



DATE: December 16, 2014

CATEGORY: New Business

DEPT.: Public Works

TITLE: **El Camino Real Bus Rapid Transit Project Draft Environmental Impact Report/Environmental Assessment**

RECOMMENDATION

1. Authorize the Mayor to send a letter to the Santa Clara Valley Transportation Authority (VTA) commenting on the El Camino Real Bus Rapid Transit Project Draft Environmental Impact Report/Environmental Assessment.
2. Determine if there are any project alternatives the City supports and, if so, authorize the City Manager to send a letter to the VTA to express support for those alternatives.

BACKGROUND

Bus Rapid Transit (BRT) is enhanced bus service intended to attract increased ridership by offering shorter travel times, new specialized vehicles, technological improvements, and stations with real-time passenger information. The proposed 17.6 mile El Camino Real (ECR) BRT Corridor runs through the cities of Palo Alto (Palo Alto Transit Center), Los Altos, Mountain View, Sunnyvale, Santa Clara, and a portion of San Jose (SAP Center). Existing Bus Route Local 22 service would continue to operate along ECR, sharing the curbside lane with other traffic.

The VTA has developed seven alternatives for the ECR BRT Project (Project), described later in this report, including different combinations of dedicated bus lanes and “mixed flow” lanes where buses share the lane with other vehicles. Where dedicated bus lanes are proposed, one existing travel lane is removed in each direction.

Previous Council Discussion

The City Council last discussed the Project at its January 17, 2012 Study Session where the VTA presented the proposed Preliminary Investment Strategy for the Project to the

City Council and community, and solicited feedback regarding the lane configuration alternatives in Mountain View.

Based on the feedback received at the January 17, 2012 Study Session and from a previous Study Session on June 21, 2011, staff sent the attached letter on March 7, 2013 in response to the Notice of Preparation (NOP) of an Environmental Impact Report (EIR)/Environmental Assessment (EA) for the Project dated February 6, 2013 (Attachment 1). The letter requested the scope include additional analysis of alternatives, infrastructure impacts, land use, transportation integration, traffic and circulation, bicycle and pedestrian connectivity, construction, Heritage trees, and air quality. Additionally, the letter requested information on Caltrans coordination regarding the Project.

Draft Environmental Document

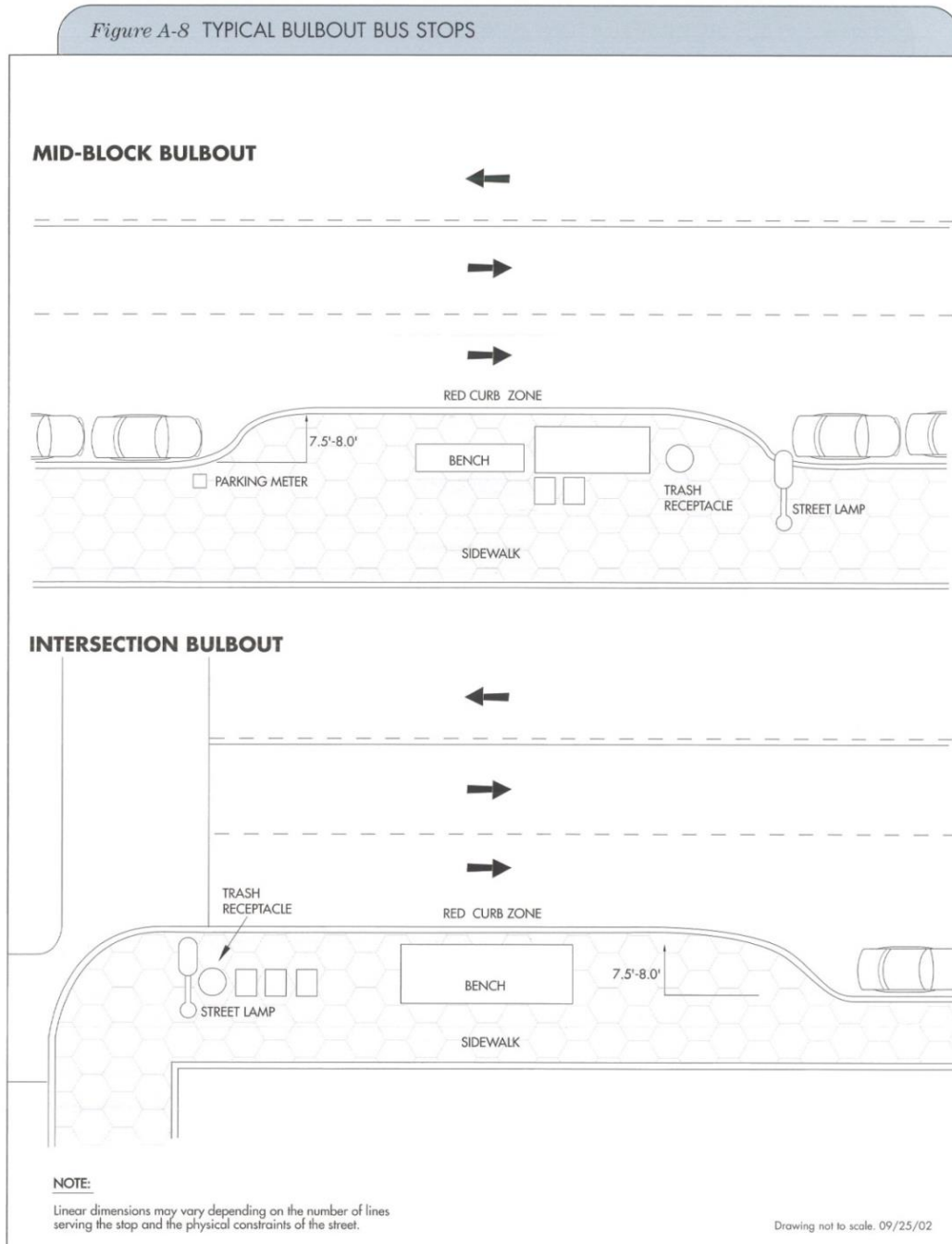
On October 24, 2014, the VTA, in partnership with the Federal Transit Administration (FTA), released the Draft EIR (DEIR)/EA for public comment. After the public comment period ends on the DEIR/EA, the Project will be reviewed by the VTA advisory committees in January/February 2015. VTA's Board of Directors will then select a Locally Preferred Alternative (LPA), the version of the Project VTA would pursue for implementation. Selection of the LPA is scheduled for spring 2015. The VTA's decision may be influenced by comments from the cities along the ECR Corridor and Caltrans. As the owner of ECR (State Route 82), Caltrans must approve any changes to the roadway proposed by the BRT project.

