



APPENDIX H

Complete Streets Policy Review Memo



To: City of Cupertino
From: Parin Patel and Christopher Kidd, Alta Planning + Design
Date: September 30, 2025
Re: City of Cupertino Complete Streets Policy Review

Introduction

This memo provides a review of the City of Cupertino Complete Streets Policy, and how the policy below aligns with the current funding eligibility requirements for the Metropolitan Transportation Commission (MTC) and the Santa Clara Valley Transportation Authority (VTA). Cupertino’s Complete Streets Policy was also measured against external metrics for Complete Streets policies, established by [City Health and Smart Growth America](#).

Recommended updates to the policy include examples of design standards, inclusion of equity and vulnerable communities, involvement of city departments and stakeholders, inclusion of data-based analyses, public input, and performance measures. Both MTC and VTA periodically update their Complete Streets Policies; the City of Cupertino should continue to modify their Complete Streets policy into the future to retain funding eligibility.

Complete Streets Policy Recommendations

In April 2018, the City of Cupertino adopted a Complete Streets Policy to further the goals of meeting the safety, access and mobility needs of all users of the roadways¹. The 2018 policy can be found [here](#).

While the 2018 Complete Streets Policy is not out of compliance with funding eligibility, the following recommended updates will help strengthen funding eligibility, as well as meet the “Silver” designation of CityHealth’s Complete Streets policies.² As VTA is in the middle of a process to revise their Complete Streets Policy as of the publication date of this memo, the City of Cupertino should wait until after the new VTA Complete Streets Policy is adopted to pursue any updates to their Complete Streets Policy in order to eliminate duplicative efforts. Recommendations are shown in bold and underlined.

A. Complete Streets Principles

1. **Complete Streets Serving All Users**. The City of Cupertino, through its 2015 Mobility Element update of the General Plan, has committed to creating and maintaining Complete Streets that provide safe, comfortable and convenient travel along and across streets, roads, highways, bridges, and other portions of the transportation system through a comprehensive, integrated transportation network that serves all categories

¹ [Staff Report.pdf](#)

² [Complete Streets - CityHealth — Helping everyone live healthy, full lives](#)

of users, including pedestrians, bicyclists, persons with disabilities, motorists, movers of commercial goods, users and operators of public transportation, seniors, children, youth, and families.

2. **Context Sensitivity.** In planning and implementing street projects, departments of the City of Cupertino shall maintain sensitivity to local conditions in both residential and business districts as well as urban, suburban, and rural areas, and shall work with residents and businesses to ensure that a strong sense of place ensues. Improvements that may be considered include sidewalks, shared use paths, bicycle lanes, bicycle routes, paved shoulders, street trees and landscaping, planting strips, accessible curb ramps, crosswalks, refuge islands, pedestrian signals, signs, street furniture, bicycle parking facilities, public transportation stops and facilities, transit priority signalization, and other features assisting in the provision of safe travel for all users as identified in adopted plans.

Proposed Addition: The project meets professional design standards or guidelines appropriate for bicycle and/or pedestrian facilities. (City should list explicit design standards and/or adopted plans they will follow; this could include):

- **NACTO Urban Street Design Guide**
- **NACTO Transit Street Design Guide**
- **United States Department of Justice ADA Standards for Accessible Design**
- **U.S. Access Board Proposed Guidelines for Pedestrian Facilities in the Public Right-of-Way**
- **Caltrans Class IV Bikeway Guidance (Separated Bikeways/Cycle Tracks), DIB 89**
- **City/County General + Area Plans**
- **Bicycle, Pedestrian & Transit Plan**
- **Community-Based Transportation Plan**
- **ADA Transition Plan**
- **Station Access Plan**
- **Short-Range Transit Plan**
- **Vision Zero/Systematic Safety Plan**

3. **Complete Streets Routinely Addressed by all Departments.** All relevant departments of the City of Cupertino shall work towards making Complete Streets practices a routine part of everyday operations, approach every relevant project, program, and practice as an opportunity to improve streets and the transportation network for all categories of users, and work in coordination with other agencies and jurisdictions to maximize opportunities for Complete Streets, connectivity and cooperation.

