



Mountain View Coalition for Sustainable Planning  
817 Montgomery Street  
Mountain View, CA 94041

April 17, 2017

Martin Alkire  
Community Development Department  
City of Mountain View  
500 Castro Street  
Mountain View, CA 94041

Dear Mr. Alkire:

Below are the formal comments from the Mountain View Coalition for Sustainable Planning (MVCSP) on the *North Bayshore Precise Plan, Draft Subsequent Environmental Impact Report (2017 NBPP DSEIR)*. The members of MVCSP would again like to thank you for setting up the April 7, 2017 meeting with representatives from Fehr & Peers, Nelson/Nygaard, David J. Powers, and MVCSP members that provided important dialogue and clarification of potential questions and comments that we had on the 2017 NBPP DSEIR. The meeting has enabled us to provide more informed comments on the 2017 NBPP DSEIR as presented below.

We would also like to thank the City of Mountain View and its consultants for the extraordinary analysis and sensitivity testing for trip generation and household characteristics conducted for the Transportation Impact Analysis. Such detailed sensitivity testing provides the basis for informed public discussion on many of the findings of the 2017 NBPP DSEIR.

As a broad introduction to this comment letter, MVCSP members have been involved with the redevelopment of North Bayshore for almost nine years now. We were involved in public outreach efforts in the 2008 Environmental Sustainability Task Force, 2012 General Plan, 2014 North Bayshore Precise Plan (2014 NBPP), and the Draft 2016 North Bayshore Precise Plan (2016 Draft NBPP). In general, MVCSP is extremely supportive of the 2016 Draft NBPP -- it provides a vision to transform a traditional auto-centric suburban business park into a vibrant mixed-use major activity center in the heart of Silicon Valley, with a robust mix of uses, including office, market-rate and affordable residential, and retail. It includes a new mobility paradigm that encourages walking, biking, and public and private transit, and discourages the use of single-occupant private automobiles (SOV) whenever feasible. MVCSP feels that the policies and standards in the 2016 Draft NBPP are very forward-thinking and innovative, and they provide the public policy framework to achieve the vision that we have been advocating for these last nine years.

We would like responses to our following comments in the Final EIR.

### **1. There is a need for an easy-to-read general public summary of the 2017 NBPP DSEIR.**

The 2017 NBPP DSEIR is very voluminous by any standard with about 2,500 pages in just the main body of the DSEIR and Appendix J alone. The details of the transportation analysis are extremely complex and technical, and these cannot be easily understood by even the most informed members of MVCSP. It is virtually impossible for the community at large to engage with the City on such a document. There is a need for a summary that the general public can read that provides a short digest on the background, methodology, key assumptions, key findings, and the sensitivity of the key assumptions that a layperson can easily understand.

There were a number of important decisions made on assumptions driving key findings of the 2017 NBPP DSEIR that are opaque to concerned community members. For instance, the community deserves an explanation about why the standard 1.2 parking spaces per residential unit was chosen for the proposed project when the 2016 Draft NBPP has a blended parking rate standard of approximately 0.6 parking spaces per unit (about half of what is included in the analysis). Another important assumption is that 27% of North Bayshore residents will live and work in North Bayshore. The general public summary should explain the importance of the key assumptions, the rationale for the assumptions, and the sensitivity of the assumptions relative to outcome and the key finding of the analysis. (We address our concerns around both of these assumptions in separate comments below.)

### **2. There needs to more treatment and analysis of SB 743 and the implications on the outcome of the EIR findings and conclusions.**

On page 453 of the EIR, there is a very brief explanatory note on SB 743. When fully implemented, SB 743 means vehicle level of service (LOS) will no longer be used as a determinant of significant impacts, and an analysis of vehicle miles traveled (VMT) will be required instead. It is our understanding that the City of Mountain View is waiting for the final guidance from the California Office of Planning and Research (OPR) before utilizing VMT as a determinant of significant impacts, even though other nearby cities are already using VMT as the standard for significant impacts. And critically, Mountain View's own 2012 General Plan utilized VMT comparisons for different alternatives in the EIR. Using LOS in this analysis is discordant with the general plan vision for the future of our city and mismatched with the upcoming laws of our state.

