<table>
<thead>
<tr>
<th><strong>Docket Number:</strong></th>
<th>21-SPPE-02</th>
</tr>
</thead>
<tbody>
<tr>
<td><strong>Project Title:</strong></td>
<td>STACK Backup Generating Facility</td>
</tr>
<tr>
<td><strong>TN #:</strong></td>
<td>242538</td>
</tr>
<tr>
<td><strong>Document Title:</strong></td>
<td>TZP SPPE Application Transportation Section</td>
</tr>
<tr>
<td><strong>Description:</strong></td>
<td>N/A</td>
</tr>
<tr>
<td><strong>Filer:</strong></td>
<td>Scott Galati</td>
</tr>
<tr>
<td><strong>Organization:</strong></td>
<td>DayZenLLC</td>
</tr>
<tr>
<td><strong>Submitter Role:</strong></td>
<td>Applicant Representative</td>
</tr>
<tr>
<td><strong>Submission Date:</strong></td>
<td>4/4/2022 6:56:42 AM</td>
</tr>
<tr>
<td><strong>Docketed Date:</strong></td>
<td>4/4/2022</td>
</tr>
</tbody>
</table>
4.17  TRANSPORTATION

The evaluation of the project’s transportation impacts in this section is based on the City’s Transportation Analysis Handbook, Transportation Analysis Policy (Policy 5-1), and standard CEQA practices. The project’s VMT was estimated using the City of San José and Valley Transportation Authority (VTA) VMT Evaluation Tools (refer to Attachments 1 and 2). Additionally, a Transportation Analysis technical report is currently being prepared by Hexagon Transportation Consultants in coordination with the City of San José. The analysis below will be updated accordingly upon its completion.

4.17.1  Environmental Setting

4.17.1.1  Regulatory Framework

State

Regional Transportation Plan

The Metropolitan Transportation Commission (MTC) is the transportation planning, coordinating, and financing agency for the nine-county San Francisco Bay Area, including Santa Clara County. MTC is charged with regularly updating the Regional Transportation Plan, a comprehensive blueprint for the development of mass transit, highway, airport, seaport, railroad, bicycle, and pedestrian facilities in the region. MTC and ABAG adopted Plan Bay Area 2040 in July 2017, which includes a Regional Transportation Plan to guide regional transportation investment for revenues from federal, state, regional and local sources through 2040.

Senate Bill 743

SB 743 establishes criteria for determining the significance of transportation impacts using a vehicle miles traveled (VMT) metric intended to promote the reduction of GHG emissions, the development of multimodal transportation networks, and a diversity of land uses. Specifically, SB 743 requires the replacement of automobile delay – described solely by level of service (LOS) or similar measures of vehicular capacity or traffic congestion – with VMT as the recommended metric for determining the significance of transportation impacts. The Governor’s Office of Planning and Research (OPR) approved the CEQA Guidelines implementing SB 743 on December 28, 2018. Local jurisdictions were required to implement a VMT policy by July 1, 2020.

SB 743 did not authorize OPR to set specific VMT impact thresholds, but it did direct OPR to develop guidelines for jurisdictions to utilize. CEQA Guidelines Section 15064.3(b)(1) describes factors that might indicate whether a development project’s VMT may be significant. Notably, projects located within 0.50 mile of transit should be considered to have a less than significant transportation impact based on OPR guidance.

Regional and Local

Congestion Management Program

VTA oversees the Congestion Management Program (CMP), which is aimed at reducing regional traffic congestion. The relevant state legislation requires that urbanized counties in California prepare
a CMP in order to obtain each county’s share of gas tax revenues. State legislation requires that each CMP define traffic LOS standards, transit service standards, a trip reduction and transportation demand management plan, a land use impact analysis program, and a capital improvement element. VTA has review responsibility for proposed development projects that are expected to affect CMP-designated intersections.

Transportation Analysis Policy (City Council Policy 5-1)

As established in City Council Policy 5-1, Transportation Analysis Policy (2018), the City of San José uses VMT as the metric to assess transportation impacts from new development. According to the policy, an employment (e.g., office or research and development) project’s transportation impact would be less than significant if the project VMT is 15 percent or more below the existing average regional per capita VMT. The threshold for a retail project is whether it generates net new regional VMT, as new retail typically redistributes existing trips and miles traveled as opposed to inducing new travel. Screening criteria have been established to determine which projects require a detailed VMT analysis. If a project meets the relevant screening criteria, it is considered to have a less than significant VMT impact.

