because street typologies are assigned assuming a theoretical buildout of General Plan land uses, they can be modified as actual development occurs to more accurately reflect the circulation patterns of the development.

Any roadway extensions and new streets included in the final design would need to comply, subject to allowances pursuant to Title 13 and Title 19 of the Municipal Code, with the City's Complete Streets Design Standards and Guidelines[30] (May 2018) and the proposed Planned Development Permit (including the Downtown West Design Standards and Guidelines), both of which include design specifications to ensure the safe and efficient travel of vehicles, bicycles, pedestrians, and transit vehicles.[31]

The proposed project's changes to the General Plan Transportation Network Diagram would not, on their own, represent a conflict with the General Plan. Potential conflicts relative to the use, function, or safety of the roadways are discussed below under Impacts TR-3 and TR-4.

Conflicts with the Congestion Management Program

As described previously, the City's new Transportation Impact Policy (Council Policy 5-1) replaces the former Council Policy 5-3, which used intersection LOS, or vehicle delay or congestion, as the primary measure of development traffic impacts. Evaluating the project's impact on LOS at intersections under the jurisdiction of the City of San José is no longer allowed under CEQA.

However, apart from CEQA, the City is still required to conform to the requirements of VTA's Congestion Management Program. VTA has yet to adopt and implement guidelines and standards for evaluating the CMP roadway system, using VMT under SB 743. Therefore, the LTA, which includes all the non-CEQA analyses conducted for the proposed project in accordance with San José Council Policy 5-1, analyzes the effects of the proposed project on CMP-designated intersections and freeway segments near the project site, following the LOS standards and methodologies outlined in the VTA *Transportation Impact Analysis Guidelines* for informational purposes only. This analysis, provided in Appendix J2 of this EIR, is included to determine project consistency with the CMP, not to identify the project's impacts on the transportation system under CEQA, which are based on VMT metrics as discussed above.

The LTA analysis finds that traffic generated by the proposed project may cause CMP-established LOS thresholds to be exceeded at some CMP intersections and on some CMP freeway segments under 2040 Cumulative Plus Project conditions. Improvement projects to address these findings are provided in Appendix J2 of this EIR and where possible, aim to support the Project's and City's multimodal and TDM goals.

Conflicts with Other Plans and Policies

As stated in *Plan Bay Area 2040*, the Regional Transportation Plan and Sustainable Communities Strategy include policies to shift more travel demand to transit and to accommodate growth along transit corridors in Priority Development Areas. The proposed project is consistent with these policies because the project site is located in a Priority Development Area, and would construct

[30] City of San José, *San Jose Complete Streets Design Standards & Guidelines*, May 2018. Available at https://www.sanjoseca.gov/home/showdocument?id=33113.

[31] The Downtown West Design Standards and Guidelines also propose to supersede certain Complete Streets Design Standards and Guidelines, as applied to the proposed project. Refer to the draft document in Appendix M.

high-density mixed uses in a currently underused area of Downtown adjacent to high-quality, high-frequency transit that would generate future transit ridership.

For these same reasons, the proposed project would also be consistent with the VTP 2040, which focuses on transportation infrastructure improvements that would help to close transportation gaps, provide vital connections to jobs and housing, help to balance the overall system, and contribute to an efficient and sustainable multimodal transportation system that serves all socioeconomic groups.

Furthermore, by locating a new job center at a transit-rich location, the proposed project would create more efficient transportation linkages between the on-site jobs and employees' homes. The project would also provide housing at a range of affordability levels.

For these reasons, the proposed project would be consistent with the RTP and SCS. Thus, the impact of the project with respect to conflicts with other regional plans would be **less than significant**.

The proposed project's consistency with plans, policies, or ordinances related to transit, bicycle, and pedestrian facilities is described below. This CEQA analysis differs from the LTA analysis (provided in Appendix J2), which focuses on access and capacity constraints, and on connectivity (i.e., gaps in the network) in accordance with San José Council Policy 5-1.

Transit Facilities

The proposed project would conflict with a transit-related program plan or policy if it would conflict with existing or planned transit services, or would decrease the performance or safety of such services. The project would enhance transit access and ridership by leveraging the project site's proximity to Diridon Station, which is currently served by multiple transit agencies, and where existing and new transit providers are planning new or enhanced services in the future. Furthermore, as part of the proposed project, the project applicant would construct off-site improvements to the pedestrian and bicycle circulation network that would improve access to transit services in the project vicinity (refer to discussion of *Bicycle and Pedestrian Facilities*, below). The project does not propose infrastructure changes to existing transit facilities inside or outside of the project site, and thus, would not interfere with the ability of transit agencies to provide, modify, or expand service on those existing facilities. Potential changes to transit corridor travel speeds are addressed separately in Impact TR-7 below.

As described previously, several major transit plans would increase transit service in the area in the future. These include Caltrain electrification, Caltrain Business Plan, BART Phase II extension to Diridon Station and Santa Clara, California HSR, and enhanced BRT service along Santa Clara Street and The Alameda (refer to Appendix J1). The design of Diridon Station to accommodate increases in transit service is being addressed in the DISC Plan process.

The DISC Plan, currently underway, will develop a spatial configuration and layout for the Diridon multimodal transit station: the alignment of the heavy and light rail tracks entering and exiting the station, the location of rail platforms, access considerations for bicycle and pedestrian traffic and for private vehicle access and flow, and the station's integration with the urban fabric

and city context. The DISC Plan, and its relationship to the proposed project, is described in detail in Chapter 2, *Project Description*. Although the DISC Plan is not sufficiently developed at this stage to analyze as part of the project's transportation analysis, the project applicant would work with the City and the DISC partner agencies to address the final concept layout, while still meeting the objectives of the proposed project.

The Downtown West Design Standards and Guidelines provides a framework for such coordination efforts. Any such modifications would be subject to review by the Director of Planning, Building and Code Enforcement or the Director's designee pursuant to the applicable DISC-related standards in the Downtown West Design Standards and Guidelines.

An analysis of transit demand generated by the proposed project is provided in Appendix J2. The analysis found that demand for Caltrain services would not cause crowding at levels that would exceed Caltrain's comfortable-crowding level during the peak hour and peak direction (p.m. peak hour, southbound). The proposed project's effect on VTA service would be most pronounced on bus service closest to the project, and on Green Line light rail service. When compared to existing service levels, the proposed project could use up to 80 percent of the Green Line's current capacity, assuming that service includes four trains per hour, and that each train can accommodate 120 seated passengers. If total ridership, including transit riders generated by the proposed project, were to exceed the peak passenger load guidelines identified in VTA's *Transit Service Guidelines*[32] (i.e., 120 percent of seated capacity for all transit modes except Express Bus, which is 100 percent of seated capacity), mild to moderate crowding on VTA services may occur during peak hours. Although the proposed project would add transit riders to local and regional transit operators (e.g., VTA, Caltrain) serving the project site, increased transit ridership would be positive from a policy perspective (i.e., added uses and services accessible by transit, improved accessibility, fewer passenger vehicles added to roadways).

Furthermore, supporting increased transit ridership is consistent with regional and local policies that encourage the use of transit in an effort to reduce VMT and GHG emissions attributable to the use of single-occupancy vehicles. Specifically, VTA's *Transit Service Guidelines* provide a framework for designing and operating transit service, which relies on high transit ridership generated by attractive transit service, dense and transit-supportive land uses, and pedestrian-oriented street design. The latter two components are consistent with the proposed project's land use and circulation patterns.

None of the plans for future transit service in the area call for new dedicated parking facilities. However, developing existing privately operated surface parking facilities into other uses as part of the proposed project or future projects may reduce the availability of parking for transit users who currently use such facilities, potentially increasing dependence on first-mile and last-mile transit connections and the use of pedestrian and bicycle facilities. As stated in Chapter 2, *Project Description*, the project site is located in a Transit Priority Area, as defined in CEQA Section 21099, meaning that the site is within 0.5 miles of a major transit stop. The proposed project would be a mixed-use residential and employment center project on an infill site within

[32] Santa Clara Valley Transportation Authority, *Transit Service Guidelines*, April 2018. Available at https://www.vta.org/sites/default/files/2019-06/Transit%20Service%20Guidelines%202018%20FINAL.pdf.

this Transit Priority Area. For this reason, the proposed project is exempt from the requirement to analyze parking impacts pursuant to Section 21099, and no further analysis of parking is required. Additional information on the City's parking requirements and the proposed project's compliance with such requirements is provided in Appendix J2.

Based on the above discussion, the proposed project would not conflict with a plan, policy, or ordinance related to transit facilities, and this impact would be **less than significant**.

The LTA for the proposed project, provided in Appendix J2 of this EIR, includes an additional transit evaluation that focuses on the proposed project's ability to support transit ridership. It includes an assessment of transit facilities and services, access to transit, and transit operations.

Bicycle and Pedestrian Facilities

The proposed project would conflict with a bicycle- or pedestrian-related program plan or policy if it would create a hazardous condition that currently does not exist for pedestrians or bicyclists, or if it conflicts with planned facilities or local agency policies regarding bicycle and pedestrian facilities.

The proposed project would include several proposed bicycle network changes to provide bicycle connectivity within the project site and to the surrounding neighborhoods and regional destinations. Proposed improvements include:

- A multi-use path parallel to the light rail tracks between South Montgomery Street and West San Fernando Street.
- Off-street path connections along Los Gatos Creek within the project site to fill in gaps in the existing trail, with an off-street path connection (Class I) running along the western edge of Los Gatos Creek between Auzerais Avenue and Park Avenue, as well as along the eastern edge of the Creek from West San Fernando Street to West Santa Clara Street. These trail segments would be connected by on-street protected bikeways (Class IV) along Autumn Street between Park Avenue and the VTA tracks.
- On-street bicycle facilities (Class IV or Class II) along Park Avenue, West San Fernando Street, West St. John Street, West Julian Street, South Autumn Street, North Montgomery Street, and Cahill Street.
- Shared public streets that would have traffic calming, low speeds, and potential restrictions to auto travel along South Montgomery Street between West San Fernando Street and West Santa Clara Street and Post Street between Cahill Street and South Autumn Street.
- An additional network of private streets, most of which would be generally accessible to the public and some of which would predominantly provide service and loading access. Generally accessible private streets would include a new street extending west and north from North Montgomery Street to the rear (west) of the northern most parcel (Block A1) connecting to Lenzen Avenue; a dead-end street extending west from North Montgomery Street between West Julian and West St. John Streets (within Block C1); an L-shaped street along the alignment of Delmas Avenue north of the light rail tracks and turning east to reach the Guadalupe River; and an L-shaped street linking Royal Avenue and Auzerais Street (between Blocks H3 and H4). Limited-access private streets would include a service street that would run north of West San Fernando Street and parallel to Delmas

Avenue at the eastern border of the project site and a service connection between Cahill Street and South Autumn Street north of Park Avenue (through Block F1).