The community needs to know: if the analysis had utilized VMT as the determinant of significant impacts, how would the major conclusions of the NBPP EIR potentially change, including the environmentally preferred alternative? At a minimum, could you provide a comparison of the VMT change of the Proposed Project compared to the 2014 NBPP as well as the final alternatives selected for Final EIR analysis? If there were 9,850 housing units built in North Bayshore, some percentage of existing employees would move from outside of North Bayshore into North Bayshore. It is true that other residents would live in North Bayshore and commute out of North Bayshore, but the VMT per employee may be lower due to increased access to jobs and shorter commutes. The analysis needs to capture these benefits of the new internal trips and the shorter commute trips and therefore less total VMT.

### **3. The standard parking ratio of 1.2 parking spaces per unit is too high, as the 2016 Draft NBPP parking maximums average about 0.6 parking spaces per unit. We believe that the Proposed Project should be consistent with the average parking maximums in the 2016 Draft NBPP.**

The standard parking of 1.2 parking spaces per unit is not reflective of the new mobility paradigm for North Bayshore that envisions car-light, walkable, and bikeable complete neighborhoods. We request that the Proposed Project reflect the mix of units in the 2016 Draft NBPP and parking maximums in the 2016 NBPP (since they were known as of November 2016), which is an average of 0.6 parking spaces per residential unit.

For residential uses, the parking ratio maximums on page 185 of the 2016 Draft NBPP range are:

- 1.0 spaces per unit for three bedroom units
- 1.0 spaces per unit for two bedroom units
- 0.5 spaces per unit for one bedroom units
- 0.25 spaces per unit for a micro-unit up to 450 square feet

The 2016 NBPP has a housing unit mix goal of 40% micro-units/studios, 30% 1-bedroom units, 20% 2-bedroom units, and 10% 3-bedroom units. According to our understanding of the discussion at the April 7 meeting, the blended rate is approximately 0.6 parking spaces per unit.

The 2017 NBPP DSEIR has a standard parking rate of 1.2 spaces per unit (standard parking rate). According to the April 7 meeting, the standard parking rate was selected to be conservative and because the 2016 NBPP parking standards were not known when the EIR analysis commenced. But they are known now.

The Fehr & Peers sensitivity analysis in Appendix J's Transportation Impact Analysis clearly shows the importance of smaller residential units and reduced parking on the trip generation rates. When applied to the transportation model, they could improve the level of service at key intersections, reducing the number traffic related unavoidable significant impacts.

Appendix J has a series of tables on trip generation from Table 6A to Table 9B that provide excellent sensitivity analysis on the importance of smaller units and reduced parking. These tables also highlight the mixed-use reduction of person trips with smaller residential units and reduced parking. For example, for 3,000 housing units, with smaller residential units and reduced parking, there is a 22.8% mixed-use reduction in person trips during the AM peak hour and a 20.9% mixed reduction in PM peak hours compared to existing office-only development. It is not known from the 2017 NBPP DSEIR what the person trip reduction would be *if* the 2016 Draft NBPP blended parking spaces per unit of 0.6 parking spaces per unit were applied for all 9,850 residential units.

**4. The assumed mode share of North Bayshore for residents leaving North Bayshore is 77% single occupant vehicles. We request that the Proposed Project include a goal of approximately 60% SOV for residential trips leaving North Bayshore, and that this be incorporated in the transportation modelling for the Proposed Project.**

Of the 73% of future North Bayshore residents who are presumed to work outside of North Bayshore, it is assumed that 77% of the residents commuting to jobs outside North Bayshore will drive alone, a very similar figure to the existing average for all Mountain View residents today. This figure is not reflective of the 2016 Draft NBPP vision of a car-light environment, nor does it reflect mode shift potential to transit, bicycling, and walking by residents based on the proposed significant transit and active transportation investments planned for North Bayshore.

