
IV. ENVIRONMENTAL IMPACT ANALYSIS

E. TRANSPORTATION

This section of the Draft EIR addresses transportation and traffic issues related to the industrial development at 1000 Gibraltar Drive ("Project") in Milpitas, California. The transportation and traffic information and analysis in this section are based upon analyses conducted by Fehr & Peers. Supporting information is included in Appendix G.

The section presents a comprehensive analysis of the project impacts, including the environmental (existing) setting, regulatory framework, significance criteria, significant impacts, and recommended mitigation measures.

INTRODUCTION

The transportation impact analysis within the study area was performed through the use of established traffic engineering techniques and in accordance with the standards and methodologies set forth by the California Office of Planning and Research's *Technical Advisory on Evaluating Transportation Impacts in CEQA* (Technical Advisory) guidance document with respect to vehicle miles traveled (VMT) at the time of the Notice of Preparation of the EIR.

Analysis Scenarios

The following scenarios were analyzed:

1. Existing Conditions: Represents current home-based work vehicle miles traveled (VMT) per employee.
2. Existing with Project Conditions: Adds Project-generated VMT to Existing Conditions.
3. Cumulative Conditions: Represents expected home-based work VMT per employee in 2040 assuming various foreseeable land use developments in the study area and planned/funded roadway improvements. It adds 2040 traffic forecasts for the study area developed using the VTA Travel Demand Model.
4. Cumulative with Project Conditions: Adds Project-generated VMT to Cumulative Conditions.

Analysis Methodologies

This section describes the analysis techniques used to analyze Project-generated VMT impacts, relative to CEQA Guidelines Transportation Checklist Criteria (b). The methodologies for the analysis of the other three transportation checklist criteria (a), (c) and (d), are discussed in the Environmental Impacts section under Significance Criteria.

CEQA Guidelines Transportation Checklist Criteria (b) asks:

Would the project conflict or be inconsistent with CEQA Guidelines section 15064.3, subdivision (b)?

CEQA Guidelines Section 15064.3, subdivision (b) is reproduced below.

Criteria for Analyzing Transportation Impacts:

- (1) Land Use Projects. Vehicle miles traveled exceeding an applicable threshold of significance may indicate a significant impact. Generally, projects within one-half mile of either an existing major transit stop or a stop along an existing high-quality transit corridor should be presumed to cause a less-than-significant transportation impact. Projects that decrease vehicle miles traveled in the project area compared to existing conditions should be presumed to have a less-than-significant transportation impact.
- (2) Transportation Projects. Transportation projects that reduce, or have no impact on, vehicle miles traveled should be presumed to cause a less-than-significant transportation impact. For roadway capacity projects, agencies have discretion to determine the appropriate measure of transportation impact consistent with CEQA and other applicable requirements. To the extent that such impacts have already been adequately addressed at a programmatic level, such as in a regional transportation plan EIR, a lead agency may tier from that analysis as provided in Section 15152.
- (3) Qualitative Analysis. If existing models or methods are not available to estimate the vehicle miles traveled for the particular project being considered, a lead agency may analyze the project's vehicle miles traveled qualitatively. Such a qualitative analysis would evaluate factors such as the availability of transit, proximity to other destinations, etc. For many projects, a qualitative analysis of construction traffic may be appropriate.
- (4) Methodology. A lead agency has discretion to choose the most appropriate methodology to evaluate a project's vehicle miles traveled, including whether to express the change in absolute terms, per capita, per household or in any other measure. A lead agency may use models to estimate a project's vehicle miles traveled, and may revise those estimates to reflect professional judgment based on substantial evidence. Any assumptions used to estimate vehicle miles traveled and any revisions to model outputs should be documented and explained in the environmental document prepared for the project. The standard of adequacy in Section 15151 shall apply to the analysis described in this section.

VMT Overview

In its simplest form, VMT is a measure of the number of daily vehicle trips multiplied by their trip lengths. VMT is an accessibility performance metric that evaluates the effect that changes in TDM programs, land use patterns, regional transportation systems, and other built environment characteristics have on roadway travel. The land use changes associated with the Project would affect the VMT generated by the Project site, as well as the total VMT within the region. To evaluate the potential VMT impacts, this analysis uses procedures and metrics, and significance criteria consistent with the guidance provided by the Office of Planning and Research (OPR), the Santa Clara County Valley Transportation Authority (VTA), and the City of Milpitas, as described further below.

VTM Metrics

The OPR Technical Advisory sets forth guidance regarding metrics that may be calculated to evaluate VMT impacts from three types of land uses: residential, office/employment, and retail. The Project use type is employment.

With regard to metrics, the advisory recommends that home-based work vehicle trips and home-based work vehicle trips per employee would be appropriate metrics for employment uses. This captures the employee commute trips to and from the employment site. In addition, the Project's effect on total regional VMT under cumulative conditions is also evaluated to assess whether regional total VMT would increase with the Project. This metric captures the effects of land use interactions and is a more wholistic evaluation of the Project's effect on regional VMT. For this analysis, the three-county region encompassing Santa Clara, Alameda, and San Mateo Counties was included, to ensure that the full effect of Project vehicle and truck trip lengths was captured.

VTM Calculation Methodology

The VMT analysis was conducted using the Santa Clara County Travel Demand Model, received from VTA in July 2020. The analysis was conducted by running the 2019 and 2040 travel demand models for the "No Project" and "With Project" scenarios. The "No Project" scenarios included no changes to the employment totals in the traffic analysis zones (TAZs) in the Project vicinity (roughly the area bounded by Calaveras Boulevard, I-880, Montague Expressway, and the railroad tracks). Fehr & Peers then reviewed the model's assumptions for industrial/manufacturing/warehouse employment growth within this area and found that it includes about 850 additional employees of this type. Because approval of the Project would not necessarily constitute an increase in the citywide and regional market for industrial/warehouse uses, but would rather result in some of that market potential being located on the Project site, the "With Project" cases were developed by re-allocating the Project's estimated 330 industrial/manufacturing/warehouse employees to the Project TAZ from the surrounding TAZs. The resulting metrics, discussed further in the Environmental Impacts section, were calculated using the model results.

VTM Significance Thresholds

Significance thresholds with respect to VMT are discussed in the Environmental Impacts section under Significance Thresholds.

ENVIRONMENTAL SETTING

Roadway Network

Figure IV.E-1 displays the Project location and local roadway system in Milpitas. The immediate Project area is primarily industrial uses. The greater study area includes the Great Mall to the west and residential communities to the north, south, and east. Regional access to the study area is provided by Interstate 680 (I-680), Interstate 880 (I-880), and State Route 237 (SR-237). Local and direct access are provided by Ames Avenue, Calaveras Boulevard, Gibraltar Drive,

Great Mall Parkway, Montague Expressway, South Hillview Drive, South Milpitas Boulevard, and Yosemite Drive. The City of Milpitas classifies streets according to its function and access, as shown in Table IV.E-1. Roadways that serve the Project area are described below.

**Table IV.E-1
City of Milpitas Street Classifications**

Classification	Function	Access
Freeway	Provides for intra- and inter- regional mobility.	Restricted to primary arterials and expressways via interchanges.
Expressway	Provide for movement of through traffic.	Limited accesses to abutting properties; varies according to situation.
Arterial	Collect and distribute traffic from freeways and expressways to collector streets, and vice versa.	Varies according to situation.
Collector	Serves as connectors between local and arterial streets and provide direct access to parcels.	Driveways and/or intersecting streets or collector streets should be no closer than 300-400 feet apart.
Local Street	Provide access to parcels.	Access is not restricted.
<i>Source: City of Milpitas General Plan Circulation Element, April 2015.</i>		

Regional Roadways

I-680 is a north-south freeway extending north from San Jose to the I-80 in Fairfield. It has four general purpose lanes in each direction within the study area. Access to I-680 from the study area is provided via East Calaveras Boulevard and Montague Expressway.

I-880 is a north-south freeway extending north from the I-280/I-880/SR-17 interchange in San José to Oakland. It has three general purpose lanes and one HOV lane in each direction. Access to I-880 from the study area is provided via West Calaveras Boulevard, Great Mall Parkway, or Montague Expressway.

SR-237 is an east-west freeway that runs from El Camino Real in Mountain View to I-680 in Milpitas. It has two general purpose lanes and one HOV express lane in each direction. Access to SR-237 from the study area is provided via West Calaveras Boulevard.

Local Roadways

Ames Avenue is an east-west local street that provides direct access to the Project site and to commercial, office, and light industrial land uses east of the Project site. It has one travel lane in each direction. The posted speed limit is 35 miles per hour (MPH). On-street parking is permitted east of the railroad tracks. Discontinuous sidewalks are provided on either side of the roadway. Bicycle facilities are not provided.

Calaveras Boulevard is an east-west arterial that provides access to I-680 and I-880 freeways north of the Project site. It is divided by a median and has three travel lanes in each direction west of Abel Street to SR-237 and two travel lanes in each direction east of Abel Street. The posted speed limit is 40 MPH. On-street parking is not permitted. Sidewalks are provided on

both sides of the street, except between Milpitas Boulevard and Abel Street where a sidewalk is provided only on the north side. Bicycle facilities are not provided.