If a project’s VMT does not meet the established thresholds, mitigation measures would be required, where feasible. The policy also requires preparation of a Local Transportation Analysis to analyze non-CEQA transportation issues, including local transportation operations, intersection level of service, site access and circulation, and neighborhood transportation issues such as pedestrian and bicycle access and recommend transportation improvements. The VMT policy does not negate Area Development policies and Transportation Development policies approved prior to adoption of Policy 5-1. Policy 5-1 does, however, negate the City’s Protected Intersection policy as defined in Policy 5-3.

City of San José Bike Plan

The City of San José Bike Plan 2020, adopted in 2009, contains policies for guiding the development and maintenance of bicycle and trail facilities within San José. The plan also includes the following goals for improving bicycle access and connectivity: 1) complete 500 miles of bikeways; 2) achieve a five percent bike mode share; 3) reduce bicycle collision rates by 50 percent; 4) add 5,000 bicycle parking spaces; and 5) achieve Gold-Level Bicycle Friendly Community Status. The Bike Plan defines a 500-mile network of bikeways that focuses on connecting off-street bikeways with on-street bikeways. The City is in the process of preparing the San José Better Bike Plan 2025, an update to the Bike Plan 2020.¹

Envision San José 2040 General Plan

The General Plan includes policies for the purpose of avoiding or mitigating impacts resulting from planned development projects with the City. The following policies are specific to transportation and are applicable to the proposed project.

### Envision San José 2040 Relevant Transportation Policies

<table>
<thead>
<tr>
<th>Policies</th>
<th>Description</th>
</tr>
</thead>
</table>
| Policy LU-2.2 | Include within the Land Use/Transportation Diagram significant job and housing growth capacity within the following identified growth areas:  
  - Specific Plan Areas – The City’s Specific Plans provide significant residential growth capacity and opportunities for mixed-use development. |
| Policy TR-1.1 | Accommodate and encourage use of non-automobile transportation modes to achieve San José’s mobility goals and reduce vehicle trip generation and vehicle miles traveled (VMT). |
| Policy TR-1.2 | Consider impacts on overall mobility and all travel modes when evaluating transportation impacts of new developments or infrastructure projects. |
| Policy TR-1.7 | Require that private streets be designed, constructed and maintained to provide safe, comfortable, and attractive access and travel for motorists and for pedestrians, bicyclists, and transit users of all ages, abilities, and preferences. |
| Policy TR-2.2 | Provide a continuous pedestrian and bicycle system to enhance connectivity throughout the City by completing missing segments. Eliminate or minimize physical obstacles and barriers that impede pedestrian and bicycle movement on City streets. |
| Policy TR-2.8 | Require new development where feasible to provide on-site facilities such as bicycle storage and showers, provide connections to existing and planned facilities, dedicate land to expand existing facilities or provide new facilities such as sidewalks and/or bicycle lanes/paths, or share in the cost of improvements. |
| Policy TR-2.18 | Provide bicycle storage facilities as identified in the San José Bicycle Master Plan. |
| Policy TR-5.5 | Require that new development, which includes new public or private streets, connect these streets with the existing public street network and prohibit the gating of private streets with the intention of restricting public access. Furthermore, where possible, require that the street network within a given project consists of integrated short blocks to facilitate bicycle and pedestrian travel and access. |

### 4.17.1.2 Existing Conditions

#### Transit Facilities

Bus and light rail transit (LRT) service in Santa Clara County is operated by the Santa Clara Valley Transportation Authority (VTA). The project site is directly served by VTA local bus routes 60 and 77, both of which provide access to the Milpitas BART Station located roughly 1.4 miles north of the site. A bus stop is located directly adjacent to the site at the intersection of Trade Zone Boulevard and Ringwood Avenue.

#### Roadway Facilities

Regional access to the project site is provided via I-880, I-680, and SR 237. Local access to the project site is provided via Fortune Drive, Ringwood Avenue, and Trade Zone Boulevard.
Bicycle Facilities

Bicycle connectivity to the project site includes Class II bike lanes\(^2\) present along the project frontages on Trade Zone Boulevard and Ringwood Avenue. A Class II bike lane is also located on Capitol Avenue which provides access to the Milpitas BART Station. There are also off-street bicycle trails along the Guadalupe River and Penitencia Creek that provide access to central San José and Santa Clara.