The vision for the 2016 Draft NBPP is to have less driving and more alternative transportation use by both residents and employees of North Bayshore. To this end, the 2016 Draft NBPP requires a 45% single occupant vehicle (SOV) goal, and this is captured in the transportation modelling. There are requirements for aggressive residential TDM that would have a goal of substantially less SOV use than the average residential commuter in Mountain View. While no goal for residential SOV use has been established for resident commuting outside of North Bayshore, the North Bayshore vision assumes less driving, and this should be reflected in this key assumption for the Proposed Project.

From the April 7th discussion, we were told that many of the transit improvements being designed or proposed were included in the EIR analysis. However, we are unsure if this includes some or all of: the electrification of Caltrain, reversible dedicated bus lane on Shoreline, light rail extension to North Bayshore, and Automated

Guideway system between Caltrain and North Bayshore. This will provide significant public transportation alternatives for North Bayshore residents. *Please specifically document what transportation improvements are included in the transportation modelling.*

For the office commute trips, the achievement and sustainability of the 45% SOV goal is very dependent on the existing private transit network provided in North Bayshore. This network will very likely be available for residents commuting out of North Bayshore as well as office commuters into North Bayshore. If not, this could be an important mitigation measure. We are assuming that currently the 2017 NB DSEIR does not reflect the availability of private transit leaving North Bayshore. We are requesting that both the substantial investment in private and public transportation be considered for the mode share assumption for North Bayshore residential work trips outside of North Bayshore in the transportation modelling.

We are therefore requesting that at least a 60% SOV goal (or a goal adopted by the City Council) for residential driving be utilized in transportation modelling for residential commute trips leaving North Bayshore as part of the Proposed Project. This is a reasonable assumption reflective of the vision for the North Bayshore.

**5. Increase the internalization rate for trips within North Bayshore from 27% to at least 35% in the Proposed Project.**

As reported in the 2017 NBPP DSEIR, there is a 27% internalization rate provided, and this is backed up by excellent research of existing communities and the California Household Travel Survey. However, there is a degree of uncertainty as to the range of the potential outcomes if 9,850 housing units are built.

The existing analysis does not show the sensitivity of this important assumption. Similar to the extensive and excellent sensitivity done for trip generation, there needs to be a better understanding of how the internalization rate affects the trip distribution and mode choice assumptions in the transportation model. The range of assumptions will ultimately affect the number of significant unavoidable impacts in the traffic analysis, and we request that this be documented. There are a number of policy interventions that could be implemented to achieve a higher internalization rate. This includes a potential policy directing that a percentage of residential housing units built in North Bayshore have a preference for employees working in North Bayshore.

We are requesting that additional sensitivity testing be conducted for the internalization rate. The vision for the 2016 Draft NBPP is to provide mixed-use development in order to provide increased opportunity for living and working in North Bayshore. With such housing development in the campus of a major Silicon Valley employer, the goal of a 35% is not unreasonable, and we are requesting that such a goal be included in the Proposed Project.

*In summary of comments 3,4, and 5 above, MVCSP is requesting that the following changes in key assumptions to the Proposed Project be made to better reflect the vision for North Bayshore:*

- Standard parking rate assumption of 1.2 parking spaces is changed to 0.6 parking spaces per unit.
- The residential commute mode share assumption is changed from 77% to 65% SOV drivers.
- The internalization rate is increased from 27% to 35%.

If these reasonable changes in assumptions were run in the transportation model for the Proposed Project with the 9,850 housing units, there could be a significant decrease in the number of vehicle trips during the AM and PM peak periods. It is not known if the number of vehicle trips would exceed the gateway capacity in North Bayshore, but there would be significant improvement compared to the current 2017 NBPP DSEIR.

