



# CITY OF MOUNTAIN VIEW

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January 2, 2015

Ms. Christina Jaworski  
VTA Environmental Planning Department  
3331 North First Street, Building B-2  
San Jose, CA 95134

## COMMENTS ON THE ENVIRONMENTAL IMPACT REPORT/ENVIRONMENTAL ASSESSMENT FOR THE EL CAMINO REAL BUS RAPID TRANSIT (BRT) PROJECT

Dear Ms. Jaworski:

The City of Mountain View appreciates the opportunity to share its comments and concerns regarding the Draft Environmental Impact Report(DEIR)/Environmental Assessment (EA) for the El Camino Real Bus Rapid Transit (BRT) project (Project) dated October 29, 2014.

The Project proposes BRT improvements along 17.6 miles of West Santa Clara Street, The Alameda, and El Camino Real (ECR) between the Arena (SAP Center) in San Jose and the Palo Alto Transit Center, including exclusive BRT-dedicated lanes, mixed-flow lanes (lanes for BRT and vehicular travel), and 15 median or curbside BRT stations.

After reviewing the DEIR/EA at its meeting of December 16, 2014, the Mountain View City Council is concerned about the potentially significant right-of-way, aesthetic, biological resource, land use, noise, transportation/traffic, and other impacts the BRT will have on the quality of life in our community.

The City requests that VTA and Federal Transit Authority (FTA) carefully consider the comments contained in this letter and continue to work with the City as the environmental review process progresses to ensure that the City's interests are addressed and proper mitigations are included in the Final EIR (FEIR).

### DIVERSION OF TRAFFIC

The DEIR/EA evaluates seven alternatives that include combinations of no-build, mixed-flow lanes on ECR (BRT buses sharing lanes with other vehicles) and dedicated lanes on ECR for BRT buses. The DEIR/EA states that the dedicated lane BRT 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, about 900 vehicles are estimated to be diverted from southbound ECR. This is essentially the full capacity of one travel lane.

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). 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. The City Council is especially concerned about diversion of traffic onto smaller residential side streets such as Latham and Church 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.*

City Comment: *The DEIR/EA does not consider or examine the capacity of these parallel routes, including Central Expressway and Highway 101 to determine if these facilities have any remaining capacity to accommodate the diverted traffic.*

The DEIR/EA should provide a figure and/or a summary showing how the trips were assumed to be distributed across the street network to allow a better public review and understanding of the Project impacts. This would help to determine if additional intersections beyond the 0.5-mile buffer should be studied based on the number of trips added per lane.

Middlefield Road is identified as one of the main routes for diverted trips; however, the DEIR/EA does not analyze any Middlefield Road intersections. Middlefield Road is a major east-west connection between Palo Alto and Sunnyvale and the effect of BRT diversion traffic should be presented in the FEIR.

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. The DEIR/EA includes mitigation measures for these 8 intersections. 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.

City Comment: *Show the basis for the assumption that right-of-way acquisition or road widening is not necessary for the mitigation measures at the impacted intersections.*

Page 4.12-30 of the DEIR/EA discusses MM TRA-A which describes local roadway improvements, including signal optimization, signal installation, and roadway striping improvements to improve the operations and to reduce or eliminate the localized significant impacts at the impacted intersections. The DEIR 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."

Page 4.12-46 discusses MM TRA-A further, "VTA will fund its fair share of 2040 feasibly 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." Please clarify that the VTA will fund the construction, design, project management, and inspection costs for such improvements. 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 VTA should implement all mitigation measures required for the Project and not rely on local jurisdictions to implement mitigation measures.*

#### REMAINING ECR TRAFFIC AND CROSS STREETS

The DEIR/EA assumes that all 900 p.m. peak-hour traffic (one lane capacity) will go somewhere else when one travel lane becomes a dedicated BRT lane. While some of the 900 peak-hour vehicles will find other routes, some may use other modes such as the BRT; staff is certain that some will stay on ECR. Therefore, 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.

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

The alternatives with a dedicated BRT would close seven existing median access openings along ECR in the City of Mountain View and would close 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)

With the closure of these median openings, access to the impacted side streets and commercial and residential properties along ECR would be more difficult. Some motorists would need to make U-turns where under existing conditions they do not. The DEIR does not include analysis of the existing left-turn pocket and the queuing impacts on any of the remaining intersections and, therefore, no mitigation measures are included. The diversion of traffic onto side streets and small parallel streets (such as Church and Latham Streets) is not analyzed. More information and analysis of this issue must be incorporated into the FEIR.