In addition, as part of the proposed project, the project applicant would construct a series of off-site improvements, identified in the project's LTA, to the bicycle and pedestrian network to enhance pedestrian and bicycle circulation and access to transit in the project vicinity. These improvements, which are part of the project analyzed in this EIR, include the following:

- A new footbridge over Los Gatos Creek between West Santa Clara Street and the VTA light-rail tracks.[33]
- Controlled at-grade crossing (crosswalk and curb improvements) for the Los Gatos Creek Trail across West Santa Clara Street at or near Delmas Avenue. This crossing would connect the existing segment of the Los Gatos Creek Trail within Arena Green, along the west side of the creek, with a new portion of the trail to be developed as part of the project on the east side of Los Gatos Creek between the VTA tracks and West Santa Clara Street.
- Improved bicycle facilities on Auzerais Avenue between the existing Los Gatos Creek Trail and Bird Avenue.
- Widening of the Auzerais Avenue north sidewalk beneath the SR 87 freeway, beginning from the existing Auzerais Avenue/Delmas Avenue intersection, and alignment of the curb line at the northeast corner of this intersection with the curb line at the northwest corner. A signal modification would also be made at this intersection.
- Improvements at the Coleman Avenue/West Taylor Street intersection to enhance bicycle connectivity along West Taylor Street from Walnut Street to Stockton Avenue. Improvements to the pedestrian walkway, removal of corner islands, and widening within the existing rail undercrossing would also be included.

In addition, the project applicant may provide funding, or partial funding, to the City to implement other off-site transportation improvements. Such improvements are not part of the proposed project. Environmental review of other off-site transportation improvements beyond those set forth above would be conducted separately by the City, as required.

These proposed improvements would be designed in accordance with state and City standards and would complement and in some cases, implement, the City's current bike network and the planned facilities drafted in the City's Better Bike Plan 2025, which is expected to be finalized in 2020. The proposed improvements also would not prevent the implementation of any facilities described in the San José Bike Plan 2020 or the Santa Clara Countywide Bicycle Plan.

The project applicant proposes to construct mid-block passages at several locations to facilitate pedestrian and bicycle access through the project site and break up the scale of larger blocks. The project would enhance sidewalks and implement "road diets" (removal and reconfiguration of lanes) along Park Avenue, and South Montgomery Street south of Park Avenue. Implementing the road diets would also entail changing South Autumn and South Montgomery Streets from one-way to two-way operation and removing vehicular access from South Montgomery Street

[33] Although this footbridge would begin and end within the project site, it would cross Los Gatos Creek, which is not part of the site, and is therefore included on this list of off-site transportation improvements.

south of San Fernando Street, and from Delmas Avenue between West Santa Clara and West San Fernando Streets.

The project would also enhance streetscape and intersection design and implement new and improved bike facilities throughout the study area to prioritize pedestrian and cyclist safety and improve linkages to Downtown San José. These project elements are described in the Downtown West Design Standards and Guidelines and are generally consistent with VTA's Complete Streets Program, which seeks to improve certain corridors to accommodate bicyclists, pedestrians, transit passengers, and vehicles. However, no corridors near the project site have been identified for evaluation as part of the Complete Streets Program.

The City's Complete Streets Design Standards and Guidelines vary depending on the context of the built environment and roadway typology. The project site falls under the "Downtown" context type because the project site and the surrounding areas are characterized by intensive office, retail, service, residential, and entertainment. The Downtown context prioritizes transit usage and pedestrian activity over automobile activity.

The Complete Streets Design Standards and Guidelines outline specific design features for each roadway typology and for the Downtown context. Examples of guidance provided in the standards and guidelines include minimum sidewalk widths, design vehicle lengths, crosswalk treatments, and recommended bikeway design variations.

The proposed project would provide a walkable area with good pedestrian connections between land uses and Diridon Station and the greater Downtown area. Specific streets have not been fully designed, but the typical street sections outlined within the project site are generally consistent with the example cross sections illustrated in the Complete Streets Design Standards and Guidelines as well as the Downtown West Design Standards and Guidelines.

As discussed above, the proposed project's on-site and off-site transportation network improvements would be designed in accordance with state and City standards and would not prevent the implementation of planned bicycle or pedestrian facilities. Thus, the proposed project would not create hazardous conditions where none exist today, nor would it conflict with planned facilities or local agency policies. Based on the discussion above, the proposed project would not conflict with a plan, policy, or ordinance related to bicycle or pedestrian facilities, and this impact would be **less than significant**.

Mitigation: None required.

Impact TR-2: The proposed project would not conflict or be inconsistent with CEQA Guidelines Section 15064.3(b) regarding the use of VMT for analysis of land use projects. *(Less than Significant)*

As described previously, the City of San José Transportation Impact Policy (Council Policy 5-1) replaces the former Council Policy 5-3, which used intersection LOS, or vehicle delay or congestion, as the primary measure of traffic impacts from development. Thus, the evaluation of a

project's impact on LOS at intersections under the City's jurisdiction is no longer allowed under CEQA. Council Policy 5-1 provides guidance on project screening criteria, thresholds of significance for environmental clearance for development projects, and methods for VMT analysis.

Screening Criteria

The City's VMT procedure includes screening criteria that are used to identify the types, characteristics, and/or locations of projects that would not exceed the CEQA thresholds of significance. If a project or a component of a mixed-use project meets the screening criteria, the project or component is presumed to result in a less-than-significant VMT impact and a VMT analysis is not required. The screening criteria categorize development projects as one of the following:

- Small infill project;
- Local-serving retail;
- Local-serving public facility;
- Project located in a Planned Growth Area with low VMT and high-quality transit; or
- Deed-restricted affordable housing located in a Planned Growth Area with high-quality transit.

A project or a component of a mixed-use project that meets the associated screening criteria is exempted from performing a CEQA-level VMT analysis. The screening criteria are described in detail in the City's *Transportation Analysis Handbook*.

Project work on most of the potential residential and office development parcels included in the proposed project would meet the City's screening criteria for VMT analysis and would be presumed to have a less-than-significant VMT impact. This finding is based on the parcels':

- Location in a Planned Growth Area (Downtown);
- Proximity to high-quality transit;
- Location in an area of low VMT in accordance with the established thresholds;
- Transit-supporting density; and
- Limited amount of parking provided.

Generally, only the proposed project's development parcels north of Julian Street are located outside of low-VMT areas. Those parcels would not meet the screening criteria and would require a detailed VMT analysis. However, given the size and unique characteristics of the proposed project, and to provide full disclosure, a VMT analysis using the City's model was conducted for the entire project in lieu of applying the City's VMT screening tool. The results of the VMT analysis are presented below.

Project Land Use Vehicle Miles Traveled

The City developed a spreadsheet-based tool, known as the City's VMT Evaluation Tool, to estimate VMT-related impacts and mitigation measures for new land use development projects.

The tool is used to determine the existing and project VMTs for the area around the parcel where the proposed project is located. However, the tool is geared toward smaller projects because it analyzes projects at the parcel level. Because of the size of the proposed project (more than 100 parcels), the project's VMT for all land uses except for the event center and logistics center was evaluated using the City's Travel Demand Forecasting Model directly, instead of the City's VMT spreadsheet tool. The proposed project's land uses and transportation system changes were incorporated into the City's 2015 baseline model. The model was run and used to estimate the VMT for all vehicle trips with an origin or destination on the project site on an average weekday.

To obtain VMT per capita, the VMT estimates for all residential vehicle trips generated by the proposed project with an origin or destination on the project site were divided by the number of residents. The results were compared to the City's VMT threshold for residential projects. Similarly, the VMT estimates for all project-related, office-generated vehicle trips with an origin or destination on the project site were divided by the number of office employees to obtain VMT per employee.[34] The results were compared to the City's VMT threshold for office projects.

The hotel and retail components of the proposed project were evaluated separately from the project's other land use components. Specifically, the total regional VMT with the proposed project was calculated for two scenarios—without and with the retail/hotel uses—to compare the shifts in an equivalent amount of retail from other locations in San José. The premise of the analysis is that if retail is located at the project site, then travel demand from other similar locations in San José would be shifted to the project site. This is a typical analysis to evaluate the project's effect on retail VMT; the project does not propose to physically shift retail from other areas of the city.

Table 3.13-4 summarizes the results for the residential, office, and retail/hotel components of the proposed project.

TABLE 3.13-4
RESULTS OF THE VEHICLE MILES TRAVELED ANALYSIS

Scenario	VMT	VMT Threshold	Exceed VMT Threshold?
Residential Project Components			
Project	7.93 per capita	10.12 VMT per capita	No
Office (General Employment) Project Component			
Project	9.72 per employee	12.21 VMT per employee	No
Retail/Hotel Uses			
Existing	74,303,439	Net increase from regional total VMT	N/A
Existing plus Retail/Hotel Shift	74,261,308		No

NOTE:
N/A = not applicable (existing VMT is not subject to the thresholds); VMT = vehicle miles traveled
SOURCES: Data compiled by Fehr & Peers in 2020; City of San José, *Transportation Analysis Handbook*, 2018.

[34] Section 3.11, *Population and Housing*, explains how the numbers of residents and office employees were derived.

With implementation of the proposed project, both the residential and office VMTs would be below the City's VMT thresholds, and the VMT impact of the proposed project for these land uses would be **less than significant**.