Project design is scheduled to begin in late 2015. Construction is planned to be completed by summer 2018 and BRT service to begin that fall.

Seven Alternatives

The DEIR/EA evaluates seven Project alternatives that vary in scope, featuring combinations of mixed flow and dedicated lane configurations. In a mixed flow configuration, the BRT vehicle operates in the right lanes with other vehicles, stopping at curbside bulb-out stations. Bulb-out stations are essentially sidewalk extensions that increase the sidewalk width at stops and create defined spaces for passenger waiting outside of the normal sidewalk traffic. Bulb-outs are typically placed at intersections, but may also be used for midblock stops. Buses stop in a travel lane and will normally block traffic, including bicycles, for short periods while the riders get on and off the bus (Exhibit 1 – Bulb-Out Stations*). In a dedicated lane configuration, one lane in each direction adjacent to the median would be converted to a BRT-only lane, leaving two

lanes in each direction for other vehicles. In that configuration, bus stops/stations would be located in the center median (Exhibit 2 – Median Station).



*Note this is a typical cross-section. There would be three lanes throughout Mountain View.

Exhibit 1 – Bulb-Out Stations



Existing View from El Camino Real at Castro Street looking northwest (VP 17)



Visual Simulation of Proposed Project - Alternatives 4b and 4c (VP 17)

Refer to Figure 4.2-2 for photograph viewpoint location

Source: Environmental Vision 2014.

Figure 4.2-6b
Existing View and Visual Simulation of
Castro Median Station
El Camino Real Bus Rapid Transit Project

Exhibit 2 – Median Station

Travel times along the Corridor for BRT buses improve as the scope of the Project increases (more dedicated lanes) and estimated ridership increases. Estimated travel times and ridership from San Jose to Palo Alto are given for each alternative in 2013 (current), 2018, and 2040.

Estimated ridership is also given for each period.

The seven alternatives are:

ALTERNATIVE 1: No Build	
Description	Provides mixed-flow traffic configuration along the entire Corridor, and includes improvements that are planned to occur regardless of whether BRT is implemented. Diesel buses that currently provide Rapid 522 service at Mountain View's Castro Street and Showers Drive stops would be replaced in 2015 by BRT hybrid diesel-electric buses. Service frequency would increase from four to six buses per hour. Bus Route Local 22 service would operate at 15-minute headways.
Lane Configuration in Mountain View	Mixed Flow. No change to lane configuration in Mountain View. No bicycle or pedestrian improvements will be constructed with this alternative. Existing 522 stops at Castro Street and Showers Drive will be used.
Estimated Travel Time (from San Jose to Palo Alto, Peak Hours)	San Jose to Palo Alto Travel Time During Peak on BRT (in minutes): 2013: 71 a.m., 85 p.m. 2018: 72 a.m., 87 p.m. 2040: 89 a.m., 108 p.m.
Estimated Ridership (Total Boardings Per Day)	2013: 3,278 (current 522 Rapid Transit Ridership) 2018: 8,159 2040: 10,576

ALTERNATIVE 2: 17.6-Mile All Mixed Flow from San Jose to Palo Alto (Curbside Bulb-Outs in Mountain View)	
Description	Provides for mixed-flow lanes along the entire Corridor. In Mountain View, curbside bulb-out stations would be constructed at Castro Street and Showers Drive, with a potential additional station at Escuela Avenue.
Lane Configuration in Mountain View	<p>Mixed flow, with no change to lane configuration. No bicycle lanes will be constructed with this alternative. Existing 522 stops at Castro Street and Showers Drive will be used.</p> <p>The Project would remove existing pork-chop islands and extend existing curbs to make smaller intersections and crosswalks restriped, providing a benefit to pedestrians.</p>
Estimated Travel Time	<p>San Jose to Palo Alto Travel Time During Peak on BRT (in minutes):</p> <p>2013: 71 a.m., 85 p.m. 2018: 66 a.m., 81 p.m. 2040: 83 a.m., 107 p.m.</p>
Estimated Ridership (Total Boardings Per Day)	<p>2013: 3,278 (current 522 Rapid Transit Ridership) 2018: 9,223 2040: 11,736</p>

ALTERNATIVE 3a: 3-Mile Short Dedicated Lane	
Description	Provides dedicated lanes for BRT in portions of the Project Corridor. There would be mixed-flow lanes from downtown San Jose to Lafayette Street in Santa Clara and a 3-mile dedicated lane from Lafayette Street in Santa Clara to Halford Avenue in Santa Clara. This alternative would provide no further BRT infrastructure improvements west of Halford Avenue.
Lane Configuration in Mountain View	Mixed flow, with no new infrastructure or change to lane configuration in Mountain View. Existing 522 stops at Castro Street and Showers Drive will be used. No bicycle lanes will be constructed with this alternative in Mountain View.
Estimated Travel Time	San Jose to Palo Alto Travel Time During Peak on BRT (in minutes): 2013: 71 a.m., 85 p.m. 2018: 66 a.m., 78 p.m. 2040: 81 a.m., 96 p.m.
Estimated Ridership (Total Boardings Per Day)	2013: 3,278 (current 522 Rapid Transit Ridership) 2018: 9,561 2040: 13,976

