4.14 Transportation

4.14.1 Introduction

This section evaluates the effects of the project, which includes the Housing Element Update (HEU) the Stanford Community Plan (SCP) update, and related rezonings, on transportation, focusing on changes to the Santa Clara County General Plan that may result in new or more severe impacts, and describes any mitigation measures needed to address any such impacts.

Specifically, this section describes existing and future transportation and circulation within Santa Clara County, describes the analysis methodology and regulatory framework, identifies potential transportation-related impacts of the HEU, and identifies the recommended mitigation measures for identified significant impacts.

Prior to July 1, 2020, transportation impact criteria used roadway congestion, or level of service (LOS), as the primary study metric for planning and environmental review purposes. However, the passage of Senate Bill (SB) 743 required OPR to establish a new vehicle miles traveled (VMT) metric for identifying and mitigating transportation impacts under CEQA in an effort to meet the State's goals to reduce GHG emissions, encourage infill development, and improve public health through more active transportation (non-driving transportation modes such as walking and biking). CEQA Section 21099(b)(2) states that upon certification of the revised guidelines for determining transportation impacts pursuant to CEQA Section 21099(b)(1), automobile delay, as described solely by LOS or similar measures of vehicular capacity or traffic congestion, shall not be considered a significant impact on the environment under CEQA. OPR identified vehicle miles traveled (VMT) as the required CEQA transportation metric for determining potentially significant environmental impacts[1]. In December 2018, the California Natural Resources Agency certified and adopted the CEQA Guidelines update package, including the section implementing SB 743 (CEQA Guidelines Section 15064.3). OPR developed a Technical Advisory on Evaluating Transportation Impacts in CEQA, which contains OPR's technical recommendations regarding assessment of VMT, thresholds of significance, and mitigation measures.

In accordance with SB 743 for purposes of determining potentially significant environmental impacts, this EIR will focus only on VMT as the threshold of significance. The County of Santa Clara does not have established significance criteria for evaluating VMT. For the purpose of evaluating potential transportation impacts for projects in unincorporated Santa Clara County, the County generally follows the Office of Planning and Research (OPR)'s Technical Advisory on Evaluating Transportation Impacts in CEQA to the extent applicable to and appropriate for the particular project.[2]

[1] California Office of Planning and Research (OPR). 2016. Revised Proposal on Updates to the CEQA Guidelines on Evaluating Transportation Impacts in CEQA, Implementing Senate Bill 743 (Steinberg, 2013). January 20.

[2] OPR. 2018. Technical Advisory on Evaluating Transportation Impacts in CEQA. Website: opr.ca.gov/docs/20190122-743_Technical_Advisory.pdf. December 18.

The information in this chapter is based on travel demand modeling, analyses, and identification of mitigations, if any, developed by Hexagon Transportation Consultants, Inc. The analyses were conducted in accordance with the current standards and methodologies required by law and set forth by the OPR's Technical Advisory.

Notice of Preparation Comments

A Notice of Preparation (NOP) for the Draft EIR was circulated on August 8, 2022, and a scoping meeting was held on August 23, 2022. A revised NOP reflecting changes to the HEU's list of opportunity sites was circulated on March 21, 2023. Both NOPs circulated for a period of 30 days, and the NOPs and the comments received during their respective comment periods can be found in **Appendix A** of this EIR.

During the first NOP comment period, transportation-related comments were received from Caltrans. Those comments clarified the requirements related to VMT analysis and contributions by projects to transportation impact fees that benefit multi-modal and regional transit improvements. This EIR considers impacts related to VMT and multi-modal and transit facilities.

During the second NOP comment period, the City of Palo Alto submitted comments requesting that the EIRs analysis consider cumulative VMT impacts in relation to the City's own 6th Cycle HEU process. Cumulative impacts related to VMT are assessed in the cumulative impact analysis later in this section. The City also requested that the EIR consider impacts to its General Plan level of service (LOS) policies, as well as safety, transit, bicycle, and pedestrian operations. With respect to these issues, the County notes that no applications for specific projects have been submitted for any of the identified housing opportunity sites on the Stanford campus, thus rendering detailed impact analysis of these impacts speculative and infeasible at this time. However, the EIR does address these impacts in a general and qualitative manner later in this section.

Other Issues of Concern

The Board of Supervisors, at their December 13, 2022, regular meeting, requested an analysis of the potential traffic impacts in the College Terrace neighborhood resulting from the planned Housing Opportunity Site in the East Campus area. While potential traffic congestion no longer constitutes an environmental impact for CEQA purposes, this analysis is provided for informational purposes responsive to the issue.

Historically, traffic associated with Stanford University has caused concern for surrounding communities when traffic backs up on major roads, typically during peak traffic times, and drivers seek alternative routes, creating "cut-through" traffic in some neighborhoods. Since the mid-1970s this issue has been addressed in the College Terrace neighborhood through a series of road modifications that effectively prevent cut-through traffic. Over time, all the streets within College Terrace have received physical changes to discourage or prevent cut-through traffic. These include roundabouts, stop sign-controlled intersections, and road barricades that effectively discourage cut-through traffic. For example, every street that runs from Stanford Avenue to

California Avenue has been blocked at one end or the other to discourage cut-through traffic. There are also numerous stop signs and speed bumps to discourage through traffic.[3]

Based on a review of the existing traffic patterns and street network within College Terrace, it is unlikely that additional housing constructed in the East Campus area would noticeably increase traffic in this neighborhood. This is based on several factors including the long-standing traffic calming improvements that have already been implemented, the low VMT rate expected for future housing (see Table 4.14-2), and the stringent traffic controls within the SCP.

Information Sources

The primary sources of information referenced in this section included those listed below. Please note that a full list of references for this topic can be found at the end of this section.

- Santa Clara County General Plan (1995-2010).
- Stanford University Community Plan (2000).

4.14.2 Environmental Setting

This section describes the existing conditions for transportation facilities in the City, including roadway network, transit service, and pedestrian and bicycle facilities in the vicinity of the areas where housing is proposed in the HEU.

Existing Roadway Network

Regional access to the County is provided via US-101, Interstate 280 (I-280), Interstate 680 (I-680), Interstate 880 (I-880), State Route 17 (SR-17), and State Route 130 (SR-130). Freeways that provide access to other cities within the County include State Route 237 (SR-237), State Route 87 (SR-87), and State Route 85 (SR-85). Significant arterials in the County include El Camino Real, Capitol Expressway, Central Expressway, Montague Expressway, Lawrence Expressway, San Tomas Expressway, and Almaden Expressway.

Roadways near the proposed housing sites that weren't described in the above are described below. Descriptions are provided using roadway classifications defined by Caltrans and the Federal Highway Administration (FHWA).

San Carlos Street is an east-west, four-lane arterial street in the vicinity of the proposed housing sites in the Campbell area of San José, extending from Bascom Avenue in the west to 4th Street in the east. West of Bascom Avenue, the road transitions to Stevens Creek Boulevard. San Carlos Street has a posted speed limit is 35 mph. Sidewalks are present along both sides of the street. Crosswalks are provided at major intersections.

