GENERAL PLAN LAND USE COMPONENT AND HOUSING ELEMENT UPDATES

EIR Addendum

Prepared for
City of Santa Clara

November 2014

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SECTION 1
Introduction

This addendum was prepared in accordance with the California Environmental Quality Act (CEQA) and the CEQA *Guidelines*. This document has been prepared to serve as an addendum to the previously certified Santa Clara 2010-2035 General Plan Integrated Final Environmental Impact Report (EIR), which consists of the consolidated First Amendment Final EIR and Draft EIR. The City of Santa Clara (City) is the lead agency for the environmental review of the proposed City of Santa Clara General Plan Land Use components and Housing Element updates for the 2015-2022 planning period (the project).

A. Background and Purpose of the EIR Addendum

The General Plan is anticipated to be implemented in three phases, and the first phase was completed at the end of 2014. The timeframe for implementation of Phase II is anticipated to be from 2015 to 2023, and Phase III is expected to occur between 2023 and 2035. The timing of the phases is generally aligned with the housing element update cycles, which are mandated by the State. Rather than seeking a comprehensive update to the General Plan, the City will modify the existing 2010-2035 City of Santa Clara General Plan through the adoption of new and revised housing and land use policies at the end of each phase.

The City's previous Housing Element was revised in 2010 and certified by the State HCD in February 2012 and is in compliance with State Housing Element Law. The adoption of the proposed Housing Element update is consistent with the state law requirement that each city and county update the housing element of its general plan every eight years in order to establish and update housing and land use strategies reflective of changing needs, resources, and conditions. Minor text changes are proposed to the City's adopted General Plan Housing Element.

The proposed Land Use component update is intended to encompass all related changes within the 2015 Housing Element as well as to reflect changes that have occurred with implementation of Phase I of the General Plan, from 2010-2014. The proposed Land Use component update includes new and revised land use policies, an updated land use map, and reporting on the City's status and progress of implementing General Plan programs and the progress of growth since plan adoption. The proposed Land Use component update is also revised to reflect all new legislative and legal updates since adoption of the 2010-2035 General Plan.

Under CEQA, the City must determine whether the proposed changes would require a new or supplemental EIR, or whether an addendum would suffice. Section 2, *Project Description*, provides detailed description of the proposed changes. In determining whether an addendum is the appropriate document to analyze the modifications to the project and its approval, State CEQA *Guidelines* Section 15164 (addendum to an EIR or Negative Declaration) states:

a) The lead agency or a 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 Section 15162 calling for preparation of a subsequent EIR have occurred.

b) An addendum to an adopted negative declaration may be prepared if only minor technical changes or additions are necessary or none of the conditions described in Section 15162 calling for the preparation of a subsequent EIR or negative declaration have occurred.

c) An addendum need not be circulated for public review but can be included in or attached to the final EIR or adopted negative declaration.

d) The decision-making body shall consider the addendum with the final EIR or adopted negative declaration prior to making a decision on the project.

e) A brief explanation of the decision not to prepare a subsequent EIR pursuant to Section 15162 should be included in an addendum to an EIR, the lead agency's required findings on the project, or elsewhere in the record. The explanation must be supported by substantial evidence.

B. CEQA Framework for an Addendum

According to CEQA *Guidelines* Section 15162, once an EIR has been certified, no subsequent or supplemental EIR shall be prepared for a project unless the lead agency determines that one or more of the following occurs (emphasis added):

1. Substantial changes are proposed in the project which will require major revisions of the previous EIR or negative declaration due to the involvement of new significant environmental effects or a substantial increase in the severity of previously identified significant effects;

2. Substantial changes occur with respect to the circumstances under which the project is undertaken which will require major revisions of the previous EIR or Negative Declaration *due to the involvement of new significant environmental effects or a substantial increase in the severity of previously identified significant effects*; or

3. New information of substantial importance, which was not known and could not have been known with the exercise of reasonable diligence at the time the previous EIR was certified as complete or the Negative Declaration was adopted, shows any of the following:

    a. The project will have one or more significant effects not discussed in the previous EIR or negative declaration;

    b. Significant effects previously examined will be substantially more severe than shown in the previous EIR;

    c. Mitigation measures or alternatives previously found not to be feasible would in fact be feasible, and would substantially reduce one or more significant effects of the project, but the project proponents decline to adopt the mitigation measure or alternative; or

d. Mitigation measures or alternatives which are considerably different from those analyzed in the previous EIR would substantially reduce one or more significant effects on the environment, but the project proponents decline to adopt the mitigation measure or alternative.

