ADDENDUM
TO THE SAN JOSE DOWNTOWN STRATEGY 2000 FINAL ENVIRONMENTAL IMPACT REPORT (SCH # 2003042127)

Pursuant to Section 15164 of the CEQA Guidelines, the City of San Jose has prepared an Addendum to the San Jose Downtown Strategy 2000 Final Environmental Impact Report (Strategy 2000 FEIR) because minor changes made to the project, as described below, do not raise important new issues about the significant impacts on the environment.

**PP16-074 – Downtown Strategy 2000 Phase 1 Second Adjustment.** Proposal to amend the Downtown Strategy 2000 Plan to allow for an intensification of residential and office growth capacity in Phase 1 of the Strategy 2000 Plan as follows: 1) increase residential capacity from 5,500 units to 7,500 units (an increase of 2,000 units); and 2) increase office capacity from 1.4 million square feet to 2 million square feet (an increase of 600,000 square feet). No changes would be made to the retail square footage or hotel rooms in Phase 1 (350,000 square feet of retail and 900 hotel rooms). These increases in Phase 1 growth capacity will be accommodated by reducing the amount of development in the subsequent three phases of development, with no change to the total amount of development at buildout. **Location:** The Greater Downtown area, roughly bounded by Coleman Avenue and Julian Street to the north, 4th Street to the east (except a six-block extension to 7th Street between St. John and San Fernando Streets), I-280 to the south, and the CalTrain right-of-way and Stockton Avenue to the west. **Council District:** 3.

The environmental impacts of this project were addressed by a Final Environmental Impact Report titled, "The Downtown Strategy 2000 Final Environmental Impact Report," (Strategy 2000 FEIR) adopted by City Council Resolution No. 72767 on June 21, 2005. The proposed project is eligible for an addendum pursuant to CEQA Guidelines §15164, which states that: “A lead agency or responsible agency shall prepare an addendum to a previously certified EIR if some changes or additions are necessary but none of the conditions described in CEQA Guidelines §15162 calling for preparation of a subsequent EIR have occurred.” Circumstances which would warrant a subsequent EIR include substantial changes in the project or new information of substantial importance which would require major revisions of the previous EIR due to the occurrence of new significant impacts and/or a substantial increase in the severity of previously identified significant effects.

The following impacts were reviewed and found to be adequately considered by the Strategy 2000 FEIR:

- Traffic and Circulation
- Cultural Resources
- Urban Services
- Aesthetics
- Energy
- Water Quality
- Soils and Geology
- Hazardous Materials
- Biotic Resources
- Airport Considerations
- Greenhouse Gas Emissions
- Utilities
- Noise
- Land Use
- Air Quality
- Microclimate
- Construction Period Impacts
- Facilities and Services
Greenhouse gas emissions from developments citywide were analyzed in the Final EIR prepared for the Envision San Jose 2040 General Plan, which was adopted subsequent to the Downtown Strategy 2000 FEIR.

**BACKGROUND**

The Strategy 2000 FEIR is a broad range, program-level environmental document, which analyzed anticipated growth in the Downtown Core. The FEIR and supporting Traffic Impact Analysis (TIA) analyzed following development capacity for future growth in the Greater Downtown Core Area during the planning horizon of Strategy 2000:

- 11,200,000 square feet of office space;
- 8,500 residential dwelling units;
- 1,400,000 square feet of retail space; and
- 3,600 guest rooms of hotel space, in four to five hotel projects.

The Strategy 2000 FEIR and TIA divided this development capacity into four phases (Phase 1 through 4) of 25% increments, which were tied to the completion of specified infrastructure improvements, as follows:

| Table 1: Original Downtown Strategy 2000 Development Capacity |
|--------------|------------|-----------|------------|------------|
|              | Phase 1    | Phase 2   | Phase 3    | Phase 4    |
| Office Space (sq. ft.) | 2,800,000  | 2,800,000 | 2,800,000  | 2,800,000  |
| Residential Dwelling Units | 2,125      | 2,125     | 2,125      | 2,125      |
| Retail (sq. ft.)         | 350,000    | 350,000   | 350,000    | 350,000    |
| Hotel Guest Rooms        | 900        | 900       | 900        | 900        |