[3] Source: https://norcalapa.org/2021/01/the-slow-streets-of-college-terrace/

Leigh Avenue is a north-south, two to four-lane arterial street in the vicinity of the proposed housing sites in the Campbell and Cambrian Village areas of San José, extending from San Carlos Street in the north to Blossom Hill Road in the south. North of San Carlos Street, the road transitions to Shasta Avenue. South of Camden Avenue, Leigh Avenue has two lanes. North of Camden Avenue, Leigh Avenue has four lanes. The posted speed limit within the vicinity of the proposed housing sites is 35 mph. Sidewalks are present on both sides of Leigh Avenue. Crosswalks are provided at major intersections. Class II bike lanes are provided between Moorpark Avenue and Fruitdale Avenue.

Bascom Avenue is a north-south, six-lane arterial street in the vicinity of the proposed housing sites in the Campbell area of San José, extending from I-880 in the north to SR-85 in the south. North of I-880, the road transitions to Washington Street. South of SR-85, the road transitions to Los Gatos Boulevard. The posted speed limit within the proposed housing sites is 35 mph. Sidewalks are present along most of the roadway, except for a small section on the west side between San Carlos Street and Elliot Street. Crosswalks are provided at major intersections. Class II bike lanes are provided between Fruitdale Avenue and Southwest Expressway.

Camden Avenue is an east-west, six-lane major arterial street in the vicinity of the proposed housing sites in the Cambrian Village area of San José, extending from SR-17 in the west to Harry Road to the east. The posted speed limit in the vicinity of the housing sites is 40 mph. Sidewalks are present on both sides of Camden Avenue. Crosswalks are provided at major intersections. East of Leigh Avenue, bicycle facilities are provided along both sides of the street striped as Class II bike lanes. On-street parking is mostly prohibited along most of Camden Avenue near the proposed housing sites.

Hostetter Road is an east-west, four to six-lane minor/major arterial street in the vicinity of the proposed housing sites in the Berryessa area of San José, extending from Lundy Avenue in the west to Old Piedmont Road in the east. West of Lundy Avenue, the road transitions to Murphy Avenue. The posted speed limit along Hostetter Road 40 mph west of Capitol Avenue and 35 mph east of Capitol Avenue. Sidewalks are present along Hostetter Road. Crosswalks are provided at major intersections. Bicycle facilities are present along both sides of the street and are striped as Class II bike lanes. On-street parking is prohibited on both sides of the street.

Capitol Avenue is a north-south, four to six-lane major arterial street in the vicinity of the proposed housing sites in the Berryessa and Alum Rock areas of San José, extending from Montague Expressway in the north to Capitol Expressway to the south. North of Capitol Avenue, the road transitions to Great Mall Parkway. The posted speed limit 35 mph. Sidewalks are present along Capitol Avenue. Crosswalks are provided at major intersections. Bicycle facilities are provided along the street and are striped as Class II bike lanes. On-street parking is prohibited along Capitol Avenue. The Orange Light Rail Line provides transit along Capitol Avenue and provides its services north of Capitol Avenue.

McKee Road is an east-west, four-lane major/minor arterial street in the vicinity of the proposed housing sites in the Alum Rock area of San José, extending from US-101 in the west and Alum Rock Avenue in the east. The posted speed limit is 40 mph. Sidewalks are present along McKee Road and crosswalks are provided at major intersections. Bicycle facilities are provided along both sides of the street. On-street parking is prohibited on both sides of the street.

Alum Rock Avenue is an east-south, four-lane arterial street in the vicinity of the proposed housing sites in the Alum Rock area of San José, transitioning from Santa Clara Street at US-101 in the west and Miguelita Road in the east, where it transitions to Edgemont Drive. The posted speed limit is 40 mph. Sidewalks along the north side of the roadway for a short segment east of Kirk Avenue. On-street parking is permitted along both sides of the street.

White Road is a north-south, two to four-lane major/minor arterial street in the vicinity of the proposed housing sites in the Pleasant Hills area of San José, extending from Penitencia Creek Road in the north and Aborn Road in the south. North of Penitencia Creek Road, White Road transitions to Piedmont Road. South of Aborn Road, the road transitions to San Felipe Road. The posted speed limit within the proposed housing sites is 35 mph. Sidewalks are present along White Road, except for a short segment along the east side between Pleasant Lake Lane and White Road, and crosswalks are provided at major intersections. Bicycle facilities are provided along both sides of the street and are striped as Class II bike lanes. On-street parking is prohibited on both sides of the street within the proposed housing sites.

Meadow Lane is a north-south, two-lane street in the vicinity of the proposed housing sites in the Alum Rock area of San José, between East Hills Drive in the north and transitions to Clayton Road at Story Road in the south. The posted speed limit is 25 mph. Sidewalks are present along Meadow Lane for the entire street. Crosswalks are provided at some intersections. On-street parking is provided along both sides of the street.

Tully Road is an east-west, six-lane arterial in the vicinity of the proposed housing sites in the Pleasant Hills area of San José that transitions from Curtner Avenue in the west at Monterey Highway and transitions to Murillo Avenue at Ruby Avenue in the east. The posted speed limit near the proposed housing sites is 35 mph. Bicycle facilities are present along Tully Road and are striped as Class IV protected bike lanes. On-street parking is prohibited along both sides of the street.

El Camino Real is a six-lane arterial that extends from Santa Clara County northerly to San Mateo County, a portion of which passes through the vicinity of the housing opportunity sites on the Stanford campus. Near the housing sites, El Camino Real has a raised, landscaped median with left-turn pockets provided at intersections. The speed limit is 35 mph. On-street parking is prohibited along certain street segments.

Sand Hill Road is a north-south, two- to four-lane road that extends from Portola Road in the south to El Camino Real in the north. In the vicinity of the proposed housing sites on the Stanford campus, Sand Hill Road is a four-lane roadway, and the posted speed limit is 35 mph. Striped Class II bike lanes are present along both sides of the street. On-street parking is prohibited along both sides of the street.

Page Mill Road is a north-south, four-lane arterial adjacent to the Stanford campus that transitions from Alpine Road at Skyline Boulevard in the south and transitions to Oregon Expressway at El Camino Real in the north. The posted speed limit is 35 mph. Striped Class II bike lanes are present along both sides of the street. On-street parking is prohibited along both sides of the street.

Stanford Avenue is an east-west, two-lane collector street in Palo Alto near the proposed housing sites on the Stanford campus, extending from Junipero Serra Boulevard in the west to Park Boulevard in the east. Within the vicinity of the proposed housing sites, there are sidewalks along both sides of the street. Bicycle facilities are present along Stanford Avenue and are striped as Class III bicycle routes. On-street parking is prohibited along the street.