Gibraltar Drive is a north-south local street with a portion of the street oriented in the east-west direction. Gibraltar Drive provides direct access to the Project site and to industrial and office land uses west of the Project site. It has one travel lane in each direction, with a two-way left-turn lane on the east-west oriented portion. The posted speed limit is 30 MPH. On-street parking is not permitted. Sidewalks are provided on both sides of the street. Bicycle facilities are not provided.

Great Mall Parkway-Capitol Avenue is a northwest-southeast oriented arterial that provides access to residential, commercial, and office uses in the southwestern area of the City. It has three travel lanes in each direction with the VTA rail tracks in the middle. The posted speed limit is 40 MPH. On-street parking is not permitted. Sidewalks and striped bike lanes are provided on both sides of the street.

Montague Expressway is an east-west expressway to the south of the Project site. It is divided by a center median. There are three general travel lanes and one carpool lane (weekdays between 6 AM to 9AM) in each direction between Montague Court and Great Mall Parkway and three general travel lanes in each direction west of Great Mall Parkway. The posted speed limit is 45 MPH. On-street parking is not permitted. Discontinuous sidewalks are provided on either side of the street and bicycle facilities are not provided.

South Hillview Drive is a north-south collector roadway to the northeast of the Project site. It has one travel lane in each direction. The street is divided by a two-way left-turn lane between East Calaveras Boulevard and Los Coches Street. There is no median south of Los Coches Street. South Hillview Drive provides access to office, commercial, and industrial uses near the Project site. The posted speed limit is 35 MPH. On-street parking is permitted on some segments of the street. Sidewalks are provided on both sides of the street between East Calaveras Boulevard and Los Coches Street and on one side south of Los Coches Street. Bicycle facilities are not provided.

South Milpitas Boulevard is a north-south collector roadway that provides direct access to the Project site. There is a center two-way left-turn lane between Los Coches Street and Gibraltar Drive for access to office, industrial, and commercial use driveways along and a median on the rest of the street. It has two travel lanes in each direction. The posted speed limit is 40 MPH. On-street parking is not permitted. Sidewalks are provided on both sides of the street and continuous pedestrian paths are disrupted by landscaped building frontages. Striped bike lanes are provided on both sides of the street.

Yosemite Drive is an east-west local street to the northeast of the Project site. It is a divided street with two travel lanes in each direction. Yosemite Drive provides access to office, industrial, and commercial uses within the study area. The posted speed limit is 35 MPH. On-street parking is not permitted. Sidewalks and striped bike lanes are provided on both sides of the street.

Proposed future roadway improvements in the study area, based on the City's General Plan and the Santa Clara County Valley Transportation Plan (VTP), which is the County's Regional Transportation Plan (RTP) include:

- Calaveras Boulevard Widening – bridge replaced between Milpitas Boulevard and Abel Street to accommodate 6 lanes and pedestrian bicycle facilities in both directions.

Truck Routes

The City of Milpitas identified primary truck routes for the safe and adequate circulation of trucks entering and leaving the City. Further information about policies pertaining to goods movement can be found in the General Plan Circulation Element. Trucks routes within the study area are shown on Figure IV.E-2. Truck routes providing direct access or connection to direct access routes to the Project site are listed below:

- Ames Avenue
- Calaveras Boulevard
- Gibraltar Drive
- Great Mall Parkway-Capitol Avenue
- Landess Avenue
- Los Coches Street
- Montague Expressway
- South Hillview Drive
- South Main Street
- South Milpitas Boulevard
- SR-237
- Yosemite Avenue

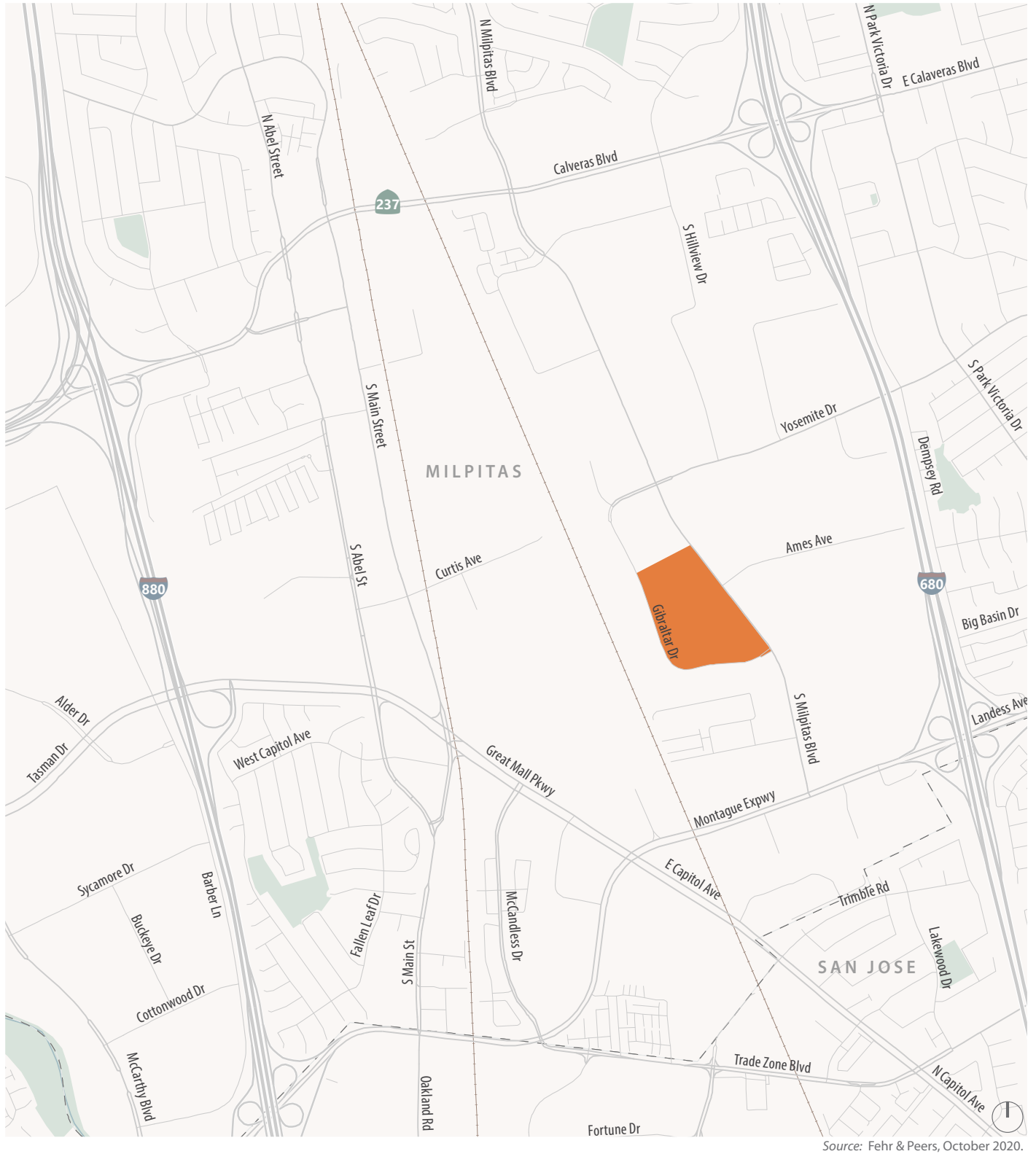


Figure IV.E-1. Project Vicinity

1000 Gibraltar Drive
City of Milpitas, California



Figure IV.E-2. Primary Truck Routes

1000 Gibraltar Drive
City of Milpitas, California

Transit Services

The study area is served by a variety of transit services provided by the Santa Clara Valley Transportation Authority (VTA), Alameda-Contra Costa (AC) Transit, and Bay Area Rapid Transit (BART). These services include local bus and light rail transit services and inter-city rail services. The existing transit routes and stops in the study area are shown on Figure IV.E-3.

The Project site is directly served by AC Transit bus route 217 with one bus stop on South Milpitas Boulevard, one south of Ames Avenue on the west side of the right-of-way and one north of Ames Avenue on the east side of the right-of-way. VTA provides bus and Light Rail Transit (LRT) service within the study area including local bus routes 47, 70, and 71, frequent bus routes 60, 66, and 77, express bus routes 104 and 181, and LRT Orange Line.

On June 13, 2020, BART service was extended to the Milpitas Station, located about 3,500 feet (walking distance) from the closest Project access driveway on Gibraltar Street. A new pedestrian bridge is under construction over Montague Expressway at Piper Drive, facilitating pedestrian crossings which otherwise would need to utilize the signalized intersection of Montague Expressway/South Milpitas Boulevard. The bridge is scheduled to open in February 2021.

The transit routes are summarized in Table IV.E-2. The operating hours and peak headways reflect Covid-19 reduced service schedules.

