

**DEPARTMENT OF TRANSPORTATION**

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May 13, 2015

SCL000219  
SCL/GEN/PM VAR  
SCH# 2013092026

Ms. Rebecca Shapiro  
Community Development Department  
City of Mountain View  
500 Castro Street  
Mountain View, CA 94039

Dear Ms. Shapiro:

**2030 General Plan and Greenhouse Gas Reduction Program (GGRP), San Antonio Change Area Subsequent EIR (SEIR) – Final Supplemental Environmental Impact Report (FSEIR)**

Thank you for continuing to include the California Department of Transportation (Caltrans) in the environmental review process for the project referenced above. We have reviewed the FSEIR and have the following comments to offer. In addition to our Draft SEIR comment letter, dated January 2, 2015, please also refer to our previous comment letter, dated December 22, 2011, on this project. We provide these comments consistent with the State's smart mobility goals to support a vibrant economy and build communities, not sprawl.

**Response to Comment 2-2:** The comment asks that a trip generation table be included in the TIA.

*A program-level TIA was prepared to evaluate potential transportation and circulation impacts arising from the construction of new land uses within the San Antonio Change Area originally unaccounted for in the 2030 General Plan EIR. The TIA uses the same analysis tool that was used for the traffic assessment for the 2030 General Plan EIR (Appendix B of the 2030 General Plan EIR), the City's travel demand forecasting (TDF) model, to prepare traffic projections. Inputs for the travel demand model include the land use in each traffic analysis zone and the roadway network. With these inputs, the TDF model completes complex calculations to match complementary land uses and connect their vehicle trip ends to determine the number of vehicle trips to and from each traffic analysis zone. Because of the type, mix, and locations of the land use changes in the San Antonio Change Area, the TDF model produced changes in traffic volumes on roadways throughout Mountain View and did not generate traditional trip generation tables typically found in a TIA. Although there are no traditional trip generation tables in the TIA, the results from the TDF model indicates the changes to outbound and inbound*

*vehicle trips compared to the land use assumptions in the General Plan EIR. Specifically, compared to the General Plan EIR, the change in allowable development in the San Antonio Change Area results in a decrease of daily outbound vehicle trips by almost 2,600 (4 percent) and an increase of daily Inbound vehicle trips by 500 (1 percent) from the traffic analysis zones within the San Antonio Change Area.*

*The proposed land use change is estimated to increase employment within the San Antonio Change Area by 2,300 jobs and decrease the population in the area by 660 people. Per the Institute of Transportation Engineers' standard rates, the change in allowable development results in a decrease in the number of daily trips by almost 2,900, an increase in the total number of AM peak-hour trips by 750, and an increase in the total number of PM peak-hour trips by 170 compared with the original land use assumptions in the 2030 General Plan EIR. (These estimates do not include any reduction for transportation demand management [TDM] or internalization.) Detailed trip generation tables may be required of future TIAs that will be completed for new development within the San Antonio Change Area but were not necessary for the transportation analysis in the SEIR. No revisions to the Draft SEIR are necessary.*

**Reply to Response to Comment 2-2:** Caltrans recommends the report could adopt either travel demand forecasting (TDF) model or *ITE Trip Generation Manual*, 9 edition, to derive AM (PM) generated traffic resulted directly from proposed project as allowable development in the San Antonio Change Area. The difference between the San Antonio Change Area and the 2030 General Plan EIR cannot alone fully reflect the significant AM (PM) generated traffic resulting from the San Antonio Change Area. The San Antonio Change Area consists of an additional 800,000 square feet (ksf) of offices and 170 lodging rooms, reduction 120 ksf of retail, reallocation of 330 housing units and 80 ksf of retail, so would likely generate significant AM (PM) generated traffic. The underlying methodology used in the report is the travel demand forecasting (TDF) model to derive changes to outbound and inbound vehicle trips, compared to the land use assumptions in the 2030 General Plan Environmental Impact Report (EIR). Specifically, compared to the 2030 General Plan EIR, the change in allowable development in the San Antonio Change Area decreases 2,900 daily trips and increases 750 AM (170 PM) trips.

**Response to Comment 2-3:** The comment states that because the report adopts measures of effectiveness such as vehicle miles traveled, LOS, and volume-to-capacity ratios to evaluate roadway segments, the TIA should include traffic turning movements for key study intersections, project driveways, and interchanges for each of the four scenarios.

*Because this is a subsequent EIR to the 2030 General Plan EIR, the travel demand model used for the 2030 General Plan EIR analysis was also used for the SEIR to estimate impacts on the capacity of roadway facilities on a link-level basis (not an intersection-level basis) in the city and nearby jurisdictions.*

*Because of the programmatic nature of the Project and SEIR, the transportation analysis was conducted using the City's TDF model to evaluate the system-wide transportation metrics, consistent with the 2030 General Plan EIR. The TDF model evaluated the following:*

- *Citywide vehicle miles traveled per service population*
- *Daily roadway segment volumes in Mountain View*
- *Peak-hour roadway segment volumes in adjacent jurisdictions*

*The land use changes associated with the Project would affect the vehicle performance measures listed above. The TDF model is currently the best tool available for developing long-range traffic forecasts for streets and highways within Mountain View and the adjacent jurisdictions. The roadway segment forecasts are useful metrics of Project impacts because, in urban conditions, when roadway segment operations fail, intersections also fail because intersections govern the roadway network capacity.*

*Detailed turning movement estimates may be required of future TIAs that will be completed for new development within the San Antonio Change Area but were not necessary for the transportation analysis in the SEIR, which is programmatic in nature. Additionally, detailed turning movement estimates were created as part of the San Antonio Precise Plan EIR (August 2014). The transportation analysis for the San Antonio Precise Plan identified one plan-related impact and no impacts in the cumulative condition (which reflects buildout of the approved general plan land use).*

*No revisions to the Draft SEIR are necessary.*

**Reply to Response to Comment 2-3:** Caltrans recommends the report include AM (PM) turning movement traffic per study intersection used for highway operational analysis such as delay, queue length, signal timing under proposed Project, 2035 Cumulative, and 2035 Plus Project Conditions for further review. Traffic Forecasting analysis shows the San Antonio Change Area will likely generate significant AM (PM) traffic, potentially causing significant impact upon State facilities and nearby interchanges and intersections. Caltrans commends the City of Mountain View for adopting measures of effectiveness for the report, such as vehicle miles traveled, level of service (LOS), and volume to capacity (V/C) ratio on roadway segments, which are good tools used for planning, environmental and economic analysis.

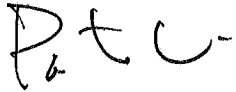
Ms. Rebecca Shapiro/City of Mountain View

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Should you have any questions regarding this letter, please contact Brian Ashurst at (510) 286-5505 or [brian.ashurst@dot.ca.gov](mailto:brian.ashurst@dot.ca.gov).

Sincerely,

Handwritten signature of Patricia Maurice, consisting of the letters 'P', 't', and 'C' in a stylized, cursive font.

PATRICIA MAURICE  
Acting District Branch Chief  
Local Development - Intergovernmental Review

- c: Scott Morgan, State Clearinghouse
- Robert Swierk, Santa Clara Valley Transportation Authority (VTA) – electronic copy
- Robert Cunningham, Santa Clara Valley Transportation Authority (VTA) – electronic copy