Bowdoin Street is an east-west, two lane street on the Stanford campus, extending from Campus Drive in the west and transitions to Amherst Way in the east, east of Drake Way. Access to Bowdoin Street east of Stanford Avenue is restricted to westbound traffic only. The posted speed limit is 25 mph. Paved sidewalks exist along the south side of the street and a dirt path exists along the north side of the street between Stanford Avenue and Pine Hill Road. Striped Class II bike lanes are present along both sides of the street. On-street parking is prohibited along both sides of the street between Stanford Avenue and Pine Hill Road but is permitted west of Pine Hill Road.

Escondido Road is an east-west, two-lane street on the Stanford campus, extending from a cul-de-sac in the west, west of Arguello Way, to Stanford Avenue in the east. The posted speed limit is 15 mph. Striped Class II bike lanes are present along both sides of the street west of Comstock Circle. On-street parking is permitted along both sides of the street between Comstock Circle and the inbound driveway to Escondido Elementary School and along the north side of the street, west of Campus Drive.

Campus Drive is a two-lane street on the Stanford campus that begins and ends at Junipero Serra Boulevard and serves as the boundary for Stanford University. Campus Drive has a landscaped median east of Arguello Way with roundabouts at major intersections. The posted speed limit is 25 mph. Sidewalks are present along both sides of the road, and crosswalks are provided at major intersections. Bicycle facilities are provided along both sides of the street and are striped as Class II bike lanes. On-street parking is prohibited on both sides of the street within the proposed housing sites.

Arboretum Road is a north-south, four-lane street on the Stanford campus, extending from Sand Hill Road in the north to Galvez Street. The prima facie speed limit is 25 mph. There are sidewalks along most of Arboretum Road except for the west side of the street between Palm Drive and Galvez Street. Bicycle Facilities are present along Arboretum Road and are striped as Class II bike lanes. On-street parking is prohibited along both sides of the street.

Quarry Road is an east-west, four-lane collector street adjoining the Stanford campus in Palo Alto, extending from Campus Drive in the west to El Camino Real in the east. The prima facie speed limit is 25 mph. There are continuous sidewalks along both sides of the street. Bicycle

facilities are present along both sides of the street and are striped as Class II bike lanes. On-street parking is prohibited along Quarry Road.

Palm Drive is a north-south, four-lane street on the Stanford campus, transitioning from University Avenue in the north at El Camino Real and ends at the Stanford Oval in the south. The posted speed limit is 25 mph. There are Class I bicycle and pedestrian pathways along both sides of the street. On-street parking is prohibited along both sides of the street.

Existing Bicycle and Pedestrian Facilities

The County's existing bicycle facilities are classified according to the State's system of classification as identified in the Santa Clara Countywide Bike Plan 2018:

- Class I (bike path) – A Class I bicycle facility is completely separated from vehicles on a paved right-of-way and is commonly known as a bike path.
- Multi-use Pathway – A Multi-use Pathway is a Class I bicycle facility that allows both bicyclists and pedestrians to use the facility.
- Class II (bike lane) – A Class II bicycle facility is a striped and stenciled lane on an existing right-of-way shared with vehicles and is commonly known as a bike lane.
- Class III (bike route) – A Class III bicycle facility is identified through signage and/or pavement markings called "sharrows" indicating that bicyclists and drivers share the same travel lane and is commonly referred to as a bike route.
- Class IV (cycle track) – A Class IV bicycle facility is a striped lane with a vertical and physical separation, such as parking or bollards, from the vehicle travel lane and is commonly referred to as a protected bike lane.

The proposed project would facilitate development of housing units in several urbanized areas of the unincorporated County. These units have been generally grouped into geographic areas within the County for discussion below of existing bicycle and pedestrian facilities.

Cambrian Park Area

Class II bicycle facilities are provided on Leigh Avenue (from Curtner Avenue to Blossom Hill Road) and on Union Avenue (from Bascom Avenue to Los Gatos Almaden Road).

Pedestrian facilities consist of sidewalks, crosswalks, and pedestrian signals at signalized intersections. The proposed housing site in this area is located in a mostly residential and commercial neighborhood with predominately single-family homes. Sidewalks are generally present on both sides of Camden Avenue, Union Avenue, and Leigh Avenue.

Hostetter Station, Alum Rock/East Foothills, and Pleasant Hills Areas

Class II bicycle facilities are provided on Capitol Avenue (from San José north City Limit near Trimble Road to Capitol Expressway), White Road (from Penitencia Creek Road to Aborn Road), McKee Road (King Road to Valley View Avenue), and Tully Road. Class III bicycle route is provided on Toyon Avenue, from Penitencia Creek Road to McKee Road.

Pedestrian facilities consist of sidewalks, crosswalks, and pedestrian signals at signalized intersections. The proposed housing sites in this area are located in a residential area with mostly single-family homes. There are pedestrian facilities throughout the local streets.

Parkmoor/Burbank Neighborhood, and Fruitdale/Santa Clara Valley Medical Center Areas

Class II bicycle facilities are provided along Bascom Avenue from Fruitdale Avenue to Hamilton Avenue.

Class III bicycle facilities are generally provided on Scott Street, MacArthur Avenue, Pfeffer Lane, and Thornton Way.

Pedestrian facilities consist of sidewalks, crosswalks, and pedestrian signals at signalized intersections. The proposed housing sites in this area are located in a mixed residential and commercial area with single-family homes. Two of the housing sites are located near the Santa Clara Valley Medical Center. The are pedestrian facilities along the local streets in the area.

Stanford Area

Class II bike facilities are provided along the following streets in the vicinity of the proposed housing sites: Sand Hill Road from El Camino Real to Portola Road in Woodside, Arboretum Road from Sand Hill Road to Quarry Road, Quarry Road from El Camino Real to Campus Drive, Palo Road from Quarry Road to Palm Drive, Palm Drive from Arboretum Road to Jane Stanford Way, Campus Drive from Junipero Serra Boulevard to Constanzo Street, Santa Teresa Street from Campus Drive to Lomita Drive, and Stanford Avenue.

Pedestrian facilities consist of sidewalks, crosswalks, and pedestrian signals at signalized intersections. The proposed housing sites in this area are located in an area that consists of a mix of single-family housing, retail development, and Stanford University. There are pedestrian facilities along the local streets.

Existing Transit Service

Existing transit service in Santa Clara County is provided by the Valley Transportation Authority (VTA), Stanford Marguerite Shuttle, SamTrans, and Caltrain. The bus routes that provide services near the HEU sites are described in **Table 4.14-1**.

