



Loma Prieta Chapter serving San Mateo, Santa Clara & San Benito Counties

May 9, 2016

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Re: City Place Santa Clara FINAL Environmental Impact Report (FEIR) comments

Dear Ms. Fernandez,

Thank you for providing the opportunity for the Sierra Club Loma Prieta Chapter Sustainable Land Use Committee to comment on the proposed City Place Project FEIR.

We have reviewed the Responses to the comments made on the Draft EIR, attended the Study Sessions and have the following observations.

1. General Plan

we do not agree that the project is "*not in conflict with policies in the General Plan*". Given the magnitude of the impacts on jobs, housing, land use, open space, air quality and other environmental factors, it is clear that, in order for a project of this size to be considered and move forward some work on the general plan is required.

At the very least a **North Santa Clara Specific Plan** needs to be undertaken to see how the cumulative impacts of the mixed-use, entertainment, office district, the new high-density housing at East Tasman, and changes that the City may want to consider on other properties within this district will affect the quality of life for the future residents and users of this area.

2. Jobs Housing imbalance: We are pleased to see the proposed change to the EIR specifying the desire to include 11,000 new housing units.

If a North Santa Clara area Specific Plan is undertaken it would be desirable to include Mixed Use/ Housing zoning in proximity to intense office development and to include the zoning for service amenities that are needed to support a mature city center.

3. Mobility and Transportation : *The EIR projects that the development will reduce daily trips from office use by 4% and peak-hour traffic by 10%, for residential use the EIR projects daily trips reduced by 2% and peak traffic by 4%.*

"Mitigation Measure TRA-1.1 would not be feasible because the current trip reduction targets are aggressive and reasonably achievable and would result in trip generation rates that are below those for typical development projects. For the reasons outlined below, increasing the trip reduction targets would not be expected to be successful and therefore is not feasible. "

We believe that the EIR response to the transportation demand management strategies proposed in our comments, and in several other comment letters, aim to find excuses for why stronger TDM strategies are difficult and not possible. Experience indicates that when goals are set, that behavior can and will be changed.

However, if the trip reduction goals cannot be any better than are currently proposed in the EIR, and therefore the traffic impacts, locally and regionally, are going to be very significant and unmitigatable, then **the reduced intensity alternative is really the only direction to go until it can be demonstrated that traffic impacts can be absorbed by improvements to the transportation infrastructure or that stronger TDM is taking hold.**

- **This suggests that the City Council needs to seriously consider the reduced intensity alternative for regional and local traffic considerations.**

4. Need for transparency and open monitoring: We note that a TDM program is to be studied in order to meet VTA congestion management requirements. However, it is critical that this strategy be open, transparent and subject to public comment.

It is not acceptable that the program and progress be reviewed only by the planning director for final approval. We believe reporting to City Council and Council approval should be a requirement. See item 5 below.

5. Phased approvals contingent on meeting traffic mitigation, mode share changes and housing needs: Given the shortage of housing to meet job density in this location, and the importance of successful TDM to address the seriousness of regional traffic impacts being created, we suggest that the EIR needs to include the following statement:

"Final approvals for phases 2 and 3 entitlements shall be approved by City Council, and shall be contingent on meeting TDM goals set in the TDM program accepted by the City and the developer and evaluation of the progress of housing starts in the pipeline to ensure that the jobs/housing balance is not being negatively impacted."

6. Parks and Open Space:

The loss of over 240 acres of city open space is in direct conflict with general plan policy which states that the already low rate of 2.4 acres per 1000 population shall be maintained if not improved as Santa Clara continues to experience growth.

The general plan notes that the city of Santa Clara has access to the County of Santa Clara open space. As the largest city in the county, with the obvious exception of San Jose, Santa Clara needs consider its position as a civic leader and its responsibility to its citizens as well as to the region, in providing amenities such as open space for recreation and habitat.

We believe the opportunity to create a wide usable linear park and habitat along the river, as many other cities are doing that have a real, living and potentially iconic river as an asset, would be its most significant and memorable contribution to the recreational opportunities in the region rather than relying on regional open space provided by its smaller neighbors and the county.

7. Pedestrian and bicycle investments as part of TDM

As in the case of many other cities, Santa Clara needs to require and establish and require clear priority for bicycle access, for this development, so that commuting by bicycle is a realistic option. This means looking **at a radius of approximately 5 miles to ensure connected and safe bike access to the project area.** This

could entail providing bike lanes as well as improving access using trails. A Fair Share of the cost of this infrastructure should be paid for the developer.

8. Air Quality

We do not agree that greenhouse gas caused by traffic is not relevant as is suggested in the response to the comments raised with regard to traffic caused by the project.

The transportation demand management plan must prioritize and achieve transit, pedestrian and bicycle travel, safety, and connectivity, above cars, using clearly stated and measurable goals for shifting the mode share, and a pro-active program for meeting these goals. These are all currently missing in the proposed plan and associated EIR and need to be specifically noted, in the EIR, as needing to be included in the proposed TDM plan.

9. Hydrology Water Quality

Creek protection: The creeks that run along the property, are valued assets of the region. We continue to point out that new roadways proposed along San Tomas Aquino Creek and the Guadalupe River have the potential to degrade water quality by airborne dust, toxic tire does an toxic brake dust. Given the size of the properties every attempt should be made to avoid routing roads along creeks.

10. Cumulative impacts

The EIR inadequately addresses proposed projects in the pipeline in San Jose and Sunnyvale, both adjoining cities, within very close proximity to the project site. In fact, just across the river. We believe the EIR needs to be revised to include the traffic impacts of adjacent cities.

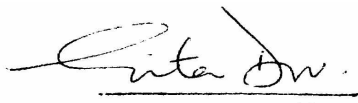
Cumulative impacts on water supply must be also be analyzed and addressed.

11. Alternatives

Given the apparently unmitigatable impacts of severe traffic, as outlined in the responses to EIR comments, it seems clear that the city needs to **seriously consider going to the reduced intensity alternative**. In that scenario, the site plan proposed by the developer indicates Parcels one, two and three as having office buildings with only on grade parking sprawled across the entire sites.

It is quite clear that the reduced office space obviously requires less land and can be accumulated on fewer parcels so that the community will be able to put its recreational open space to alternative recreational uses. We believe that development of recreational space is an appropriate community benefit for development rights on the public land.

Respectfully submitted:



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