An addendum may be prepared if some changes or additions are necessary to a certified EIR and none of the above-stated conditions apply (CEQA *Guidelines* Section 15164). Based on a review of the New Project (as described in Section 2, *Project Description*) and surrounding circumstances (i.e., the Environmental Setting), this addendum concludes that there is no substantial change proposed that would require major revisions to the previous EIR; that there is no substantial change in circumstances as a result of project modifications that would cause new or substantially more severe significant impacts (see Section 3, *Environmental Impacts and Mitigation Measures*); and, that there is no new information of substantial importance that identifies new or more intense significant impacts (CEQA *Guidelines* Section 15162).

C. Organization and Scope

The EIR addendum is organized into the following four sections:

Section 1, Introduction: Provides an introduction and overview describing the intended use of the EIR addendum.

Section 2, Project Description: Provides a description of the Santa Clara 2010-2035 General Plan EIR and the proposed Land Use component and Housing Element updates addendum (project).

Section 3, Environmental Impacts and Mitigation Measures: Contains an analysis of environmental topic areas that were addressed in the 2010-2035 General Plan EIR and describes how the environmental affects in this addendum are found to be similar or different to the findings in the General Plan EIR.

Section 4, Conclusion: Summarizes the findings in this EIR addendum.

SECTION 2
Project Description

A. Project Location and Setting

Project Location

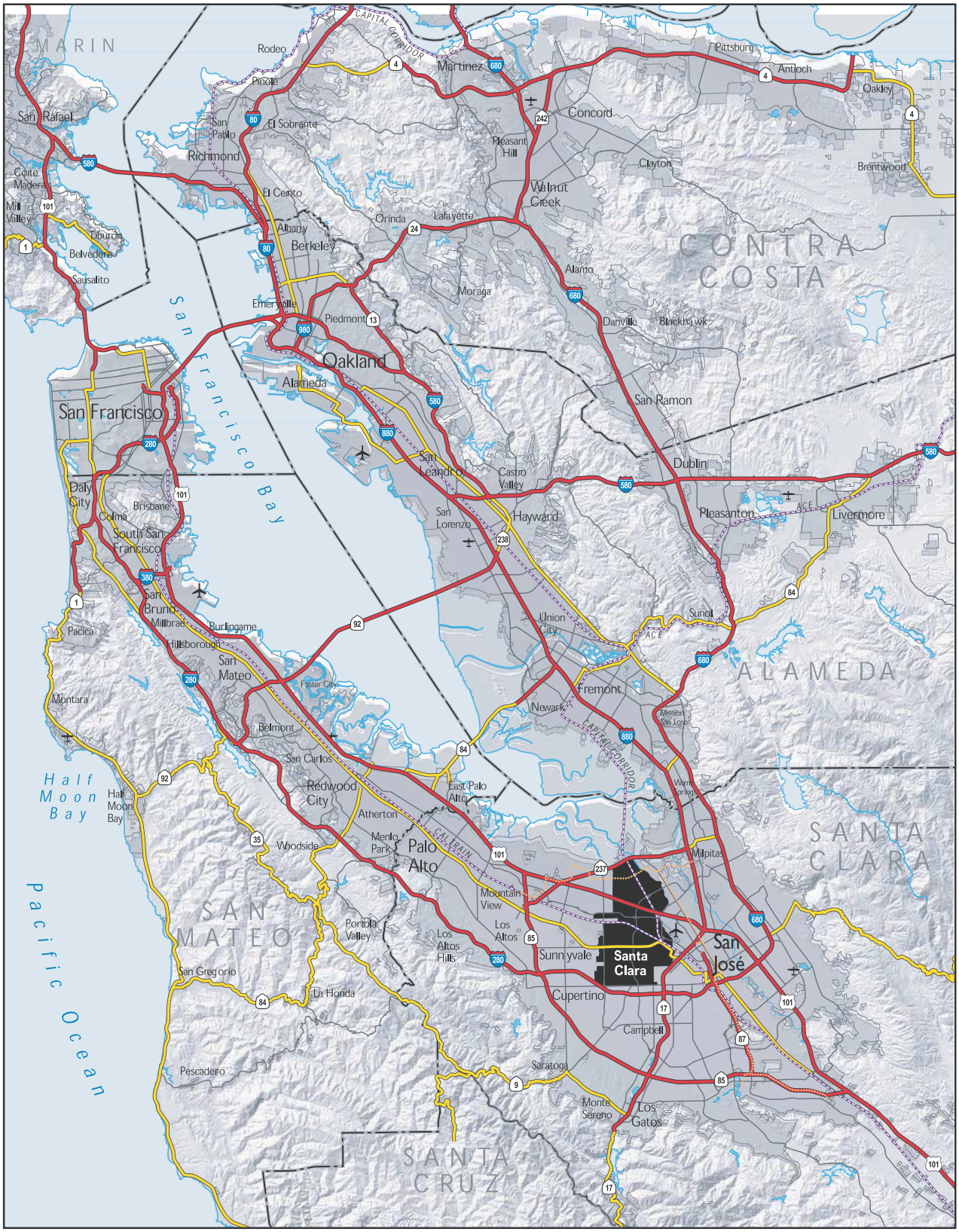
The project location consists of all areas within the City of Santa Clara General Plan Planning Area, which include all incorporated areas located within the boundaries of the City of Santa Clara.