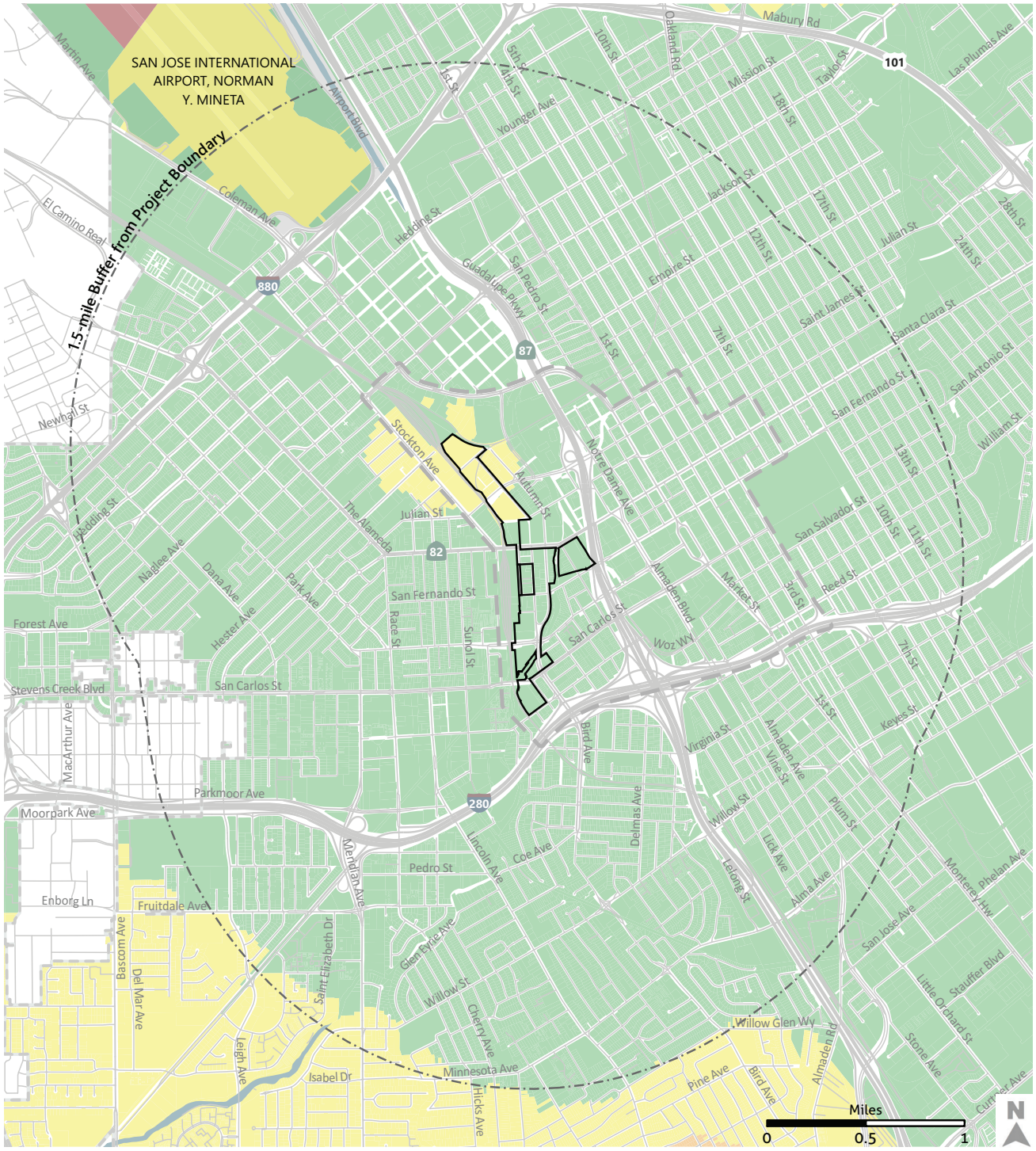
As discussed in Chapter 2, *Project Description*, the proposed project will include an affordable housing program in support of the MOU's articulated goal of 25 percent affordable housing throughout the DSAP. The City's Travel Demand Forecasting Model does not distinguish between affordable and market-rate housing. Affordable housing would likely result in lower VMT than market-rate housing because residents of affordable housing have comparatively lower vehicle ownership rates and higher transit usage. For reference purposes, **Figure 3.13-5** and **Figure 3.13-6** show the City's residential VMT per capita and employment VMT per office job maps. As shown on these figures, VMT is lowest in denser urban areas of San José with good transit and multimodal connectivity. Denser areas with a mix of land uses provide opportunities for residents and workers to walk to their destinations, along with good multimodal access to Diridon Station, light rail, and bus transit that provides for a broader range of travel options.

Based on the modeling of total regional VMT with and without the project's retail/hotel uses, total regional VMT would be reduced by 42,131 as a result of the shift in retail/hotel VMT caused by the proposed project. Based on the City's retail/hotel VMT threshold of no net increase from regional total VMT, the proposed project's retail/hotel VMT impact would be **less than significant**, because the total regional VMT would be reduced with the proposed project.

As noted in the *Approach to Analysis*, the City's Travel Demand Forecasting Model does not directly account for the use of TNCs, such as Uber and Lyft, since there was limited available travel survey data available during development of the model itself. Further, there are no alternative, accepted models for quantifying estimated TNC demand or travel distances in San José. However, trips made by TNC are likely shorter than average vehicle trips that currently occur in the area; have higher average vehicle occupancy; and are generally not associated with travel for work purposes; therefore, these trips are not anticipated to substantially affect per capita VMT associated with the proposed project. Additionally, the VMT associated with the project, as summarized in Table 3.13-4, is projected to be well below the VMT per capita threshold for a significant impact; in the event that the use of TNCs would increase the VMT per capita in the study area, this effect is not anticipated to be great enough to exceed the threshold of significance, given the typical use purpose, vehicle occupancy, and trip length of TNC trips.

Event Center Vehicle Miles Traveled

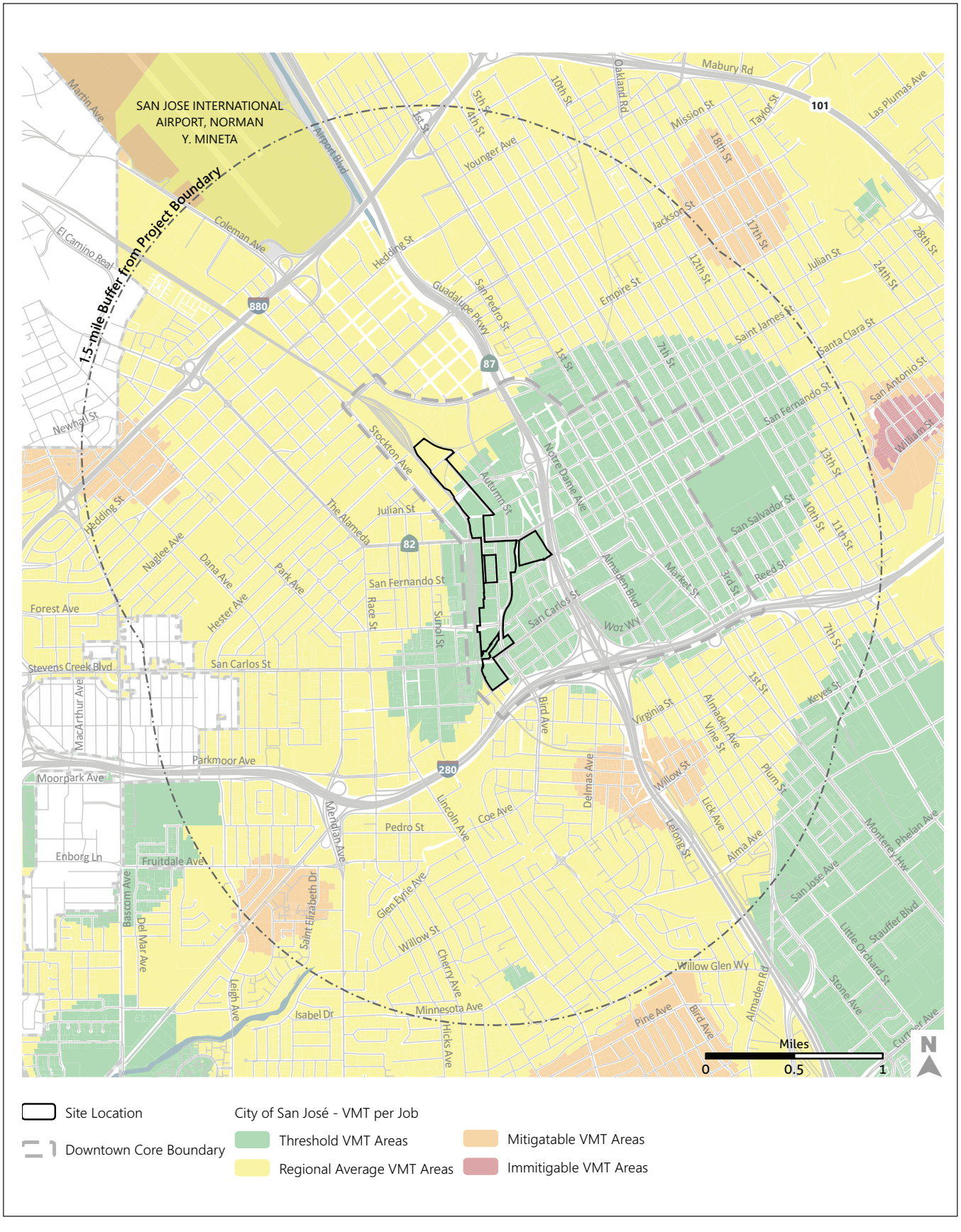
Because of the unique characteristics of the event center component of the proposed project, the City's Travel Demand Forecasting Model was not used to estimate VMT for that component. Instead, VMT for the event center was evaluated qualitatively based on the characteristics of its anticipated usage (e.g., number and type of events, attendee profiles).



SOURCE: Fehr & Peers, 2020

Downtown West Mixed-Use Plan

Figure 3.13-5
Residential VMT per Capita Map



SOURCES: Fehr & Peers, 2020

Downtown West Mixed-Use Plan

Figure 3.13-6
Employment VMT per Office Job Map

The proposed project would also include up to 100,000 square feet of event center uses in the center of the project site. The event center uses could accommodate up to 2,000 people and would function as a flexible space to accommodate a variety of event functions supporting Google businesses. Typical events could include product launches/announcements, corporate meetings, conferences, seminars, small conventions, and screenings. External trips to the site would vary based on the type of event; most events would be targeted toward on-site employees, and as a result, most attendees (approximately 70 percent) would already be at the project site and would not generate a substantial number of additional trips. For most functions at the event space, VMT effects would be smaller than for typical stand-alone event spaces, such as a convention center, because the number of trips for which attendees would travel longer distances (more than 5 miles) would be low compared to trips already on or near the project site. The convention-type events, which would attract a larger proportion of attendees from farther away, would occur an estimated four or five times a year and would not be considered part of the event center's normal day-to-day operations. For these reasons, the VMT impact for daily use of the event space would be considered **less than significant**.

Logistics Center Vehicle Miles Traveled

The proposed project includes 100,000 square feet of on-site logistics center uses to serve the commercial uses on-site. The 100,000 square feet would include two 50,000 square feet buildings; one in the Northern Infrastructure Zone of the project site and the other in the Southern Infrastructure Zone (see Chapter 2, *Project Description*, Figure 2-3). The logistics centers would allow for better management and distribution of daily deliveries within the site; thus generating a negligible amount of external trips to the site and not separately accounted for in the proposed project's travel demand and VMT estimates.

However, to provide a worst-case scenario, a separate VMT analysis was conducted applying the City's VMT Evaluation Tool) to estimate the project-generated VMT for the two logistics centers. The logistics center would be located in the area north west of the Julian Street/ Montgomery Street intersection in the Northern Infrastructure Zone and the area south west of the San Fernando Street/Autumn Street intersection in the Southern Infrastructure Zone. Parcels within these areas were selected for use of the City's VMT Evaluation Tool. The results from the City's VMT Tool are compared to the threshold for industrial projects as shown in **Table 3.13-5**. Outputs from the City's VMT Evaluation Tool for the two logistics centers are provided in Appendix J1.

TABLE 3.13-5
LOGISTICS CENTER VEHICLE MILES TRAVELED ANALYSIS

Location	VMT	VMT Threshold	Exceed VMT Threshold?
Northern Infrastructure Zone	10.17	14.37 VMT per Employee	No
Southern Infrastructure Zone	9.25		No

NOTE:

SOURCES: Data compiled by Fehr & Peers in 2020; City of San José, *VMT Evaluation Tool*, 2020.

With implementation of the proposed project, both the northern and southern logistics centers would generate VMT per employee below the City's VMT thresholds for industrial uses. Therefore, the VMT impact for the logistics center uses would be **less than significant**.

