

## EXHIBIT A

### **Transportation Analysis Policy**

#### *Purpose/Intent*

The California Environmental Quality Act (CEQA) requires all California Cities to evaluate and disclose potential transportation environmental impacts of any proposed "Project". It is the intent of this policy to establish Vehicle Miles Traveled (VMT) as the methodology for analyzing transportation environmental impacts and establish baseline, threshold and exemptions for environmental review to comply with State law. This policy also establishes the requirement of a transportation operational analysis to address transportation deficiencies resulting from a Project.

#### *Policy*

This policy requires all projects to evaluate and disclose transportation environmental impacts by measuring Vehicle Miles Traveled (VMT) per CEQA and also establishes Level of Service (LOS) as an operational measure of intersection efficiency, which is not defined as transportation environmental impact per CEQA.

#### Evaluating Vehicle Miles Traveled (VMT)

The City will use the Countywide Average VMT as the established environmental baseline. To evaluate whether a proposed project will have a significant impact under CEQA, the City will compare the project's VMT with this baseline. As detailed in Table 1, for residential and office projects, a Project will have a less than significant impact if the Project results in a 15% VMT reduction compared to the baseline. Consult Table 1 for other project types.

#### Evaluating Level of Service (LOS)

To evaluate LOS, the City will continue to rely upon the standards set by the City's General Plan. The General Plan Mobility and Transportation Diagram references the LOS "D" standard for local City streets for the Phase I of the plan (2010-2015). For Phase II (2015-2023) and Phase III (2023-2035), the plan allows for exemptions and modifications to the LOS standard based on the context, location and circumstance. The plan also establishes a LOS "E" on the regional roadway facilities.

#### *Applicability*

All proposed projects are required to undergo environmental review as part of the City's approval process. This includes an analysis of CEQA impacts (VMT) and non CEQA operational measures of intersection efficiency (LOS).

In addition to establishing the baseline and significant impact threshold, this policy establishes certain projects that are presumed to have a less than significant impact per the State's guidance and will not require a VMT analysis. The following is the list of projects that do not require VMT analysis:

- Small projects (generating 110 daily trips or less)
- Retail of 50,000 square feet or less (local serving)
- Local serving public projects such as fire stations, neighborhood parks, libraries, and community centers
- 100% Affordable Housing projects
- "Transit Supportive Projects." A project will qualify as a Transit Supportive Project if it meets the following requirements:

- The Project is located within ½ mile of an existing Major Transit Stop<sup>1</sup> or an existing transit stop along a High-Quality Transit Corridor<sup>2</sup>
- For Office/R&D projects, a minimum Floor Area Ratio of 0.75
- For Residential projects, a minimum density of 35 units/acre
- Project promotes multimodal transportation networks
- Project includes transit-oriented design elements
- No excess parking: the project does not include more parking for use by residents, customers, or employees of the project than required by the City Code
- No loss of affordable dwelling units: the project does not replace affordable residential units with a smaller number of affordable units, and any replacement units are at the same level of affordability

Projects that do not meet the above requirements are required to evaluate and disclose potential VMT environmental impacts with the established baseline and threshold criteria. Projects that do not require VMT analysis will be required to measure LOS as part of an operational analysis, as appropriate, and provide improvements or address project related operational deficiencies.

The following chart outlines the types of projects and the VMT analysis requirement:

**Table 1. Project Type and VMT Thresholds of Significance**

<b>Project Type</b>	<b>Threshold for Determination of Significant Transportation Impact</b>
Residential Units	15% below the existing Countywide VMT per resident. If project VMT per resident exceeds this amount, impact is significant.
Employment (e.g. office, R&D)	15% below the existing Countywide VMT per employee. If project VMT per employee exceeds this amount, impact is significant.
Industrial Employment Uses (e.g. warehouse, manufacturing and distribution uses)	15% below the existing Countywide VMT per employee. If project VMT per employee exceeds this amount, impact is significant. This applies to the work trip element of the project (employee commute only).
Retail Uses	Existing Countywide VMT for retail uses. If Project will result in a net increase in the total existing VMT for the County for regional retail, impact is significant.
Public/Quasi-Public Uses	Public/Quasi-Public land use projects shall be analyzed using the most relevant threshold as determined by the Director of Public Works

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<sup>1</sup> “Major transit stop” means a site containing any of the following: (a) an existing rail or bus rapid transit station; (b) the intersection of two or more major bus routes with a frequency of service interval of 15 minutes or less during the morning and afternoon peak commute periods; or (c) a major transit stop that is included in Plan Bay Area 2040. Pub. Res. Code §§ 21064.3, 21155(b).

<sup>2</sup> “High-Quality Transit Corridor” means a corridor with fixed route bus service with service intervals no longer than 15 minutes during peak commute hours. Pub. Res. Code § 21155(b).

Mixed Uses	Each land use component of a mixed-use project will be analyzed independently, applying the significance threshold for each land use in this Table 1
Change of Use or Additions to Existing Development	Change of use or additions to existing developments shall be analyzed when the change of land use or addition to existing development results in additional trips in excess of the small Project threshold (110 daily trips or less)
Focus growth Area Plans, Specific Plans or Precise Plans	Each land use component of a mixed-use project will be analyzed independently, applying the significance threshold for each land use in this Table 1.
General Plan Amendments (GPA), if not covered by other categories on this Table 1. (Standalone GPA's)	Net increase in VMT greater than the 2035 12.19 VMT per service population target consistent with Santa Clara General Plan Transportation and Mobility <sup>3</sup>
Transportation Projects	Net increase in VMT greater than the 2035 12.19 VMT per service population target consistent with Santa Clara General Plan Transportation and Mobility Assumptions <sup>3</sup>

*Existing Approvals*

Projects that are currently approved, or that are scheduled for adoption prior to July 1, 2020 (and actually adopted by that date), will not require any supplemental VMT environmental review unless the 'Project' requires supplemental environmental review not covered by an addendum.

*Outcomes*

Implementation of this policy will result in reducing VMT growth, promoting the reduction of greenhouse gas emissions, the development of multimodal transportation networks, and a diversity of land uses and ultimately, meeting the State's long-term climate goals. This policy supports and aligns with the General Plan land use and transportation goals and facilitates the implementation of the three phases of development envisioned in the plan. Lastly, this policy will also support a more sustainable, healthy and livable community as outlined in the City's Climate Action Plan.

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<sup>3</sup> Santa Clara General Plan, Appendix 8.7 Transportation and Mobility Assumptions, Table 8.7-4, pages 8.7-7