Project Setting

The City of Santa Clara is located at the center of the Santa Clara Valley, between the Santa Cruz Mountains to the southwest and the Diablo Range to the northeast. Santa Clara is at the southern end of the San Francisco Bay, approximately 40 miles south of San Francisco. Three seasonal creeks run through the City and empty into the southern portion of the San Francisco Bay: the San Tomas Aquino, Saratoga and Calabazas Creeks. Additionally, the City is bordered by the Guadalupe River to the northeast.

The City is completely surrounded by neighboring jurisdictions: San José to the north, east and south, and Sunnyvale and Cupertino to the west. U.S. Highway 101 traverses east-west through the center of the City, while State Route 237 is located to the north and Interstates 880 and 280 skirt the southeast and southwest corners of the City, respectively. Existing transit lines include Caltrain, Altamont Commuter Express (ACE), Capitol Corridor, and Valley Transportation Authority (VTA) bus and light rail. The City's regional location is shown in **Figure 1**.

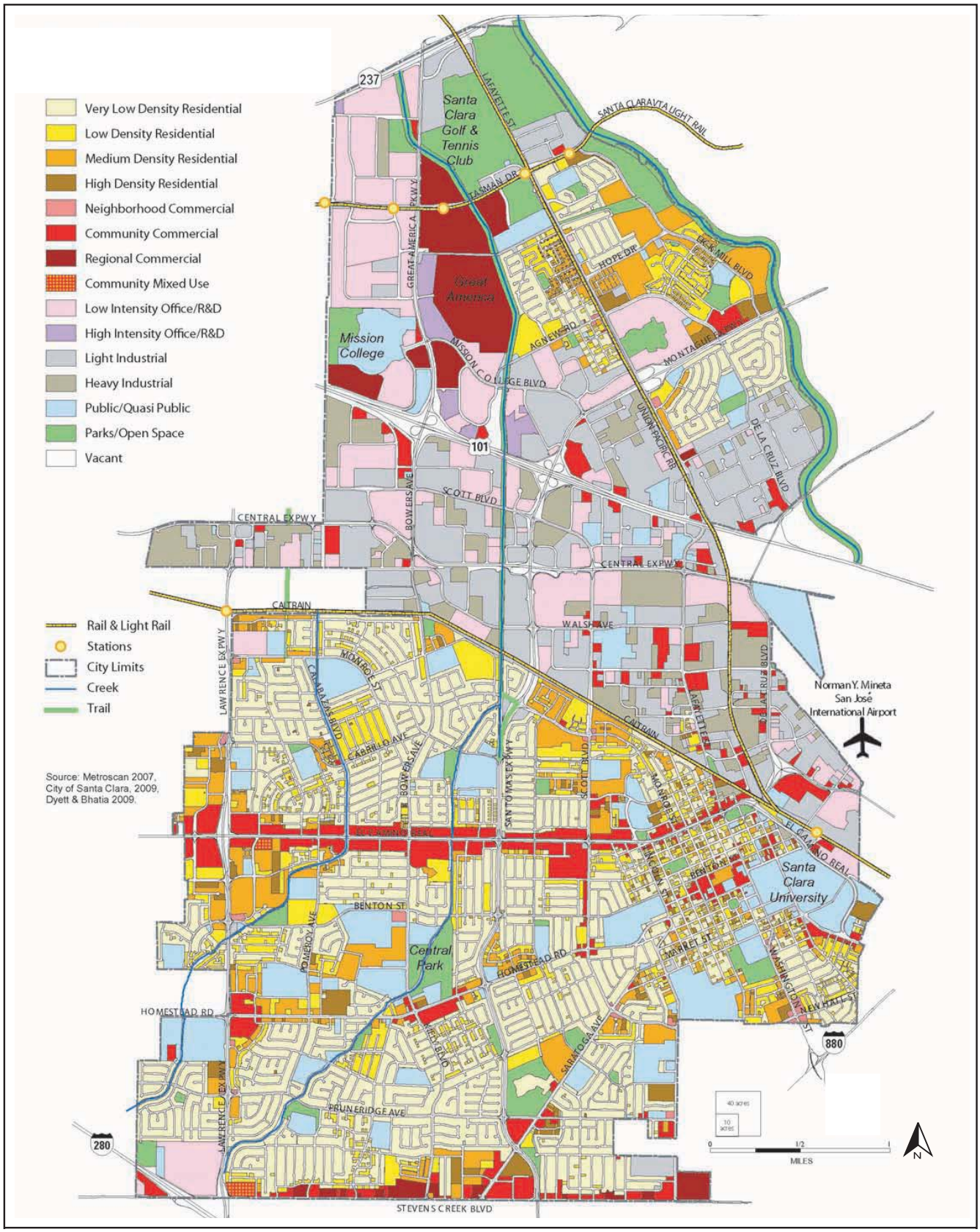
The City is essentially built out and the existing land use pattern is predominantly characterized by single family neighborhoods, retail commercial corridors and industrial/office employment centers, as shown in **Figure 2**. These uses are largely separated by major transportation facilities located in the City. The City of Santa Clara covers approximately 18.4 square miles of land.



City of Santa Clara Housing & General Plan Land Use . 140020

SOURCE: City of Santa Clara, Draft 2010-2035 General Plan EIR, 2011

Figure 1
Regional Location



City of Santa Clara Housing & General Plan Land Use . 140020

SOURCE: City of Santa Clara, Draft 2010-2035 General Plan EIR, 2011

Figure 2

Existing Land Use in 2008

B. Overview of the General Plan and EIR

Purpose of a General Plan

California law requires each city to adopt a comprehensive, long-term general plan to guide the physical development of the incorporated city and land outside city boundaries that bears a relationship to its planning activities. The general plan serves as a blueprint for future growth and development. As such, the plan contains policies and programs designed to provide decision-makers with a solid foundation for land use and development decisions. The Santa Clara General Plan features the physical, social, economic, and environmental character of the city.

In accordance with California Government Code Section 65302, a general plan must address the issues of land use, circulation, housing, noise, safety, conservation, and open space. The general plan can also address topics of special and unique interest, including urban design, economic development, air quality, historic and cultural resources, infrastructure, services, and finance. These topics are optional but often reflect issues that are important to the community. California Government Code Section 65300.5 specifically requires that the elements and associated policy provisions are internally consistent and that no one element or provision of a general plan carries greater weight than another.