In October 2014, an Addendum to the San José Downtown Strategy 2000 Final EIR was prepared to adjust Phase 1 development levels to meet market demand by allowing additional residential units while reducing the amount of office development. It was determined at that time that the proposed Phase 1 changes (increasing residential capacity from 2,125 units to 5,500 units and decreasing office capacity from 2.8 million square feet to 1.4 million square feet) would not result in any new traffic impacts beyond those already identified the Strategy 2000 EIR. Therefore, the Phase 1 levels for residential and office development were adjusted in 2014. Table 2 shows the adjustment in development capacity covered by the 2014 Addendum.

| Table 2: Revised Downtown Strategy 2000 Development Capacity – First Phasing Adjustment (October 2014) |
|----------|------------|-----------|------------|------------|
|          | Phase 1    | Phase 2   | Phase 3    | Phase 4    |
| Office Space (sq. ft.) | 1,400,000  | 4,200,000 | 2,800,000  | 2,800,000  |
| Residential Dwelling Units | 5,500      | 1,000     | 1,000      | 1,000      |
| Retail (sq. ft.)         | 350,000    | 350,000   | 350,000    | 350,000    |
| Hotel Guest Rooms        | 900        | 900       | 900        | 900        |

In May 2015, the City Council directed planning staff to prepare a new EIR for the Downtown Strategy that:
1) Updates the traffic analysis based on Envision San José 2040 General Plan
Transportation goals, potentially reducing or modifying the required mitigation measures
and plans identified in EIR. Reducing mitigation is especially important because
dissolution of the Redevelopment Agency removed the funding source for such
mitigation;
2) Updates Downtown development levels to reflect the current General Plan;
3) Increases the maximum residential and office capacities allowed in Downtown;
4) Expands the Downtown boundary;
5) Removes or modifies the phasing of development connected to the construction of traffic
improvements identified as mitigation in the Downtown Strategy 2000 EIR; and
6) Updates and clarifies development capacities to reflect the adoption of the Diridon
Station Area Plan.

The new EIR is under preparation as staff determines the amount of additional development that
can be accommodated Downtown above the levels currently approved. However, the demand
for Downtown development has continued to increase such that past, current, and reasonably
probable projects are again, about to exceed the adjusted Phase 1 development levels. It is
anticipated that the adjusted Phase I development levels will be exceeded in advance of
certification of the new Downtown Strategy EIR (expected in Spring 2017). To continue to
approve development in Downtown while the EIR is being prepared, a 2nd Addendum to the
Downtown Strategy 2000 EIR is required.

Since certification of the Strategy 2000 FEIR in 2005, there have been a number of changed
circumstances. These include the fact that the Redevelopment Agency, which was identified in
the EIR as the source of funds for the construction of identified transportation improvements,
was eliminated by state legislation in 2011. The elimination of the Redevelopment Agency
removed the primary funding mechanism for build-out of each phase of development. Thus, the
identified transportation improvements are the responsibility of the City and because the
improvements have not been financially feasible to date, the City is pursuing other funding
sources/methods.

In addition, the City is utilizing an updated traffic model (CUBE) with 2015 traffic counts and
more intersections were added to the Downtown that are now exempt from the city-wide
minimum LOS standard of D. Additional intersections were also added to the City’s list of
Protected Intersections, meaning by City policy, those intersections will not be further expanded
and additional delay/congestion is considered acceptable from new development, provided those
projects provide “offsetting improvements” or in-lieu fees to benefit other modes of travel in the
vicinity of those intersections.

Downtown is again approaching the residential capacities identified in the adjusted Phase 1 and
the demand for office development will also exceed that allowed in Phase 1. Two main traffic
improvements were identified in the EIR as being necessary during Phase 1 development; the
extension of Autumn Parkway from Coleman Avenue to West Santa Clara Street and the
widening of Coleman Avenue from four to six lanes. Autumn Street has been extended south to
the UPRR tracks and is currently being constructed to West Julian Street. The remainder of the
extension (from West Julian Street to West St. John Street) has yet to be implemented but is
included in the City’s 2014-2018 Capital Improvement Program and was included in the
Background Condition for the traffic analysis described in detail, below. Coleman Avenue has
yet to be widened; therefore, one of the purposes of the traffic analysis described below was to
determine if the widening of Coleman Avenue is required for the implementation of Phase 1 development.