Project Roadway Modification Vehicle Miles Traveled

The proposed project would include several changes to the roadway network, as well as the proposed use of "dynamic" lanes. The VMT effects of these roadway modifications are discussed below.

Roadway Network Changes

The proposed roadway network changes include new streets or the removal of select streets, which in general would provide a small grid network that would allow efficient circulation within the project site. The streets that would be removed are generally short (less than 250 feet), with the exception of the segment of South Montgomery Street between West San Fernando Street and Park Avenue, which is approximately 950 feet long; and the segment of Delmas Avenue between West Santa Clara Street and West San Fernando Street, which is approximately 750 feet long. The removal of the one-way segment of South Montgomery Street would be partially offset by the extension of a two-way Cahill Street to the north and south. With the extension of Cahill Street and the parallel Autumn Street, the project site would maintain continuous north–south connections through the project site.

Similarly, north-south connections through the project site with the closure of Delmas Avenue between West Santa Clara Street and West San Fernando Street would be maintained via parallel routes on Autumn Street and Almaden Boulevard. The southern portion of the segment of Delmas Avenue to be removed as a through street would be reconfigured as a private street/driveway from West San Fernando Street. This new private street would connect with two new private streets between West San Fernando Street and West Santa Clara Street, an east-west street within the block and a north-south street between the development and the west edge of the Guadalupe River (the western half of the east-west street would be considered a mid-block passage). These new streets would provide parking access and egress to and from the proposed development on the portion of the project site between Los Gatos Creek and the Guadalupe River.

These roadway network modifications would result in a decrease in overall VMT by improving multimodal connections to and from the project site. Furthermore, the improved multimodal connections provide additional ways to access Diridon Station, which is served by commuter rail, light rail, and bus transit services.

As stated in the City's *Transportation Analysis Handbook*, most other roadway projects, including construction of new roadways, may or may not induce additional vehicle travel and associated VMT. In select cases, adding a link that greatly improves connectivity by providing drivers a shorter route in exchange for a longer one may reduce total VMT. Because the project site generally has a small grid network, there are easily accessible alternate routes for vehicle travel; in some cases, the new route may be slightly longer, while in other cases, it may be shorter. On balance, however, the network changes (including new streets and removal of streets) would not substantially increase VMT in the area. Therefore, the VMT impact of the proposed project related to roadway network changes would be **less than significant**.

Dynamic Lanes

The Downtown West Design Standards and Guidelines identify several roadways on the project site that are proposed to have "dynamic" lanes. Dynamic lanes are lanes adjacent to the curb that are flexible in that they can provide space for a variety of uses depending on need: vehicle or bicycle parking, pick-up/drop-off for goods or people, stormwater management and landscaping, or additional travel lanes to support SAP Center event traffic. Because these dynamic lanes would not be used for additional travel throughput, except for short periods to support event traffic from the SAP Center, the dynamic lanes are not considered to be travel- or VMT-inducing. Therefore, this VMT impact would be **less than significant**.

Mitigation: None required.

Impact TR-3: The proposed project would not substantially increase hazards due to a geometric design feature (e.g., sharp curves or dangerous intersections) or incompatible uses (e.g., farm equipment). ***(Less than Significant)***

As described in Section 2.7.1, *Changes to the Street Network*, several street network changes are currently proposed as part of the project. Any roadway extensions and new streets included in the final design would need to comply, subject to allowances pursuant to Title 13 and Title 19 of the Municipal Code, with the City of San José's Complete Streets Design Standards and Guidelines[35] (May 2018) and the Planned Development Permit, both of which include design specifications to ensure the safe and efficient travel of vehicles, bicycles, pedestrians, and transit vehicles.

In addition, final building footprints and site designs, including access and egress to individual development sites, would be subject to Council Policy 5-1 (2018). The policy states, in part, "All projects may be required to submit an LTA as determined by the Public Works Director," indicating that project LTAs must contain sufficient detail to analyze safety elements "proximate to the project site." Under Council Policy 5-1, the project applicant must prepare and submit LTAs evaluating sight distance, on-site circulation, and building access/egress when sufficient information is available for each building or development phase to allow the City to evaluate those aspects of the project for conformance with the City's Complete Streets Design Standards and Guidelines, and any other relevant City standards before recordation of final maps. For this reason, the proposed project would not introduce any geometric design features or incompatible uses, and this impact would be **less than significant**.

Mitigation: None required.

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[35] City of San José, *San Jose Complete Streets Design Standards & Guidelines*, May 2018. Available at https://www.sanjoseca.gov/home/showdocument?id=33113.

Impact TR-4: The proposed project would not result in inadequate emergency access. *(Less than Significant)*

An emergency access impact would occur if the project would create conditions that would substantially affect the ability of drivers to yield the right-of-way to emergency vehicles, or preclude the ability of emergency vehicles to access streets in the project vicinity.

The proposed project would extend portions of certain streets and remove parts of other streets within the project site to improve circulation. Proposed street network changes include:

- Extend Cahill Street to North Montgomery Street to the north and to Park Avenue in the south to provide continuous north–south connectivity through the length of the project site.
- Extend West St. John Street to connect from Montgomery Street to the new Cahill Street extension toward the north end of the project site.
- Create a new east–west extension of Post Street between South Montgomery Street and Autumn Street.
- Create a new north-south roadway between Cinnabar Street and Lenzen Avenue, providing public access to Block A1.
- Create a new "L-shaped" connection from Auzerais Avenue to Royal Avenue along existing alignments of Drake Street and Columbia Avenue (private street).
- Create a new ring roadway extending west from the intersection of North Montgomery and Cinnabar Streets around the rear (west) of Block A1, connecting to the former Lenzen Avenue right-of-way (private street) and to a new public street along the east side of Block A1.
- Close Delmas Avenue between West Santa Clara Street and West San Fernando Street to through traffic.
- Remove North Montgomery Street between West St. John Street and Cahill Street.
- Remove South Montgomery Street between West San Fernando Street and Park Avenue.
- Remove Otterson Street to the west of South Montgomery Street.
- Remove Cinnabar Street west of North Montgomery Street.
- Create several mid-block passages through the project site to facilitate pedestrian and bicycle access. Mid-block passages are a small-scale pedestrian network of passageways that provide mid-block shortcuts for people walking, increasing accessibility throughout the project site.

The proposed project also proposes to establish emergency vehicle access at the north end of the site before occupancy, to allow emergency vehicles to enter the site by going across or under the railroad tracks. The project applicant has evaluated a range of options for a new at-grade railroad crossing or new grade separation under the railroad. Grade separation options include an underpass at Lenzen Avenue or North Montgomery Street. A grade separation over the railroad is not being considered because the elevations required for rail clearance would not be feasible given the current roadway geometry. At-grade rail crossing options include a modification to the existing North Montgomery Street at-grade crossing or a new at-grade crossing on the north leg of the Warm Springs wye (the UPRR track that runs southeasterly from the Caltrain tracks north

of the project site) to the San Jose Market Center (the retail center northeast of the site). In addition, with the introduction of new technologies, such as remotely controlled bollards/gates, integrated communications between building fire alarm systems and rail and/or mass notification systems, North Montgomery Street could potentially continue to serve as the sole access point for emergency vehicles.

The specific proposal for emergency vehicle access has not been finalized because of the need to coordinate with other efforts that affect the feasibility of certain options. The City is applying to the Federal Railroad Administration for a quiet zone on the Warm Springs corridor from North Montgomery Street to Horning Street, about a mile northeast of the project site, which may include improvements to the North Montgomery Street at-grade railroad crossing. In addition, the DISC partner agencies have approved a Concept Layout that would elevate the railroad tracks that currently limit access to the site. Elevation of the tracks, consistent with the Concept Layout, would allow for at-grade or nearly at-grade reconnections of streets to the north end of the project site. These streets could include North Autumn Street, Cinnabar Street, and Lenzen Avenue.

Any new emergency vehicle access proposed by the project at the north end of the project site could be reconfigured, replaced, or supplemented by alternative access options at the time that the railroad is elevated as proposed by the DISC partner agencies. The new at-grade or grade-separated crossing ultimately proposed by the project would require coordination with the City and with the California Public Utilities Commission and/or Federal Railroad Administration and Caltrain and UPRR as applicable.

Staff members from the San José Bureau of Fire Prevention, Public Works, and Department of Planning, Building and Code Enforcement would review and approve individual building plans and related emergency access, which would be established before occupancy.

Any roadway extensions and new streets would need to comply, subject to allowances pursuant to Title 13 and Title 19 of the Municipal Code, with the City's Complete Streets Design Standards and Guidelines (May 2018), which include design specifications that consider emergency vehicle access requirements. Design requirements could include mountable concrete buffers, mountable curbs, and corner or sidewalk bulbs to accommodate turning of emergency vehicles. All new street segments would be designed in accordance with City policies, would provide adequate emergency vehicle access, and would not impede access to the project site and surrounding area by emergency vehicles.

Overall, the proposed roadway extensions and new streets would provide a grid network that would accommodate emergency vehicle access throughout the project site. The streets proposed for removal are generally short (less than 250 feet) and would not prevent emergency vehicles from accessing individual buildings via driveways.

The removal of Cinnabar Street west of North Montgomery Street would be replaced by a new private street connection between North Montgomery Street and Lenzen Avenue along the southern and western perimeter of the block, and a new north-south connection between Cinnabar Street and Lenzen Avenue along the eastern perimeter of the block that could be used for

emergency vehicle access. Access to the block along North Montgomery Street across railroad tracks serving Union Pacific Railroad (UPRR) would be maintained.

Given the planned land use and occupancy intensification from the existing manufacturing to the proposed office at the north end, the project proposes modifying the existing North Montgomery Street at-grade railroad crossing to provide adequate emergency vehicle access. Options are currently being explored, but may include a lane dedicated to emergency vehicle access. In addition, the introduction of new technologies could be implemented such as remotely controlled bollards and/or gates and integrated communications between building fire alarm systems and rail and/or mass notification systems, that could allow the North Montgomery railroad crossing to continue to serve as the sole access point to the block for emergency vehicles. Individual building plans and related emergency access would be established before occupancy and is subject to the review and approval of the San Jose Bureau of Fire Prevention, Public Works, and Department of Planning, Building and Code Enforcement.

Though the project applicant proposes the existing North Montgomery Street railroad crossing continue to serve as the sole access point to the block for emergency vehicles, options for a second access point for emergency vehicles were studied for compliance with San Jose Fire Code. The range of options for a second access point could include a new at-grade railroad crossing or new grade separation under the railroad. Grade separation options studied include an underpass at Lenzen Avenue or North Montgomery Street. In addition to the proposed modification of the existing North Montgomery Street at-grade crossing, a new at-grade crossing on the along the eastern boundary of the block, to the San Jose Market Center (the retail center northeast of the site) was studied. The underpass at Lenzen Avenue would have the greatest impact to air quality of all the options, and was included in the air quality analysis.