According to state law, the General Plan is the primary document the City of Santa Clara utilizes to regulate land use. The General Plan is the policy guide for the development (both public and private) of Santa Clara. It is the foundation for land use decisions, including subdivisions, development agreements, and many other actions. The Santa Clara General Plan identifies the City's land use, circulation, environmental, economic, and social goals and policies. It provides a basis for local government decision-making. Additionally, it informs citizens, developers, and decision-makers, as well as other jurisdictions and public agencies, of the ground rules that guide development within the city.

2010-2035 General Plan and EIR

General Plan

The 2010-2035 General Plan includes objectives, goals, policies and actions which have been designed to implement the City's and community's vision for Santa Clara. The General Plan contains sever major strategies with overarching principles, that define the City's priorities in terms of quality of life, neighborhood preservation, sustainability, City identity, improvement of Focus Areas and community vitality, fiscal health and City services, and health and safety benefits.

By the year 2035, the 2010-2035 General Plan would allow for an additional 32,400 residents in 13,312 new housing units, and 25,040 new jobs in 24,253,600 square feet of new non-residential development. This development under the new General Plan would occur in addition to 'in process' development taking place under the current General Plan, for a total population of 154,990 and total employment base of 152,860 in 2035.

The 2010-2035 General Plan is organized into three phases, reflecting near (2010-2015), mid (2015-2023) and long-term (2023-2035) horizons. Each phase includes changes in land uses and development intensities for specific areas in the City. The 2010-2035 General Plan has nine Focus Areas, including four Focus Areas south of the Caltrain corridor and five Future Focus

Areas north of the Caltrain tracks. Focus Areas include major corridors and destinations, new centers of activity around transit stations, and new residential neighborhoods. The development timing of the Focus Areas will depend on market demand and the availability of infrastructure.

General Plan EIR

The 2010-2035 General Plan EIR provides an assessment of the potential environmental consequences of adoption and foreseeable implementation of the 2010-2035 General Plan. Under CEQA, a significant impact on the environment is defined as "…a substantial, or potentially substantial, adverse change in any of the physical conditions within the area affected by the project, including land, air, water, minerals, flora, fauna, ambient noise, and objects of historic or aesthetic significance." As stated in the EIR, implementation of the 2010-2035 General Plan has the potential to result in adverse environmental impacts in several environmental areas. Impacts in the following areas would be significant without the implementation of mitigations measures, but would be reduced to a less-than-significant level if the mitigation measures recommended in this report are implemented:

- Public Utilities
- Biological Resources
- Air Quality
- Transportation and Traffic
- Noise
- Climate Change

Implementation of the 2010-2035 General Plan would result in significant and unavoidable impacts in the following areas:

- Population and Housing: the proposed project will induce substantial population growth and the City's continued jobs/housing imbalance will contribute to air pollutant emissions (including greenhouse gas emissions) and congestion on area freeways, roadways and intersections, and constitutes a significant unavoidable impact.
- Traffic and Circulation: The 2010-2035 General Plan would have significant and unavoidable freeway and roadway segment level of service impacts.
- Future Roadway Noise: Future traffic volumes under the 2010-2035 General Plan would result in increased roadway noise levels, and in some cases, the increases would be substantial. The mitigation measures necessary to reduce roadway noise levels may not ultimately be feasible. Given their implementation cannot be guaranteed, this impact is significant and unavoidable.
- Climate Change/2035 GHG Emissions: Citywide 2035 GHG emissions are projected to exceed efficiency standards necessary to maintain a trajectory to meet long-term 2050 state climate change reduction goals. Achieving the substantial emissions reductions will require policy decisions at the federal and state level and new and substantially advanced

technologies that cannot today be anticipated, and are outside the City's control, and therefore cannot be relied upon as feasible mitigation strategies. Given the uncertainties about the feasibility of achieving the substantial 2035 emissions reductions, the City's contribution to climate change for the 2035 timeframe is conservatively determined to be cumulatively considerable.