City Comment: *The FEIR should analyze the existing left-turn pockets which 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 intersection 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 the dedicated lane BRT Alternative, 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 full BRT lanes might impact them even if they do not travel along ECR.

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

## TREES

One of the City Council's current three major goals is to preserve and enhance the City's tree canopy. Many of the existing trees were planted in the early 1980s when ECR was improved in Mountain View to its current condition as part of an Assessment District. Even if the existing trees are replaced, it may take between 20-25 years to replace the lost canopy. This loss of canopy will have significant aesthetic and noise impacts on properties and land uses in Mountain View along ECR.

The DEIR/EA states that the VTA it is not subject to the City's Heritage Tree Ordinance as a separate agency, but since the right-of-way is owned by Caltrans, the City requires some documentation from Caltrans that they are supportive of removal of these trees by VTA for this Project.

City Comment: *Provide documentation that Caltrans, as owner of the trees, approves the removal and replacement plan.*

The City is concerned that it will not be practical within the remaining Project area within the Cities of Mountain View and Los Altos to plant replacement trees (333 in Mountain View and 88 for Los Altos.)

The City is more concerned that the VTA may determine that it cannot replace the trees within Mountain View or Los Altos, that the trees may be replaced elsewhere along ECR far from our City, or worse yet, select to pay an in-lieu fee without any decision or input from our City.

City Comment: *Revise Mitigation Measure BIO-B, Replace Trees Removed by the Project, to provide some detail of where the 333 replacement trees in Mountain View and 88 replacement trees in Los Altos would be located.*

The City is concerned about the impact to the remaining trees, smaller plants, and irrigation system as trees are removed and construction progresses. Specific measures to protect other trees, existing plant materials, and ensure irrigation systems remain functioning during Project construction should be incorporated into the FEIR.

City maintenance crews need access to the medians to maintain and care for the trees, landscaping, and irrigation systems. Currently through a permit with Caltrans, they

close the center 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/BICYCLE CIRCULATION AND PARKING

The ECR Corridor currently creates a barrier to the movement of pedestrians and bicycles and the Project must not further divide the Mountain View community physically or visually. The DEIR/EA does not adequately address:

- Impacts/mitigation for bicyclists currently using the corridor to commute, shop, etc. A number of the Project's alternatives remove several left-turn pockets, eliminating the bicyclist's ability to make left turns to access City services and facilities.
- Impacts/mitigation for bicycle facilities connected to the Project corridor, including Stevens Creek Trail and the City's Bicycle Boulevard at Sylvan Avenue/The Americana. Access to both of these facilities is currently provided to and from ECR. This access must not be interrupted due to the Project or during construction.
- Coordination with Mountain View's bicycle/pedestrian goals and objectives identified in the 2030 General Plan, Shoreline Transportation Study, El Camino Real 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.

City Comment: *Provide exhibits demonstrating how crossing distances will be shortened and what additional amenities will be provided.*

ECR does not currently have bicycle lanes and is not a classified bikeway under existing conditions within the City of Mountain View. Reconfiguration of the streetscape for BRT may positively affect the bicycle environment. Alternative 4c includes marked bike lanes in each direction throughout Mountain View.

With the dedicated lane, the BRT Project would remove all on-street parking along ECR. Within the City of Mountain View, this represents the loss of approximately 336 parking spaces. While the project is not removing any parking on the side streets, removal of parking on ECR would impact parking on the side streets. The DEIR/EA does not adequately address the impact of diversion of parking to the side streets (especially those that have residential uses).

City Comment: *The FEIR must more specifically address impacts of loss of street parking on ECR and on existing residential side streets.*

On Page 3-9, the DEIR/EA states "Dedicated lane segments would include bicycle lanes in place of parking." In Mountain View, bicycle lanes would be appropriate east of Calderon Avenue and in key segments connecting cross-corridor routes, but local businesses are dependent on street parking between Calderon Avenue and Mariposa Avenue. More analysis and outreach is necessary prior to removal of these spaces.