TABLE 4.14-1
EXISTING TRANSIT SERVICE

Bus Route	Route Description	Travelled Roadways	Weekday Hours of Operation	Headway
VTA Light Rail Orange Line	Mountain View – Alum Rock	Capitol Avenue, Great Mall Parkway, Tasman Drive, Java Drive, Moffett Park Drive, Manila Avenue, Central Expressway	5:20 AM – 12:46 AM next day	20 min
VTA Route 21	Stanford Shopping Center – Santa Clara Transit Center	Middlefield Road, San Antonio Road, California Street, Maude Avenue, Mathilda Avenue, Wolfe Road, Reed Street, Monroe Street	5:35 AM – 8:45 PM	30 min
VTA Route 22	Palo Alto Transit Center - Eastridge	El Camino Real, The Alameda, Santa Clara Street, King Road, Tully Road Capitol Expressway	4:27 AM – 2:59 AM next day	15 min
VTA Route 23	De Anza College – Alum Rock Station via Stevens Creek	Stevens Creek Boulevard, San Carlos Street, 1st Street, 2nd Street, Santa Clara Street, Alum Rock Avenue, Capitol Avenue	5:28 AM – 1:33 AM	15 min
VTA Route 25	De Anza College – Alum Rock Station via Valley Med	Stevens Creek Boulevard, De Anza Boulevard, Bollinger Road, Williams Road, Winchester Boulevard, Moorpark Avenue, Renova Drive, Bascom Avenue, Fruitdale Avenue, Meridian Avenue, Willow Street, Lelong Street, Graham Avenue, Keyes Street, Story Road, White Road	5:39 AM – 12:29 AM next day	15 min
VTA Route 61	Sierra & Piedmont – Good Samaritan Hospital	Samaritan Drive, Union Avenue, Bascom Avenue, Naglee Avenue, Taylor Street, Coleman Avenue, Hedding Street, 1st Street, Taylor Street, Berryessa Station Way, Berryessa Road, Morill Avenue, Piedmont Road, Sierra Road	5:20 AM – 10:48 PM	15 min
VTA Route 64A	Ohlone – Chynoweth Station – McKee & White	White Road, McKee Road, Julian Street, Santa Clara Street, The Alameda, Cahill Street, Montgomery Street, Bird Avenue, Coe Avenue, Lincoln Avenue, Almaden Expressway, Coleman Road, Winfield Boulevard, Chynoweth Avenue	5:22 AM – 11:30 PM	30 min
VTA Route 64B	Almaden Expressway & Camden – McKee & White	White Road, McKee Road, Julian Street, Santa Clara Street, The Alameda, Cahill Street, Race Street, Saddle Rack Street, Meridian Avenue, Camden Avenue, Almaden Expressway, Crown Boulevard, Trinidad Drive	5:58 AM – 9:08 PM	30 min

TABLE 4.14-1 (CONTINUED)
EXISTING TRANSIT SERVICE

Bus Route	Route Description	Travelled Roadways	Weekday Hours of Operation	Headway
VTA Route 68	San José Diridon Station – Gilroy Transit Station	Barack Obama Boulevard, Santa Clara Street, 1st Street, 2nd Street, Reed Street, Monterey Road, Blossom Hill Road, Endicott Boulevard, Great Oaks Parkway, Cottle Road, Santa Teresa Boulevard, Hale Avenue, Main Avenue	4:43 AM – 11:34 PM	15 min
VTA Route 70	Milpitas BART – Capitol Station via Jackson	Capitol Expressway, King Road, Rigoletto Drive, Quimby Road, Ocala Avenue, Adrian Road, Story Road, Jackson Avenue, Mabury Road, Berryessa Road, Flickinger Avenue, Hostetter Road, Morill Avenue, Montague Expressway	5:10 AM – 11:42 PM	30 min
VTA Route 71	Milpitas BART - Eastridge	Quimby Road, White Road, Piedmont Road, Landess Avenue, Montague Expressway	5:54 AM – 10:15 PM	20 – 30 min
VTA Express 101	Camden & Highway 85 – Stanford Research Park	Camden Avenue, Winchester Boulevard, Hamilton Avenue, Campbell Avenue, Lawrence Expressway, Stevens Creek Boulevard, Vallco Parkway, Wolfe Road, I-280, Page Mill Road, Deer Creek Road, Arastradero Road, Hillview Avenue, Hanover Street, El Camino Real, Hansen Way	6:16 AM – 8:21 AM & 4:10 PM – 6:34 PM	60 min
VTA Express 121	Gilroy/Morgan Hill – Lockheed Martin Station	Old Gilroy Street, Monterey Road, Dunne Avenue, Butterfield Boulevard, Cochrane Road, US 101, Great America Parkway, Tasman Drive, Lawrence Expressway, Caribbean Drive, Crossman Avenue, Java Drive, Mathilda Avenue	4:30 AM – 9:06 AM & 2:52 PM – 6:56 PM	60-120 min
VTA Rapid 523	San José State – Lockheed Martin via De Anza	5th Avenue, Mathilda Avenue, Evelyn Avenue, Sunnyvale Avenue, Sunnyvale-Saratoga Road, Homestead Road, Sterling Road, Stevens Creek Boulevard, San Carlos Street, 1st Street, 2nd Street, 6th Street, 7th Street, Santa Clara Street, San Fernando Street	6:11 AM – 10:41 PM	15 min
VTA Rapid 568	Gilroy Transit Center to San José Diridon	Barack Obama Boulevard, Santa Clara Street, 1st Street, 2nd Street, Reed Street, Monterey Road, Cochrane Road, Butterfield Boulevard, Old Gilroy Street	5:23 AM – 7:37 PM	30 min
SamTrans Route 280	Purdue/Fordham – Stanford Mall	Arboretum Road, Quarry Road, Manhattan Avenue, O'Connor Street, Bayshore Road, Newell Road, Pulgas Avenue, Purdue Avenue, Fordham Street	5:40 AM – 9:25 PM	60 min

TABLE 4.14-1 (CONTINUED)
EXISTING TRANSIT SERVICE

Bus Route	Route Description	Travelled Roadways	Weekday Hours of Operation	Headway
SamTrans Route 281	Onetta Harris Center – Stanford Mall	Aroboretum Road, Quarry Road, University Avenue, Donohoe Street, Bay Road, Market Place, Del Norte Avenue	6:00 AM – 10:31 PM	30 min
Marguerite Shuttle – East Bay Express	Fremont BART, Union City BART, and Ardenwood Park & Ride	Quarry Road, Campus Drive, Roth Way, Palo Road, Palm Drive, University Avenue, Bayfront Expressway	4:50 AM – 5:48 AM & 9:57 PM – 12:40 AM next day	-
Marguerite Shuttle – Hospital: Direct	Hoover Pavilion/Neuroscience Center and the Stock Farm Garage	Quarry Road, Welch Road, Pasteur Drive, Oak Road, Palo Road	5:00 AM – 9:19 AM & 3:00 PM – 6:19 PM	10 min
Marguerite Shuttle – Medical Center	Palo Alto Transit Center - Hoover Pavilion/Neuroscience Center	University Circle, Quarry Road, Palo Road, Welch Road, Pasteur Drive	5:06 AM – 9:34 AM & 2:52 PM – 6:42 PM	AM – 12 min & PM - 10 min
Marguerite Shuttle – P Line	Palo Alto Transit Center via Palm Drive	University Circle, Palm Drive	6:36 AM – 7:55 PM	12 min
Marguerite Shuttle – Line C	Palo Alto, Stanford West, and Escondido Village	Sand Hill Road, Pasteur Drive, Stock Farm Road, Campus Drive West, Jane Stanford Way, Bowdoin Street, Stanford Avenue, Olmsted Road	5:35 AM – 8:58 PM	34 min

NOTES: This table represents approximate weekday operation hours and headways in Santa Clara County, as of 2022.

