



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

January 17, 2017

John Davidson, Principal Planner,
City of Santa Clara
1500 Warburton Avenue, Santa Clara 95050

Re Tasman East Specific Plan - EIR Scoping Comments

Dear Mr Davidson,

We thank the City of Santa Clara for providing the Sierra Club Loma Prieta the opportunity to comment on the preparation of the environmental impact report for Tasman East Specific Plan. We believe that the proposed residential mixed use development will help to improve the pressing issue of jobs-housing imbalance prevailing in the city and the Bay area.

The notice of preparation covers various environmental and social issues impacted by the proposed development, but we believe a few more areas need to be analyzed in the environmental impact report.

A. Proposed Alternative for Reduced Impacts

Reduced density at the site is not the appropriate alternative to study, for reduced impacts, since the reason for revising the General Plan with the Specific Plan is to provide a higher density at this location. We believe the addition of supportive infrastructure is the appropriate Alternative to analyze for reduced impact. This is particularly appropriate given that it is adjacent to the large City Place development, Levi's stadium and the Convention Center.

Therefore, rather than looking at the impacts of decreasing development, the most effective strategy for decreasing the environmental impact is to examine what changes could be made in the infrastructure to achieve lower traffic environmental impacts.

Proposed Alternative One:

1. With an approach of "Mobility as a Service" , also known as MaaS¹, to reduce the traffic impacts at this project, consider the addition of a new multi-modal station at the NW of the

¹ [Mobility-as-a-Service \(MaaS\)](#), describes a shift away from personally owned modes of transportation and towards mobility solutions that are consumed as a service or utility. This shift is also fueled by a myriad of innovative new mobility service providers such as [ride-sharing](#) and [e-hailing](#) services, [bike-sharing](#) programs, and [car-sharing](#) services as well as on-demand "pop-up" bus services. On the other hand, the trend is motivated by the anticipation of [self-driving cars](#), which put in question the economic benefit of owning a personal car over using on-demand car services.

intersection of Tasman and Lafayette, that would serve Tasman East, City Place and Levi's Stadium and would provide:

- More frequent and regular heavy and light rail service.
 - Local bus service with several lines, discussed during City Place Study Sessions
 - Regular and frequent shuttle service to Downtown Santa Clara station and Diridon station, BART, Caltrain and future hi-speed rail
 - Car share, bike share, bike valet parking and repair and autonomous (self-driving) vehicles² parking
 - Easy and attractive pedestrian and bike access connecting across Lafayette street to Tasman East and access across Tasman to Levi's stadium
2. In addition, analyze and include the reduced environmental impacts of ALL unbundled, paid parking in every building at Tasman East.
 3. Assume every building to be Zero-Net Energy³, as will be required by CA code in 2020.
 4. Assume improvements to the bicycle trail system for connected and safe access improving the percentage of people able to use bicycles safely for trips

B. EIR Sections

Additional issues that we would request be included in the following sections of the EIR include:

1. **Aesthetics:** Bird-friendly design⁴ requires careful use of glass surfaces and building volume design to minimize bird strikes.

Attractive design, with articulated volumes and facades, and high quality detailing and materials, make higher density buildings more appealing to the public. These features should be included as mitigation for desired higher density.

2. Air Quality:

In order to meet the BAAQMD's requirements for air quality, we would prefer that the EIR not be satisfied with suggesting that reduced air quality is a significant and unmitigatable impact. We expect that robust mitigation strategies will be included in mitigation strategies to promote improved access to mobility to reduce auto use.

- Include a robust transportation demand management plan that will provide various travel options to the future residents of the proposed site.
- We also recommend a Transportation Management Association (TMA- hopefully in association with City Place), as a mitigation strategy, for the study area. It will not

² The DMV released its updated draft of its "autonomous vehicles deployment regulations" in September 2016 and [final rules are expected shortly](#) to provide a clear path for driverless testing in the coming months. Senator Jerry Hill announced Senate Bill 145 to eliminate a 180-day waiting period in order to get autonomous vehicles on the road in 2017.

³ [Zero-Net Energy](#): California's revisions to Title 24 put in place ambitious performance goals: all residential buildings must be Zero Net Energy (ZNE) by 2020, and all commercial buildings must follow suit by 2030.

⁴ [Bird-friendly design guidelines](#): Reduce glass reflectivity, light pollution, etc <http://sf-planning.org/standards-bird-safe-buildings> and <http://sanjoseca.gov/DocumentCenter/View/35>

only analyze the travel patterns, but also pool resources to facilitate appropriate travel options that connect various destinations in the vicinity.

3. Biological Resources:

Increased intensity of development along the Guadalupe River will tend to have a negative effect of the riparian corridor as well as the adjacent Ulistac Natural Area. We look to the EIR to consider strategies to mitigate these negative effects

Along the river edge, mitigations should include a 200' setback within which the natural edge of the river be restored to healthy habitat.

Factors such as height of the buildings adjacent to the river, glazing of the buildings, and lighting along the river edge and the buildings' interior and exterior lighting can have significant negative impact on the birds, insects and wildlife along the river and need to be addressed in the environmental impact report. We recommend adding a Habitat Overlay Zone⁵ of 200' that protects the wildlife along the river and bird-friendly design guidelines for the project.