In addition, the City is applying to the Federal Railroad Administration for a quiet zone on the Warm Springs corridor from North Montgomery Street to Horning Street, about a mile northeast of the project site, which may include improvements to the North Montgomery Street at-grade railroad crossing. Also, the DISC partner agencies are studying a Concept Layout that would elevate the railroad tracks that currently limit access to the north end of the site. Elevation of the tracks, consistent with the Concept Layout, would allow for at-grade or nearly at-grade reconnections of streets to the north end of the project site. These streets could include North Autumn Street, Cinnabar Street, and Lenzen Avenue.

Proposed modification of the existing at-grade crossing, and options for a new at-grade or grade-separated crossing studied by the project would require coordination with the City and with the California Public Utilities Commission and/or Federal Railroad Administration, as well as Caltrain and/or UPRR as applicable.

The increases in vehicle, bicycle, and pedestrian demand associated with the proposed project would not substantially affect emergency vehicle access patterns; however, the addition of project-generated vehicle trips could increase intersection delays and overall travel times,

especially in the study area. At intersections, emergency vehicle access would not be significantly affected for the following reasons:

- The City has implemented a citywide emergency vehicle preemption system, managed through a central control system, that preempts signal control at individual intersections based on the global positioning system location of emergency vehicles and their priority as they respond to an incident.
- California law requires drivers to yield the right-of-way an emergency vehicle and remain stopped until the emergency vehicle passes, and emergency vehicles are equipped with flashing lights and sirens to facilitate movement through congested streets.

Multi-lane roadways, such as Santa Clara Street and San Carlos Street, provide for higher speed access by emergency vehicles and provide room for traffic to more easily move out of the path of emergency vehicles.

In summary, the site plans for each building or phase of project development would be required to comply with (subject to allowances pursuant to Title 13 and Title 19 of the Municipal Code) the City's Complete Streets Design Standards and Guidelines. Compliance would be governed by Council policy 5-1, which states, in part, "All projects may be required to submit an LTA as determined by the Public Works Director," indicating that project LTAs must contain sufficient detail to analyze safety elements "proximate to the project site." LTAs evaluating sight distance, on-site circulation, and building access/egress when sufficient information is available for each building or development phase would allow the City to evaluate those aspects of the project for conformance with the City's Complete Streets Design Standards and Guidelines, and any other relevant City standards before recordation of final maps. City review of the LTAs would ensure that all proposed roadway network changes (i.e., additions or removals of street segments) would not impede emergency vehicle access to the project site or surrounding areas. Design requirements deemed necessary by the City would be incorporated into the final design of each roadway network change. Design requirements could include mountable concrete buffers, mountable curbs, and corner or sidewalk bulbs to accommodate the turning of emergency vehicles. For the reasons described above, the proposed project would not result in inadequate emergency access, and this impact would be **less than significant**.

Mitigation: None required.

Impact TR-5: The proposed project would not cause an increase in VMT per service population over Year 2040 Cumulative No Project conditions. ***(Less than Significant)***

Where a General Plan Amendment is proposed, the City of San José considers an increase in VMT per service population compared to Year 2040 Cumulative No Project conditions to constitute a significant impact. VMT per service population is a measure of the daily VMT divided by the total number of residents and employees in a project area. VMT per service population (residents + jobs) differs from VMT per capita (residents only) and VMT per employee, discussed previously under Impact TR-2. VMT per capita and VMT per employee are metrics used to calculate average trip length per resident and per job for CEQA purposes. The

VMT per service population metric is typically used for air quality analysis and to evaluate proposed General Plan Amendments in San José. The VMT per service population includes all vehicle trips (trips to work, school, shopping, medical facilities, movie theaters, parks, etc.) that both start *and* end in the project area, and only half of the trips that either start *or* end in the project area.

The daily VMT per service population was calculated using the City's Travel Demand Forecasting Model. VMT is calculated by multiplying the number of vehicle trips and the length of the trip. Any increase to the VMT over Year 2040 Cumulative No Project conditions that is attributable to the project would constitute a significant impact. **Table 3.13-6** shows the citywide daily VMT per service population under the Base Year, Year 2040 Cumulative No Project, and Year 2040 Cumulative Plus Project conditions.

TABLE 3.13-6
CITYWIDE VEHICLE MILES TRAVELED PER SERVICE POPULATION

	Base Year (2015)	Year 2040 Cumulative No Project	Year 2040 Cumulative plus Project
Citywide Daily VMT	17,505,088	27,000,706	27,428,691
Citywide Service Population	1,392,946	2,025,534	2,069,268
Daily VMT per Service Population	12.57	13.33	13.26
Total Increase in VMT per Service Population over General Plan Conditions			**-0.07**

NOTES:
General Plan = *Envision San José 2040 General Plan*; VMT = vehicle miles traveled
Service population = total residents + total jobs. Refer to Section 3.11, *Population and Housing*, for the calculation of project population and employment. As discussed in Section 3.11, the number of project residents and employees is anticipated to be within the total growth projected for the General Plan in 2040.
SOURCE: Data compiled by Fehr & Peers in 2020.

Although the proposed project would result in an increase in the daily VMT per service population relative to the Base Year, the proposed project would have 0.07 less daily VMT per service population than the current Year 2040 Cumulative No Project buildout assumptions, which is the comparison called for in the City's General Plan Amendment significance criteria. This lower VMT is attributable to increased transit and multimodal access in the Downtown area compared to other parts of the city, because the proposed project would mainly shift land uses to Downtown. Therefore, the impact of the proposed project on citywide daily VMT per service population would be **less than significant**.

Mitigation: None required.

Impact TR-6: The proposed project would not cause an increase in journey-to-work drive-alone mode share over Year 2040 Cumulative No Project conditions. *(Less than Significant)*

The journey-to-work mode share measures the distribution of all daily work trips by travel mode. These travel modes include drive-alone, carpool with two persons, carpool with three or more

persons, transit, bike, and walk trips. The focus of this analysis is on evaluating work trips that occur during the a.m. peak (6 a.m. to 10 a.m.) and p.m. peak (3 p.m. to 7 p.m.) commute periods, using the City's Travel Demand Forecasting Model.

Because most weekday trips occur during the a.m. and p.m. peak commute hours, the journey-to-work mode is used to determine whether the land use amendments proposed as part of the project's General Plan Amendment would cause a significant impact. Any increase in the drive-alone journey-to-work mode share would be considered a significant impact. **Table 3.13-7** summarizes the journey-to-work mode share under Base Year, Year 2040 Cumulative No Project, and Year 2040 Cumulative Plus Project conditions.

TABLE 3.13-7
CITYWIDE JOURNEY-TO-WORK MODE SHARE

	Base Year (2015)		Year 2040 Cumulative No Project		Year 2040 Cumulative Plus Project	
Mode	**Trips**	**Percentage**	**Trips**	**Percentage**	**Trips**	**Percentage**
Drive-Alone	753,264	79.7%	1,062,938	71.1%	1,065,489	69.6%
Carpool 2	85,496	9.0%	133,139	8.9%	135,567	8.9%
Carpool 3+	28,526	3.0%	51,488	3.4%	52,782	3.5%
Transit	48,181	5.1%	190,440	12.8%	215,045	14.1%
Bicycle	14,120	1.5%	26,813	1.8%	28,182	1.8%
Walk	15,666	1.7%	30,568	2.0%	32,837	2.1%
Total	*945,253*	*100%*	*1,495,243*	*100%*	*1,529,485*	*100%*
Total Increase in Drive-Alone Mode Share over General Plan Conditions						**-1.5%**

NOTE: General Plan = *Envision San José 2040 General Plan*

SOURCE: Data compiled by Fehr & Peers in 2020, based on output from City's Travel Demand Forecasting Model (prior to any adjustments to reflect implementation of project TDM program).

As shown in Table 3.13-7, the total of all trips would increase by approximately 34,200 with implementation of the proposed project as a result of the new trips that would be generated by the project's land uses. Despite this increase in total trips, the proposed project would decrease the drive-alone mode share by 1.45 percentage points, likely because of its location in an area that has and will have substantially more transit service than most other areas of San José and the region. Therefore, the impact of the proposed project related to the citywide journey-to-work mode share would be **less than significant**.

Mitigation: None required.

Impact TR-7: The proposed project would cause a decrease in average travel speed on a transit corridor below Year 2040 Cumulative No Project conditions in the 1-hour a.m. peak period when the average speed drops below 15 mph or decreases by 25 percent or more; OR when the average speed drops by 1 mph or more for a transit corridor with average speed below 15 mph. *(Less than Significant with Mitigation)*

The average travel speeds for all vehicles in San José's 14 transit corridors were calculated for the a.m. peak hour by dividing the segment distance by vehicle travel time. Transit corridors are identified as Grand Boulevards in the General Plan's Land Use/Transportation Element. Grand Boulevards accommodate moderate to high volumes of through traffic in and beyond the city in addition to serving as primary routes for VTA transit service, which includes LRT and BRT. Transit is prioritized over all other travel modes on Grand Boulevards. It should be noted that travel speeds are a measure of congestion and differ from the VMT metrics discussed in this report that evaluate connectivity and trip lengths.

The average vehicle a.m. peak-hour travel speeds along the city's 14 transit corridors were calculated using the City's Travel Demand Forecasting Model. **Table 3.13-8** summarizes the average vehicle speeds in the city's 14 transit corridors under the Base Year (2015), Year 2040 Cumulative No Project, and Year 2040 Cumulative Plus Project conditions. Although the drive-alone mode share would be reduced with the proposed project (refer to Table 3.13-7) in 2040, the reallocation of land uses closer to Downtown would shift more vehicle trips to transit corridors serving Downtown, resulting in more traffic congestion and lower transit speeds along some corridors.

Under the General Plan plus Project scenario, travel speeds of 15 mph or less are forecast for the following five transit corridors:

- Alum Rock Avenue (Capitol Avenue to U.S. 101)
- East Santa Clara Street (U.S. 101 to Delmas Avenue)
- North First Street (SR 237 to Keyes Street)
- Tasman Drive (Lick Mill Boulevard to McCarthy Boulevard)
- The Alameda (Alameda Way to Delmas Avenue)

Four of the five corridors are already projected to experience travel speeds of 15 mph or less with Cumulative No Project buildout in 2040, and travel speeds on these corridors would not constitute a significant impact unless the proposed project would reduce travel speeds by 1.0 mph or more.

As shown in Table 3.13-8, corridor travel speeds along Alum Rock Avenue are forecast to be above 15 mph under the Year 2040 Cumulative No Project scenario and would drop below 15 mph with implementation of the proposed project; thus, the project would result in a significant impact at this location. Travel speeds below 15 mph are forecast for the East Santa Clara Street, North First Street, Tasman Drive, and The Alameda corridors both without and with the proposed project; however, implementing the project would not decrease the travel speeds by more than 1.0 mph, and therefore, the impact on these four segments would be less than significant. In summary, the proposed project would result in a potentially significant transit travel-speed impact on the Alum Rock Avenue corridor, warranting mitigation.