**PROPOSED ADJUSTMENT**

This Addendum addresses a second adjustment to the development phasing in the Strategy 2000 FEIR. This second adjustment will 1) increase the Phase I residential capacity from 5,500 units to 7,500 units (an increase of 2,000 units); and 2) increase the Phase I office capacity from 1.4 million square feet to 2 million square feet (an increase of 600,000 square feet). No changes would be made to the retail square footage or hotel rooms in any of the phases. These increases in Phase 1 development capacity will be accommodated by reducing the amounts of development in subsequent phases of development, as shown in Table 3, below. The total amount of development at buildout will remain the same as that analyzed in the Strategy 2000 FEIR.

| Table 3: Revised Downtown Strategy 2000 Development Capacity – Second Phasing Adjustment (July 2016) |
|---|---|---|---|---|
| Office Space (sq. ft.) | 2,000,000 | 3,600,000 | 2,800,000 | 2,800,000 |
| Residential Dwelling Units | 7,500 | 250 | 250 | 500 |
| Retail (sq. ft.) | 350,000 | 350,000 | 350,000 | 350,000 |
| Hotel Guest Rooms | 900 | 900 | 900 | 900 |

**ANALYSIS**

CEQA Section 15164 states that a Lead Agency shall prepare an Addendum to a previously certified EIR if some changes or additions are necessary but none of the conditions described in CEQA Section 15162 calling for preparation of a subsequent EIR have occurred. Circumstances that would warrant a subsequent EIR include substantial changes in the project or new information of substantial importance which would require major revisions of the previous EIR due to the occurrence of new significant impacts and/or a substantial increase in the severity of the previously identified significant effects.

A traffic analysis was completed to evaluate the effects of adding 2,000 residential units and 600,000 square feet (sf) of office space to the currently approved Phase 1 development levels of the Strategy Plan (attached).

The objective of the analysis was to evaluate traffic conditions and the need for the widening of Coleman Avenue as part of the Phase 1 transportation improvements utilizing updated traffic data and traffic forecasting modeling tools. The analysis is based on baseline conditions that reflect current traffic conditions on the roadway system and assumes the completion of the Autumn Parkway extension between Coleman Avenue and St. John Street.

A total of 120 intersections were evaluated, including those that were identified in the 2004 traffic analysis to be impacted by the planned Phase 1 Strategy Plan development and/or identified to operate at LOS E or F conditions under Strategy Plan buildout conditions. The evaluation utilized the City of San José’s standard near-term analysis methodology and included the following scenarios:
**Scenario 1:** Existing Conditions. Existing conditions are represented by existing peak-hour traffic volumes on the existing roadway network. Year 2014-2015 counts were utilized for all study intersections to represent existing conditions. This scenario includes Phase 1 development that is currently constructed since its traffic volume is already included within the existing traffic counts.

**Scenario 2:** Background Conditions. Background traffic volumes are represented by adding to the existing volumes the projected volumes from approved and planned developments that have not yet been constructed and occupied. Approved project trips and/or approved projects information were obtained from the City of San Jose ATI database. Background conditions represent the baseline conditions to which each of the Phase 1 project conditions are compared for the purpose of determining project impacts.

**Scenario 3:** Approved Phase 1 Development Conditions. The City’s CUBE model was used to forecast traffic growth associated with the currently approved Phase 1 development levels. Approved Phase 1 Development conditions traffic volumes were produced by applying traffic growth forecasted by the model (future condition forecasts minus base year (2015) forecasts) to background traffic volumes. The forecasted traffic volumes consist of only the unconstructed Phase 1 development levels within the Downtown area and completion of the Autumn Street extension to St. John Street. Approved Phase 1 development conditions were evaluated relative to background conditions to determine impacts and necessary improvements.