We recommend including a resilient landscape framework⁶, as mitigation, that minimizes impacts and revitalizes the ecology impacted due to development of the proposed project. The plan proposes to require open spaces of varying sizes. We recommend connecting the spaces by green corridors to create a connected ecology within the proposed site as mitigation for increased density's negative impact that replaces the existing low rise development.

Section 4. Cultural Resources: The notice of preparation suggests the environmental impact report will discuss impacts to the cultural, archaeological, and historical impacts of the development. Currently the area is a relatively quiet, semi industrial zone with no activity at night.

- The natural environment does not benefit from activity 24/7. We recommend analyzing the quality of place created by the proposed project that enhances the street activity and makes the streets and outdoor spaces a social place and we look to the EIR to include mitigations that keep the river edge, and the zone close to the river, quiet and dark during the night.

Section 6. GHG and Energy and Section 12. Transportation

Traffic impacts and transportation are key elements in this EIR (as well as in the adjacent proposed City Place development). To reduce automobile usage and the associated GHG and air quality

- Along with the analysis of impact of vehicular traffic generated by the proposed project on key intersections and freeways, it is essential that traffic mitigation measures should

⁵ See [Section 5 Habitat and Biological resources](#), City of Mountain View, North Bayshore Precise Plan includes Habitat Overlay Zones along habitat corridors and edges.
<http://www.mountainview.gov/civicax/filebank/blobdload.aspx?BlobID=20935>

⁶ "[Landscape resilience Framework](#)" by San Francisco Estuary Institute
http://www.sfei.org/sites/default/files/biblio_files/SFEI_2015_Landscape%20Resilience%20Framework.pdf

be devised. These measures will work to reduce auto trips and encourage alternative transportation and mobility⁷ travel patterns.

- To reduce auto-oriented development, mitigations should include reducing the parking ratios in the development, implement paid parking for the residents, and provide car-pooling and car-sharing options for the residents, include bicycle facilities.
- Along with minimum, maximum parking ratios should be required mitigation.
- Provision for electric vehicle chargers should be made mandatory in the development of the proposed project.
- A very critical element is a pedestrian priority environment and the EIR should comment on the "walkability" of the proposed project. Making walking the easiest mode of transport for errands is an important goal.

Section 8: Hydrology and Water Quality

Water quality will be effected by both construction period and later, by the higher percentage of impervious surface and water conservation.

In order to prevent any deterioration in water quality in the river and in ground water:

- Include Low Impact Development (LID)⁸ strategies, as mitigation strategies, to protect water quality, reduce run-off and save storm and waste water at the source.
- The setback at the River edge should be required to be fenced and protected during construction to ensure that dust, dirt and debris during construction does not pollute the water. Dust control shall used during construction.

Section 10: Noise

Currently the area is relatively quiet with the adjacency of the golf course. In addition, traffic noise would be amplified in high density development with the noise contained between the hard surfaces of buildings.

- As mitigation we believe that noise reduction asphalt⁹ roadways, increasingly popular in the Bay Area, will reduce the newly introduced traffic noise significantly, making high density development less stressful due to the increase in noise levels.

⁷ Including [Safe Routes to School](http://www.dot.ca.gov/hq/LocalPrograms/saferoutes/saferoutes.htm) for nearby elementary school across Tasman.

www.dot.ca.gov/hq/LocalPrograms/saferoutes/saferoutes.htm

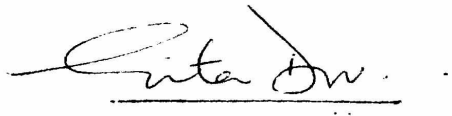
⁸ [Low Impact Development \(LID\)](http://www.lowimpactdevelopment.org/links.htm) – Low Impact Development is a sustainable practice that benefits water supply, increases infiltration and storage of storm water and contributes to water quality protection.
<http://www.lowimpactdevelopment.org/links.htm>

⁹ [Report on Status of Rubberized Asphalt Traffic Noise Reduction](#): The conclusions of the 6-year study, in Sacramento, California, indicate that the use of rubberized asphalt on Alta Arden Expressway resulted in a 60% reduction in traffic noise energy, and a clearly perceptible decrease in traffic noise. This traffic noise attenuation from rubberized paving is similar to the results documented in several non-related studies conducted in recent years at other locations, both nationally and internationally.

In Summary: We hope these comments will be helpful in analyzing the impacts created by the proposed project as well as devise the mitigation measures needed to create a Specific Plan for a sustainable development at East Tasman.

We strongly believe that the only useful Alternative to be analyzed for reduced impacts is requiring implementation of infrastructure to support **increased Mobility options**.

Respectfully Submitted,

A handwritten signature in black ink, appearing to read "Gita Dev", written over a horizontal line.

Gita Dev, Co-Chair, Sustainable Land Use Committee
Sierra Club Loma Prieta

cc Santa Clara Planning Commission
 Melissa Cerezo, Valley Transportation Authority
 Corinne M. Winter, Winter Consulting Group
 Gladwyn D'Souza, Transportation Committee, Sierra Club Loma Prieta
 James Eggers, Exec. Director, Sierra Club Loma Prieta
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