- Public Utilities: Development allowed under the 2010-2035 General Plan would be served by a landfill with sufficient permitted capacity to accommodate the project's solid waste disposal needs through 2024, however the City has no specific plan for disposing of solid waste beyond 2024, but will undertake a process to identify a solution prior to 2024.

Alternatives Analysis

Two alternatives were to the 2010-2035 General Plan, below, were considered in the General Plan EIR.

No Project/Existing General Plan Alternative

Identifies what development and associated environmental impacts would have occurred if the City had not adopted a comprehensive update of its General Plan. The service population (jobs + residents) under the No Project/Existing General Plan Alternative in 2035 would be approximately 265,000, consisting of 137,000 residents and 128,000 jobs, or approximately 18,000 residents and 25,000 fewer jobs than the 2010-2035 General Plan. Forecast growth in population and employment, as projected by ABAG, is presumed, for purposes of this alternative, to be accommodated elsewhere in the South Bay region.

Depending upon the location and form of that development, associated environmental impacts could have been greater or reduced. The environmental impacts that would result from the 2010-2035 General Plan would be lessened, however on a per unit basis, the No Project/Existing General Plan Alternative is less efficient than the 2010-2035 General Plan in terms of increased vehicle miles traveled (VMT) and greenhouse gas (GHG) emissions per service population.

Balanced General plan Growth Jobs/Housing Alternative

Evaluates the environmental impacts of continuing to accommodate Association of Bay Area Governments (ABAG) projected housing growth, but reducing the General Plan's net new jobs to equal the anticipated number of employed residents associated with the projected population increase. This alternative also serves as a 'reduced development' alternative in that it accommodates substantially fewer (5,600) future jobs while still achieving ABAG projected population growth. In 2035, under this Alternative, the City would have had a service population (jobs + residents) of approximately 302,000, consisting of 155,000 residents and 147,000 jobs.

The Balanced General Plan Growth Jobs/Housing Alternative is, on balance, environmentally superior compared to the 2010-2035 General Plan in that the magnitude of impacts associated with the overall level of development would be reduced. However, on a per unit basis, the Balanced General Plan Growth Jobs/Housing Alternative is no more efficient than the 2010-2035 General Plan in terms of VMT and GHG emissions per service population.

The environmentally superior alternative is the No Project/Existing General Plan Alternative, because the project's significant environmental impacts would be reduced, although not to a less than significant level, by avoiding the impacts from an additional 18,000 residents and 25,000

jobs that would be accommodated by the 2010-2035 General Plan. However, adopting this alternative would not have achieved the underlying purpose of the project, which is a comprehensive update of the City's General Plan.

After the No Project/Existing General Plan Alternative, the environmentally superior alternative was the Balanced General Plan Growth Jobs/Housing Alternative, because the environmental impacts that would result from an additional 5,600 jobs accommodated by the proposed 2010-2035 General Plan would be avoided. However, the reduced job growth under this Alternative would have resulted in a reduced revenue stream for public services, which over time could have created fiscal challenges for implementing the City's seven Major Strategies, which form the foundation of the 2010-2035 General Plan.

C. Proposed Land Use Update

The Land Use components of the General Plan serve as a framework for development by designating the proposed general distribution, location, and extent of public and private land uses for housing, business, industry, open space, agriculture, natural resources, recreation, public services and other uses. The Land Use components are implemented through a series of goals, objectives, policies and programs which may help to implement the other parts of the General Plan.

The 2010-2035 General Plan is organized into three phases, reflecting near (2010-2015), mid (2015-2023) and long-term (2023-2035) horizons. Each phase includes changes in land uses and development intensities for specific areas in the City. The Land Use components are set forth in Chapters 4 and 5 and Appendices 8.3 and 8.6 of the General Plan. The proposed project would make revisions to the following eleven sections of Chapter 5:

- **5.1: Prerequisites** – consists of goals and policies that support the Major Strategies of the General Plan, by allowing the City to monitor its progress at regular intervals and helping the City to determine if development proposals can be supported by adequate services.