Proposed Addition: The city department which leads the project planning and/or implementation will bear the responsibility of ensuring that the project aligns with all Complete Street guidelines and ensures project sponsors and partners are actively engaged. This includes coordination with VTA, the Water District, MTC, Caltrans, local CBOs, and a local (city or county) Bicycle and Pedestrian Advisory Commission (BPAC). The BPAC should also be included in reviewing MTC's complete streets checklist.

4. **All Projects and Phases.** Complete Streets infrastructure sufficient to enable reasonably safe travel along and across the right of way for each category of users, consistent with the City's Mobility Element update, shall be incorporated into all planning, funding, design, approval and implementation processes for any construction, reconstruction, retrofit, maintenance, operations, alteration, or repair of streets, roads, highways, bridges and other portions of the transportation system, except that specific infrastructure for a given category of users may be excluded if an exemption is approved via the process set forth in section C.1 of this policy.

Proposed Addition: Developers of private projects must also meet Complete Streets standards, except that specific infrastructure for a given category of users may be excluded if an exemption is approved via the process set forth in section C.1 of this policy.

B. Implementation

1. **Plan Consultation and Consistency.** Maintenance, planning, and design of projects affecting the transportation system shall be consistent with local bicycle, pedestrian, transit, multimodal, and other relevant plans, except that where such consistency cannot be achieved without negative consequences, consistency shall not be required if the head of the relevant department provides written approval explaining the basis of such deviation.

Proposed Addition: The project / plans include a timeline for the review and improvements to the project selection criteria.

2. **Street Network/Connectivity.** Consistent with the City's Mobility Element update, the City of Cupertino shall incorporate Complete Streets infrastructure into existing streets to improve the safety and convenience of users, with the particular goal of creating a connected network of facilities accommodating each category of users, and increasing connectivity across jurisdictional boundaries and between existing and anticipated future areas of travel origination or destination.

Proposed Addition: The project or plan will review the High Injury Network (HIN) and include a traffic safety assessment if a high incidence of bicyclist / pedestrian-involved crashes is found within the project area. If the project includes a bikeway, a Level of Traffic Stress (LTS), or similar assessment will be conducted.

3. **Bicycle Pedestrian Commission Consultation.** Transportation projects shall be reviewed by the Cupertino Bicycle Pedestrian Commission early in the planning and design phase to provide the Cupertino Bicycle Pedestrian Commission an opportunity to provide comments and recommendations regarding Complete Streets features to be incorporated into the project.

Proposed Addition: City of Cupertino staff, or project leads, should also seek community input on projects and programs early in the planning and design stages.

4. **Evaluation.** All relevant departments shall perform evaluations of how well the streets and transportation network of the City of Cupertino are serving each category of users by collecting baseline data and collecting follow-up data on a regular basis.

Proposed Addition: Performance metrics, strategies, and mechanisms will produce actionable data that accounts for equity and is made publicly available. Performance metrics will align with the City of Cupertino’s ATP.

C. Exceptions

1. **Exception Approvals.** Projects that seek exception from the Complete Streets approach must provide written finding of how exceptional circumstances dictated that accommodations for all modes were not to be included in the project. The memorandum should be signed by the Public Works Director or an equivalently senior staff person or his/her designee. Projects that are granted exceptions must be made publicly available for review.

CityHealth Complete Street Policy Assessment

CityHealth is an initiative by the de Beaumont Foundation and Kaiser Permanente, in partnership with Smart Growth America, to streamline evidence-based policy solutions that improve and support the health and well-being of people and communities. The Complete Streets policy ensures that streets are “designed and maintained to meet all our needs. Whether you walk, bike, roll, drive, or use public transit, we all deserve streets that are safe. Tragically, people in the United States are struck and killed, maimed, and seriously injured by vehicles on unsafe streets at alarming rates. All people from all neighborhoods should have access to Complete Streets that help them get where they need to go, live, play, and grow.”³

CityHealth’s Complete Streets Policy Checklist⁴

The following policies were taken into consideration for recommended updates to the City of Cupertino’s Complete Streets Policy:

1. Lays out a clear vision about the goal of creating a complete, connected transportation network that allows all users to safely travel to and from destinations
2. Defines which projects, programs, and interventions (including new construction, reconstruction/ retrofit, maintenance and ongoing operations) will be subject to the policy
3. Describes the balance and prioritization of different modes of travel, with an emphasis on non-motorized mobility
4. Specifies the design guidelines that will be adopted and/or created
5. Describes vulnerable users and how they will be identified, protected, and prioritized

³ [Complete Streets - CityHealth — Helping everyone live healthy, full lives](#)

⁴ [Complete-Streets-Policy-Action-Guide.pdf](#)

6. Designates entities or departments that will be responsible for implementing the policy
7. Describes a robust and inclusive community engagement plan
8. Describes performance measures, strategy and mechanisms that will produce actionable data that accounts for equity and is made publicly available
9. Lists the specific, and limited, exceptions to the policy
10. Indicates how private development projects will be encouraged, incentivized, and guided to comply with the policy
11. Includes the timeline for the review and improvements to the project selection criteria

Medal Designation

City Health grades the adopted Complete Streets Policies of cities across America on a Bronze-to-Gold medal scale. To meet the Silver designation, the City of Cupertino’s complete street policies should include the following:

- City has a complete streets policy.
- Policy requires compliance.
- Policy balances pedestrians, bicyclists, and at least two other modes.
- Policy references the adoption of specific design guidelines, and/or requires the development or revision of internal design policies and guides.
- Policy explicitly prioritizes vulnerable users.
- Policy requires compliance of all new construction, reconstruction, and retrofit projects.
- Policy references compliance of all maintenance projects and ongoing operations.

Funding Eligibility

Metropolitan Transportation Commission

MTC updated their regional policy for provision of Complete Streets in 2022 (Resolution 4493)⁵. This policy works to advance Plan Bay Area 2050 objectives of achieving mode shift, safety, equity, and vehicle miles traveled and greenhouse gas emission reductions, as well as state & local compliance with applicable CS-related laws, policies, and practices, specifically the California Complete Street Act of 2008 (Gov. Code Sections 65040.2 and 65302) and applicable local policies such as the CS resolutions adopted before January 16, 2016 (as part of MTC’s OBAG 2 requirements.)

This policy applies to transportation project planning, design, funding, construction, reconstruction, and maintenance activities. A Complete Streets checklist from projects seeking discretionary funding or funding endorsements from MTC is required. MTC’s CS Policy requires that all projects (with a total project cost of \$250,000 or more) applying for regional discretionary transportation funding – or requesting regional endorsement or approval through MTC – must submit a Complete Streets Checklist (Checklist) to MTC.

The following topics must meet Complete Streets Policy Considerations:

⁵ [MTC Resolution No. 4493 Approved](#)

1. **Bicycle, Pedestrian and Transit Planning** – Does Project implement relevant Plans, or other locally adopted recommendations? Plan examples include:
 - City/County General + Area Plans
 - Bicycle, Pedestrian & Transit Plan
 - Community-Based Transportation Plan
 - ADA Transition Plan
 - Station Access Plan
 - Short-Range Transit Plan
 - Vision Zero/Systematic Safety Plan
2. **Active Transportation Network** – Does the project area contain segments of the regional Active Transportation (AT) Network? [See AT Network map on the [MTC Complete Streets webpage](#).]
3. **Safety and Comfort**
 1. Is the Project on a known High Injury Network (HIN) or has a local traffic safety analysis found a high incidence of bicyclist/ pedestrian-involved crashes within the project area?
 2. Does the project seek to improve bicyclist and/or pedestrian conditions? If the project includes a bikeway, was a Level of Traffic Stress (LTS), or similar user experience analyses conducted?
4. **Transit Coordination**
 1. Are there existing public transit facilities (stop or station) in the project area?
 2. Have all potentially affected transit agencies had the opportunity to review this project?
 3. Is there a MTC [Mobility Hub](#) within the project area?
5. **Design** – Does the project meet professional design standards or guidelines appropriate for bicycle and/or pedestrian facilities?
6. **Equity** – Will Project improve active transportation in an Equity Priority Community (EPC)?
7. **BPAC Review** – Has a local (city or county) Bicycle and Pedestrian Advisory Commission (BPAC) reviewed this checklist. The CS Checklist MTC review will begin once the BPAC meeting has occurred.