**Scenario 4:** Adjusted Phase 1 Development Conditions. Similar to Scenario 3, the City’s CUBE model was used to forecast traffic growth associated with the adjusted Phase 1 development levels (addition of 600,000 sf of office space and 2,000 residential units). Adjusted Phase 1 conditions were evaluated relative to background conditions to determine impacts and necessary improvements.

Trip generation estimates were prepared for the approved and adjusted Phase 1 land uses. When compared to the approved Phase 1 land uses, the proposed Phase 1 land use adjustments would result in an additional 1,956 trips during the AM peak hour and 2,134 additional trips during the PM peak hour.

Of the 120 intersections evaluated, 12 are projected to operate at LOS E or F under the adjusted Phase 1 conditions. The remainder would continue to operate at LOS D or better under the adjusted Phase 1 conditions. Conditions improved slightly at two intersections: Race Street/The Alameda and First Street/Taylor Street. Four of the 12 intersections were identified to be impacted in the Strategy 2000 FEIR and are projected to continue to operate at LOS E or worse under the adjusted Phase 1 conditions. These intersections are Coleman Avenue/Taylor Street, Oakland Road/Commercial Street, and US 101/Oakland Road (North and South). The Coleman Avenue/Taylor Street intersection is a Downtown intersection and therefore, exempt from the City’s Level of Service Policy. The other three intersections are included in the 101/Oakland Transportation Development Policy (TDP), as described below.

The US 101/Oakland TDP is intended to manage traffic congestion generated by near-term new development in the vicinity of the US 101/Oakland interchange. The TDP is intended to promote General Plan goals for economic development and housing, improve the US 101/Oakland Road interchange, and construct the new US 101/Mabury Road interchange to accommodate new development. The TDP recognizes and allows for the LOS of signalized intersections covered by...
the TDP to temporarily exceed City’s LOS standards until the required improvements are constructed.

Six additional intersections are projected to operate at LOS E or F under adjusted Phase 1 conditions. All of these intersections are either within Downtown and thus, exempt from the City’s Level of Service policy or on the City’s list of Protected Intersections. It should be noted that each of these intersections were projected to operate either LOS E or F with buildout of the Strategy 2000 Plan. Phase 1 land use adjustments will not result in impacts to any intersections that were not already identified in the original Downtown Strategy 2000 FEIR.

CONCLUSION

The proposed adjustments to the Phase 1 development capacities will not change the overall development capacity of the Strategy 2000 Plan at buildout. Adjustments to the housing and office development levels in Phase 1 will not result in any new traffic impacts beyond those previously identified in the Strategy 2000 FEIR and/or would not result in impacts to intersections at which there has not already been a disclosure of impact and policies and/or improvement plans established. Further, it has been determined that the widening of Coleman Avenue between Taylor Street and Hedding Street is not required for the implementation of adjusted Phase 1 development. Therefore, it can be concluded that the proposed adjustment of the approved Strategy Phase 1 development would not result in a significant change to intersection operations that were reported in the original Downtown Strategy 2000 FEIR.

David Keyon
Environmental Project Manager

Harry Freitas, Director
Planning, Building and Code Enforcement

7/15/16
Date

7/15/16
Deputy

Memorandum

Date: July 13, 2016
From: Robert Del Rio, T.E.
Subject: Downtown San Jose Strategy 2000 Plan EIR Addendum Traffic Analysis

Introduction

This memo presents an analysis of proposed adjustments to the office and residential development levels that are currently approved for Phase 1 of the Strategy Plan 2000. The analysis was completed as part of an addendum to the approved Environmental Impact Report (EIR) for the Downtown Strategy 2000 Plan. A traffic study was completed for the Strategy 2000 Plan EIR in 2005. The analysis is necessary due to changes in traffic conditions, development growth, and policy changes within the Downtown area that have an effect on roadway improvements that were identified in the 2004 EIR traffic analysis. The Phase 1 development adjustments will allow for pending and reasonably probable development while identifying an adjusted timing for the major roadway improvements, such as the Autumn Street extension and Coleman Avenue widening, that were originally identified as part of Phase 1.