ALTERNATIVE 3b: 3-Mile Short Dedicated Lane with Curbside Bulb-Out Stations in Mountain View	
Description	Provides dedicated lanes for BRT in portions of the Project Corridor. There would be mixed-flow lanes from downtown San Jose to Lafayette Street in Santa Clara and a 3-mile dedicated lane from Lafayette Street in Santa Clara to Halford Avenue in Santa Clara. This alternative would provide a mixed-flow configuration with full bulb-out stations west of Halford Avenue.
Lane Configuration in Mountain View	<p>Mixed-flow in Mountain View (and also in Sunnyvale, Los Altos, and Palo Alto) with new curbside bulb-out stations at Castro Street and Showers Drive, and a potential additional bulb-out station at Escuela Avenue.</p> <p>No change to lane configuration in Mountain View.</p> <p>No bicycle lanes will be constructed with this alternative in Mountain View.</p> <p>Project would remove existing pork-chop islands and extend existing curbs to make smaller intersections and crosswalks restriped.</p>
Estimated Travel Time	<p>San Jose to Palo Alto Travel Time during peak on BRT (in minutes):</p> <p>2013: 71 a.m., 85 p.m. 2018: 62 a.m., 74 p.m. 2040: 77 a.m., 93 p.m.</p>
Estimated Ridership (Total Boardings Per Day)	<p>2013: 3,278 (current 522 Rapid Transit Ridership) 2018: 10,090 2040: 14,490</p>

ALTERNATIVE 4a: 7.1-Mile Long Dedicated Lane with Mixed Flow (Curbside Bulb-Out Stations in Mountain View)	
Description	<p>Provides a dedicated BRT lane in a 7.1-mile segment from Lafayette Street in Santa Clara to State Route 85 in Mountain View. Mixed-flow lanes are from downtown San Jose to Lafayette Street in Santa Clara and from SR 85 in Mountain View to the Palo Alto Transit Center.</p> <p>The Castro Street and Showers Drive stops and optional Escuela Avenue stop would be curbside bulb-out stations (similar to Alternative 2).</p>
Lane Configuration in Mountain View	<p>Dedicated lanes from Sunnyvale to SR 85 (resulting in loss of one travel lane in each direction).</p> <p>New bicycle lanes east of SR 85 resulting in the loss of on-street parking.</p> <p>Curbside bulb-out stations at Castro Street and Showers Drive and a potential additional bulb-out station at Escuela Avenue.</p> <p>West of SR 85 mixed-flow lanes (no change from existing lane configuration west of SR 85).</p> <p>Removal of existing pork-chop islands and extend existing curbs to make smaller intersections and crosswalks restriped.</p>
Estimated Travel Time	<p>San Jose to Palo Alto Travel Time During Peak on BRT (in minutes):</p> <p>2013: 71 a.m., 85 p.m. 2018: 59 a.m., 68 p.m. 2040: 73 a.m., 84 p.m.</p>
Estimated Ridership (Total Boardings Per Day)	<p>2013: 3,278 (current 522 Rapid Transit Ridership) 2018: 10,801 2040: 15,878</p>

ALTERNATIVE 4b: 10.1-Mile Long Dedicated Lane with Mixed-Flow (Median Stations in Mountain View)	
Description	Includes mixed-flow lanes from downtown San Jose to Lafayette Street in Santa Clara and from Showers Drive to the Palo Alto Transit Center, and a 10.1-mile dedicated-lane segment from Lafayette Street in Santa Clara to Showers Drive in Mountain View.
Lane Configuration in Mountain View	<p>Dedicated BRT lanes in Mountain View (loss of travel lane).</p> <p>New bicycle lanes from Sunnyvale to Showers Drive (loss of on-street parking).</p> <p>Median stations at Castro Street and Showers Drive (with possible median station at Escuela Avenue).</p> <p>New traffic signal at Bonita Avenue and new pedestrian signal near Mariposa and Pettis Avenues.</p> <p>Mixed flow west of Showers Drive with no lane configuration changes.</p>
Estimated Travel Time	<p>San Jose to Palo Alto Travel Time During Peak on BRT (in minutes):</p> <p>2013: 71 a.m., 85 p.m.</p> <p>2018: 53 a.m., 59 p.m.</p> <p>2040: 59 a.m., 67 p.m.</p>
Estimated Ridership (Total Boardings Per Day)	<p>2013: 3,278 (current 522 Rapid Transit Ridership)</p> <p>2018: 11,808</p> <p>2040: 18,323</p>

ALTERNATIVE 4c: 13.9-Mile Long Dedicated Lane from Santa Clara to Palo Alto (Median Stations in Mountain View)	
Description	Provides a 13.9-mile dedicated lane segment from Lafayette Street in Santa Clara to Embarcadero Road in Palo Alto.
Lane Configuration in Mountain View	<p>Dedicated BRT lanes throughout Mountain View (loss of travel lane).</p> <p>New bike lanes (loss of on-street parking).</p> <p>Median station at Castro Street and Showers Drives (with possible median station at Escuela Avenue).</p> <p>New traffic signal at Bonita Avenue and a pedestrian signal near Mariposa and Pettis Avenues.</p>
Estimated Travel Time	<p>San Jose to Palo Alto Travel Time During Peak on BRT (in minutes):</p> <p>2013: 71 a.m., 85 p.m.</p> <p>2018: 45 a.m., 48 p.m.</p> <p>2040: 47 a.m., 52 p.m.</p>
Estimated Ridership (Total Boardings Per Day)	<p>2013: 3,278 (current 522 Rapid Transit Ridership)</p> <p>2018: 13,104</p> <p>2040: 21,071</p>

Exhibit 3 shows the extent of each type of lane configuration for the various alternatives.