**6. Please include a “maximize housing alternative” that provides a minimum of 7,000 residential housing units in North Bayshore within the gateway capacity.**

If the decision is made not to change the above assumptions for the Proposed Project, there is a need to include an EIR alternative that maximizes the amount of housing in North Bayshore, a key goal of the 2016 Draft NBPP. Overall, the goal of MVCSP in requesting is to have sufficient residential units in order to have a viable mixed use community. There should be sufficient residents for the three complete neighborhoods proposed in the 2016 Draft NBPP. North Bayshore should be a walkable community with sufficient residents to justify dedicated parks and have financially viable retail outlets including a potential grocery store. We will let economic development experts determine the number of residential units that are necessary for a thriving community, but 7,000 to 9,850 residential units seems to be a reasonable range.

As carefully explained on page 576 of the 2017 NBPP DSEIR, the range of alternatives selected for analysis is governed by the CEQA “rule of reason”. As further explained, the intent of the alternatives is to “encourage both meaningful public participation and informed decision-making.” In alternatives considered but rejected is the “Design Alternative,” an alternative to the proposed project that would “adjust (reduce) the parking supply.” The discussion above points to the importance of parking standards to trip generation and mixed-use reduction. The changes to the mode share for residential external commute trips and increasing the internalization rate are also very important assumptions in the analysis. It is the contention of MVCSP that aligning key assumptions in the EIR analysis with the vision and standards of 2016 Draft NBPP will come close to enabling sufficient housing for a viable community. The current alternative of 3,000 housing units is too low.

Currently, all alternatives assume all 3.4 million square feet is developed regardless of the alternative. We would like to request an alternative be included with a minimum of 7,000 housing units (but up to the 9,850) with the goal of being within the gateway capacity. The alternative would include the 0.6 parking rate standard, but could also consider one or more of the many reasonable policy alternatives to achieve maximum housing in North Bayshore such as:

- Preference of up to 50% of housing units for local employees
- Establishing a modal goal for external residential auto trips leaving North Bayshore in the morning, similar to the 45% SOV goal for commute trips
- Expanding the gateway capacity by including a transit, bike, and pedestrian bridge across Stevens Creek, and HOV/bike/pedestrian tunnel or other high capacity treatment as Charleston enters North Bayshore
- Lowering the 3.4 million square feet of development to a number that would enable a minimum of 7,000 housing units, but hopefully all 9,850 housing units

It is our understanding that some of these ideas will be discussed with the City Council on April 25, 2017, and City Council direction could guide how this alternative is designed.

**7. Determine the impact of mixed-use development colocation with major planned transit improvements in North Bayshore.**

The proposed transit investments are summarized above. They should be included in the 2017 NBPP DSEIR.

There is no discussion in the 2017 NBPP DSEIR that we are aware of that discusses the impact of the innovative mixed-use land use plan in combination with these major infrastructure improvements. What affect do these improvements have on mode choice and trip assignment in the transportation model?

In closing, MVCSP would like to thank the City of Mountain View for considering the comments we have made on the 2017 NBPP DSEIR. As stated earlier, we are very supportive of the vision and standards included in the 2016 Draft NBPP. Our comments are made in order to match the key assumptions in the 2017 NBPP DSEIR with vision and standards in the 2016 Draft NBPP. Additionally, a general public summary of this voluminous EIR would provide a better basis for public input and discussion.

Sincerely,

A handwritten signature in black ink, appearing to read "Cliff Chambers". The signature is fluid and cursive, with a long horizontal stroke at the end.

Cliff Chambers  
On behalf of Mountain View Coalition for Sustainable Planning

cc:

Lorrie Brewer, City Clerk

**About Mountain View Coalition for Sustainable Planning**

The Mountain View Coalition for Sustainable Planning is a group of local volunteers dedicated to making Mountain View as beautiful, economically healthy, transit, bicycle, and pedestrian accessible, and affordable as possible. MVCSP member interest and expertise covers areas such as housing, transportation, the environment, the economy, and beyond!

For more information, see <http://www.mvcsp.org>.

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