Project Understanding

The study evaluates the effects of adding 600,000 square feet (s.f.) of office space and 2,000 residential units to the currently approved Phase 1 development levels of the Strategy Plan that consist of:

- 5,500 residential units
- 1.4 m.s.f. of office space
- 350,000 s.f. of retail
- 900 hotel rooms

The proposed adjustments to the Phase 1 office and residential development levels will result in additional growth within Phase 1. However, the total planned development growth within the Downtown area remains as identified with the approved Strategy 2000 EIR. Therefore, the conclusions regarding traffic impacts and mitigation identified in the 2005 Strategy 2000 Plan EIR remain valid. The objective of the analysis is to evaluate the need for the roadway improvements that were identified as necessary to support the Phase 1 development levels of the Strategy Plan utilizing updated traffic data and traffic forecasting modeling tools. The analysis is based on baseline conditions that reflect current traffic conditions on the roadway system and assumes the completion of the Autumn Street extension between Coleman Avenue and St. John Street.

Scope of Work

This study provides an evaluation of traffic conditions and the need for roadway improvements due to the proposed increase in Phase 1 development levels on key intersections in the Downtown area during the weekday AM and PM peak hours. The study intersections included intersections that were identified in the 2005 traffic analysis to be impacted by the planned Phase 1 Strategy Plan development and/or identified to operate at LOS E or F conditions under Strategy Plan buildout conditions. This evaluation is essentially a comparison between a project scenario and a “no project” scenario, showing conditions with and without the proposed land use adjustments.

The City’s current CUBE traffic forecasting model was utilized to develop projected traffic volume growth associated with the approved and proposed increase in Phase 1 development. The potential intersection level
of service impacts of the proposed land use adjustments were evaluated in accordance with the standards set forth by City of San Jose and the Congestion Management Program (CMP) of Santa Clara County and compared with the approved Strategy 2000 plan EIR analysis.

The following scenarios were evaluated during the weekday AM and PM peak hours:

**Scenario 1:** *Existing Conditions.* Existing conditions are represented by existing peak-hour traffic volumes on the existing roadway network. Year 2014-2015 counts were utilized for all study intersections to represent existing conditions. This scenario includes Phase 1 development that is currently constructed since its traffic volume is already included within the existing traffic counts.

**Scenario 2:** *Background Conditions.* Background traffic volumes are represented by adding to the existing volumes the projected volumes from approved and planned developments that have not yet been constructed and occupied. Approved project trips and/or approved projects information were obtained from the City of San Jose ATI database. The ATI database includes the Phase 1 trips that were originally projected as part of the 2005 traffic analysis. The Phase 1 trips were removed from the ATI given that the Phase 1 trips are included in Scenarios 3 and 4 as described below. Background conditions represent the baseline conditions to which each of the Phase 1 project conditions are compared for the purpose of determining project impacts.

**Scenario 3:** *Approved Phase 1 Development Conditions.* The City’s CUBE model was used to forecast traffic growth associated with the currently approved Phase 1 development levels. Approved Phase 1 Development conditions traffic volumes were produced by applying traffic growth forecasted by the model (future condition forecasts minus base year (2015) forecasts) to background traffic volumes. The forecasted traffic volumes consist of only the unconstructed Phase 1 development levels within the Downtown area and completion of the Autumn Street extension to St. John Street. Approved Phase 1 development conditions were evaluated relative to background conditions in order to determine impacts and necessary improvements.

**Scenario 4:** *Adjusted Phase 1 Development Conditions.* Similar to Scenario 3, the City’s CUBE model was used to forecast traffic growth associated with the adjusted Phase 1 development levels (addition of 600,000 s.f. of office space and 2,000 residential units). This scenario includes the completion of the Autumn Street extension to St. John Street. Adjusted Phase 1 conditions were evaluated relative to background conditions in order to determine impacts and necessary improvements.