Table IV.E-2
Existing Transit Service

Route	From	To	Weekday		Weekend	
			Operating Hours	Peak Headways (minutes)	Operating Hours	Peak Headways (minutes)
AC Transit Bus Route						
217	Milpitas BART	Fremont BART	7:05 am – 10:36 pm	30	Same as weekday	
VTA Local Bus Routes						
47	Milpitas BART	Ranch & McCarthy Walmart	8:00 am – 7:22 pm	60	Same as weekday	
70	Eastridge Transit Center	Milpitas BART	6:08 am – 9:23 pm	20	Same as weekday	
71	Capitol Station	Milpitas BART	6:59 am – 9:42 pm	30	Same as weekday	
VTA Frequent Bus Routes						
60	Winchester Station	Milpitas BART	5:20 am – 9:58 pm	20	Same as weekday	
66	North Milpitas	Kaiser San José	5:39 am – 10:09 pm	20	Same as weekday	
77	Eastridge Transit Center	Milpitas BART	6:40 am – 9:32 pm	30	Same as weekday	
VTA Express Bus Routes						
104 Westbound	Milpitas BART	Stanford Research Park	6:09 am – 7:53 am	35	No weekend service	
104 Eastbound	Stanford Research Park	Milpitas BART	4:01 pm – 5:55 pm	30	No weekend service	

Route	From	To	Weekday		Weekend	
			Operating Hours	Peak Headways (minutes)	Operating Hours	Peak Headways (minutes)
181	Diridon Station	Warm Springs BART	5:07 am – 11:07 pm	30	7:17 am – 11:25 pm	40
VTA Light Rail Routes						
Orange Line	Mountain View Station	Alum Rock Station	5:31 am – 7:18 pm	30	No weekend service	
BART						
			5:00 am – 9:00 pm	30	8:00 am – 9:00 pm	20 – 24
Source: AC Transit, VTA, and BART, May 2020.						

City Shuttle Study

The City of Milpitas completed a study of potential citywide shuttle service in March 2020. The study explored the feasibility of a citywide shuttle service to enhance mobility and fill service gaps of existing transit services. Its intent was to lay the groundwork to enhance “first and last mile” transit service that connects major transit hubs, employment centers, shopping centers, recreation facilities, major housing areas, and schools. Due to the high cost of the potential shuttle routes proposed, and anticipated budget shortfalls due to the COVID-19 pandemic, the City chose not to move forward with a shuttle program at that time. The shuttle study concluded with the following recommendations:

- Establishment of Funding Sources -- Dedicated shuttle program funding sources could be initiated through one-time grant opportunities for program start-up, the formation of a Transportation Management Association (TMA) with partnerships and contributions from employers, establish and enforce conditions of approval in the entitlement process for qualifying new development projects to contribute funding, and/or the through the creation of a Business Improvement Districts (BID) to collect revenue.
- Encourage Private First/Last Mile Shuttle Services -- Since a first/last mile shuttle service would primarily serve the workforce of major employers in Milpitas rather than residents, the City should encourage employers to develop and implement a privately funded shuttle service in the form of a Transportation Management Association (TMA) comprised of employers and businesses whereby resources can be pooled to maximize service, reduce redundancy, and lower cost.
- Community re-engagement -- It is recommended to re-engage the community approximately a year after the Milpitas BART Station is open or after the overall travel pattern in the City has stabilized in order to re-evaluate the need and interest of a potential community shuttle program. This period will allow VTA to determine the success of their New Transit Plan and allow passengers to determine if the new service meets their needs.



WRA
ENVIRONMENTAL CONSULTANTS

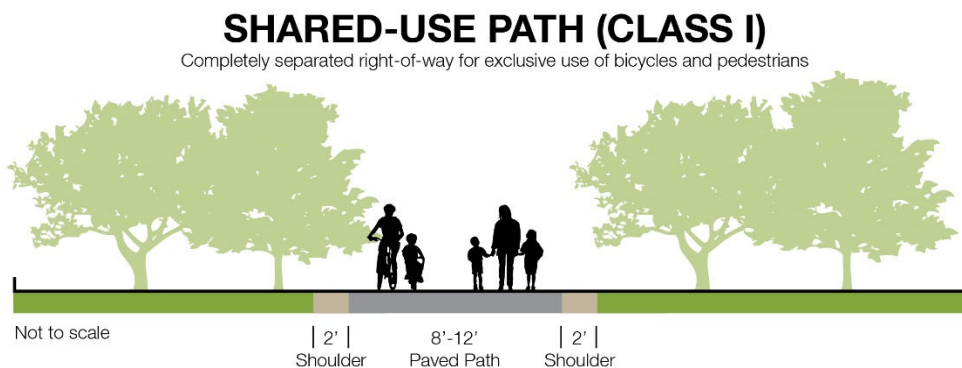
Bicycle Facilities

Bikeway planning and design in California typically relies upon guidelines and design standards established by the California Department of Transportation (Caltrans) in the *Highway Design Manual* (Chapter 1000: Bikeway Planning and Design). Caltrans provides four distinct types of bikeway facilities, as described below and shown in the accompanying figures. The City's existing bicycle facilities near the Project site are illustrated on Figure IV.E-4 and summarized below.

Class I Bikeways (Shared-Use Path)

Class I Bikeways (Shared-Use Paths) provide separate right-of-way and are designated for the exclusive use of bicycles and pedestrians, with vehicle and pedestrian crossflow minimized. In general, bike paths serve corridors when on-street facilities are not feasible or where sufficient right-of-way exists to allow them to be constructed.

Class I Bikeways are not present in the Project vicinity.



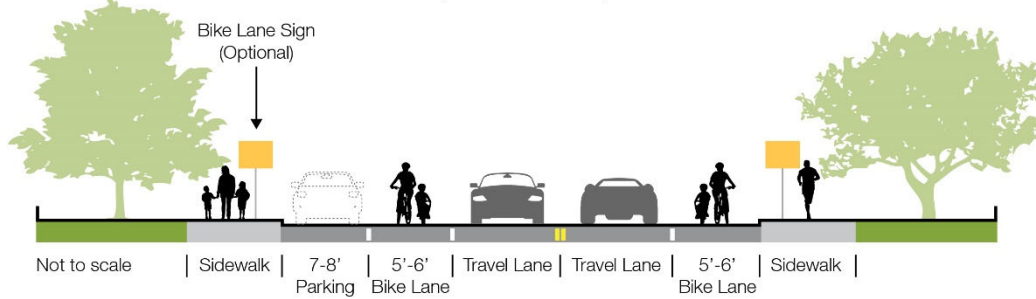
Class II (Bicycle Lane)

Class II Bikeways (Bicycle Lanes) are dedicated lanes for bicyclists generally adjacent to the outer vehicle travel lanes. These lanes have special lane markings, pavement legends, and signage. Bicycle lanes are typically five feet wide. Adjacent vehicle parking and vehicle/pedestrian crossflow are permitted.

Within the Project vicinity, Class II Bikeways are provided on Great Mall Parkway, Capitol Avenue, South Milpitas Boulevard, and Yosemite Drive.

BICYCLE LANE (CLASS II)

On-street striped lane for one-way bike travel



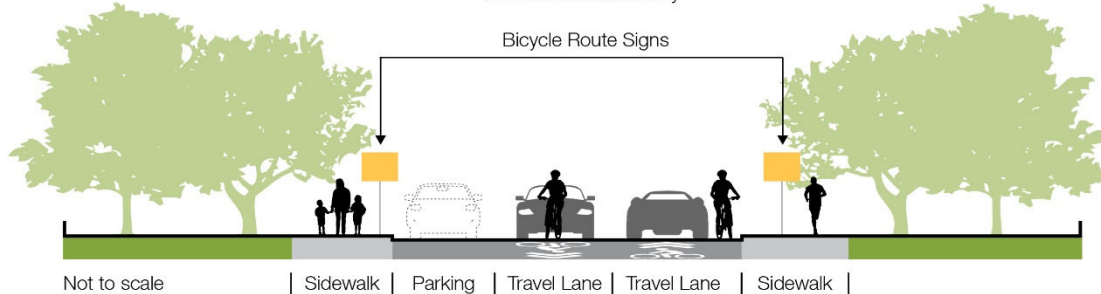
Class III (Bicycle Route)

Class III Bikeways (Bicycle Routes) are designated by signs or pavement markings for shared use with pedestrians or motor vehicles but have no separated bike right-of-way or lane striping. Bike routes serve either to a) provide a connection to other bicycle facilities where dedicated facilities are infeasible or b) designate preferred routes through high-demand corridors.

Class III Bikeways are not present in the Project vicinity.

