



September 27, 2012

Melinda Denis, Planner  
City of Mountain View  
Planning Department  
500 Castro Street  
Mountain View, CA 94041

Re: Comments to the Notice of Preparation for the 870 E. El Camino Real Project

Dear Melinda:

Thank you for allowing the City of Sunnyvale to review the Notice of Preparation for the project proposed at 870 E. El Camino Real, immediately adjacent to the City of Sunnyvale. We have the following comments relating to the project:

**General Comments:**

1. The project is located immediately adjacent to several properties in Sunnyvale. A commercial auto repair business is adjacent to the site along El Camino Real and several multi-family residential properties are located east of the project site. Based on the provide site plan, new residential uses will be located within close proximity to an existing tire retail and repair facility. Adequate noise and air quality analysis should be undertaken to determine appropriate mitigation measures for the proposed project.
2. Planned outreach meetings should include nearby property owners and residents located within Sunnyvale. A noticing list can be provided by Sunnyvale staff upon request.
3. Based on the provided project site plan, the use of the proposed building at the northeast corner of the site is unclear. This structure is located within close proximity to residential uses to the east.
4. The City of Sunnyvale has an adopted Precise Plan for El Camino Real which serves as a guide for redevelopment along this major corridor. You may reference this document from the following link:  
<http://sunnyvale.ca.gov/Portals/0/Sunnyvale/CDD/Non-Residential/FINAL%20Precise%20Plan%20for%20ECR%202007%20WEB.pdf>

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**Transportation Related Comments:**

1. The City of Sunnyvale uses criteria of the VTA TIA Guidelines as a basis for determining study intersections. Accordingly, municipal and CMP intersections with ten or more project trips per approach lane should be analyzed. In light of the project size and location, it is expected that project trips would travel to the east through Sunnyvale which is likely to trigger the need for intersections analysis.
2. The need for evaluating alternative modes of transportation needs to be emphasized for this project. El Camino Real serves local and express bus routes, and is planned to be a Bus Rapid Transit (BRT) route. The VTA CMP Guidelines indicate that traffic analysis must include transit facilities in terms of transit service availability, transit capacity relative to the increased demand, impact of increased traffic delays on the service, and the need for transit access improvements. According to the CMP Guidelines, the traffic analysis must also evaluate bicycle and pedestrian facilities in terms of their availability, project effects on future bike/pedestrian plans, and improvements proposed by the project. It should be noted that El Camino Real is designated in the City of Sunnyvale Bicycle Plan for future establishment of Class II bike route. Maps and information on existing and planned bicycle facilities can be supplied upon request.
3. The project site is located on the westerly boundary of the City of Sunnyvale. Relevant approved projects within Sunnyvale and other neighboring jurisdictions need to be included in the study estimates of the Background traffic volumes. This is consistent with the CMP TIA Guidelines. Similarly, pending projects and/or the application of an annual growth rate need to be incorporated in the Cumulative traffic volume estimates in order to reflect the growth in both the local and regional traffic. Please be advised that the City of Sunnyvale regularly updates a list of its approved and pending development projects which is published on the web site and can be accessed using the following link: <http://sunnyvale.ca.gov/Departments/CommunityDevelopment/CurrentProjectsandHearings/DevelopmentUpdates.aspx>.
4. Besides capturing local and regional traffic growth, it should be noted that Background analysis is typically conducted for the year of project completion and occupancy, while the Cumulative analysis is performed for a longer term horizon year.
5. This mixed used development project is proposing to establish 333 residential units, 6,270 square foot of retail space, recreation and community space, 564 parking stalls, and outdoor communal spaces including a pool, a courtyard, and a public park. Demolition of the existing 25 structures, and construction of the proposed buildings and associated

amenities is expected to generate a significant amount of truck traffic. Truck routes and construction related impacts on the City of Sunnyvale and regional corridors need to be investigated and mitigated if necessary.

6. The NOP lists the EIR's requirement to identify the environmental consequences including (a) any significant environmental effects which cannot be avoided, (b) the growth inducing impacts, and (c) the cumulative impacts. Besides identifying the individual and cumulative project impacts along with associated feasible mitigations, it is important to also explain the project's full/pro-rata share financial contributions towards the implementation of these mitigations.
7. In addition to the aforementioned mitigation costs, I would kindly refer you to regional improvements already identified in the Regional Transportation Plan (RTP) which is published on the VTA web site. When utilizing regional road improvements as project mitigations, please clarify construction schedule of these improvements relative to the schedule of the development completion. I would also refer you to local improvements within the City of Sunnyvale that are already identified in the City's Deficiency Plan. If needed, a copy of the Sunnyvale Deficiency Plan can be supplied to Mountain View staff. Deficiency plans and impact fees are established to address existing and future deficiencies in the transportation system. Such fees would be applicable to any project with a net increase in trip generation, regardless of whether or not the project would have significant environmental impacts. Nexus and fair share issues as they relate to transportation mitigation through the payment of fees should be addressed in the EIR.
8. Means, such as traffic calming, should be considered in case the development project would result in cut-through traffic on neighborhood streets within Sunnyvale. It is also recommended to describe any potential Transportation Demand Management (TDM) measures planned to be deployed by the project.
9. The proposed project is significant in size and is expected to affect the Sunnyvale street system. Following to the CMP guidelines, the City of Sunnyvale is requesting to review the draft TIA report. We believe that the early review of the project's traffic analysis and potential impacts could save time in the review and approval process of the EIR.

We truly appreciate your consideration of our comments in this matter. Please contact Ryan Kuchenig, Associate Planner, at (408) 730-7431 or via email at [rkuchenig@ci.sunnyvale.ca.us](mailto:rkuchenig@ci.sunnyvale.ca.us), if you have any questions or concerns about items discussed in this letter. Traffic related comments can be directed to Heba El-Guendy at (408) 730-2713 or via e-mail at [heiguendy@ci.sunnyvale.ca.us](mailto:heiguendy@ci.sunnyvale.ca.us).

Sincerely,

A handwritten signature in black ink, appearing to read 'R. Kuchenig', written in a cursive style.

Ryan Kuchenig  
Associate Planner  
Planning Division  
Community Development Department

Cc: Hanson Hom, Director Community Development  
Trudi Ryan, Planning Officer  
Andrew Miner, Principal Planner