Pedestrian Facilities

Pedestrian connectivity is provided by a mostly complete network of sidewalks and crosswalks that serve the surrounding area. Sidewalks are present along the project frontages with Fortune Drive, Ringwood Avenue, and Trade Zone Boulevard.

4.17.2 Impact Discussion

For the purpose of determining the significance of the project’s impact on transportation, would the project:

a) Conflict with a program, plan, ordinance or policy addressing the circulation system, including transit, roadways, bicycle lanes, and pedestrian facilities?

b) Conflict or be inconsistent with CEQA Guidelines Section 15064.3, subdivision (b)?

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?

4.17.2.1 Project Impacts

a) Would the project conflict with a program, plan, ordinance or policy addressing the circulation system, including transit, roadways, bicycle lanes, and pedestrian facilities?

Transit Facilities

The project site is near VTA bus lines and the Milpitas BART Station that would support multi-modal travel to and from the site. The project would not physically remove or inhibit access to any bus stops in the area, nor would the project conflict with any planned transit improvements in the project area. Therefore, implementation of the proposed project would not conflict with any program, plan, ordinance or policy addressing transit facilities.

Roadways

The project’s effect on vehicle delay on nearby roadways would not be considered a significant transportation impact under CEQA, as VMT is the City’s adopted standard for assessing

\(^2\) Class II bike 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 cross-flow are permitted.
transportation impacts. For a discussion of the project’s VMT impacts, refer to the discussion below under Impact “b”. The project would not conflict with any planned or ongoing roadway improvements in the project area. Therefore, the proposed project would not conflict with any program, plan, ordinance or policy addressing roadways.

**Bicycle Facilities**

The project would not remove or inhibit access to any existing bicycle facilities. The project includes on-site bicycle facilities such as dedicated bicycle parking to facilitate the use of nearby bike paths.

**Pedestrian Facilities**

The project would not inhibit pedestrian flow through the area by reducing sidewalk width or eliminating sidewalks to accommodate vehicular flow. The project would not conflict with any program, plan, ordinance, or policy addressing pedestrian facilities.

The project would not conflict with a program, plan, ordinance, or policy addressing the circulation system, including transit, roadways, bicycle lanes, and pedestrian facilities. (*Less than Significant Impact*)

---

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

A project-level VMT analysis using the City’s VMT Evaluation Tool was completed to estimate the project’s VMT based on the project location, type of development, and project description. The City’s VMT threshold for industrial uses such as the proposed project is whether VMT per employee would be greater than the existing regional VMT per employee of 14.37.

The project’s VMT was estimated to be 13.57 per employee using the City’s VMT Evaluation Tool, which is below the threshold of 14.37. This result was confirmed by completing an additional VMT analysis using the VTA’s Countywide VMT Evaluation Tool, which returned an identical result.³ The project, therefore, would not conflict or be inconsistent with CEQA Guidelines Section 15064.3, subdivision (b). (*Less than Significant Impact*)

---

### c) Would the project substantially increase hazards due to a geometric design feature (e.g., sharp curves or dangerous intersections) or incompatible uses (e.g., farm equipment)?

Vehicular access to the site would be provided via one driveway on Fortune Drive, one driveway of Ringwood Avenue, and two driveways on Trade Zone Boulevard. Three of the four driveways would be in the same locations as existing conditions, with one new driveway placed on Trade Zone

---

³ To ensure the project was not receiving excessive VMT reduction credit due to intensification of employment in the project area, which is one of the inputs in both VMT evaluation tools utilized in this analysis, an additional model run was completed where the square footage of industrial uses on the site was reduced to 135,000, which is equivalent to the square footage of the proposed Advanced Manufacturing Facility. This eliminated the potential that the large square footage of the proposed data center buildings was inflating expected employment levels in the models. The model runs returned identical results of 13.57 VMT per employee after this adjustment.
Boulevard to serve as the primary entrance for vehicles accessing the proposed parking garage. The project would not alter the shape of adjacent roadways or create any sharp curves or dangerous intersections. The project, therefore, would not substantially increase hazards. **(Less than Significant Impact)**

d) Would the project result in inadequate emergency access?