Caltrain

Commuter rail service between San Francisco and Gilroy is provided by Caltrain, which currently operates 92 weekday trains. Within Santa Clara County there are 15 Caltrain stops, including two stops in Palo Alto, two stops in Mountain View, two stops in Sunnyvale, one stop in Santa Clara, five stops in San José, one stop in Morgan Hill, one stop in San Martin, and one stop in Gilroy. Caltrain operates between 4:22 AM and 12:52 AM the next day in the northbound direction., and between 4:51 AM and 1:45 AM the next day in the southbound direction. Caltrain provides passenger train service seven days a week and provides extended service to Morgan Hill and Gilroy during commute hours.

4.14.3 Regulatory Setting

Federal

Federal Highway Administration (FHWA)

The FHWA is a major agency of the U.S. Department of Transportation. In partnership with State and local agencies, the FHWA carries out Federal highway programs to meet the Nation's transportation needs. The FHWA administers and oversees Federal highway programs to ensure that Federal funds are used efficiently.

Americans with Disabilities Act

Titles I, II, III and V of the ADA have been codified in Title 42 of the United States Code, beginning at section 12101. Title III prohibits discrimination on the basis of disability in "places of public accommodation" (businesses and non-profit agencies that serve the public) and "commercial facilities" (other businesses). The regulation includes Appendix A to Part 36 (Standards for Accessible Design) establishing minimum standards for ensuring accessibility when designing and constructing a new facility or altering an existing facility. Examples of key guidelines include detectable warnings for pedestrians entering traffic where there is no curb, a clear zone of 48 inches for the pedestrian travel way, and a vibration-free zone for pedestrians.

State

California Department of Transportation (Caltrans)

Caltrans has authority over the State highway system, including freeways, interchanges, and arterial State Routes. Caltrans approves the planning, design, and construction of improvements for all State-controlled facilities and the associated interchanges for these facilities located in the County of Santa Clara. Caltrans requirements are described in their *Guide for the Preparation of Traffic Impact Studies* (Caltrans 2001), which covers the information needed for Caltrans to review the impacts on state highway facilities including freeway segments.

Statewide Transportation Improvement Program

The California Transportation Commission (CTC) administers transportation programming. Transportation programming is the public decision-making process, which sets priorities and funds projects envisioned in long-range transportation plans. It commits expected revenues over a multi-year period to transportation projects. The State Transportation Improvement Program (STIP) is a multi-year capital improvement program of transportation projects on and off the State Highway System, funded with revenues from the State Highway Account and other funding sources. Caltrans manages the operation of State Highways in the County of Santa Clara.

AB 32 and Senate Bill 375

As a means to achieve the Statewide emission reduction goals set by AB 32 ("The California Global Warming Solutions Act of 2006"), SB 375 ("The Sustainable Communities and Climate Protection Act of 2008") directs the California Air Resources Board (CARB) to set regional targets for reducing GHG emissions from cars and light trucks. Using the template provided by the State's Regional Blueprint program to accomplish this goal, SB 375 seeks to align transportation and land use planning to reduce VMT through modified land use patterns.

There are five basic directives of the bill: 1) creation of regional targets for GHG emissions reductions tied to land use; 2) a requirement that regional planning agencies create a Sustainable Communities Strategy (SCS) to meet those targets (or an Alternative Planning Strategy if the strategies in the SCS would not reach the target set by CARB); 3) a requirement that regional transportation funding decisions be consistent with the SCS; 4) a requirement that the Regional Housing Needs Allocation numbers for municipal general plan housing element updates must conform to the SCS; and 5) CEQA exemptions and streamlining for projects that conform to the SCS. The implementation mechanism for SB 375 that applies to land uses in the County of Santa Clara is "Plan Bay Area 2050" adopted by the Association of Bay Area Governments (ABAG) and the Metropolitan Transportation Commission (MTC) in 2021 (see below).

Senate Bill 743

On September 27, 2013, Governor Brown signed Senate Bill (SB) 743. Among other things, SB 743 created a process for changing the analysis of transportation impacts under CEQA, with the analysis focusing on a project's VMT rather than impacts on intersection level of service (LOS). On December 30, 2013, the Governor's Office of Planning and Research (OPR) released a preliminary evaluation of alternative methods for transportation analysis. The original guidance documentation was geared toward projects in areas that are designated as transit priority areas, followed by other areas of the state. OPR issued another draft discussion document in March 2015, suggesting some new revisions to the formal CEQA Guidelines. In January 2016, OPR issued another guidance document and requested additional input. In 2018, the CEQA Guidelines were revised to reflect the process set forth in SB 743 and became effective later that year, and the VMT provisions of the updated CEQA Guidelines commenced on July 1, 2020 (although lead agencies had the right to elect to be governed by these provisions earlier than July 1, 2020).

The CEQA Guidelines now identify VMT as the most appropriate metric for evaluating a project's transportation impacts. With the California Natural Resources Agency's certification and adoption of the changes to the CEQA Guidelines, automobile delay and congestion, as measured by LOS and other similar metrics, generally no longer constitutes a significant environmental effect under CEQA (Public Resources Code Section 21099, subdivision [b][3]). It should be noted that LOS is used outside of the CEQA document to evaluate other non-CEQA transportation impacts of development projects, such as congestion, circulation, and safety issues and concerns.

Regional

Metropolitan Transportation Commission

The Metropolitan Transportation Commission (MTC) is responsible for planning, coordinating, and financing transportation projects in the nine county Bay Area. The local agencies that comprise these nine counties help the MTC prioritize projects based on need, feasibility, and conformance with federal and local transportation policies. In addition to coordinating with local agencies, the MTC distributes State and federal funding through the Regional Transportation Improvement Program (RTIP).

Plan Bay Area

Plan Bay Area 2050 is a state-mandated, integrated long-range transportation and land use plan. As required by SB 375, all metropolitan regions in California must complete a Sustainable Communities Strategy as part of a Regional Transportation Plan. This strategy integrates transportation, land use and housing to meet greenhouse gas reduction targets set by the California Air Resources Board. The plan meets those requirements. In addition, the plan sets a roadmap for future transportation investments and identifies what it would take to accommodate expected growth. The plan neither funds specific transportation projects nor changes local land use policies.