The MTC Complete Streets Checklist can be found here: [Complete Streets Checklist | Metropolitan Transportation Commission](#)

Santa Clara Valley Transportation Authority

VTA updated their Complete Streets principles and practices to all transportation capital projects and funding programs in December 2017⁶ and is currently (as of 2025) in the process of updating their Complete Streets Policy. The following from the 2017 Complete Streets Policy apply:

⁶ https://www.vta.gov/sites/default/files/2022-07/Attachment-A3_Complete-Streets-Policy.pdf

1. **Serve All Users** – All transportation improvements must be planned, designed, constructed, operated and maintained to support safe and convenient access for all users, and increase mobility for walking, bicycling and transit use.
2. **Use Context Sensitive Design** – VTA staff should design transportation projects to be appropriate for the surrounding land use, community character, and function of the transportation facility. Designs should reflect desired or anticipated future conditions.
3. **Maintain or Enhance Networks** – With every transportation project, VTA staff should seek opportunities to create, maintain or enhance network connectivity for all users, and ensure that the user experience is maintained across jurisdictional boundaries. The transportation network for pedestrians, bicyclists, and transit riders should not be severed or degraded with the completion of new or modified transportation infrastructure.
4. **Incorporate Technology** – VTA staff should incorporate technology to improve safety and operations of the roadway system for all users, and to improve information dissemination.
5. **Be Consistent with Adopted Plans**– VTA staff should assure consistency with regional, local and VTA planning documents, including the Countywide Bicycle Plan, Pedestrian Access to Transit Plan, Transit Passenger Environment Plan, VTA’s corridor studies, Metropolitan Transportation Commission’s Regional Transportation Plan, and Member Agency planning documents.
6. **Maintain Transportation Infrastructure** –With every transportation project, VTA staff should seek opportunities to maintain, upgrade, or replace transportation infrastructure and technology, using asset management best practices.
7. **Seek and Respond to Public Input**– VTA staff should seek community input on transportation projects and programs early in the planning and design stages. Input should be sought from relevant VTA Advisory Committees, local communities, and other stakeholders.
8. **Build Complete Streets Infrastructure** – VTA staff should proactively seek opportunities to integrate Complete Streets infrastructure into every transportation project.
9. **Design Using Latest and Best Practice Design Standards and Guides** – VTA staff should: (i) use latest and best practice multi-modal design standards and guides when developing and delivering capital projects; (ii) consult innovative pedestrian, bicycle, and transit design manuals; and (iii) seek new examples as innovations are tested. Examples of national, state, and local design standards/guidelines that support Complete Streets include:

National

- American Association of State Highway and Transportation Officials (AASHTO) Policy on Geometric Design of Highways and Streets
- AASHTO Guide for the Planning, Design, and Operation of Pedestrian Facilities
- AASHTO Guide for the Development of Bicycle Facilities
- Institute of Transportation Engineers (ITE) Designing Walkable Urban Thoroughfares

- ITE Recommended Design Guidelines to Accommodate Pedestrians and Bicycles at Interchanges
- National Association of City Transportation Officials (NACTO) Urban Bikeway Design Guide
- NACTO Urban Street Design Guide
- NACTO Transit Street Design Guide
- NACTO Urban Street Stormwater Guide

Regulatory

- United States Department of Justice ADA Standards for Accessible Design
- U.S. Access Board Proposed Guidelines for Pedestrian Facilities in the Public Right-of-Way

State

- California Highway Design Manual and all Deputy Directives and Design Information Bulletins
- California Manual on Uniform Traffic Control Devices and adopted Interim Approvals
- Main Street, California – A Guide for Improving Community and Transportation Vitality
- Caltrans Class IV Bikeway Guidance (Separated Bikeways/Cycle Tracks), DIB 89

Local

- VTA Community Design and Transportation Manual of Best Practices for Integrating Transportation and Land Use
- VTA Bicycle Technical Guidelines
- VTA Pedestrian Technical Guidelines
- VTA Multi-Modal Design Practices and Principles
- Santa Clara Valley Urban Runoff Pollution Prevention Program C.3 Stormwater Handbook