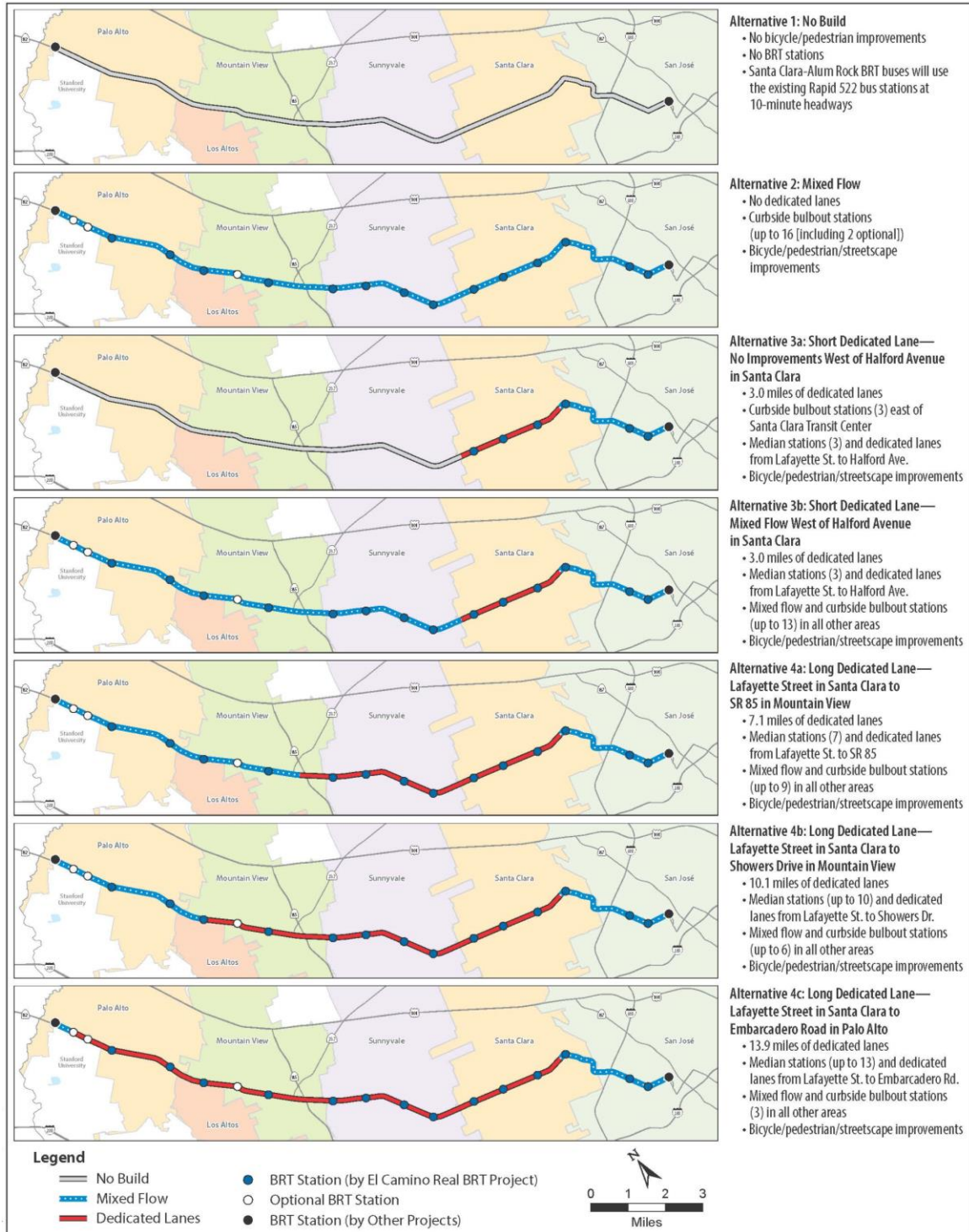


Figure ES-3
Project Alternatives
 El Camino Real Bus Rapid Transit Project

Exhibit 3 – Lane Configurations

ANALYSIS

Staff from multiple departments have reviewed the DEIR/EA and have identified potential traffic-related, biological, and pedestrian/bicycle circulation impacts as the greatest concern. Staff contracted with Hexagon Transportation Consultants, Inc., (Hexagon) to assist in reviewing the traffic and transportation modeling and assist in analyzing results from the environmental documents.

DIVERSION OF TRAFFIC

The loss of vehicle travel lanes on ECR as envisioned in some of the alternatives is a significant concern because of the potential for increased traffic congestion on ECR and the diversion of traffic to parallel roadways. In the DEIR/EA, the VTA counted average daily trips in 2013 near Bush Street in Mountain View of nearly 53,000 vehicles per day on ECR. Based on Caltrans counts, existing peak-hour trips in October 2012 for this section were 2,748 vehicles per hour or 916 vehicles per hour per lane. The DEIR/EA states that the dedicated lane alternatives would not result in any significant traffic impacts along ECR despite elimination of a lane in each direction because traffic from the eliminated lanes will divert to other routes. For the year 2040 p.m. peak-hour time period, the DEIR/EA estimated 900 vehicles to be diverted from southbound ECR (essentially the full capacity of one travel lane per hour).