**Projected Traffic Volumes**

Traffic forecasts for this analysis were completed utilizing the City’s current traffic forecasting model, CUBE. The TRANPLAN transportation modeling software was utilized for traffic forecasting assignments at the time the Strategy 2000 EIR traffic analysis was completed in 2004-2005. However, the TRANPLAN model software is no longer available for use. The CUBE transportation modeling software, which was used to develop Year 2040 traffic projections for the Envision San Jose 2040 General Plan, has since replaced the TRANPLAN modeling software. Therefore, to complete a comparison of Strategy 2000 Phase 1 conditions without and with the proposed land use adjustments, it was necessary to reproduce the projected traffic conditions for the original Strategy 2000 Phase 1 scenario (Approved Phase 1) using the CUBE traffic modeling software. However, this analysis is not intended to serve as an update to the traffic analysis for the completed and approved EIR. The original Strategy 2000 traffic report included as part of the approved Strategy 2000 EIR should be referenced for additional information regarding the Strategy 2000 traffic analysis.

**Approved and Adjusted Phase 1 Land Use Trip Generation Comparison**

Phase 1 of the approved Strategy 2000 plan includes 1.4 msf of office space and 5,500 residential units. The proposed Phase 1 land use adjustment consists of the intensification of residential and office/commercial
space within Phase 1 to include an additional 2,000 residential units and 600,000 sf of office space. There is no proposed change to the identified retail and hotel land uses of the plan.

For informational purposes, trip generation estimates were prepared for the approved and adjusted Phase 1 land uses. When compared with the approved Phase 1 land uses, the proposed Phase 1 land use adjustments would result in an additional 1,956 trips during the AM peak hour and 2,134 additional trips during the PM peak hour. The project trip generation estimates comparison is presented in Table 1.

**Intersection Level of Service Analysis**

The purpose of the intersection level of service analysis is to determine the effects of the proposed Phase 1 land use adjustments on the roadway system and evaluate its consistency with the approved Downtown Strategy 2000 Plan EIR. Table 2 presents a summary of only those intersections (12 intersections) that are projected to operate at LOS E or F conditions under the updated and adjusted Phase 1 conditions. The remainder of the 120 study intersections would continue to operate at LOS D or better conditions under the approved and adjusted Phase 1 conditions.

The level of service analysis indicates that operations at each of the four intersections that were identified to be impacted in the original Strategy 2000 Phase 1 analysis would continue to operate at LOS E or worse conditions under the adjusted Phase 1 conditions:

- Coleman Avenue and Taylor Street (Downtown Core)
- Oakland Road and Commercial Street (101/Oakland TDP)
- US 101 and Oakland Road (North) (101/Oakland TDP)
- US 101 and Oakland Road (South) (101/Oakland TDP)

In addition, the analysis indicates that the widening of Coleman Avenue from a four-lane roadway to a six-lane roadway as identified within the original EIR is not necessary to serve Phase 1 development levels.

Six additional intersections are projected to operate at LOS E or F conditions under the Adjusted Phase 1 conditions.

- Delmas Avenue and Park Avenue (Downtown Core Exempt)
- Almaden Boulevard and San Carlos Street (Downtown Core Exempt)
- Market Street and San Carlos Street (Downtown Core Exempt)
- Meridian Avenue and San Carlos Street (Protected Intersection)
- First Street and Taylor Street (Protected Intersection)
- Oakland Road and Hedding Street (Protected Intersection)

Each of the six intersections were projected to operate at LOS D or better conditions under the original Strategy 2000 Phase 1 analysis. However, each of the six intersections were projected to operate at LOS E or F conditions with buildout of the Strategy 2000 plan.

**Mitigation Requirements**

Mitigation is not required at any of the 10 intersections identified above as there are adopted policies that are applicable to each of the intersections as described below.

**Downtown Core**

Recognizing that the Downtown area serves as a center for financial and business activities, development within the Downtown area boundary is exempt from the City’s level of service policy and traffic mitigation requirements.