TABLE 3.13-8
A.M. PEAK HOUR TRANSIT CORRIDOR TRAVEL SPEEDS (MPH)

Transit Corridor	Base Year (2015)	Year 2040 Cumulative No Project (A)	Year 2040 Cumulative plus Project (B)	Percent Difference (B–A)/(A+B)	Absolute Difference (B–A)
Alum Rock Avenue Capitol Ave to U.S. 101	21.3	15.2	**14.7**	**-2%**	**-0.5**
Camden Avenue SR 17 to Meridian Ave	23.1	17.0	16.9	-1%	-0.1
Capitol Avenue S. Milpitas Blvd to Capitol Expy	27.1	22.9	22.6	-1%	-0.3
Capitol Expressway Capitol Ave to Meridian Ave	33.0	26.5	26.1	-1%	-0.3
E Santa Clara Street U.S. 101 to Delmas Ave	20.4	**14.6**	**13.7**	-3%	-0.9
Meridian Avenue Park Ave to Blossom Hill Rd	24.9	19.8	19.5	-1%	-0.3
Monterey Road Keyes St to Metcalf Rd	27.4	21.3	21.1	-1%	-0.2
N First Street SR 237 to Keyes St	21.3	**13.1**	**13.3**	1%	0.2
San Carlos Street Bascom Ave to SR 87	24.8	20.5	19.4	-3%	-1.1
Second Street San Carlos St to St. James St	16.6	15.2	15.5	1%	0.3
Stevens Creek Boulevard Bascom Ave to Tantau Ave	24.3	18.8	18.8	0%	0.0
Tasman Drive Lick Mill Blvd to McCarthy Blvd	22.7	**12.3**	**12.8**	2%	0.5
The Alameda Alameda Wy to Delmas Ave	20.5	**14.0**	**13.4**	-2%	-0.6
W San Carlos Street SR 87 to Second St	20.0	18.3	17.5	-2%	-0.8

NOTES:
Ave = Avenue; Blvd = Boulevard; Expy = Expressway; General Plan = *Envision San José 2040 General Plan*; mph = miles per hour; Rd = Road; SR = State Route; St = Street; U.S. = U.S. Highway; Wy = Way
Bold text indicates travel speeds below 15 mph. **Bold shaded** text indicates significant impacts.
SOURCE: Data compiled by Fehr & Peers in 2020, based on output from City's Travel Demand Forecasting Model (prior to any adjustments to reflect implementation of project TDM program).

Mitigation Measure AQ-2h, Enhanced Transportation Demand Management Program (refer to Section 3.1, *Air Quality*) outlines required TDM program components, performance measures, implementation, and monitoring that would reduce emissions of air pollutants from mobile sources by reducing vehicle trips. Specifically, Mitigation Measure AQ-2h would achieve a non-single-occupancy vehicle mode share of 65 percent, which is estimated to be equivalent to a 27-percent reduction in daily vehicle trips from the City's Travel Demand Forecasting Model following completion of service enhancement related to Caltrain electrification and BART service to Diridon Station by 2040. As summarized in **Table 3.13-9**, with implementation of Mitigation Measure AQ-2h, travel speeds along the Alum Rock Avenue corridor would increase to at least 15.0 mph, thereby reducing the impact on this corridor to a **less-than-significant** level.

TABLE 3.13-9
MITIGATED A.M. PEAK HOUR TRANSIT CORRIDOR TRAVEL SPEEDS (MPH)

Transit Corridor	Year 2040 Cumulative No Project	Year 2040 Cumulative Plus Project	Year 2040 Cumulative Plus Project with Mitigation
Alum Rock Avenue Capitol Ave to U.S. 101	15.2	**14.7**	15.9

NOTES:
Ave = Avenue; General Plan = Envision San José General Plan; mph = miles per hour; U.S. = U.S. Highway
Bold shaded text indicates significant impacts.
SOURCE: Data compiled by Fehr & Peers in 2020.

It should be noted that the LTA for the proposed project (refer to Appendix J2 of this EIR) includes an additional transit evaluation that focuses on the proposed project's ability to support transit ridership. It includes an assessment of transit facilities and services, access to transit, and transit operations.

Significance after Mitigation: Less than significant.

Cumulative Impacts

Impact C-TR-1: The proposed project would result in a cumulatively considerable contribution to a significant transportation impact. ***(Less than Significant with Mitigation)***

The analyses presented above, which use the City's Travel Demand Forecasting Model to consider the proposed project's impacts in the context of projected growth through the year 2040 under the General Plan/Cumulative No Project, are by definition cumulative analyses and are not repeated here. For the following reasons, the proposed project would not result in a cumulatively considerable contribution to a significant transportation impact with respect to conflicts with plans, ordinances, or policies; increases in VMT; increased hazards; emergency access; VMT per service population; or journey-to-work drive-alone mode share, or transit corridor travel speeds.

- As shown in Table 3.13-6, the proposed project would reduce the cumulative VMT per service population under Year 2040 conditions as compared with conditions without the proposed project, and thus would not contribute to citywide VMT impacts.
- As discussed previously under Impact TR-1, the proposed project is consistent with the General Plan policies related to transportation facilities.
- The proposed project is located in a central, underused area of San José near Downtown and high-quality transit. These characteristics are beneficial with regard to VMT, reduced vehicle trips, and increased usage of non-auto transportation (walking, biking, and transit).
- Corridor travel speeds along Alum Rock Avenue are forecast to drop below 15 mph with implementation of the proposed project. However, with implementation of Mitigation Measure AQ-2h, corridor travel speeds in this corridor would be 15 mph or higher, thereby reducing the impact to a **less-than-significant** level.

Mitigation Measure

Mitigation Measure AQ-2h: Enhanced Transportation Demand Management Program (refer to Section 3.1, *Air Quality*)

Significance after Mitigation: Less than significant.

3.13.4 Non-CEQA Transportation Issues

Transportation Analysis

As stated in Section 3.13.3, *Impacts and Mitigation Measures*, under *General Plan Amendment Significance Criteria*, the transportation analysis prepared for the proposed project (refer to Appendix J1 of this EIR) includes an analysis of potential project impacts on roadways in adjacent jurisdictions. Because that analysis is based on the measures of delay/LOS, which are no longer allowed under CEQA, this is considered a non-CEQA transportation issue, and is summarized below for informational purposes.

Using the City's Travel Demand Forecasting Model, roadway conditions on major streets in adjacent jurisdictions were evaluated for the morning 4-hour peak commute period (6 to 10 a.m.) in the General Plan buildout year of 2040 based on the V/C ratios of the street segments and San José's contribution to the total traffic. Freeway facilities and expressways located within San José city limits are also considered in this analysis because they are not operated by the City. The *V/C ratio* represents the ability of a segment to accommodate vehicular demand; it measures the proportion of roadway capacity being used. A V/C ratio less than 0.85 indicates that sufficient capacity is available and vehicles are not expected to experience significant delays or queuing. A V/C ratio greater than 1.0 indicates that roadway capacity is being fully used and that vehicles will experience excessive delay and queuing. Roadway segments with a V/C ratio greater than 1.0 were isolated to calculate the total deficient-lane miles in each jurisdiction.

A deficient roadway segment in an adjacent jurisdiction is attributed to San José when trips originating from residents and jobs in San José equal 10 percent or more on the deficient segment. An impact on an adjacent jurisdiction would occur when 25 percent or more of the total deficient-lane miles are attributable to San José. The 25 percent threshold represents what would be a noticeable change in traffic.

Twelve of the 14 surrounding jurisdictions as well as Caltrans facilities and County expressways in Santa Clara County are projected to have deficient-lane miles attributed to San José in year 2040 with General Plan implementation. Overall, with implementation of the proposed project, the deficient-lane miles attributed to San José would increase in total for all local jurisdictions

from about 21.7 miles to 22.4 miles, and would decrease from about 4,792 miles to 4,784 miles across all of Santa Clara County in 2040.

For the following jurisdictions, the percentages of deficient-lane miles attributed to San José would increase in 2040 with implementation of the proposed project:

- **Palo Alto:** The deficient-lane miles would increase by one percentage point to 50 percent attributed to San José. Compared to the current General Plan, the total deficient-lane miles would decrease from 3.44 miles to 3.38 miles.
- **Sunnyvale:** The deficient-lane miles would increase by two percentage points to 100 percent attributed to San José. Compared to the current General Plan, the total deficient-lane miles attributed to San José would increase from 3.10 miles to 9.20 miles.

The proposed project would exceed the General Plan Amendment threshold on the roadway segments in the adjacent jurisdiction of Sunnyvale because the percentages of deficient-lane miles are projected to increase both in total value and by percent contribution attributed to San José. However, with implementation of the project's TDM program (refer to Mitigation Measure AQ-2h), which would reduce average daily vehicle trips by about 27 percent, the General Plan Amendment threshold would no longer be exceeded for Sunnyvale.

Local Transportation Analysis

As noted previously, the LTA prepared for the proposed project analyzes non-CEQA transportation issues and is included in Appendix J2 of this EIR. Specific topics addressed include intersection performance; a freeway segment analysis; project construction; a parking supply assessment; an analysis of neighborhood traffic and parking intrusion; and an additional non-CEQA analysis of pedestrian, bicycle, and transit service, as summarized below.[36] To the extent that the LTA identifies physical improvements to address non-CEQA impacts beyond those described above under Impact TR-1, including study of and/or funding contributions towards multimodal improvements or those that would expand roadway capacity, these improvements have not been studied in detail, designed, or funded and are not considered part of the project.

City and Adjacent-Jurisdiction Intersections—Level of Service Analysis

Based on City guidelines, these intersections include 12 signalized intersections (study intersection nos. 1 through 12) within 0.5 miles of the project site that are not within the City-designated Downtown Core. They also include 9 study intersections (study intersection nos. 13 through 21) under the jurisdiction of either the City or County, based on the guidance of those jurisdictions for selecting study intersections.

1. Coleman Avenue and Hedding Street
2. Coleman Avenue and Taylor Street
3. The Alameda and West Julian Street

[36] Unlike the CEQA analysis of transit, bicycles, and pedestrians, which is focused on plan consistency and the potential for a project to introduce hazardous conditions, the LTA analysis focuses on access and capacity constraints, and on connectivity (i.e., gaps in the network) in accordance with San José Council Policy 5-1.

4. Park Avenue and Race Street
5. West San Carlos Street and Race Street
6. Race Street and Auzerais Avenue
7. Race Street and Saddle Rack Street
8. Race Street and Parkmoor Avenue
9. Auzerais Avenue and Lincoln Street
10. Auzerais Avenue and Sunol Street
11. Bird Avenue and Virginia Street
12. Bird Avenue and Coe Avenue
13. De La Cruz Boulevard and Central Expressway
14. De La Cruz Boulevard and Martin Avenue
15. De La Cruz Boulevard and Reed Street
16. Coleman Avenue and Brokaw Road
17. El Camino Real and Benton Street
18. El Camino Real and Palm Drive
19. El Camino Real and Campbell Avenue
20. El Camino Real and The Alameda
21. The Alameda and Newhall Street

The LOS analysis found that at Coleman Avenue/Taylor Street (study intersection no. 2), the proposed project would degrade acceptable intersection operations to unacceptable levels during the p.m. peak hour. Although LOS operations would not be affected, it should be noted that as part of the off-site transportation improvements included as part of the proposed project, the project applicant would construct multimodal improvements at the Coleman Avenue/Taylor Street intersection, as physical improvements to expand intersection capacity were found to be infeasible. The plans include improvements to enhance bicycle connectivity along West Taylor Street from Walnut Street to Stockton Avenue; improvements to the pedestrian walkway, removal of corner islands, and widening within the existing rail undercrossing could also be included.