In the Bay Area, the Metropolitan Transportation Commission and the Association of Bay Area Governments adopted the latest plan in 2021. Under Plan Bay Area 2050's strategies, just under half of all Bay Area households would live within one half-mile of frequent transit by 2050, with this share increasing to over 70 percent for households with low incomes. Transportation and environmental strategies that support active and shared modes, combined with a transit-supportive land use pattern, are forecasted to lower the share of Bay Area residents that drive to work alone from 50 percent in 2015 to 33 percent in 2050. Greenhouse gas emissions from transportation would decrease significantly as a result of these transportation and land use changes, and the Bay Area would meet the state mandate of a 19 percent reduction in per capita emissions by 2035.

Under the previous Plan Bay Area 2040, to meet the greenhouse gas reduction targets, that plan identifies priority development areas. The agencies estimate approximately 77 percent of housing and 55 percent of job growth will occur in the priority development areas between 2010 and

2040. Some of the proposed HEU housing inventory sites are located within a priority development area. It will be several years before the regional transportation model (and therefore county and local transportation models) are updated to reflect Plan Bay Area 2050; the models currently incorporate data from Plan Bay Area 2040.

Santa Clara County Congestion Management Program

VTA is responsible for maintaining the standards of the CMP roadway system in Santa Clara County (Santa Clara Valley Transportation Authority, 2017). VTA strives to maintain LOS E on all CMP monitored facilities. Based on VTA's Guidelines, a CMP intersection shall be included in a transportation analysis if a proposed development project would add 10 or more peak-hour vehicles per lane to any intersection movement; a CMP freeway segment shall be included in a TIA if a proposed development project would add traffic equal to at least 1 percent of the freeway segment's capacity (Santa Clara Valley Transportation Authority, 2014).

Local

Santa Clara County General Plan

The Santa Clara County General Plan is a comprehensive long-range general plan for the physical development of the County of Santa Clara (Santa Clara County, 1995-2010). The various elements within the General Plan include strategies and policies for the physical development of the City. Strategies and policies related to transportation are listed below.

Strategy #1: Develop Urban Land Use Patterns that Support Travel Alternatives

Policy C-TR 4: Overall transportation planning for Santa Clara County should be integral and consistent with the goals and objectives of comprehensive, countywide planning regarding urban growth management, compact and mixed-use development patterns, environmental quality, and social and economic well-being.

Policy C-TR 5: The transportation plans and the land use plans, specific plans, and redevelopment plans of local jurisdictions should be consistent and mutually reinforcing in order to enhance transportation infrastructure investment.

Policy C-TR 6: Increase the proximity between housing and major employment areas to reduce commute distances and automobile-dependency by:

a. Increasing supply and affordability of units in northern portions of the county, as well as increasing employment-related land uses in the southern portion of the metropolitan area;

b. Applying the concepts of "balanced urban growth and development" in general to both the north and south valley areas;

c. Encouraging developers and employers to build on-site or near-site housing for potential workers at a planned commercial or industrial site, the cost of which is matched to the workers' wages;

d. Encouraging developers to provide pedestrian and bicycle paths that connect housing and employment sites so as to encourage walking and bicycling.

Policy C-TR 7: Appropriate urban densities, mixed-use development patterns, and other aspects of urban development which support use of travel alternatives and reduce auto-dependency should be employed along planned transportation corridor, within designated "urban activity centers," and within redeveloping areas of existing cities.

Policy C-TR 8: Urban design concepts and site development standards which facilitate use of transit and other travel alternatives should be adopted and implemented by local jurisdictions, to provide adequate:

a. Accessibility to transit and transit facilities;

b. Pedestrian and bicycle pathways and facilities, both on and between individual sites; and

c. Building design, orientation, on-site services and amenities which support the use of travel alternatives.

Strategy #2: Manage Travel Demand, System Efficiency, and Congestion

Policy C-TR 9: Transportation Demand Management (TDM) measures should be employed to make more efficient use of existing road and highway capacity by increasing vehicle occupancy and reducing the need for commute and other trips.

Policy C-TR 14: Reduce the number of workers who must drive by increasing the opportunities to telecommute; support and encourage the development and implementation of employer-based telecommuting programs.

Stanford Community Plan

The 1995 Santa Clara County General Plan serves as the principal means of setting goals and overall policy direction for physical development and use of lands within the unincorporated lands of Stanford within Santa Clara County. The Stanford Community Plan refines the policies of the General Plan as they apply to the Stanford area within the County. Strategies and policies related to transportation are listed below.

Strategy #1: Achieve "no net new commute trips" through land use and transportation demand management.

Policy SCP-C 1: Apply a "no net new commute trips" standard for campus-related trips in the commute direction during peak hours to the fullest extent allowed by law.

Policy SCP-C 2: Within the overall pattern of land uses on the campus, promote a development pattern that supports reduction in automobile dependency through the following approaches:

- New academic and residential development shall occur within the Academic Growth Boundary.

- Support services for campus residents and employees should be accommodated in close proximity to residential and academic facilities.

- New development should be located near existing transit services, particularly if extension of transit service to the new facilities would otherwise be infeasible or impractical.

Policy SCP-C 3: Encourage addition of housing in locations convenient to jobs on Stanford land in other jurisdictions, such as near Stanford Medical Center.

Policy SCP-C 4: Enhance pedestrian and bicycle access to and through the campus.

Policy SCP-C 5: Permit and encourage regular modification of Stanford's Transportation Demand Management (TDM) program to allow for changes in user needs and in available services over time.

Policy SCP-C 7: In addition to meeting the no net new commute trips standard, encourage Stanford to reduce automobile travel at non-commute hours and in non-commute directions, such as traffic associated with lunchtime activities by employees or travel by families of on-campus residents.

Strategy #2: Alleviate local congestion in the context of commute trip reduction.

Policy SCP-C 9: Maintain consistency with the procedures and adopted policies of the appropriate jurisdiction when evaluating local intersection service levels and defining mechanisms for addressing impacts.

Policy SCP-C 12: Consult with jurisdictions surrounding the campus regarding the potential non-commute traffic impacts of new development and activities at Stanford, and work with the jurisdictions to reduce potential effects on neighborhoods surrounding the campus.

4.14.4 Environmental Impacts and Mitigation Measures

The thresholds used to determine the significance of impacts related to transportation are based on Appendix G of the *CEQA Guidelines*. Implementation of the Project could have a significant impact on the environment if it 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 § 15064.3, subdivision (b). For the purposes of this evaluation, this impact would be significant if Future multifamily housing development projects allowed by the project would have a VMT per capita greater than 85 percent of the regional average.

- Substantially increase hazards due to a geometric design feature (e.g., sharp curves or dangerous intersections) or incompatible uses (e.g., farm equipment).

- Result in inadequate emergency access.

Impacts and Mitigation Measures

Impact TRANS-1: Implementation of the proposed project would not conflict with an applicable program, plan, ordinance, or policy establishing measures of effectiveness for the performance of addressing the circulation system, including transit, bicycle, and pedestrian facilities. (*Less than Significant Impact*)

Implementation of the proposed project would be subject to and implement General Plan policies applicable to transit, bicycle, and pedestrian facilities and service. Additionally, development projects under the HEU would be subject to all applicable County and neighboring city guidelines, standards, and specifications related to transit, bicycle, or pedestrian facilities.