The DEIR indicates that traffic would be diverted to U.S. Highway 101 (via Shoreline Boulevard and Rengstorff Avenue), Central Expressway, California Street, Middlefield Road, Cuesta Drive, Foothill Expressway, and Interstate 280 (via Miramonte Avenue and Grant Road). Both Highway 101 and Central Expressway have been shown at or near capacity in recent Project-related traffic studies. The diverted traffic on these parallel roads adds up to about 400 vehicles. The DEIR is silent about the other 500 diverted vehicles and does not provide any information about where they would go.

While some of the 900 peak-hour vehicles will find other routes and some may use other modes such as the BRT, staff does not agree with the assumption that the equivalent of one lane of traffic in each direction would be diverted to other routes if a lane is eliminated on ECR, resulting in no impacts to ECR traffic. Staff assumes that regular users of ECR would weigh travel time and other factors associated with another (presumably longer) route, and that some would remain on ECR even if congestion increased because it is still faster or more convenient than the alternatives. Therefore, staff believes traffic congestion on ECR will be negatively impacted as a result of the conversion of a travel lane to a dedicated BRT lane and congestion will increase in the

remaining two lanes. Additionally, if there is not existing capacity on U.S. 101 or Central Expressway, additional trips will be added to local streets.

City Comment: *The analysis of traffic impacts must account for all vehicles that are diverted from ECR, including what routes they are expected to take and the anticipated impact of taking that new route. The Final Environmental Impact Report (FEIR) should account for all diverted vehicles.*

City Comment: *The DEIR/EA does not consider or examine the capacity of these parallel routes, especially Central Expressway and U.S. 101, to determine if these facilities have any remaining capacity to accommodate the diverted traffic. The FEIR should address this deficiency.*

City Comment: *The FEIR should adequately analyze and address additional congestion along ECR for those vehicles that choose not to divert to alternate routes.*

Middlefield Road is one of the main routes for diverted trips, though the DEIR/EA does not analyze potential conditions at any Middlefield Road intersections.

City Comment: *Project impacts to Middlefield Road should be analyzed.*

The DEIR/EA analyzed 12 intersections along the diversion routes and determined that 8 of the 12 would experience significant traffic impacts. In most cases, the mitigation consists of adding additional turn lanes. The DEIR/EA states that the mitigation measures would not require any right-of-way acquisition or road widening, though no diagrams or plans indicating how this would be accomplished are provided in the document. Staff is concerned that adding turn lanes may impact parking, bicycle lanes, or sidewalks and therefore recommends the following comment: If right-of-way is required, this would change the analysis and mitigation measures.

City Comment: *The FEIR should provide additional information/data supporting the assumption that right-of-way acquisition or road widening is not necessary for the mitigation measures at the impacted intersections.*

The DEIR/EA states that VTA will fund the full cost of feasible improvements to be undertaken by local jurisdictions for intersections impacted in 2018. Additionally, the mitigation measures state that VTA will fund its fair share of 2040 feasible mitigation improvements as part of the Project so that local jurisdictions can undertake traffic improvements over time as the need becomes apparent and remaining funding becomes available. However, the document goes on to state that “for improvements to be undertaken by local jurisdictions that involve minimal changes to the intersection,

such as traffic signal optimization and roadway striping, there is strong evidence that the local jurisdiction can and should implement the mitigation since VTA is paying the full cost and the measure will benefit the community.”

Local staffing and financial resources are limited and the City is not in a position to take on management or implementation of projects that are not currently part of our approved Capital Improvement Program.

City Comment: *The FEIR should identify the VTA as the agency responsible for implementing all mitigation measures required for the Project and there should not be reliance on local jurisdictions to implement mitigation measures.*

The alternatives with a dedicated BRT lane in Mountain View (Alternatives 4b and 4c) would close seven existing median openings along ECR in Mountain View and two locations in Los Altos:

- Crestview Drive (closing two access openings)
- Dale Avenue
- Between Yuba Drive and State Route 85 (closing two access openings)
- Between Mariposa Avenue and Pettis Avenue
- Ortega Avenue (by removing existing traffic signal)
- Distel Drive (closing two locations in the City of Los Altos by removing existing traffic signal)

Exhibit 4 shows the median closures graphically.



Exhibit 4 – Median Closures

With the closure of these median openings, access to the impacted side streets and commercial and residential properties along ECR would be more difficult. Motorists who currently use these openings would need to bypass the opening and make U-turns or find an alternate route to the destination. The DEIR does not include analysis of the

existing left-turn pockets and the queuing impacts on any of the remaining intersections and, therefore, no mitigation measures are included.

City Comment: *The FEIR should analyze the existing left-turn pockets that will remain to determine if they are sufficient to handle the additional U-turns necessary because of the removal of other left-turn lanes along the Corridor and appropriate mitigation should be incorporated into the project.*

The DEIR/EA analyzes the level of service (LOS) at 15 cross-street intersections along ECR in Mountain View. Hexagon examined the intersection LOS calculations in detail to isolate delays on the cross streets versus the delays along ECR. With dedicated lanes, four intersections would experience negative impacts, defined as LOS E or LOS F operations (Jordan Avenue, Castro Street, Calderon/Phyllis Avenues, and Sylvan Avenue/The Americana). Staff believes the FEIR should call out these negative impacts to give the public a better overall understanding of how dedicated lanes might impact drivers on these cross streets.

City Comment: *Include analysis of impacts to cross streets beyond intersection average LOS to demonstrate local impacts to vehicles, including queuing on the side streets as well as to pedestrians and bicyclists crossing ECR.*

TREES

According to the DEIR/EA, with dedicated lanes, the Project will remove 47 Heritage trees and 96 non-Heritage trees in Mountain View. The Project would also remove all of the 44 non-Heritage median trees within the portion of ECR in Los Altos (Rengstorff Avenue to Del Medio Avenue). The DEIR/EA includes mitigation to replace the trees at 2:1 or 3:1 ratios depending on size. A size is not given for replacement trees.