BICYCLE ROUTE (CLASS III)

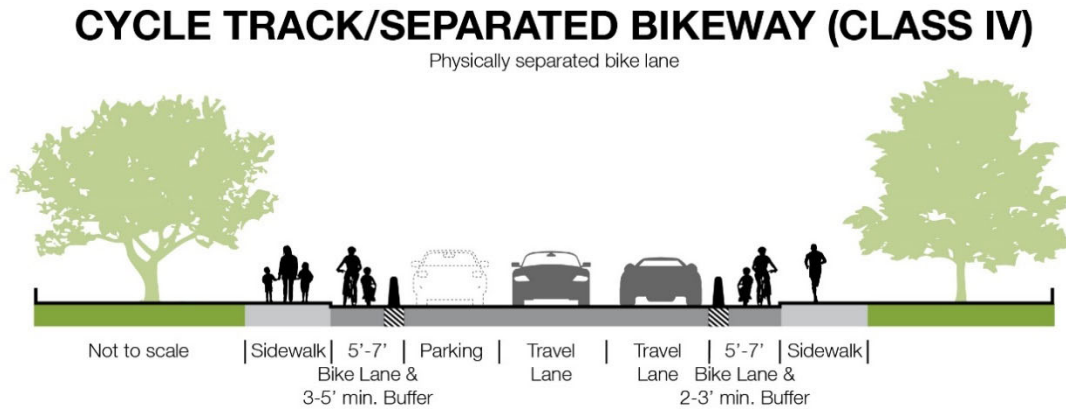
Shared on-street facility



Class IV (Cycle Track/Separated Bikeway)

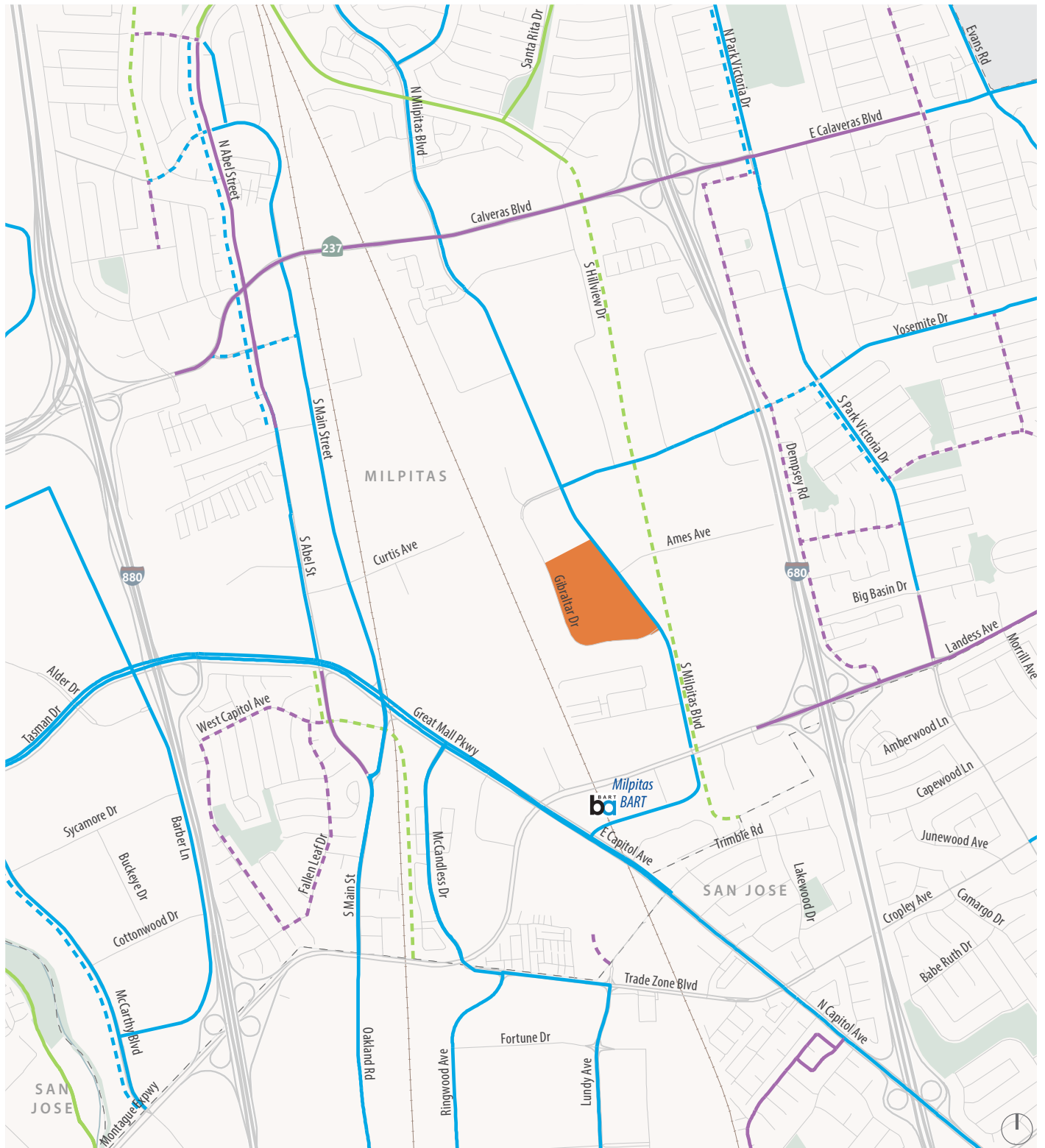
Class IV Bikeways (cycle tracks or “separated” bikeways) provide a right-of-way designated exclusively for bicycle travel within a roadway and are protected from other vehicle traffic by physical barriers including, but not limited to, grade separation, flexible posts, and inflexible vertical barriers such as raised curbs or parked cars.

Class IV Bikeways are not present in the Project vicinity.



Pedestrian Facilities

Pedestrian facilities including sidewalks, crosswalks, curb ramps, and pedestrian signals are provided throughout the Project vicinity. Sidewalks are generally provided on at least one side along all surface roadways in the study area. Pedestrian signals, pushbuttons, and crosswalks are provided at all signalized study intersections. Crosswalks are provided at unsignalized intersections within the Project vicinity. Curb ramps are also provided at all intersections within the Project vicinity. Existing pedestrian facilities in the vicinity of the Project are shown on Figure IV.E-5.



Source: Fehr & Peers, October 2020.

 Project Site

Existing

Proposed

  Bike Path (Class I)

  Bike Lane (Class II)

  Bike Route (Class III)

Figure IV.E-4. Existing and Planned Bicycle Facilities

1000 Gibraltar Drive
City of Milpitas, California

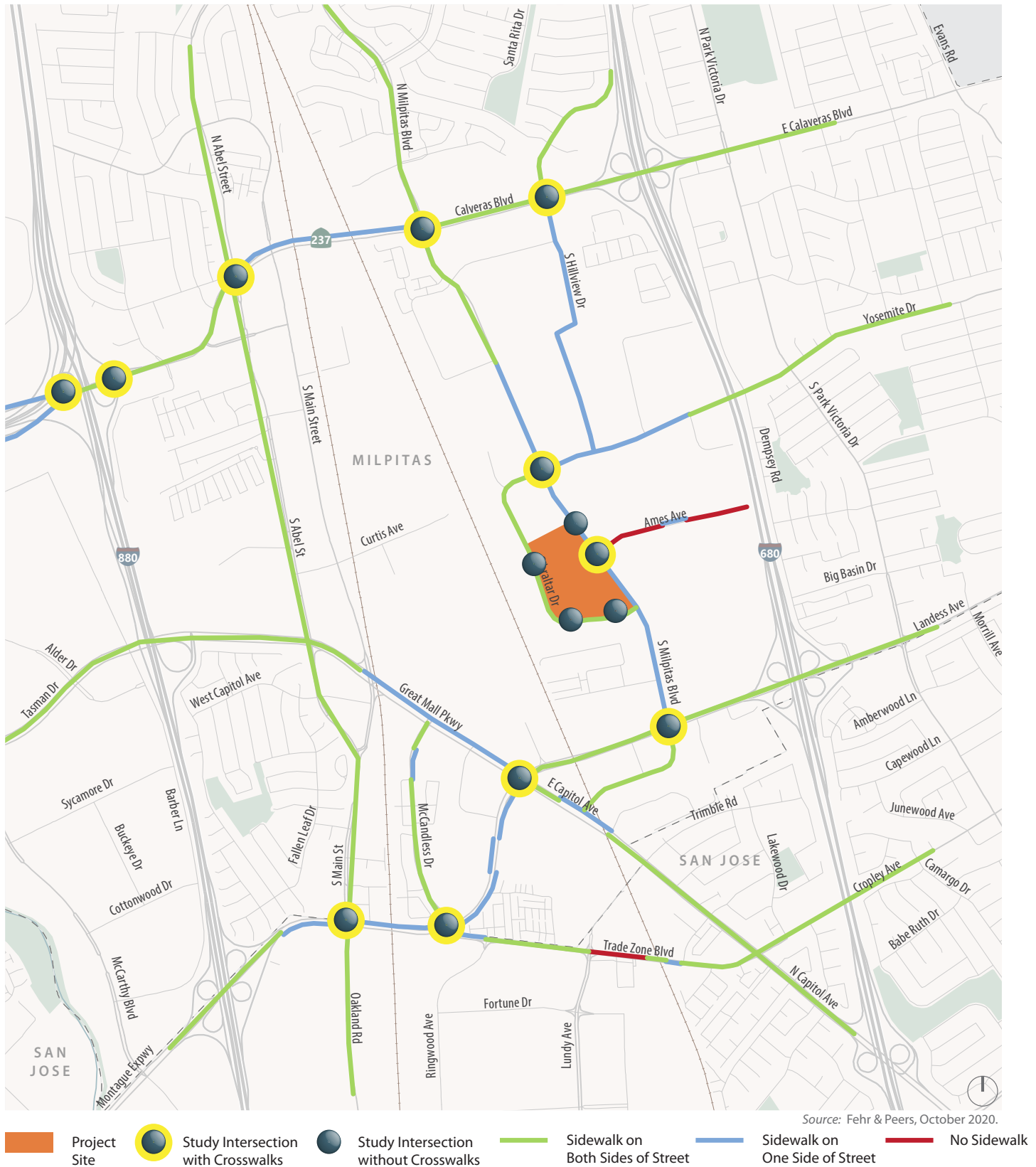


Figure IV.E-5. Existing Pedestrian Facilities

REGULATORY FRAMEWORK

This chapter describes the Project's relevant transportation regulatory framework. The regulatory framework includes state, regional, and local programs and plans related to the Project, including their implementation status, as some are still in-progress and not yet fully adopted.