Specifically, the Stanford housing sites would be subject to and implement all applicable Stanford Community Plan policies. Policy SCP-C 12 requires Stanford to work with the neighboring jurisdictions to reduce potential effects on neighborhoods surrounding the campus. Per the Stanford University 2000 General Use Permit, Stanford must participate in any future neighborhood traffic studies initiated by the County of Santa Clara, City of Palo Alto, or City of Menlo Park in the area bounded by Middlefield Road, Willow Road/Santa Cruz Avenue/Sand Hill Road, Interstate 280, and Page Mill Road/Oregon Expressway.

Because implementation of the proposed project would be subject to all applicable County and city guidelines, standards, and specifications, the proposed project would not conflict with adopted policies, plans, or programs for transit, bicycle, or pedestrian facilities. Therefore, the project would result in a **less-than-significant impact** to transit, bicycle, and pedestrian facilities.

Mitigation Measures: None required.

Impact TRANS-2: Implementation of the proposed project would exceed an applicable VMT threshold of significance (*Significant and Unavoidable Impact, with Mitigation*)

For the purpose of this EIR, the project is considered to generate a significant VMT impact if the buildout of the identified housing opportunity sites would result in a per capita VMT greater than 85 percent of the regional average.

Since the County of Santa Clara has not adopted its own VMT guidelines, for the purpose of analyzing the potential transportation impact related to potential future residential development projects consistent with the project, the evaluation of VMT impacts in this EIR follows the Office of Planning and Research's (OPR's) *Technical Advisory on Evaluating Transportation Impacts in CEQA.*[4] OPR's recommended VMT threshold is 15 percent below the regional average VMT per capita (or at or below 85 percent of the regional average VMT). Residential VMT is defined as home-based VMT as calculated by the VTA travel demand model. For projects in Santa Clara

[4] OPR. 2018. Technical Advisory on Evaluating Transportation Impacts in CEQA. Website: opr.ca.gov/docs/20190122-743_Technical_Advisory.pdf. December 18.

County, the general practice defines the regional average as the countywide average, which includes the incorporated and unincorporated areas.

Many future individual residential development projects that are consistent with the proposed project, should they materialize, would also be evaluated for their own project-level VMT impact. However, this EIR recognizes that some future development projects facilitated by the proposed project could potentially be subject to ministerial approval, meaning they may not be subject to additional CEQA review. In other cases, some development projects meeting specific criteria could be exempt from additional VMT analysis under OPR's VMT guidelines, which provide various screening criteria to exempt residential projects from VMT, including:

- Projects generating fewer than 100 vehicle trips per day.
- Projects located in an identified low VMT area (less than 85 percent of regional average).
- Projects located within ½-mile of an existing major transit stop or within ½-mile of a high-quality transit corridor.
- Affordable housing developments with 100 percent affordable units.

The analysis described below is thus conducted in two steps. First described is the project's plan-level VMT impact. The project-level VMT impacts for individual housing opportunity sites are generally described afterwards.

VMT Evaluation Methodology

Travel Demand Model

VMT is defined as the total distance traveled by vehicles to and from a project site over a typical day. To estimate the project's effect on countywide residential VMT, the VTA travel demand forecast model was used. The VTA model is the best available model to represent travel within the County and serves as the primary forecasting tool for public agencies in Santa Clara County. The model is a mathematical representation of travel within the nine Bay Area counties, as well as Santa Cruz, San Benito, Monterey and San Joaquin counties. The base model structure was developed by the Metropolitan Transportation Commission (MTC) and further refined by the City/County Association of Governments and Santa Clara Valley Transportation Authority for use within San Mateo County and Santa Clara County.

There are four main components of the model: 1) trip generation, 2) trip distribution, 3) mode choice, and 4) trip assignment. The model uses socioeconomic inputs (i.e., population, income, employment) aggregated into geographic areas, called transportation analysis zones (TAZs) to estimate travel within the model area. There are 166 TAZs within the model to represent the unincorporated County, and 1,490 TAZs to represent the entirety of Santa Clara County.

VMT Evaluation for All HEU Housing Opportunity Sites

The baseline scenario for the HEU's VMT analysis is assumed as the year 2022 existing conditions. The baseline scenario assumes 604,011 households and 1,974,489 persons residing in Santa Clara County. As shown in Table 4.14-2, the VTA model estimated the Countywide

average residential VMT for this baseline scenario as 12.84 home-based VMT per capita. Using OPR's recommended VMT threshold of 15 percent below the regional average VMT per capita, the significance threshold for the project would be 10.91 home-based VMT per capita.

The VTA model was used to estimate the HEU units' VMT under the Baseline + project scenario. The HEU includes 8,441 units and 24,432[5] population. As shown in Table 4.14-2, the HEU units' average VMT per capita is estimated at 13.1 home-based VMT per capita, which exceeds the 10.91 significance threshold.

TABLE 4.14-2
VMT EVALUATION

Scenario	Home-Based VMT	Population	Home-Based VMT per Capita
Countywide Average	25,360,220	1,974,489	12.84
		VMT Impact Threshold (85%)	10.91
HEU units	320,059	24,432	13.1
		VMT Impact?	Yes

SOURCE: VTA travel demand forecast model, Hexagon Transportation Consultants, Inc., April 2023

VMT Evaluation of Housing Opportunity Sites on the Stanford University Campus

For informational purposes, a separate VMT analysis for the Stanford HEU housing sites was conducted. As shown in **Table 4.14-3**, the Stanford HEU units would generate residential VMT per capita of 7.63 under baseline + HEU conditions, which is well below the Countywide threshold of 10.91 (which is 15 percent below Countywide baseline average of 12.84). This is largely a function of two of the Stanford sites being located adjacent to high-quality transit facilities, which could be expected to substantially reduce VMT. Therefore, the Stanford HEU units, if developed as analyzed, would generate a less-than-significant VMT impact.

TABLE 4.14-3
STANFORD HEU SITES – VMT EVALUATION

Scenario	Home-Based VMT	Population	Home-Based VMT per Capita
Countywide Average	25,360,220	1,974,489	12.84
		VMT Impact Threshold (85%)	10.91
Baseline + HEU	73,567	9,636	7.63
		VMT Impact?	No

SOURCE: VTA travel demand forecast model, Hexagon Transportation Consultants, Inc., April 2023

[5] For purposes of this analysis, the highest proposed density for each of the housing sites was assumed to provide a worst-case scenario. Those density figures can be found in Table 3-2 in Chapter 3, *Project Description*, of this EIR. Since initiation of this analysis, the HEU highest potential density has been downward adjusted from 8,539 units to 8,441 units. This minor change in units is not expected to materially change the VMT conclusions.