The DEIR/EA accurately states that VTA is not subject to the City's Heritage Tree Ordinance as a transit agency.

Staff is concerned that it will not be practical within the project area within the City of Mountain View and Los Altos to plant the required number of replacement trees (333 in Mountain View and 88 in Los Altos) and that the replacement trees may be replaced elsewhere along the ECR.

City Comment: *Revise Mitigation Measure BIO-B, Replace Trees Removed by the Project, to reflect that replacement trees be planted in the jurisdiction where the corresponding trees were removed and to provide a plan of where the 333 replacement trees in Mountain View and 88 replacement trees in Los Altos would be planted.*

City maintenance crews need access to the medians to maintain and care for the trees, other landscaping, and irrigation systems (Mountain View staff maintain the medians in Mountain View and Los Altos). Currently through a permit with Caltrans, crews close a lane adjacent to the median to allow staff and vehicles to access the area during nonpeak hours. With dedicated lanes and buses every 10 minutes, the Project must be designed to allow City crews to close the lane and direct buses into the remaining travel lanes to do regular or emergency maintenance.

City Comment: *The FEIR must address impacts to existing planting and irrigation systems and maintenance activities for median and other streetscape landscaping affected by the Project.*

PEDESTRIAN/BIKE CIRCULATION AND PARKING

As noted through the updating of the General Plan and development of the ECR Precise Plan, the ECR Corridor currently creates a barrier to the movement of pedestrians and bicycles in Mountain View. As such, the BRT Project should not further divide the Mountain View community physically or visually.

By closing median openings, the project would create impacts to bicycle travel by preventing left turns. The DEIR/EA also does not discuss potential impacts to existing bicycle networks that cross ECR, including Stevens Creek Trail and the City's Bicycle Boulevard at Sylvan Avenue/The Americana.

The DEIR/EA also does not address coordination with Mountain View's bicycle/pedestrian goals and objectives identified in the 2030 General Plan, Shoreline Transportation Study, ECR Precise Plan, San Antonio Precise Plan, Shoreline Corridor Study, and the California/Shoreline Complete Street Study.

City Comment: *The FEIR must specifically address impacts to bicyclists from the removal of left-turn pockets, existing bicycle network crossings at ECR, and provide analysis of how the Project supports the City's various land use and policy documents related to pedestrians and bicyclists.*

Reconfiguration of the streetscape for the BRT project is expected to provide various enhancements to the pedestrian environment, including shorter crossing distances, improved amenities, and additional signalized crossings. The DEIR/EA does not provide any conceptual design drawings (plan view) for any locations in the City of Mountain View and it is unclear where or how these improvements will be implemented.

City Comment: *The FEIR should provide exhibits demonstrating how crossing distances will be shortened, what additional amenities will be provided, and what is the funding and timeline for these improvements.*

ECR does not currently have bicycle lanes and is not a classified bikeway under existing conditions within the City of Mountain View. On Page 3-9, the DEIR/EA states “Dedicated lane segments would include bicycle lanes in place of parking.” Within the City of Mountain View, this represents the loss of approximately 336 on-street parking spaces.

East of Calderon Avenue, businesses tend to have sufficient off-street parking, but many businesses are dependent upon on-street parking between Calderon Avenue and Mariposa Avenue. More analysis and outreach is necessary prior to removal of these spaces.

Removal of parking on ECR may also divert parking to side streets. The DEIR/EA does not adequately address the impact of removal of on-street parking on ECR.

City Comment: *The FEIR must more specifically address the impacts of loss of street parking on ECR, including impacts to small businesses and diversion of on-street parking to side streets.*

CALTRANS COORDINATION

One of the items specifically mentioned in the City’s March 7, 2013 letter in response to the NOP of the EIR/EA was regarding Caltrans Coordination.

The DEIR/EA has no discussion of coordination with Caltrans. The document indicates that the section of ECR at Bush Street in Mountain View carries the highest average daily traffic (2013) of nearly 53,000 vehicles per day with an average trip of 5 to 6 miles. Caltrans support of the proposed BRT improvements, including the removal of vehicular travel lanes, removal of left turns, or addition of bicycle lanes along the ECR Corridor is critical to the Project.

City Comment: *The FEIR should describe VTA’s coordination with Caltrans and if there is additional coordination prior to the release of the FEIR. The City requests to participate in those discussions.*

LAND USE ASSUMPTIONS/CONSISTENCY

The DEIR/EA often cites the Grand Boulevard Initiative (GBI) when discussing land use and planning for the Corridor. While the City supports and works with the GBI,

the GBI is not a replacement for the City of Mountain View's General Plan 2030 or the ECR Precise Plan and San Antonio Precise Plan. The need to reference our General Plan and other planning documents/studies was discussed in our March 7, 2013 scoping comments. The DEIR/EA has not adequately considered local land use plans or policies.

City Comment: *The DEIR/EA has not adequately considered the City of Mountain View's 2030 General Plan and, therefore, has not adequately considered local land use plans or policies as required. The VTA should review the City's 2030 General Plan and recently adopted ECR Precise Plan and San Antonio Precise Plan and address how the project supports or does not support local planning policies in the FEIR.*

On Page 11 of Appendix H—Traffic Operations Analysis Report, the study states that the analysis “Uses the 2013 Association of Bay Area Governments (ABAG) Projections for estimates of households, population and employment.” The table below compares the ABAG projections with the City's growth projections. The ABAG model projects significantly lower job growth and marginally lower housing growth than the City. Since the DEIR/EA was begun after Mountain View's 2030 General Plan update, this environmental review should study a cumulative growth scenario consistent with the General Plan.