Emergency vehicle access to the project site would be provided via the 26-foot-wide project driveways on Fortune Drive, Ringwood Avenue, and Trade Zone Boulevard. All areas of the proposed buildings would be within 150 feet of a fire access road and adequate vertical clearance would be provided along all drive aisles and fire access roads. For these reasons, the project would not result in inadequate emergency access and would comply with City guidelines for emergency access. **(No Impact)**

4.17.2.2 Cumulative Impacts

Would the project result in a cumulatively considerable contribution to a significant cumulative transportation impact?

VMT

The City has established a VMT policy to ensure development in the City does not result in a significant cumulative increase in VMT. For industrial projects such as the proposed project, the City requires a project VMT that does not exceed the Countywide average for industrial uses. As described in the discussion under Impact “b”, the project’s VMT would be below the Countywide average. As a result, the project would not result in, or contribute substantially to, a significant cumulative VMT impact. **(Less than Significant Cumulative Impact)**

General Plan Transportation Policies

The project would be consistent with applicable General Plan policies regarding transportation and, therefore, would not have a cumulatively considerable contribution to a significant cumulative conflict with those policies. **(Less than Significant Cumulative Impact)**

Emergency Access and Geometric Design

All cumulative projects (including the project) would comply with current building and fire codes and be reviewed by the Fire Department to ensure adequate emergency access. For these reasons, the cumulative projects would not result in a significant cumulative impact to emergency access. The project would provide adequate sight distance and would not substantially increase hazards due to a geometric design feature (e.g., sharp curves or dangerous intersections) or incompatible uses (e.g., farm equipment). For these reasons, the cumulative projects would not result in a significant cumulative impact due to transportation hazards. **(Less than Significant Cumulative Impact)**
### Project Information
- **Project Name:** Trade Zone Boulevard Technology Park
- **Location:** 2400 Ringwood Avenue
- **Project Parcel:** 24417009
- **Place Type:** Suburb with Multifamily Housing
- **Planned Growth Area:** Yes
- **Proposed Parking:** Vehicle Bike

### Land Use Type
- **Residential**
  - Single Family
  - Multi Family
- **Office**
- **Retail**
- **Industrial**

### VMT Reduction Strategies

<table>
<thead>
<tr>
<th>Tier</th>
<th>Section</th>
<th>Description</th>
</tr>
</thead>
<tbody>
<tr>
<td>1</td>
<td>Increase Residential Density</td>
<td>6.3 - Existing Density (DU/Residential Acres in Parcel Buffer Zone)</td>
</tr>
<tr>
<td></td>
<td>Increase Employment Density</td>
<td>36.8 - Existing Density (Jobs/Commercial Acres in Parcel Buffer Zone)</td>
</tr>
<tr>
<td></td>
<td>Increase Development Diversity</td>
<td>0.87 - Existing Activity Mix Index</td>
</tr>
<tr>
<td></td>
<td>Integrate Affordable and Below Market Rate</td>
<td>0% Extremely Low Income BMR units</td>
</tr>
</tbody>
</table>

### Analysis Results

**Residential Only**
- **VMT Reduction:** 10.12%
- **VMT / WORKER:**
  - Area VMT: 11.4
  - Project VMT: 10.12
  - Project + TDM VMT: 10.12

**Employment Only**
- **VMT Reduction:** 10.01%
- **VMT / WORKER:**
  - Area VMT: 15.08
  - Project VMT: 13.57
  - Project + TDM VMT: 13.57

**Impact?** NO
PROJECT:
Name: Trade Zone Boulevard Technology Park
Location: 2400 Ringwood Avenue
Parcel: 24417009
Parcel Type: Suburb with Multifamily Housing
Proposed Parking Spaces: Vehicles: 0, Bicycles: 0

Tool Version: 2/29/2019
Date: 4/1/2022

LAND USE:
Residential: Percent of All Residential Units
- Single Family: 0 DU Extremely Low Income (≤ 30% MFI) 0 % Affordable
- Multi Family: 0 DU Very Low Income (> 30% MFI, ≤ 50% MFI) 0 % Affordable
- Subtotal: 0 DU Low Income (> 50% MFI, ≤ 80% MFI) 0 % Affordable