For future individual housing development projects that would be facilitated by the project that would not be exempt from CEQA or VMT impact analysis, a separate, project-specific VMT analysis would be required. This analysis, which would be based on characteristics of the proposed project and its location, may result in exceedances of the VMT criteria of 15 percent below the regional average VMT per capita, particularly for housing sites that have limited access to transit. For this reason, the impact of the HEU on VMT is conservatively considered **Potentially Significant**, requiring mitigation.

Mitigation Measure TRANS-2: Implement VMT Reduction Measures.

Individual multifamily housing development proposals that are not exempt from CEQA or VMT impact analysis shall be required to provide a quantitative VMT analysis using the methodology specified by the County (or annexing city).. Projects that would result in a significant VMT impact shall include travel demand management measures and/or physical measures (i.e. improving multimodal transportation network, improving street connectivity) to reduce VMT, including but not limited to the measures below, which have been identified as potentially VMT reducing in the California Air Pollution Control Officers Association (CAPCOA) Handbook for Analyzing Greenhouse Gas Emission Reductions, Assessing Climate Vulnerabilities, and Advancing Health and Equity (December 2021). Potential VMT reduction estimates are included below, but detailed requirements, calculation steps, and limitations are described in the CAPCOA Handbook.

- Unbundle parking costs (i.e., sell or lease parking separately from the housing unit). Effectiveness: up to 15.7 percent reduction in GHG from VMT per the CAPCOA Handbook.
- Provide car-sharing, bike-sharing, or scooter-sharing programs. Effectiveness: 0.15 – 0.18 percent reduction in GHG from VMT for car share, 0.02 – 0.06 percent for bike-share, and 0.07 percent for scooter-share, per the CAPCOA Handbook. The higher car-share and bike-share values are for electric car and bike-share programs.
- Subsidize transit passes for residents of affordable housing. Effectiveness: up to 5.5 percent reduction in GHG from VMT per the CAPCOA Handbook.

Significance after Mitigation: Because the effectiveness of the above measures in reducing an individual project's VMT impact to a less than significant level cannot be determined until the specific characteristics of the project are known, the impact for projects that are not exempt from CEQA or VMT impact analysis would conservatively remain **significant and unavoidable with mitigation**.

Impact TRANS-3: Implementation of the proposed project would not result in designs for on-site circulation, access, and parking areas that fail to meet County or industry standard design guidelines. (*Less than Significant Impact*)

Particular development projects that are facilitated by the project, including any new roadway, bicycle, pedestrian, and transit infrastructure improvements, would be designed according to the General Plan and other standards and subject to existing regulations that are aimed at reducing hazardous conditions with respect to circulation. The County's evaluation of projects' access and

circulation would incorporate analysis with respect to relevant standards for vehicular level of service and queueing, as well as for service to pedestrians, bicyclists, and transit users. Therefore, the project would result in a **less-than-significant impact** to transportation hazards.

Mitigation Measures: None required.

Impact TRANS-4: Implementation of the proposed project would not result in inadequate emergency access to development sites. (*Less than Significant Impact*)

There are no specific development projects currently being proposed as part of the proposed project; thus, specific housing projects that could arise following the project's adoption cannot be analyzed for their adequacy of emergency access at this time. However, the General Plan and other County standards and regulations include policies that would ensure efficient circulation and adequate access are provided in the County, which would help facilitate emergency response.

Additional vehicles associated with new development sites could increase delays for emergency response vehicles during peak commute hours. However, emergency responders maintain response plans that include use of alternate routes, sirens and other methods to bypass congestion and minimize response times. In addition, California law requires drivers to yield the right-of-way to emergency vehicles and remain stopped until the emergency vehicle passes to ensure the safe and timely passage of emergency vehicles.

Based on the above considerations, adequate emergency access would be provided to new development sites, and the impact would be **less than significant**.

Mitigation Measures: None required.

Cumulative Impacts

This section presents an analysis of the cumulative effects of the proposed project in combination with other past, present, and reasonably foreseeable future development that could cause cumulatively significant impacts. Significant cumulative impacts related to transportation could occur if the incremental impacts of the project combined with the incremental impacts of cumulative development would be significant, and if the project's contribution would be considerable. Cumulative development projections for 2040 are included in the project description and described in Section 4.0.3 of this EIR, *Cumulative Impacts*.

Impact TRANS-5: Implementation of the proposed project, in combination with cumulative development, would not conflict with an applicable program, plan, ordinance or policy establishing measures of effectiveness for the performance of addressing the circulation system, including transit, bicycle, and pedestrian facilities. ***(Less than Significant)***

The findings of Impact TRANS-5 are identical to Impact TRANS-1. Because implementation of the project would be subject to all applicable County guidelines, standards, and specifications, the proposed project would not conflict with adopted policies, plans, or programs for transit, bicycle, or pedestrian facilities. Therefore, the project would result in a **less-than-significant impact** to transit, bicycle, and pedestrian facilities.

Mitigation Measures: None required.

Impact TRANS-6: Implementation of the proposed project, in combination with cumulative development, could exceed an applicable VMT threshold of significance (*Significant and Unavoidable Impact, with Mitigation*)

For the same reasons discussed under Impact TRANS-2, the cumulative + HEU analysis could also result in VMT that exceeds the significance threshold of 15% below the countywide home-based VMT per capita average. For this reason, the cumulative impact of the project is conservatively considered **Potentially Significant**, requiring mitigation.

Mitigation Measure TRANS-2: Implement VMT Reduction Measures.

Significance after Mitigation: The prescribed mitigation is the same as that outlined under Mitigation Measure TRANS-2. Because the effectiveness of the above measures in reducing an individual project's VMT impact to a less than significant level cannot be determined in this analysis, the impact for projects which do not screen out from VMT impact analysis would conservatively remain cumulatively **significant and unavoidable with mitigation**.

Impact TRANS-7: Implementation of the proposed project, in combination with cumulative development, would not result in designs for on-site circulation, access, and parking areas that fail to meet County or industry standard design guidelines. (*Less than Significant Impact*)

Impact discussion is identical to Impact TRANS-3. The project would result in a **less-than-significant impact** to transportation hazards.

Mitigation Measures: None required.

Impact TRANS-8: Implementation of the proposed project, in combination with cumulative development, would not result in inadequate emergency access to development sites. (*Less than Significant Impact*)

Impact discussion is identical to Impact TRANS-8. The project would result in a **less-than-significant impact** to emergency access.

Mitigation Measures: None required.

4.14.5 References

Santa Clara County. 1994. *Santa Clara County General Plan.* Available online: https://stgenpln.blob.core.windows.net/document/GP_Book_A.pdf. Accessed April 27, 2023

Santa Clara County. 2015. *2000 Stanford University Community Plan (Amended 2015).* Available online: https://stgenpln.blob.core.windows.net/document/SU_CP.pdf. Accessed April 27, 2023.

Santa Clara County. 2015. *2000 General User Permit (Amended 2015).* Available online: https://stgenpln.blob.core.windows.net/document/SU_GUP.pdf. Accessed April 27, 2023.