	ABAG*	Mountain View 2030 General Plan	Difference
Job Growth 2013 to 2030	8,860	17,000 to 25,000**	+8,000 to 16,000
Housing Unit Growth 2013 to 2030	5,330	6,770	+1,440

* ABAG data is to 2010 to 2040 — growth shown is an interpolation.

** Variation is based on a range of possible employment densities.

City Comment: *The DEIR/EA does not adequately address the cumulative growth scenario and, therefore, may be understating cumulative impacts. The FEIR should study a cumulative growth scenario consistent with the City's 2030 General Plan.*

The DEIR/EA does not report the land use data that was used in the travel demand forecasting model. Staff found discrepancies between the ECR Precise Plan future traffic volume data and the DEIR/EA data. While both studies used the VTA Travel Demand Forecasting Model to develop forecasts of future year traffic on ECR and side streets, the future traffic volume (year 2030) in the ECR Precise Plan is shown to be higher than future traffic volume (year 2040—without Project) in the DEIR/EA. As a result, the future intersection LOS and delays are worse in the 2030 ECR Precise Plan

than 2040 DEIR/EA. VTA should use the ECR Precise Plan land use and development assumption (which are the same as the City's 2030 General Plan which was approved in 2011) for forecasting future traffic volume and intersection delay and LOS calculations for the DEIR/EA.

City Comment: *The FEIR should use the ECR Precise Plan land use and development assumption (which are the same as the City's 2030 General Plan which was approved in 2011) for forecasting future traffic volume, intersection delay, and LOS calculations for the DEIR/EA.*

City Comment: *Because the DEIR/EA does not adequately address the cumulative growth consistent with the City's 2030 General Plan, the DEIR/EA underestimates traffic volumes, intersection delay, and LOS calculations. The FEIR should include updated analysis and necessary mitigation measures.*

CONSTRUCTION IMPACTS

The DEIR/EA provides mitigation measures for construction impacts, including traffic control and noise. The language as written indicates that some closures of undetermined length might be expected and is silent about providing access to existing properties. The mitigation measure should be modified to ensure consistent pedestrian, bicycle, and vehicle access during all phases of construction.

City Comment: *The mitigation measure describing the required Transportation Management Plan (TMP) must have specifically defined parameters to adequately address access for all modes during construction, both through the Corridor and to individual properties.*

Construction Noise

Mitigation measures require the VTA to employ Best Practices to reduce outdoor noise levels at noise-sensitive land uses to ensure that construction noise levels do not exceed 80 dB(A) L_{eq} during daytime hours (7:00 a.m. to 10:00 p.m.) and 70 dB(A) L_{eq} during nighttime hours (10:00 p.m. to 7:00 a.m., and comply with all applicable local construction noise standards to the maximum extent practicable.

The City of Mountain View City Code Section 8.70.1, Construction Noise, restricts construction activities to 7:00 a.m. to 6:00 p.m. Monday through Friday. Exceptions must be given in writing by the Chief Building Official. There are existing residential units directly on ECR and many single-family homes on parcels immediately behind to those on ECR. Some of the ECR lots are extremely shallow, placing these residences in close proximity to the proposed construction. More specific and detailed mitigation

measures should be provided to ensure that residential uses along ECR are adequately protected.

City Comment: *Mitigation Measure NOI-A, Employ noise-reducing practices during construction, should be updated to reflect the City of Mountain View City Code Section 8.70.1. Additional measures to reduce the construction noise at nearby residential units beyond those identified in the DEIR/EA must be developed and incorporated into the Project.*

ADJACENT NEIGHBORHOODS

The DEIR/EA Section on Affected Environment discusses existing conditions related to socioeconomics in the Project Corridor and surrounding area. The document states... “Furthermore, no neighborhoods or communities of concern have been identified.” Page 5-111 also discusses cumulative impacts on Environmental Justice (EJ) populations.

Mountain View is an extremely diverse community. There are 15 Lower-Income Census Tract/Block Groups within the City of Mountain View based on a Bay Area Economics 2012 Map of Lower Income Block Groups for the Community Development Block Grant (CDBG) and Home Investment Partnership (HOME) Programs. These Census Tract/Block Groups indicate the percentage of lower-income households living within those block groups. The number of lower-income households within these identified block groups range from 64.7 percent of the households to 38.2 percent. All but four of these block groups are located along the ECR or are in close proximity to ECR.

City Comments: *The source of the DEIR/EA’s “neighborhoods of concern” needs to be identified to ensure that all appropriate populations are identified and considered.*

PUBLIC COMMENTS

The VTA held two public hearings in Mountain View to receive public comment on the DEIR/EA, and the public is encouraged to forward additional comments in writing to the VTA prior to the close of the public comment period, currently scheduled for January 14, 2015.

Staff has attached e-mails and other written correspondence received by the City from members of the public since the release of the DEIR/EA. Staff will attach these to the letter sent to the VTA. Written correspondence and e-mails received after the City Council meeting but prior to the end of the public comment period will be forwarded to the VTA under separate cover.

PREFERRED ALTERNATIVE

In addition to providing comments on the DEIR/EA, Council may wish to express general support for one or more alternatives. Each alternative results in a different degree of benefit to transit riders (decreased travel time and increased ridership) and impact to other vehicles (loss of travel lane and left-turn access).

The following table provides a brief summary of major pros and cons of each alternative. The table focuses on projected ridership, pedestrian improvements, loss of travel lanes, and loss of on-street parking and is generally written from a Mountain View perspective. Impacts of dedicated lanes in other cities are not included as “cons” in the table.