State Regulations

Senate Bill 743

On September 27, 2013, Senate Bill (SB) 743 was signed into law. The legislature found that with the adoption of the Sustainable Communities and Climate Protection Act of 2008 (SB 375), the State had signaled its commitment to encourage land use and transportation planning decisions and investments that reduce vehicle miles traveled and thereby contribute to the reduction of greenhouse gas emissions, as required by the California Global Warming Solutions Act of 2006 (Assembly Bill 32).

The implementation of SB 743 eliminated the use of criteria such as auto delay, level of service, and similar measures of vehicle capacity or traffic congestion as the basis for determining significant impacts as part of CEQA compliance. The SB 743 VMT criteria promotes the reduction of greenhouse gas emissions, the development of multimodal transportation networks, and a diversity of land uses. In December 2018, the Governor's Office of Planning and Research (OPR) finalized guidelines on evaluating transportation impacts in CEQA based on the criteria of VMT.

Regional Regulations

Metropolitan Transportation Commission

The Metropolitan Transportation Commission (MTC) is the transportation planning, coordinating, and financing agency for the nine-county Bay Area, including Santa Clara County. It also functions as the federally mandated metropolitan planning organization (MPO) for the region. *Plan Bay Area 2040* is the Bay Area's Regional Transportation Plan (RTP)/Sustainable Community Strategy (SCS). *Plan Bay Area 2040*, adopted jointly by Association of Bay Area Governments (ABAG) and MTC July 26, 2017, lays out a development scenario for the region, which, when integrated with the transportation network and other transportation measures and policies, would reduce GHG emissions from transportation (excluding goods movement) beyond the per capita reduction targets identified by California Air Resources Board. It serves as a limited and focused update to *Plan Bay Area* (2013), with updated planning assumptions that incorporate key economic, demographic, and financial trends from the last several years. MPOs must use transportation and air emissions modeling techniques consistent with guidelines prepared by the California Transportation Commission (CTC). The Project's relationship to greenhouse gas emissions reductions is discussed in detail in Chapter IV.C Greenhouse Gas Emissions of this Draft EIR.

Santa Clara Valley Transportation Authority (VTA)

VTA serves two roles in Santa Clara County—first, as the primary transit operator, and second, as the Congestion Management Agency (CMA). In its role as transit operator, VTA is responsible

for development, operation, and maintenance of the bus and light-rail system within the County. VTA operates more than 70 bus lines and three light-rail lines, in addition to shuttle and paratransit service. It also provides transit service to major regional destinations and transfer centers in adjoining counties.

As the County's CMA, VTA is responsible for managing the County's blueprint to reduce congestion and improve air quality. VTA is authorized to set State and federal funding priorities for transportation improvements that affect the Santa Clara Congestion Management Plan (CMP) transportation system. Priority projects are also eligible for the RTP. The CMP roadway network in Santa Clara includes all State highways, County expressways, and some principal arterials and intersections, while the CMP transit network includes rail service and selected bus service.

VTA requires local jurisdictions to analyze impacts of new developments, or land use policy changes, on CMP facilities if they are expected to generate 100 or more new peak-hour trips. VTA developed the Transportation Impact Analysis Guidelines (October 2014), which were adopted by all cities and the County, to provide local jurisdictions with a uniform program for evaluating the transportation impacts of land use decisions on the designated CMP system. VTA updated the Transportation Impact Analysis Guidelines in 2014 which are the basis of the transportation impact analysis for this Project.

As the CMA for Santa Clara County, VTA is responsible for the development of a long-range countywide transportation plan, called Valley Transportation Plan (VTP) 2040. VTP 2040 provides programs, projects, and policies for roadways, transit, Intelligent Transportation Systems (ITS) and Systems Operations Management, bicycle and pedestrian facilities, and land use and transportation integration. VTP 2040 projects serve as VTA's recommendations for the RTP known as the Plan Bay Area. VTA 2040 was adopted by the VTA Board of Directors in September of 2014.

VTA's Short-Range Transit Plan (SRTP) is a federally mandated planning document that describes the plans, programs, and goals of VTA's transit service. It has a 10-year planning horizon and is updated annually. It focuses on the characteristics and capital needs of the existing system and on committed (funded) expansion plans. The current plan proposes to keep bus and light-rail service at existing levels, expand community bus services (neighborhood-based circulator and feeder routes that travel within a limited area), continue to contribute monetarily to Caltrain service, and replace and expand the bus vehicle fleet. Other relevant VTA plans and programs are described below.

- *Transit Sustainability Policy and Service Design Guidelines:* VTA's Transit Sustainability Policy (TSP) is a ridership-based policy that provides a framework for the efficient expenditure of transit funds. It is intended to assist the VTA Board of Directors with its decision-making process by making available the most complete information possible regarding options, costs, benefits, and trade-offs for various transit projects and service proposals prior to a selection of mode and funding decisions. The Service Design Guidelines associated with the TSP were developed to evaluate and make recommendations regarding design, implementation, and monitoring of the performance of transit services in the region (VTA 2018).

- *Complete Streets Program* (ongoing): VTA, in a collaborative effort with its member agencies and partner agencies, Caltrans, and the MTC, is in the process of developing a Complete Streets Program for Santa Clara County. The main objective of this program is to formulate a process for instituting incremental “complete street” improvements in Santa Clara County. The VTA, in collaboration with the cities of Santa Clara, San José, Sunnyvale, and Milpitas, recently initiated a Complete Streets Corridor Study along Tasman Drive that will develop conceptual designs of improvements to accommodate bicyclists, pedestrians, transit passengers and vehicles, and other vehicles.
- *Safe Routes to Transit*: VTA recently developed Pedestrian Access to Transit Plan, the first countywide pedestrian plan for Santa Clara County. The plan aims to improve the safety, comfort, and convenience of the walking environment for VTA customers at twelve Focus Areas with high VTA bus ridership and need for pedestrian infrastructure improvements. VTA worked with community members and stakeholders to identify projects, such as pedestrian bridge, streetscape improvement, bicycle and pedestrian path, street crossing, and sidewalk projects to improve the safety and comfort of those who ride VTA trains and buses. None of the Focus Areas are in the City of Milpitas.
- *Santa Clara Countywide Bicycle Plan*: The Santa Clara Countywide Bicycle Plan synthesizes other local and County plans into a comprehensive 20-year cross-County bicycle corridor network and expenditure plan. The long-range countywide transportation plan and the means by which projects compete for funding and prioritization are documented in Valley Transportation Plan (VTP) 2040. The most recent version of the Santa Clara Countywide Bicycle Plan was adopted by VTA in May 2018. The plan establishes a network of Cross County Bikeway Corridors that provide continuous, complete bike connections across the county. The plan also identifies locations where new and improved bicycle connections are needed across freeways, rail lines, and creeks. Within the study area, South Milpitas Boulevard is identified as a Priority Corridor, reflecting its potential for future bicycle ridership and a high need for improvements.

Local Regulations

City of Milpitas General Plan

The City of Milpitas General Plan Circulation Element provides a framework to maintain acceptable level of service and to plan an adequate transportation network that accommodates future development. Because most of the City is built out, the Circulation Element identifies transportation demand management measures to reduce peak-period auto traffic by making more efficient use of existing transportation resources and expanding and emphasizing more sustainable non-auto alternatives. These measures will help shift transportation to non-auto modes of transportation and meet federal and state air quality standards. The transportation demand management measures aim to achieve the following goals:

- Reduce peak hour traffic congestion by reducing the number of single-occupant vehicle trips associated with commuting by providing travelers with alternate mobility choices
- Reduce or delay the need for street improvements by making more efficient use of existing facilities

- Reduce future air pollution concentrations and strive towards meeting state and federal ambient air pollution by reducing the number of single-occupant vehicle trips associated with commuting
- Reduce consumption of energy for transportation uses, thereby contributing to the national policy to increase energy self-sufficiency

Circulation Element guiding principles and implementing policies with relevance to the Project include:

Standards for Traffic Circulation

3.a-G-3: Create accessible transportation networks system to meet the needs of all segments of the population, including youth, seniors, persons with disabilities, and low-income households.

3.a.I-6: Implement street standards that remove barriers and provide accessibility for pedestrians and bicyclists.

Street Network and Classification

3.b-G-1: Develop a street network integrated with the pattern of living, working, and shopping areas, and which provides for safe, inviting, convenient, and efficient intermodal movement within the City and to other parts of the region.

3.b-G-3: Create a street pattern that encourages industrial growth and promote livable community where all people – regardless of age, ability or mode of transportation – feel safe and welcome on the streets.

3.b-G-4: Use the “Major Improvements Needed” subsection as a basis for identifying, scheduling, and implementing transportation improvements as development occurs in the future.