City Comment: *While removing on-street parking to provide for bike lanes is an appealing concept for some, the reality is that many small businesses on ECR depend on the street parking as their parcels are too small to support on-site parking. This has been the basis for not converting parking to bike lanes in our community as we try and balance competing needs. The FEIR should include a more robust analysis of the impacts to these small businesses and more targeted outreach should be done to identify specific economic and community issues and impacts, so that appropriate and adequate mitigation measures can be identified and discussed in the FEIR.*

#### CALTRANS COORDINATION

One of the items specifically mentioned in our March 7, 2013 letter in response to the Notice of Preparation (NOP) of the DEIR/EA was regarding Caltrans coordination:

"Caltrans Coordination. The EIR/EA should provide information on how the BRT Project is being coordinated with Caltrans and the City of Mountain View, including the

City's concurrence regarding the Project description, design, and environmental analysis."

The DEIR/EA has no discussion of any coordination with Caltrans. Given that the DEIR/EA (Page 4.12-6) indicates that the section of ECR at Bush Street in Mountain View carries the highest average daily traffic (ADT), or nearly 53,000 vehicles per day with an average trip of 5 to 6 miles, not coordinating or discussing the Caltrans involvement in the process or allowing the City to participate in such coordination or discussions when considering removal of a travel lane in each direction of an existing State Route with such high vehicle usage is unusual. Caltrans support any 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 fundamental 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.*

Other issues of concern include:

#### LAND USE ASSUMPTIONS/CONSISTENCY

Under DEIR/EA Section 2.2.1 – Project Purpose, the document discusses the need to provide the transit infrastructure to support the implementation of the transit goals and objectives of the Grand Boulevard Initiative (for ECR). The DEIR/EA also 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 El Camino Precise Plan and San Antonio Precise Plan. A later portion of this Chapter, Section 2.2.2.6, neglects to discuss Mountain View's General Plan or the General Plans of any of the other cities along the Project corridor. This is repeated in other sections of the DEIR/EA. 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 which was approved in 2012 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 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 BRT EIR was begun after Mountain View’s 2030 General Plan update, this EIR should study a cumulative growth scenario consistent with that 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, may be understating cumulative impacts, and, therefore, the FEIR should study a cumulative growth scenario consistent with our 2030 General Plan.*

The BRT DEIR does not report the land use data that was used in the travel demand forecasting model. We have found discrepancies between the City of Mountain View ECR Precise Plan (ECR-PP) future traffic volume data and the BRT DEIR data. While both studies used 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-PP is shown to be higher than future traffic volume (year 2040 – without Project) in the BRT DEIR/EA. As a result, the future intersection LOS and delays are much worse in the 2030 ECR-PP than 2040 BRT DEIR.

City Comment: *VTA should use the ECR-PP 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: *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

Pedestrians use ECR both to travel and, in many instances, cross ECR. Some bicyclists also use ECR, but many more cross ECR as part of their daily commute. There are a large number of students that also cross ECR on their way to and from middle schools in our community. The DEIR/EA should include the following mitigation measures for all Project-related construction activities within the City of Mountain View to ensure pedestrian/bicycle safety.

Access during construction:

- Pedestrian access, including for people with disabilities compliant with the Americans with Disabilities Act (ADA), must be maintained throughout the duration of construction. Safe, clearly marked routes must be maintained through and around the construction activity at all time, 24/7.
- The use of temporary walkways with the width, slope, and cross-slope, compliant with ADA, must be incorporated within the Project. Surfaces must be firm, stable, and slip-resistant.
- Barricades and channelizing must be used to separate pedestrians from vehicular traffic. Proper barricading must be provided to prevent visually and/or hearing impaired pedestrians from entering work zones, 24/7.
- All proposed alternate pedestrian detour routes must have appropriate signage and be accessible to people who use mobility aids (wheelchairs, walkers, scooters, etc.). The alternate detour routes shall be a minimum width of 3' and be parallel to the disrupted pedestrian access routes to the maximum extent feasible.
- Accommodations for bicycles crossing ECR must be provided 24/7 in those locations where bicycle facilities exist on side streets. Bicycles should not be made to share access with pedestrians.

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:

MM NOI-A states that VTA will employ best practices to reduce outdoor noise levels at noise-sensitive land uses to ensure that construction noise levels do not exceed 80dB(A)  $L_{eq}$  (8 hours) during daytime hours (7:00 a.m. to 10:00 p.m.) and 70 dB(A)  $L_{eq}$  (8 hours) 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 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 Building Official. There are existing residential units directly on ECR and mostly single-family homes on parcels immediately behind 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 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

Section 5.14.2 of the DEIR/EA discusses the Affected Environment and identifies existing conditions related to socioeconomics in the Project corridor and surrounding area. The document goes on further to state...“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 ECR or are in close proximity to ECR. Please ensure that the DEIR/EA has identified or reviewed these Census Tracts to make sure the remaining analysis is correct.