Alternative	Pros	Cons
Alternative 1	<ul style="list-style-type: none"> • 8,159 daily riders (2018) • +2 minute p.m. travel time (2018)* 	
Alternative 2	<ul style="list-style-type: none"> • 9,223 daily riders (2018) • 4 minutes faster p.m. (2018)* • Pedestrian improvements at intersections 	
Alternative 3a	<ul style="list-style-type: none"> • 9,561 daily riders (2018) • 7 minutes faster (2018)* 	
Alternative 3b	<ul style="list-style-type: none"> • 10,090 daily riders (2018) • 11 minutes faster p.m. (2018)* • Pedestrian improvements at intersections 	
Alternative 4a	<ul style="list-style-type: none"> • 10,801 daily riders (2018) • 17 minutes faster p.m. (2018)* • New bike lanes east of SR 85 • Pedestrian improvements at intersections 	<ul style="list-style-type: none"> • Loss of travel lane east of SR 85 • Loss of on-street parking east of SR 85

Alternative	Pros	Cons
Alternative 4b	<ul style="list-style-type: none"> • 11,808 daily riders (2018) • 26 minutes faster p.m. (2018)* • New pedestrian signal near Mariposa and Pettis Avenues 	<ul style="list-style-type: none"> • Loss of travel lane throughout Mountain View • Loss of on-street parking throughout Mountain View
Alternative 4c	<ul style="list-style-type: none"> • 13,104 daily riders • 37 minutes faster p.m. (2018)* • New pedestrian signal near Mariposa and Pettis Avenues 	<ul style="list-style-type: none"> • Loss of travel lane throughout Mountain View • Loss of on-street parking throughout Mountain View

* Versus estimated travel time of 87 minutes, 522 from Palo Alto Transit Center to San Jose Arena in 2018. Current p.m. travel time of 522 (2013) is 85 minutes, compare to automobile travel time of 40 minutes.

With the information currently available, staff recommends Council consider supporting alternatives that do not include dedicated lanes in Mountain View (Alternatives 1 through 3b), though deference should be given to Santa Clara's position on Alternative 3b. Staff does not agree with the assertion in the DEIR/EA that removal of a travel lane in each direction will not have negative impacts to traffic on ECR, and the DEIR/EA has not fully accounted for diverted traffic and its impacts, the impacts of restricted left-turn access, and loss of on-street parking.

Comparing Alternatives 3b and 4b, providing dedicated lanes throughout Mountain View increases ridership by approximately 1,700 riders per day and decreases BRT travel time by 19 minutes, while reducing travel lanes and impacting drivers on a roadway carrying 53,000 vehicles per day and impacting median access to businesses and neighborhoods at nine locations. Staff is not sure that the increased ridership and time improvements justify the impact to other users of the roadway and surrounding properties, but this is a policy decision for the City Council. It is not required that the Council take a formal position on a preferred alternative at this time.

It is our understanding that staff at the cities of Palo Alto, Los Altos, and Santa Clara are still reviewing the DEIR/EA and are expecting to go to their respective City Councils to discuss comments in early January. Sunnyvale will be providing staff comments directly to the VTA. The extent and nature of the comments from the other cities is still being developed, so we do not have any additional information at this time.

FISCAL IMPACT

The Project is proposed to be funded by the VTA, though the VTA will pursue some grant funding from the FTA. The DEIR/EA states that VTA will fund the full cost for

feasible improvements to be undertaken by local jurisdictions for intersections impacted in 2018. However, the document goes on to state that “for improvements to be undertaken by local jurisdictions that involve minimal changes to the intersection, such as traffic signal optimization and roadway striping, there is strong evidence that the local jurisdiction can and should implement the mitigation since VTA is paying the full cost and the measure will benefit the community.” Additionally, the mitigation measures state that VTA will fund its fair share of 2040 feasible mitigation improvements as part of the Project so that local jurisdictions can undertake traffic improvements over time as the need becomes apparent and remaining funding becomes available. The DEIR/EA did not identify the specific improvements at each intersection, so staff is unable to provide a potential cost impact to the City at this time for implementing or managing such projects, but some costs should be anticipated.

CONCLUSION

The VTA has prepared seven alternatives for a BRT project on the ECR Corridor, ranging from increased bus service on the existing Corridor with no infrastructure improvements to full dedicated bus lanes with the removal of traffic lanes in each direction and stations located in the median. With the increased project scope of each alternative, travel times decrease and ridership increases, but impacts also increase to other users of the roadway and neighboring properties.

While the City supports transit improvements, including policies in the recently adopted General Plan and current proposals for increased transit service City-wide, staff believes that the DEIR/EA does not demonstrate that dedicated lanes provide sufficient benefit to offset negative impacts.

Staff recommends:

1. Council authorize the Mayor to sign a letter providing comments to the VTA on the DEIR/EA based on this report.
2. Council determine if there are any project alternatives the City supports and, if so, authorize the City Manager to send a letter to the VTA to express support for those alternatives.

ALTERNATIVES

1. Do not send a letter from the City Council commenting on the ECR BRT DEIR/EA.
2. Alternative direction on comments outlined in this report.
3. Support different alternatives.
4. Do not take a position on a preferred alternative.

PUBLIC NOTICING – Agenda posting.

Prepared by:

Jacqueline Andrews Solomon
Assistant Public Works Director/
City Engineer

Approved by:

Michael A. Fuller
Public Works Director

Daniel H. Rich
City Manager

JAS/7/CAM
912-12-16-14CR-E

- Attachments:
1. March 7, 2013 Letter to VTA Regarding NOP/Scoping
 2. Letters/E-Mails Received by City Through December 10, 2014