3.b-I-5: Create a balanced multimodal transportation network that meets the needs of all users of streets, roads, and highways for safe and convenient travel in a manner than is suitable in respect to the community context of the general plan.

Transportation Demand Management

3.c-G-1: Implement measures that increase transit use and other non-motorized travel modes that lead to improved utilization of the existing transportation system.

Pedestrian and Bicycle Circulation Principles and Policies

3.d-G-2: Promote walking and bicycling for transportation and recreation purposes by providing a comprehensive system of sidewalks, bicycle lanes and routes, and off-street trails that connects all parts of the City.

3.d-G-3: Provide adequate bicycle parking and end-of-trip support facilities for bicyclists at centers of civic, retail, recreation, education, and work activity.

3.d-G-4: Promote intermodal commuting options by developing connected system of streets, roads, bridges, and highways that provides continuous, efficient, safe, and convenient travel for all users regardless of age or ability.

3.d-G-5: Encourage a mode shift to non-motorized transportation by expanding and enhancing current pedestrian and bicycle facilities to accommodate casual and experienced cyclists and pedestrians.

3.d-I-9: Require developers to make new projects as bicycle and pedestrian “friendly” as feasible, especially through facilitating pedestrian and bicycle movements within sites and between surrounding civic, recreation, education, work, and retail centers.

3.d-I-16: Include evaluation of bicycle facility needs in all planning applications for new developments and major remodeling or improvement projects.

3.d-I-17: Require new developments to provide end-of-trip facilities such as secure bicycle parking, and on-site showers and clothing storage lockers, etc. where feasible.

3.d-I-26: Use existing parks, schools, and other public facilities as staging areas wherever possible.

3.d-I-29: Require sidewalks on both sides of the street as a condition of development approval, where appropriate with local conditions.

3.d-I-32: Remove obstructions to facilitate pedestrian movements, taking into account persons with disabilities.

Goods Movement

3.e-G-1: Provide adequate circulation and off-street parking and loading facilities for trucks.

3.e-I-1: Restrict trucks to designated non-restricted routes.

ENVIRONMENTAL IMPACTS

Thresholds of Significance

The CEQA Guidelines includes provisions for significance criteria related to transportation impacts. In accordance with Appendix G of the CEQA Guidelines, the proposed project could have a significant environmental impact if it were to:

- a. Conflict with a program, plan, ordinance or policy addressing the circulation system, including transit, roadway, bicycle and pedestrian facilities?

For the purposes of this analysis, the following criteria are applied:

- A pedestrian impact is considered significant if the Project would:
 - Disrupt existing pedestrian facilities;
 - Interfere with planned pedestrian facilities; or
 - Create inconsistencies with adopted pedestrian system plans, guidelines, policies, or standards.
- A bicycle impact is considered significant if the Project would:
 - Disrupt existing bicycle facilities;

- Interfere with planned bicycle facilities;
 - Create inconsistencies with adopted bicycle system plans, guidelines, policies, or standards; or
 - Not provide secure and safe bicycle parking in adequate proportion to anticipated demand.
 - A transit impact is considered significant if the Project would result in development that is inaccessible to transit riders.
- b. Would the project conflict or be inconsistent with CEQA Guidelines section 15064.3, subdivision (b)?

For the purposes of this analysis, based on guidance contained in OPR's Technical Advisory and the Santa Clara County VTA, the following criteria would constitute a less than significant impact:

1. Project home-based work VMT per employee 15 percent or more below the countywide average VMT/employee for employment uses (for Existing Plus Project and Cumulative Plus Project conditions)
 2. No net increase in total VMT within Santa Clara County (for Existing Plus Project and Cumulative Plus Project conditions)
- c. Substantially increase hazards due to a geometric design feature (e.g., sharp curves or dangerous intersections) or incompatible uses (e.g., farm equipment)?
- d. Result in inadequate emergency access?

For the purposes of this analysis, an impact would be considered significant if the Project access driveway design does not adequately serve the Project vehicle traffic or would not conform to the relevant roadway and intersection design standards maintained by the City of Milpitas.

For the purposes of this analysis, an impact would be considered significant if the Project design would impede emergency vehicle circulation along the Project frontages or access to and from the Project's on-site buildings.

Project Description

The Project site plan is shown in Figure IV.E-6. The proposed Project will demolish all existing on-site buildings and construct a new 491,040 square foot industrial building with two supporting offices at the northwest and southeast corners, as well as surface parking on all sides of the building. There are five proposed access driveways to the Project site. One signalized intersection at South Milpitas Boulevard/Ames Avenue and one driveway on South Milpitas Boulevard north of Ames Avenue at the north end of the site will provide access from South Milpitas Boulevard, on the eastern site frontage. Three driveways along Gibraltar Drive will provide access to the west and south sides of the site. The driveway at South Milpitas Boulevard/Ames Avenue and the two northernmost driveways on Gibraltar Drive will

accommodate larger trucks, and the other two driveways will be used only by automobiles and smaller trucks/vans. The driveway dimensions, access types, and traffic controls are as follows:

- South Milpitas Boulevard/North Project Driveway: 30-foot driveway, right turn only, autos and vans only, side-street stop control
- South Milpitas Boulevard/South Project Driveway/Ames Avenue: 40-foot driveway, full access including trucks, signalized control
- Gibraltar Drive/North Project Driveway: 38 feet wide, full access for autos and vans, left turn in/right turn out for trucks, side-street stop control
- Gibraltar Drive/Middle Project Driveway: 50 feet wide, full access for trucks only, side-street stop control
- Gibraltar Drive/South Project Driveway: 30 feet wide, full access for autos and vans only, no trucks, side-street stop control

The Project site plan retains the current 5 to 6-foot sidewalks along the west, south, and east frontages of the site. No changes to traffic control, traffic lane striping, or off-site pedestrian or bicycle infrastructure are proposed as part of the Project application.

The Project may serve a variety of potential industrial uses, but the expected use is a logistics/fulfillment center. Based on a review of a comparable fulfillment center in Newark, CA, an employment density of 330 employees was estimated along with daily and peak hour vehicle, van, and heavy truck trip estimates. Peak hour driveway counts were conducted on three mid-week days (April 21, 22, and 23, 2020) at the Newark site. An additional 24-hour driveway count was conducted on Tuesday, June 2, 2020. All four days of counts were averaged and used to develop peak hour trip generation rates. The daily trip generation rate was developed using the 24-hour count data. The employee density at the Newark site was estimated at 0.67 employees per thousand square feet, based on data provided by the Project applicant. This translates to an estimated employment of 330 employees for the Project site (491,000 square feet times 0.67 employee per thousand square feet).

The estimated Project trip generation rates derived from the above information are shown in Table IV.E-3, and the trip generation estimates are shown in Table IV.E-4. The estimated trip distribution for vehicles and vans, and for heavy trucks, was derived from the VTA Travel Demand Model along with the City of Milpitas primary truck routes map; the distributions are shown in Figures IV.E-7 and IV.E-8, respectively. This trip generation, distribution, and assignment information is used in the *Local Transportation Analysis Report*, a separate report prepared for the City of Milpitas to support its review of the Project development application. Analysis of the operations of the Project driveways is presented in that report, and that analysis is referenced in the discussion of Project impacts under criteria (a), (c) and (d) below.