**Protected Intersections**

The City of San Jose Protected Intersection Policy provides an exemption for intersections that serve as gateways to the greater Downtown area from the City’s level of service policy. Protected Intersections consist
of locations (there are a total of 29) that have been built to their planned maximum capacity and where expansion of the intersection would have an adverse effect on other transportation facilities (such as pedestrian, bicycle, transit systems, etc.). Protected Intersections are, therefore, not required to maintain a Level of Service D, which is the City of San Jose standard. The deficiencies at all 29 Protected Intersections in the City of San Jose have been disclosed and overridden in previous EIRs.

**US 101/Oakland TDP**

The US 101/Oakland Transportation Development Policy (“TDP”) is intended to manage traffic congestion generated by near-term new development in the vicinity of the US 101/Oakland interchange. The TDP has been developed to promote General Plan goals for economic development and housing, improve the US 101/Oakland Road interchange, and construct the new US 101/Mabury Road interchange to accommodate new development. The TDP recognizes and allows for the LOS of signalized intersections covered by the TDP to temporarily exceed City’s LOS standards until the required improvements are constructed.

**Conclusions**

The results of the analysis for the proposed Strategy 2000 Phase 1 land use adjustments and comparison to the original Downtown Strategy 2000 Plan EIR show that the projected intersection operations are either consistent with those identified in the original Downtown Strategy 2000 Plan EIR and/or would not result in impacts to intersections at which there has not already been a disclosure of impact and policies and/or improvement plans established. In addition, the analysis indicates that the widening of Coleman Avenue from a four-lane roadway to a six-lane roadway as identified within the original EIR is not necessary to serve Phase 1 development levels. The proposed Phase 1 land use change would not result in a sufficient increase in trips that would cause the degradation of levels of service at any intersection that was projected to operate at LOS C or better conditions in the original EIR by two letter grades. Therefore, based on the City’s LOS D standard, the proposed Phase 1 land use change would not result in a significant impact at intersections projected to operate at LOS C conditions.
## Table 1
Trip Generation Comparison

<table>
<thead>
<tr>
<th>Land Use</th>
<th>Approved Strategy 2000 Phase 1</th>
<th>Adjusted Strategy 2000 Phase 1</th>
<th>Change in Residential Trips</th>
<th>Change in Office Trips</th>
<th>Total Net Difference</th>
</tr>
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<tr>
<td></td>
<td>AM Peak Hour Trips</td>
<td>PM Peak Hour Trips</td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td></td>
<td>Size</td>
<td></td>
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<td>1,299</td>
<td></td>
<td></td>
</tr>
<tr>
<td>Hotels</td>
<td>900 rooms</td>
<td>477</td>
<td>540</td>
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<tr>
<td><strong>Total</strong></td>
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<tr>
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<td>AMP</td>
<td>PM</td>
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<tr>
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</tr>
<tr>
<td>Hotels</td>
<td>900 rooms</td>
<td>477</td>
<td>540</td>
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<td><strong>Change in Residential Trips</strong></td>
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<td><strong>Total Net Difference</strong></td>
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Source:
## Table 2
### Intersection Levels of Service Summary

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<th>Study Intersection</th>
<th>Peak</th>
<th>Count Date</th>
<th>Existing Conditions</th>
<th>Approved Phase 1 Conditions</th>
<th>Adjusted Phase 1 Conditions</th>
<th>Original EIR</th>
<th>Phase 1 Impact?</th>
<th>Mitigation Required?</th>
<th>Notes</th>
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<td>Delmas Avenue and Park Avenue</td>
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* Denotes CMP designated intersection  
Bold indicates unacceptable LOS.  
Bold and boxed indicates significant impact.  
Downtown Core = Intersection is located within Downtown Growth Area and is exempt from City’s S-3 LOS Policy.  
Protected = Intersection is included in the City’s Protected Intersection Policy.  
Note: Intersection delay was shown to improve at the Race Street/Alameda & Tenth Street/Hedding Street intersections with the Phase 1 land use adjustments. The reduction in delay is due to the assignment of Phase 1 trips by the Traffic Demand Forecasting model. In addition to land use interaction, the model also accounts for roadway congestion and travel time when assigning traffic. Therefore, an increase in development size does not necessarily equate to a proportional increase in trips and intersection delay.