The LOS analysis also found that at De La Cruz Boulevard/Central Expressway (study intersection no. 13), the proposed project would exacerbate unacceptable intersection operations and meet the County's adverse effect threshold during the a.m. peak hour. The VTA's VTP 2040 identifies a highway project that is relevant to the identified intersection adverse effects: VTP ID H25: US 101 Southbound/Trimble Road/De La Cruz Boulevard/Central Expressway Interchange Improvements. This project includes several ramp modifications, in addition to widening of the De La Cruz Boulevard bridge across US 101 from four to six lanes. Complete improvement of freeway interchange impacts is considered beyond the scope of an individual development project, due to the inability of any individual project or City to fully fund a major freeway mainline improvement. Thus, consistent with the proposed project's multimodal and TDM goals, no improvements are identified for this intersection.

City Intersections—Localized Access and Queuing Analysis

The following 14 intersections (study intersection nos. 22 through 35) were analyzed to evaluate roadway system capacity at the main entry points to the study area and to provide queuing and signal operations for the localized access and queuing analysis.

22. West Julian Street and Stockton Avenue
23. The Alameda and Stockton Avenue
24. West Santa Clara Street and Cahill Street
25. West San Carlos and Bird Avenue
26. Bird Avenue and I-280 Northbound Ramps
27. Bird Avenue and I-280 Southbound Ramps
28. West Julian Street and Autumn Parkway
29. West Julian Street and SR 87 Southbound Ramp
30. West Julian Street and SR 87 Northbound Ramp
31. West Santa Clara Street and SR 87 Northbound Off-Ramp
32. Park Avenue and Delmas Avenue/SR 87 Southbound Off-Ramp
33. Park Avenue and SR 87 Northbound On-Ramp/Woz Way
34. Auzerais Avenue and Delmas Avenue/SR 87 Southbound Ramp
35. Woz Way and SR 87 Northbound Off-Ramp

The intersection operations analysis found that implementation of the proposed project would result in LOS F intersection operations at eight locations not already projected to operate at LOS F in 2040 without the proposed project:

- Intersection #22 – West Julian Street & Stockton Avenue during the a.m. peak hour (the intersection already operates at LOS F during the p.m. peak hour under the Background No Project scenario)
- Intersection #23 – The Alameda & Stockton Avenue during the p.m. peak hour
- Intersection #25 – West San Carlos Street & Bird Avenue during the a.m. peak hour
- Intersection #26 – Bird Avenue & I-280 Northbound Ramps during the a.m. peak hour
- Intersection #27 – Bird Avenue & I-280 Southbound Ramps during the a.m. peak hour
- Intersection #31 – West Santa Clara Street & SR 87 Northbound Off-Ramp during the a.m. and p.m. peak hours
- Intersection #32 – Park Avenue & Delmas Avenue/SR 87 Southbound Off-Ramp during the a.m. peak hour
- Intersection #34 – Auzerais Avenue & Delmas Avenue/SR 87 Southbound On-Ramp during the p.m. peak hour

Ongoing signal coordination would improve intersection operations and may result in better vehicle progression, particularly along West Julian Street and Delmas Avenue. In addition,

intersection capacity enhancements such as changes to lane channelization and/or roadway widening at the following two intersections where bottlenecks would occur were recommended to the City for further consideration:

- Intersection #22—West Julian Street and Stockton Avenue
- Intersection #34—Auzerais Avenue and Delmas Avenue/SR 87 Southbound On-Ramp

Although the identified improvements would address vehicle LOS, they would not improve overall access and would result in additional pedestrian/bicycle conflicts with vehicles; therefore, these improvements were not recommended for implementation. However, to further multimodal connectivity to the project and to support the project's TDM goals, the project applicant would be required to construct multimodal intersection improvement at the Auzerais Avenue/SR 87 Southbound On-Ramp intersection as part of the conditions of approval for the proposed project. Improvements include the tightening of the turning radius at the north-east corner by extending the bulbout, which will slow vehicle turn speeds and decrease the pedestrian crossing distance across the north leg of the intersection. This improvement will require the upgrade and relocation of the signal pole at that corner. In addition, the project applicant will be required to widen the northern sidewalk between Delmas Avenue and Woz Way (beneath the elevated SR 87 freeway) to provide for a continuous sidewalk that is not interrupted by the existing pillars from freeway overcrossing.

The turn-lane storage analysis found that several turn pocket lengths would be exceeded with implementation of the proposed project. To address potential queue spillback, Intelligent Transportation Systems improvements such as adaptive signal control, and/or advanced signal loop detectors or video image detectors, could be implemented to improve signal operations and queuing. Consistent with the City's multimodal goals and the project's TDM goals, the vehicle capacity enhancing improvements are not recommended. The project applicant would contribute to the Bird Avenue/I-80 Bicycle-Pedestrian multimodal connection from Diridon Station area to the Gardner community.

The off-ramp queueing analysis found that six of the seven study off-ramps would require additional storage capacity to minimize queue spillback onto the freeway mainline. While Intelligent Transportation Systems improvements at the ramp terminal intersections could alleviate some of the queueing, most off-ramps would likely require further modifications to increase the storage capacity or throughput at the intersection. A review of aerial photography indicated that some additional right-of-way may be available to increase the off-ramp storage capacities at the southbound Julian Street off-ramp, northbound Julian Street off-ramp, southbound Park Avenue off-ramp, and southbound Bird Avenue off-ramp. However, no right-of-way is available at the northbound Bird Avenue off-ramp from I-280. The additional storage capacity would not fully address the off-ramp queues, but would help minimize the frequency of queue spillbacks onto the mainline. The project applicant is not proposing the expansion of these freeway off-ramps, as such expansions would be contrary to the proposed project's emphasis on multimodal accessibility. However, as an off-setting improvement consistent with the project's multimodal and TDM goals, the project applicant would contribute to planned pedestrian and bicycle improvements at the Bird Avenue/I-80 Bicycle-Pedestrian multimodal connection from Diridon Station area to the Gardner community.

The on-ramp capacity analysis found that maximum capacities would be exceeded by project demand at four of the six study locations. On initial review, there does not appear to be sufficient right-of-way to provide additional on-ramp capacity at the Julian Street (southbound), Auzerais Avenue (southbound), Park Avenue (northbound), or Bird Avenue (southbound) on-ramps without completely rebuilding the on-ramps. It should be noted that this analysis does account for the full trip reduction required under the project's Enhanced TDM Program required as part of the EIR (refer to Mitigation Measure AQ-2h); thus the demand at the on-ramps would be lower than identified.

Congestion Management Program Intersections—Level of Service Analysis

In accordance with VTA's *Transportation Impact Analysis Guidelines*, LOS conditions at the following 18 CMP intersections (study intersection nos. 36 through 53) where the proposed project is anticipated to add more than 10 trips per lane were evaluated:

36. The Alameda and I-880 Southbound Off-Ramp
37. The Alameda and I-880 Northbound Off-Ramp
38. The Alameda and Hedding Street
39. The Alameda and Naglee Avenue
40. Coleman Avenue and I-880 Southbound Off-Ramp
41. Coleman Avenue and I-880 Northbound Ramps
42. Taylor Street and SR 87 Northbound/Southbound Ramps
43. Oakland Road and U.S. 101 Northbound Ramps
44. Oakland Road and U.S. 101 Southbound Ramps
45. First Street and Willow Street
46. First Street and Goodyear Street/Keyes Street
47. First Street and Alma Avenue
48. Monterey Road and Curtner Avenue/Tully Road
49. 10th Street and I-280 Northbound On-Ramp
50. 10th Street and I-280 Southbound Off-Ramp
51. 11th Street and I-280 Northbound Off-Ramp
52. 11th Street and I-280 Southbound On-Ramp
53. McLaughlin Avenue and I-280 Southbound Off-Ramp

LOS calculations were applied to operations of the 18 study CMP intersections under Existing Conditions and Year 2040 Cumulative scenarios with and without the proposed project.[37] The proposed project would not result in any exceedances of LOS thresholds at CMP intersections under Existing Plus Project conditions. Under Year 2040 Cumulative Plus Project conditions, all

[37] The Existing Conditions analysis year in the LTA (2018/2019) differs from the analysis year used for the VMT analysis in the EIR (2015) because the LTA analysis uses data collected for the proposed project rather than outputs from the City's Travel Demand Forecasting model.

intersections would operate at acceptable levels except the following four intersections during the identified peak periods:

- **Intersection #38, The Alameda/Hedding Street (LOS E threshold):** Adding project traffic would exacerbate unacceptable LOS F operations during the p.m. peak hour.
- **Intersection #39, The Alameda/Naglee Avenue (LOS E threshold):** Adding project traffic would exacerbate unacceptable LOS F operations during the p.m. peak hour.
- **Intersection #42, Taylor Street/SR 87 Ramps (LOS E threshold):** Adding project traffic would exacerbate unacceptable LOS F operations during the a.m. peak hour.
- **Intersection #46, First Street/Goodyear Street (LOS E threshold):** Adding project traffic would exacerbate unacceptable LOS F operations during the p.m. peak hour.

Physical improvements to address the CMP intersections' exceedances of LOS thresholds noted above would require providing additional roadway capacity. However, right-of-way constraints limit the feasibility of widening these roadways. Thus, improvements that would add roadway capacity would not be feasible, and the adverse effect of vehicle LOS cannot be reduced for the Year 2040 Cumulative Plus Project condition through such improvements. Further, the General Plan identifies The Alameda and First Street as Grand Boulevards. Grand Boulevards are intended as primary transit corridors where accommodating pedestrians is also an important goal, because transit riders are pedestrians when they are not riding transit. Any removal of medians or expansion of roadway widths required to add roadway capacity would conflict with the functional intent of The Alameda and First Street.

To support the project's multimodal and TDM goals, the project applicant would contribute to the City/ Caltrans programmed signal and bikeway improvements at the Taylor Street/SR 87 interchange. Additionally, the project applicant may include as part of the conditions of approval, the applicant's contribution of funding toward the First Street/Goodyear Street multimodal improvements consistent with those identified in the Story-Keyes Complete Streets Corridor Plan.

Congestion Management Program Freeway Segment Analysis

In accordance with VTA's *Transportation Impact Analysis Guidelines*, freeway segments where the proposed project is anticipated to add more than 1 percent of the segment's capacity were included in the analysis. The analysis includes more than 70 freeway segments, including segments on SR 87, U.S. 101, I-280, I-680, and I-880.