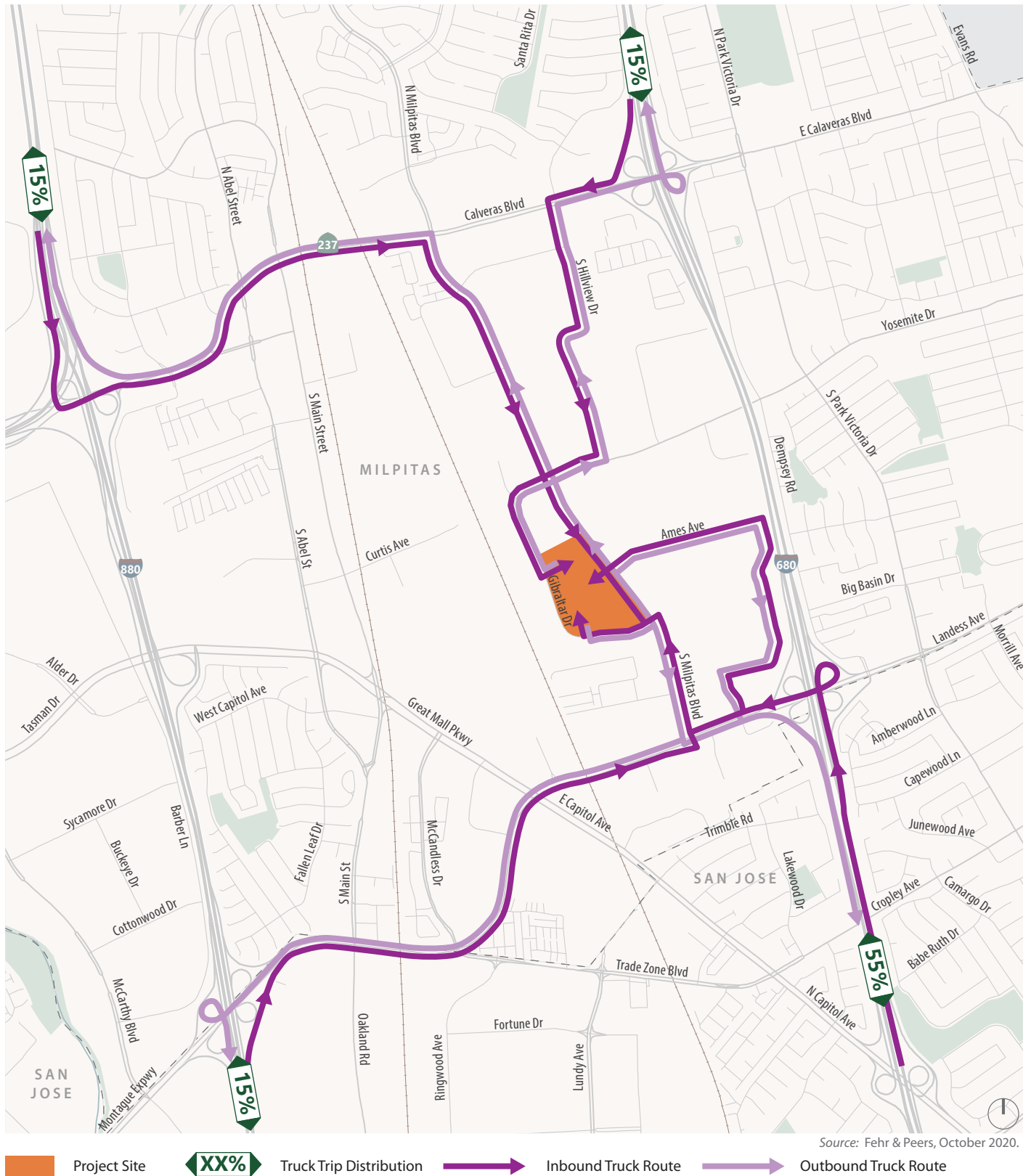


Figure IV.E-8. Project Truck Trip Distribution

1000 Gibraltar Drive
City of Milpitas, California

Table IV.E-3: Project Trip Generation Rates

Vehicle Class	Daily Rate	AM Rates		PM Rates	
		In	Out	In	Out
Passenger Vehicle	5.005	0.355	0.316	0.066	0.067
Van	0.953	0.006	0.009	0.008	0.012
Heavy Truck	0.767	0.013	0.010	0.012	0.014

Note:

1. Rate per 1,000 square feet.

Source: Fehr & Peers, October 2020; based on counts obtained in April and June 2020 at the Newark, CA Amazon facility.

Table IV.E-4: Project Trip Generation Estimate

Land Use	Size ¹	Vehicle Class (PCE Factor)	Daily Trips	AM Peak Hour Trips			PM Peak Hour Trips		
				Total	In	Out	Total	In	Out
Vehicles									
Light Logistics Center	491.04 KSF	Passenger Vehicle	2,458	329	174	155	65	32	33
		Van	468	8	3	5	10	4	6
		Heavy Truck	377	11	6	5	13	6	7
Total Vehicles			3,303	348	183	165	88	42	46

Note:

1. KSF = 1,000 square feet

Source: Fehr & Peers, October 2020.

Project Impacts and Mitigation Measures

This section presents the Project impact assessment relative to baseline (existing) conditions.

Impact TRANS-1: The Project will not conflict with a program, plan, policy or ordinance addressing the circulation system, including transit, roadway, bicycle or pedestrian facilities.

The Project is expected to generate new peak hour and daily vehicle and truck trips, as shown in Table IV.E-4, in the Project vicinity, primarily in the area bounded by I-680, I-880, Calaveras Boulevard, and Montague Expressway. Most trips, including truck trips, would travel to and from I-880 and I-680 to the north and south of the site, but some trips would use other arterials to travel to/from employee residences or delivery locations. Refer to the *Local Transportation Analysis Report* for more information on the traffic operations analysis related to Project traffic.

The external vehicle trips generated by the Project would not cause conflicts with the relevant planning documents addressing the local and regional circulation system, including the City of Milpitas General Plan, the Valley Transportation Authority's planning documents, and the MTC Plan Bay Area 2040 (refer to the regulatory setting for an overview of these plans).

The Project would generate demand for bus and BART trips, given that AC Transit bus route 217 serves the Project site on South Milpitas Boulevard and that the Milpitas BART station is located less than a mile (walking distance) to the south of the site. Employees who use BART may choose to walk or bike to the site or take the bus. There is a continuous sidewalk connection and continuous bicycle lanes between the Milpitas BART station and the Project site. Bus stops are located on South Milpitas Boulevard at Ames Avenue (north of the intersection in the northbound

direction, and south of Ames Avenue in the southbound direction). Thus, there is good pedestrian, bicycle and transit infrastructure and service in place to serve trips by these modes to and from the Project site.

The Project does not propose any off-site infrastructure changes which would cause conflicts with programs, plans, policies, or ordinances addressing off-site transit, roadway, bicycle, or pedestrian facilities.

Based on this assessment, this impact is ***less than significant*** and no mitigation is required.

Impact TRANS-2: The Project will conflict or be inconsistent with CEQA Guidelines section 15064.3, subdivision (b).

The VMT calculation methodology is described in the Analysis Methodology section of this chapter. Tables IV.E-5 through IV.E-8 present the results of the analysis. Note that these tables present results relative to both baseline (existing) and cumulative conditions; this impact discusses the Project impact on baseline conditions; see the Cumulative Impacts section for a discussion of the cumulative impacts with respect to VMT.

Table IV.E-5 shows the employment totals for the traffic analysis zone (TAZ) containing the Project site, the City of Milpitas, Santa Clara County, Alameda County, and San Mateo County, as well as the three-county total. Table IV.E-6 presents the service population, defined as all employees and residents, for the same areas. Values for the Existing, Existing Plus Project, Cumulative No Project, and Cumulative Plus Project cases are shown. These values are used in the VMT calculations in the subsequent tables.

**Table IV.E-5
Employment Summary**

Area	Employees			
	Existing	Existing + Project	Cumulative No Project	Cumulative + Project
Project TAZ (1)	1,860	2,190	2,181	2,511
City of Milpitas	44,975	44,975	54,830	54,830
Santa Clara County	1,040,507	1,040,507	1,302,707	1,302,707
Alameda County	722,058	722,058	953,128	953,128
San Mateo County	351,558	351,558	472,051	472,051
Santa Clara/Alameda/ San Mateo Counties	2,184,123	2,184,123	2,727,886	2,727,886

(1) The traffic analysis zone (TAZ) containing the project site is TAZ 279. This TAZ contains other employment outside the Project site, which is currently vacant.

Table IV.E-6
Service Population (Employees + Residents) Summary

Area	Employees			
	Existing	Existing + Project	Cumulative No Project	Cumulative + Project
Project TAZ (1)	1,860	2,190	2,181	2,511
City of Milpitas	131,473	131,473	159,335	159,335
Santa Clara County	6,400,157	6,400,157	8,280,420	8,280,420
Alameda County	2,896,757	2,896,757	3,856,423	3,856,423
San Mateo County	2,377,156	2,377,156	3,036,586	3,036,586
Santa Clara/Alameda/ San Mateo Counties	6,400,157	6,400,157	8,280,420	8,280,420

(1) The traffic analysis zone (TAZ) containing the project site is TAZ 279. This TAZ contains other employment outside the Project site, which is currently vacant.

Metric 1: Project Home-based Work VMT per Employee (Existing Plus Project)

Table IV.E-7 presents the home based-work VMT per employee for the Project TAZ, for the City of Milpitas, and for Santa Clara County. While the Project reduces VMT per employee in the Project TAZ from 16.22 to 16.19, and while the Existing Plus Project VMT per employee (16.19) is lower than the Citywide average VMT per employee (17.63), the Existing + Project VMT per employee (16.19) does not meet the significance criteria of 15 percent below the Santa Clara Countywide average (14.31). The Project VMT per employee exceeds the threshold by 13 percent (16.19/14.31). Therefore, the Project has a **significant** impact on Home-based Work VMT per employee.

Table IV.E-7
Home-Based Work VMT per Employee

Area	Existing	Existing + Project	Cumulative No Project	Cumulative + Project
<i>Project TAZ</i>				
Home-Based Work VMT	30,162	35,448	39,221	45,255
Employees	1,860	2,190	2,181	2,511
Home-Based Work per Employee	16.22	16.19	17.98	18.02
<i>City of Milpitas</i>				
Home-Based Work VMT	793,786	793,100	1,025,187	1,024,867
Employees	44,975	44,975	54,830	54,830
Home-Based Work per Employee	17.65	17.63	18.70	18.69
<i>Santa Clara County</i>				
Home-Based Work VMT	17,530,347	17,515,034	22,493,352	22,461,163
Employees	1,040,507	1,040,507	1,302,707	1,302,707
Home-Based Work per Employee	16.85	16.83	17.27	17.24
15% Below Countywide Average	14.32	14.31	14.68	14.66

Metric 2: Total Boundary VMT (Existing Plus Project)

This metric measures the total VMT for all trip types within the region expected to be affected by the Project trips. For this analysis, the three-county region of Santa Clara County, Alameda County, and San Mateo County was selected as likely to capture the effect of most to all Project trips. The total VMT per service population (employees and residents) is calculated. Table IV.E-

8 shows this metric for the City of Milpitas, for information, as well as for the three-county region, for the Existing and Existing Plus Project cases.