City Comments: Please identify the source of the DEIR/EA's "neighborhoods of concern" to ensure that all appropriate populations are identified and considered.

OTHER TECHNICAL INCONSISTENCIES WITHIN THE DEIR/EA DOCUMENT

City Comments: Please make technical corrections to the following sections as discussed below:

City Comments: Table 2-2 gives a total existing ridership of 20,396 and a total VTA core ridership of 78,186. Page 3-2 states that Rapid 522 and Route 22 have a ridership of 100,000 or nearly 20 percent of VTA's daily ridership. Table 4.12-8 Weekday Transit Ridership within the Project Corridor by Alternative gives existing ridership of 3,278 for Rapid 522/BRT and 9,234 for Local 22, for a total of 12,512. The Alternative with the most ridership in 2018 has a total of 18,616, which is less than the current ridership given in Table 2-2. Such large inconsistency in the document for such a central number does not instill confidence in the consistency or accuracy of other numbers or figures. Please correct this discrepancy.

	Existing Route 22	Existing 522	Total
Table 2-2 (2013)	14,511	5,885	20,396
Page 3-2 (2013)			100,000
Table 4.12-8 (2013)	9,234	3,278	12,512
Table 4.12-8 Alternative 4c (2018)	5,512	13,104	18,616

City Comments: The City believes that the lane geometry of the following intersections were modeled incorrectly:

- ECR/ Rengstorff Avenue
- ECR/Escuela Avenue
- ECR/El Monte Avenue

Also, all signal cycle lengths on ECR within the City of Mountain View and Los Altos were incorrectly modeled. VTA should contact Caltrans to obtain the correct lane geometry and signal cycle lengths.

City Comments: Page 2-4, last sentence states that the forecasted travel speeds will be 25.9 mph in 2018 and 20.1 mph in 2040. What is the current (2013 or 2014) travel speed (average speeds for automobiles) in the p.m. eastbound direction?

City Comments: Page 4.5-6 describes "scattered areas of undeveloped land such as the Grant Road "farm parcel" in the City of Mountain View still remain." This parcel was developed for single-family homes in 2008. Please update this section to reflect existing conditions.

City Comments: Page 4.7-3, Table 4.7-1 Water Table Information in the Project Study Area. In Mountain View, it states the depth to water is 9.8'. It gives the Groundwater Elevation (feet above mean sea level) at 39.5' (39.5'+9.8' would indicate a ground elevation of 49.3' above mean sea level). The elevation on ECR at Castro Street in Mountain View is approximately 106' above mean sea level. Please correct this table as appropriate and the assumptions and conclusions from this section as necessary.

City Comments: DEIR/EA Page 4.13-2 incorrectly states that Mountain View obtains water from California Water Service Company (commonly known as Cal Water or CWSC per DEIR/EA). Cal Water serves a portion of the City of Mountain View as a private water provider. This includes some parcels on ECR. The City provides water for the rest of the City and purchases wholesale water from the SFPUC and SCVWD, as well as using local groundwater. Please correct this section as appropriate.

#### PUBLIC COMMENTS

The City has enclosed with this letter, copies of e-mails and other written correspondence that has been received by the City of Mountain View from the members of the public during the Public Comment period up to and including December 16, 2014. Any additional written correspondence will be forwarded under separate cover prior to the close of the public comment period.

Ms. Christina Jaworski  
January 2, 2015  
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Please contact Transportation Planner, Helen Kim ([helen.kim@mountainview.gov](mailto:helen.kim@mountainview.gov)) or Transportation and Business Manager Linda Forsberg ([linda.forsberg@mountainview.gov](mailto:linda.forsberg@mountainview.gov)) to coordinate future City participation and input for the proposed ECR BRT Project.

Sincerely,



Christopher R. Clark  
Mayor

CRC/JAS/7/PWK/001-12-18-14L-E

Enclosures:   1.   Memo from Hexagon Dated December 3, 2014  
                  2.   Copies of Correspondence from Public Received as of December 10, 2014

cc:   City Council

CM, PWD, CDD, APWD – Solomon, TBM, PCE – Arango, TP, TE, STE – Lopez,  
ACDD/PM, ZA, AP – Anderson, AP – Shapiro, POSM, F/c