Office: 0 KSF
Retail: 0 KSF
Industrial: 7E+05 KSF

VMT REDUCTION STRATEGIES

Tier 1 - Project Characteristics

Increase Residential Density
- Existing Density (DU/Residential Acres in half-mile buffer): 6
- With Project Density (DU/Residential Acres in half-mile buffer): 6

Increase Development Diversity
- Existing Activity Mix Index: 0.87
- With Project Activity Mix Index: 0.04

Integrate Affordable and Below Market Rate
- Extremely Low Income BMR units: 0 %
- Very Low Income BMR units: 0 %
- Low Income BMR units: 0 %

Increase Employment Density
- Existing Density (Jobs/Commercial Acres in half-mile buffer): 37
- With Project Density (Jobs/Commercial Acres in half-mile buffer): 2,351

Tier 2 - Multimodal Infrastructure
Tier 3 - Parking
Tier 4 - TDM Programs
EMPLOYMENT ONLY

The tool estimates that the project would generate per non-industrial worker VMT below the City’s threshold.

![Bar Chart]

- Area VMT: 15.08
- Project VMT: 13.57
- Project + TDM VMT: 13.57

**Est. Max Reduction Possible** ............... 12.06
Project Details

Timestamp of Analysis: April 01, 2022, 04:09:02 PM

Project Name: Trade Zone Boulevard Technology Park

Project Description: 135,000 sf Advanced Manufacturing Building and 526,800 sf Data Center.

Project Location Map

Jurisdiction: San Jose

Analysis Details

Data Version: CSJ 2015 Model
Analysis Methodology: Parcel Buffer Method
Baseline Year: 2015

Project Land Use

Residential:
- Single Family DU: 
- Multifamily DU: 
- Total DUs: 0

Non-Residential:
- Office KSF: 
- Local Serving Retail KSF: 
- Industrial KSF: 661800

Residential Affordability (percent of all units):
- Extremely Low Income: 0 %
- Very Low Income: 0 %
- Low Income: 0 %

Parking:
- Motor Vehicle Parking: 
- Bicycle Parking: 

Proximity to Transit Screening

Inside a transit priority area? Yes (Pass)
## Industrial Vehicle Miles Traveled (VMT) Screening Results

<table>
<thead>
<tr>
<th>Land Use Type 1:</th>
<th>Industrial</th>
</tr>
</thead>
<tbody>
<tr>
<td>VMT Metric 1:</td>
<td>Home-based Work VMT per Worker</td>
</tr>
<tr>
<td>VMT Baseline Description 1:</td>
<td>Bay Area Regional Average</td>
</tr>
<tr>
<td>VMT Baseline Value 1:</td>
<td>14.37</td>
</tr>
<tr>
<td>VMT Threshold Description 1 / Threshold Value 1:</td>
<td>Regional Threshold (-0%) / 14.37</td>
</tr>
<tr>
<td>Land Use 1 has been Pre-Screened by the Local Jurisdiction:</td>
<td>N/A</td>
</tr>
</tbody>
</table>

<table>
<thead>
<tr>
<th></th>
<th>Without Project</th>
<th>With Project &amp; Tier 1-3 VMT Reductions</th>
<th>With Project &amp; All VMT Reductions</th>
</tr>
</thead>
<tbody>
<tr>
<td>Project Generated Vehicle Miles Traveled (VMT) Rate</td>
<td>15.08</td>
<td>13.57</td>
<td>13.57</td>
</tr>
<tr>
<td>Low VMT Screening Analysis</td>
<td>No (Fail)</td>
<td>Yes (Pass)</td>
<td>Yes (Pass)</td>
</tr>
</tbody>
</table>

![Graph showing VMT values](image.png)

- **Land Use 1 Threshold VMT:** 14.37
- **Land Use 1 Max Reduction Possible:** 12.06
- **VMT Values**
## Tier 1 Project Characteristics

### PC04 Increase Employment Density

<p>| | |</p>
<table>
<thead>
<tr>
<th></th>
<th></th>
</tr>
</thead>
<tbody>
<tr>
<td>Existing Employment Density:</td>
<td>36.84</td>
</tr>
<tr>
<td>With Project Employment Density:</td>
<td>2350.83</td>
</tr>
</tbody>
</table>