While the Project does increase Total Boundary VMT within the three-county region, the effect is considered to be within the travel demand model margin of error (0.0008%), and the Boundary VMT per service population is unchanged when calculated to two decimal places. Therefore, the Project's impact on Total Boundary VMT is considered ***less than significant*** and no mitigation measures are required.

**Table IV.E-8
Boundary VMT**

Area	Existing	Existing + Project	Cumulative No Project	Cumulative + Project
<i>City of Milpitas</i>				
Total Boundary VMT	2,534,888	2,533,352	3,105,935	3,100,322
Service Population (Employees + Residents)	131,473	131,473	159,335	159,335
Boundary VMT per Service Population	19.28	19.27	19.49	19.46
<i>Santa Clara/Alameda/San Mateo Counties</i>				
Total Boundary VMT	95,533,346	95,534,150	121,619,745	121,487,149
Service Population (Employees + Residents)	6,400,157	6,400,157	8,280,420	8,280,420
Boundary VMT per Service Population	14.93	14.93	14.69	14.67

Mitigation Measure TRANS-1:

The Project applicant shall implement a travel demand management program for all employees with the goal of reducing the use of single-occupant vehicles for commuting. The measures most likely to be effective given the Project's location and expected use type include the following (measures are identified with the California Air Pollution Control Officers (CAPCOA) *Quantifying Greenhouse Gas Mitigation Measures* (August 2010) measure number and VMT reduction effectiveness range):

- Implement a commute trip reduction program with required implementation and monitoring (CAPCOA measure TRT-2, effectiveness range 4.2% - 21.0%);
- Provide ride-sharing programs (CAPCOA measure TRT-3, effectiveness range 1 – 15%);
- Implement subsidized or discounted transit program (CAPCOA measure TRT-4, effectiveness range 0.3% - 20%);
- Provide end-of-trip facilities (CAPCOA measure TRT-5, effectiveness based on effectiveness of measures TRT-2 and TRT-3);
- Implement commute trip reduction marketing (CAPCOA measure TRT-7, effectiveness range 0.8% - 4.0%);
- Implement car-sharing program (CAPCOA measure TRT-9, effectiveness range 0.4% - 0.7%);

- Restripe Green Bike lanes along property frontage; and
- Bike locker subsidy.

(a) VMT Strategy Report

Prior to the issuance of an occupancy permit, the Project Applicant (or Project site operator) shall prepare a VMT Strategy Report that includes the following items:

- Identification of a baseline Project home-based work VMT per employee estimate, which may be taken from this EIR or updated based on more detailed/relevant Project information available at the time of the preparation of the VMT Strategy Report.
- Identification of selected transportation demand management strategies per the above list, and others if appropriate.
- Demonstration of how the VMT generated by the Project would be 15 percent below the countywide average home-based work VMT per employee.

After implementing the transportation demand management strategies selected in the VMT Strategy Report upon occupancy of the Project, the effectiveness of these measures relative to the performance target noted previously must be monitored, as follows.

(b) Monitoring

The Project shall be monitored by the City or by the project application/operator on an annual basis to determine the efficacy of the selected transportation demand management strategies in achieving the performance target of 14.31 home-based work VMT per employee. The monitoring shall include Project-generated VMT estimates compatible with the methodology used to estimate benchmark VMT so that performance comparisons can be made. An annual monitoring memorandum shall be submitted to City staff. If the Project site is found not to be in compliance with the mitigation measure, the Project must incorporate additional transportation demand management strategies to meet the performance target. The Project applicant/operator may propose new strategies that develop over time to further reduce Project-generated VMT if substantial evidence is provided to support the efficacy of the strategy. If a 15% VMT reduction is achieved for three consecutive years, the project will no longer need to provide annual reporting.

Research presented in the CAPCOA document indicates that the above measures, when taken together, could reduce commute trips by single-occupant vehicle by up to 15 percent in a suburban center land use context similar to that of the Project. If the full 15 percent reduction were achieved, the Project VMT per employee (16.19) would be reduced to below the significance threshold. However, the effectiveness of the group of measures cannot be assured, as the actual future employee commute mode choices cannot be known. Therefore, this impact remains **significant and unavoidable** with mitigation.

(c) Alternative Monitoring Approach

The City of Milpitas may develop a citywide VMT monitoring program to allow global monitoring of City VMT, which may provide cost efficiencies and be a more effective way to track VMT

generation by various uses in the City. The monitoring program could make use of emerging technologies including location-based services on cell phones and in vehicles to track trip lengths, along with traditional technologies such as driveway traffic counts. If such a program is developed, the Project could participate in the monitoring and demonstrate performance relative to the Project's VMT target.

Impact TRANS-3: The Project will not substantially increase hazards due to a geometric design feature or incompatible uses.

The Project proposes to construct or re-construct five driveways, two on South Milpitas Boulevard and three on Gibraltar Drive (refer to the Project Description section in this chapter). The driveway widths range from 30 feet to 50 feet. The site plan set includes turning diagrams indicating that the three driveways which will serve larger trucks – the northern two driveways on Gibraltar Drive and the driveway opposite Ames Avenue on South Milpitas Boulevard – will accommodate trucks adequately. No traffic control changes or on-street striping changes are proposed at the site driveways. The peak hour traffic operations analysis conducted for the *1000 Gibraltar Industrial Project Local Transportation Analysis* indicates that the five site driveways will operate at LOS C or better during the weekday AM and PM peak commute hours.

Because the Project will be subject to the City of Milpitas permitting process, which includes design review, there is no reason to expect that the site driveway designs will not conform to City requirements.

Based on this assessment, the Project would have a ***less-than-significant*** impact with respect to hazards due to a design feature or incompatible uses. No mitigation measures are required.

Impact TRANS-4: The Project will not result in inadequate emergency access.

As described under Impact TRANS-3, the Project driveways are projected to operate at LOS C or better during weekday commute peak hours. The Project does not propose any off-site roadway network changes and therefore would not adversely affect emergency vehicle circulation on surrounding roadways. With two driveways on South Milpitas Boulevard and three on Gibraltar Drive, emergency vehicle access to all sides of the Project building would be accommodated. Based on this assessment, the Project design would not impede emergency vehicle circulation along the Project frontages or access to and from the Project's on-site buildings, and therefore, the Project would have a ***less-than-significant*** impact on emergency access. No mitigation measures are required.

CUMULATIVE IMPACTS

Impact TRANS-5: The Project will conflict or be inconsistent with CEQA Guidelines section 15064.3, subdivision (b).

The VMT calculation methodology is described in the Analysis Methodology section of this chapter. Tables IV.E-3 through IV.E-6, presented above under Impact TRANS-2, present the results of the analysis. Note that these tables present results relative to both baseline (existing) and cumulative conditions; this impact discusses the Project impact on cumulative conditions;

Impact TRANS-2 discusses the impacts with respect to VMT on baseline (existing) conditions.

Table IV.E-3 shows the employment totals for the traffic analysis zone (TAZ) containing the Project site, the City of Milpitas, Santa Clara County, Alameda County, and San Mateo County, as well as the three-county total. Table IV.E-4 presents the service population, defined as all employees and residents, for the same areas. Values for the Existing, Existing Plus Project, Cumulative No Project, and Cumulative Plus Project cases are shown. These values are used in the VMT calculations in the subsequent tables.

Metric 1: Project Home-based Work VMT per Employee (Cumulative Plus Project)

Table IV.E-5 presents the home based-work VMT per employee for the Project TAZ, for the City of Milpitas, and for Santa Clara County. The Project increases VMT per employee in the Project TAZ from 17.98 to 18.02, although the Project TAZ VMT per employee is lower than the citywide average (18.69). However, the Cumulative + Project VMT per employee (18.02) does not meet the significance criteria of 15 percent below the Santa Clara Countywide average (14.66). The Project VMT per employee exceeds the threshold by 23 percent (18.02/14.66). Therefore, the Project has a **significant** cumulative impact on Home-based Work VMT per employee.

Metric 2: Total Boundary VMT (Cumulative Plus Project)

This metric measures the total VMT for all trip types within the region expected to be affected by the Project trips. For this analysis, the three-county region of Santa Clara County, Alameda County, and San Mateo County was selected as likely to capture the effect of most to all Project trips. The total VMT per service population (employees and residents) is calculated. Table IV.E-6 shows this metric for the City of Milpitas, for information, as well as for the three-county region, for the Existing and Existing Plus Project cases.

Under Cumulative condition, the Project decreases Total Boundary VMT within the three-county region, and the VMT per service population drops from 14.69 VMT per service population to 14.67 VMT per service population. Therefore, the Project's impact on Total Cumulative Boundary VMT is considered **less than significant**.

Mitigation Measure:

Implement Mitigation Measure TRANS-1.

LEVEL OF SIGNIFICANCE AFTER MITIGATION

The following traffic impacts would remain **significant and unavoidable**: Impact TRANS-2 and Impact TRANS-5.

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