Consistent with the VTA *Transportation Impact Analysis Guidelines*, freeway LOS is analyzed only for Year 2015 Existing Conditions. For the Year 2015 Existing Plus Project scenario, 40 mixed-flow segments are projected to operate at unacceptable LOS F during the a.m. peak hour and 29 segments during the p.m. peak hour. Similarly, 18 HOV lane segments are projected to operate at unacceptable LOS F during the a.m. peak hour and 7 lane segments during the p.m. peak hour. Based on the criteria outlined in the VTA *Transportation Impact Analysis Guidelines*, the proposed project would result in exceedances of LOS thresholds for CMP freeway segments at the 12 locations identified below.

- SR 87:
  - Northbound, between Curtner Avenue and Almaden Boulevard: Mixed-flow and HOV in the a.m. peak hour;
  - Southbound, between Julian Street and I-280: Mixed-flow in the p.m. peak hour; and
  - Southbound, between I-280 and Alma Avenue: Mixed-flow in the p.m. peak hour.
- I-280:
  - Westbound, between U.S. 101 and McLaughlin Avenue: Mixed-flow in the a.m. peak hour; and
  - Westbound, between 10th Street and SR 87: Mixed-flow in the a.m. peak hour.
- I-680:
  - Southbound, between Alum Rock Avenue and Capitol Expressway: Mixed-flow in the a.m. peak hour;
  - Southbound, between Capitol Expressway and King Road: Mixed-flow in the a.m. peak hour; and
  - Southbound, between King Road and U.S. 101: Mixed-flow in the a.m. peak hour.
- I-880:
  - Southbound, between Montague Expressway and Brokaw Road: Mixed-flow in the a.m. peak hour;
  - Northbound, between North First Street and U.S. 101: Mixed-flow in the p.m. peak hour;
  - Southbound, between Brokaw Road and U.S. 101: Mixed-flow in the a.m. peak hour; and
  - Southbound, between U.S. 101 and North First Street: Mixed-flow in the a.m. peak hour.

Options for widening the affected freeway segment are limited by right-of-way constraints. In addition, widening roadways can lead to other effects, such as induced travel demand (e.g., more vehicles on the roadway as a result of the increased capacity), air quality degradation, increased noise levels from motor vehicles, and reductions in transit use (less congestion or reduced driving time may make driving more attractive than transit travel). Complete improvement of freeway facilities is considered beyond the scope of an individual development project, given the inability of any individual project or city to fully fund a major freeway mainline improvement; therefore, no improvements were identified.

Project Construction

Construction of the proposed project would occur in three primary phases, which would involve demolition, grading, and construction of various project elements (buildings, street network changes, and other infrastructure). Construction would begin in 2021 and continue through 2031. The duration of each phase would vary; however, on average, each phase would last approximately five years, with the end of one phase and the start of the subsequent phase potentially overlapping one another.

The proposed project would be required to prepare a Recommended Temporary Traffic Control Plan (RTTCP) to limit peak-hour traffic and to address potential safety/accessibility issues related to vehicles (including emergency responders), transit, bicycles, and pedestrians. Required RTTCP elements are provided, based on best practices and consideration of site-specific constraints. The project applicant would be required to prepare and submit the RTTCP to the City for approval before beginning project construction. A more detailed summary of the RTTCP is provided in the discussion of Impact TR-1.

Transit, Bicycle, and Pedestrian Analyses

For the LTA transit assessment, Transit Priority Corridors, as specified in the General Plan, that are located within 1 mile of the project boundary were considered for evaluation. The LTA transit analysis focuses on the main transit corridors that provide direct transit connections to the project site and are served by local routes in addition to limited-stop and/or express bus routes. The LTA bicycle assessment focuses on Primary Bicycle Corridors (per the General Plan), marked bike lanes, and trails within 1.5 miles of the project boundary. The study area for the LTA pedestrian assessment is within a 0.5-mile radius of the project boundary, with a focus on main pedestrian access routes between the proposed project and major pedestrian generators and attractors. The main conclusions of the LTA transit, bicycle, and pedestrian analyses are summarized below.

Transit Analysis

The analysis of transit supply and demand found that the proposed project would have the potential to result in crowding of key transit services if there were no increase in those services. Project-generated transit trips would account for around 15 percent of total daily transit capacity and up to 20 percent of peak-hour transit capacity. The proposed project would continue to provide access to Diridon Station and bus stops to help facilitate this growth in transit demand. Although the proposed project would contribute many peak-hour riders to all transit services in its vicinity, those ridership increases would not themselves create barriers to transit use. The proposed project would maintain and support public transit use, and as such, would not adversely affect transit access or demand.

The analysis of transit vehicle delay found that the proposed project would result in additional delay to transit service in the area. The added traffic on San Carlos Street, The Alameda/Santa Clara Street, and First Street would cause increases in delays for all 10 study routes (routes located within 1 mile of the project site with full-day service and frequencies of 30 minutes or less). Delay increases are generally three minutes or more on San Carlos Street and The Alameda/Santa Clara Street, and two minutes or less on First Street, which is largely a function of the cumulative growth and congestion estimated by the year 2040. The City does not currently have established policies or significance criteria related to transit vehicle delay. However, the City and the project applicant may include as part of the conditions of approval applicant-provided funding for the study of a dedicated bus lane and/or other transit speed improvements (queue jumps, signalization, etc.) within existing right-of-way from 17th Street to I-880 along Santa Clara Street–The Alameda as part of the Development Agreement.

Bicycle Analysis

Most of the existing bike facilities near the project site are along the major corridors with east–west connectivity such as West San Fernando Street, Park Avenue, and West San Carlos Street. Street segments lacking bike facilities introduce gaps in the existing network and increase traffic stress for cyclists, such as San Fernando Street between Race Street and Wilson Avenue, and The Alameda between Race Street and Sunol Street. Network gaps lead to higher traffic stress as traffic volume grows. The bicycle analysis reflects that the proposed bike facility improvements included as part of the proposed project, which would fill in gaps in the existing network, would reduce traffic stress across multiple roadways. However, to further multimodal connectivity to the project and to support the project's TDM goals, the project applicant would be required to construct several bicycle improvements as part of the conditions of approval for the proposed project. These proposed facilities are described in detail in the discussion of Impact TR-1.

Pedestrian Analysis

The pedestrian analysis found that all the sidewalks are sufficient to meet the expected pedestrian volumes. With implementation of the proposed project, the additional pedestrian trips would not substantially change the LOS of any of the 15 study sidewalk segments; most of them would maintain both an average and platoon LOS of A or B. Overall, the project-generated pedestrian trips would be accommodated by the surrounding pedestrian infrastructure. However, to further multimodal connectivity to the project and to support the project's TDM goals, the project applicant would be required to construct several pedestrian improvements as part of the conditions of approval for the proposed project. These proposed facilities are described in detail in the discussion of Impact TR-1.

Parking Supply Assessment

The project would provide up to 4,800 publicly accessible and/or commercial parking spaces to meet the demand for parking of site-specific users and the public, and up to 2,360 parking spaces for the project's proposed residential uses. In total, the project would provide 7,160 off-street vehicle parking spaces.[38] As explained in Chapter 2, *Project Description*, the project would provide only about 62 percent of the non-residential parking spaces typically required by the Municipal Code (Section 20.70.330) for a project in the Downtown zoning districts. Municipal Code Section 20.70.330 states that the Director of Planning, Building and Code Enforcement may grant a Downtown development up to a 15 percent reduction in parking requirements if the project provides a TDM program that incorporates specified strategies such as VTA's SmartPass (an employer-paid commute pass, formerly known as Eco Pass), parking cash-out, alternate work schedules, ridesharing, transit support, carpool/vanpools, shared parking, or any other reasonable measures; and if the project demonstrates that it can maintain a TDM program for the life of the project. In general, the 15 percent reduction in parking requirements is in addition to the 50

[38] As explained in Chapter 2, *Project Description*, this could include a portion of the residential spaces that could be available for shared use by office employees, and some commercial parking could be provided at off-site location(s), should such off-site parking be developed separately from the project in the future.

percent reduction for qualified projects permitted under Municipal Code Section 20.90.220.[39] With these reductions, the proposed project would be required to provide 0.425 off-street parking spaces per residential unit, 1.06 spaces per 1,000 square feet of office space, and 0.15 spaces per hotel room. This would total a requirement of 10,290 total off-street spaces (7,782 commercial spaces and 2,508 residential spaces).

However, Municipal Code Section 20.120.510 allows custom development standards, including standards related to required parking ratios, under the Planned Development rezoning process, so the City may approve projects in planned development zoning districts with less parking than the amounts allowed under Municipal Code Sections 20.90.220 and 20.70.330.

The City's General Plan outlines a vision in which San José shifts from being an auto-dependent community to a multimodal one, where most trips are made by walking, biking, transit, or carpool. Because the availability of parking encourages driving, the less parking that is provided, the more trips via the preferred modes will occur. For the area of Downtown where the project site is located, the City has identified a mode split goal in which no more than 25 percent of trips are by single-occupancy vehicle. Meeting this goal at the project site would result in the need for less parking supply than is required by the City's Parking Code. However, this analysis does not quantify the specific parking supply required to achieve the City's mode split goals, as it would also be a function of the effectiveness of the project's TDM program elements and neighborhood parking management plan (refer to the discussion below).

The project would provide at least 3,292 bicycle parking spaces: 1,552 for the office uses, 1,475 for the residential uses, and 265 spaces for the remaining land uses, as required by the Municipal Code.

Neighborhood Traffic and Parking Intrusion Analysis

The City's *Transportation Analysis Handbook* outlines the requirements for monitoring potential neighborhood cut-through traffic, speeding concerns, and parking intrusion from the trips generated by developments. After project approval, initial monitoring data would be collected to establish a baseline to which future conditions would be compared. Annual monitoring for up to four years as determined by the City's Department of Transportation, would occur after the project is constructed and occupied to ensure surrounding neighborhoods do not experience excessive cut-through traffic, speeding, and/or parking spillover. If the project is found to be creating these conditions, specific actions would be required to reduce the effect of the increased traffic in the area due to the development.

If the project were to add traffic and parking demand exceeding cut-through traffic thresholds stated in the City's *Transportation Analysis Handbook* or parking spillover thresholds recommended as part of the LTA analysis, the City's Department of Transportation may require the implementation of a parking plan and payment representative of the project's proportional

[39] To qualify for the 50 percent parking reduction, a project must be within 2,000 feet of a proposed or an existing rail station or bus rapid transit or a General Plan growth; provide the Code-required number of bicycle parking spaces; and provide a robust TDM program that includes either transit incentives or a carpool/vanpool/carshare program and at least two additional TDM strategies from among 14 options presented in the code.

share of the recommended parking management strategies. The parking plan would include traffic calming measures that could be implemented to address cut-through traffic and speeding, including the installation of traffic control devices, traffic enforcement, safety education, and physical roadway design features or dynamic signage or warning systems. Strategies to address parking intrusion include time limits, metering, and residential parking programs.