- **5.2: Land Use Diagram** – presents a graphic representation of the Land use Framework, for each of the three General Plan phases. Provides a summary of the City's development potential under the General Plan, and supporting demographic information. Provides a definition for each of the land use classifications and associated density and intensity standards.

- **5.3: Land Use** – contains goals and policies that focus on City-wide issues applicable to all land use classifications and to each designation.

- **5.4: Focus Areas** – contains goals and policies that apply to the City's nine Focus Areas, which include major corridors and destinations, new centers of activity around transit stations, and new residential neighborhoods.

- **5.5: Neighborhood Compatibility** – contains goals and policies ensure that the City's existing neighborhoods and community fabric are maintained as the City grows.

- **5.6: Historic Preservation** – contains goals and policies that establish the City's commitment to its architectural and archaeological history through preservation and

protection of resources with local, State, and national significance, as well as the immediate surrounding area that provides the context for these resources.

- **5.7: Mobility and Transportation Diagram** - comprised of three components: the Roadway Network, the Transit Network, and the Bicycle and Pedestrian Network which, in conjunction with the three phases of the Land Use Diagram, provide the framework for the General Plan land use and transportation elements.

- **5.8: Mobility and Transportation** – contains goals and policies that are applicable to the entire mobility and transportation system throughout the City.

- **5.9: Public Facilities and Services** – goals and policies that address schools, libraries, and cultural facilities; parks, recreation, and open space; and public safety services.

- **5.10: Environmental Quality** - goals and policies in this section promote the protection of existing habitats, maximize solid waste disposal capacity through recycling and composting, conserve energy and water resources, and protect people and property from natural and man-made hazards.

- **5.11: Sustainability** – Goals and Policies, emphasize the preservation of natural resources, including air, water, habitat, building materials and non-renewable energy sources; the well-being of all community members; and the fiscal health of the City government and its ability to provide adequate public services.

Phased Development and Prerequisites

The City planned to implement the General Plan in three phases, to ensure adequate services and infrastructure are provided. Phasing allows for continued re-evaluation of the development and service goals of the General Plan, as well as the City's fiscal health and ability to support development anticipated by the Plan. The General Plan Prerequisite Goals support the Major Strategies and are intended to take into account the availability of public resources and infrastructure in order to enable the development identified in each phase of the Plan in the long-term, and not overburden existing community resources, such as schools, parks and utilities, in the short-term. Moving forward, the timing of the phases will be generally aligned with the housing element update cycles, which are mandated by the State.

With the end of Phase I of the General Plan in 2014, the Land Use component Update reflects the changes that have occurred during the Phase I and new goals and policies that will guide development during Phase II which would occur from 2015 to 2023. Phase III would be implemented between 2023 and 2035. It is possible that prerequisites may require future General Plan amendments, or adjustments to allowed growth, to ensure that the City continues to meet the infrastructure and service requirements of new development.

Priority Development Areas

In 2008, ABAG and the Metropolitan Transportation Commission created a regional initiative to support local efforts of linking job opportunities with housing to create sustainable communities. As part of this initiative, Priority Development Areas (PDAs) were identified within existing communities, which represent locally-identified, infill development opportunity areas with a local commitment to develop more housing alongside amenities and services. The proposed Land Use

component update includes a discussion of the five PDAs that were identified for Santa Clara. The PDAs generally coincide with the City's Focus Areas, which are further discussed below.

Focus Areas

The General Plan has nine Focus Areas which are shown in **Figure 3**. The Focus Areas represent areas with the potential to significantly define the City's identity, and include major corridors and destinations, new centers of activity around transit stations, and new residential neighborhoods. The proposed Land Use component update contains goals and policies that pertain to six active Focus Areas, which include: El Camino Real, Downtown, Santa Clara Station, Stevens Creek Boulevard, Lawrence Station, and Tasman East. Policies for both Lawrence Station and Tasman East have been newly added to the proposed Land Use component update for implementation during Phase II and III, having met the necessary Phase I Prerequisite goals and policies. There are three remaining Future Focus Areas, for which policies will likely be developed in Phase III, including Central Expressway, De La Cruz, and Great American Parkway.

Proposed Phase Changes

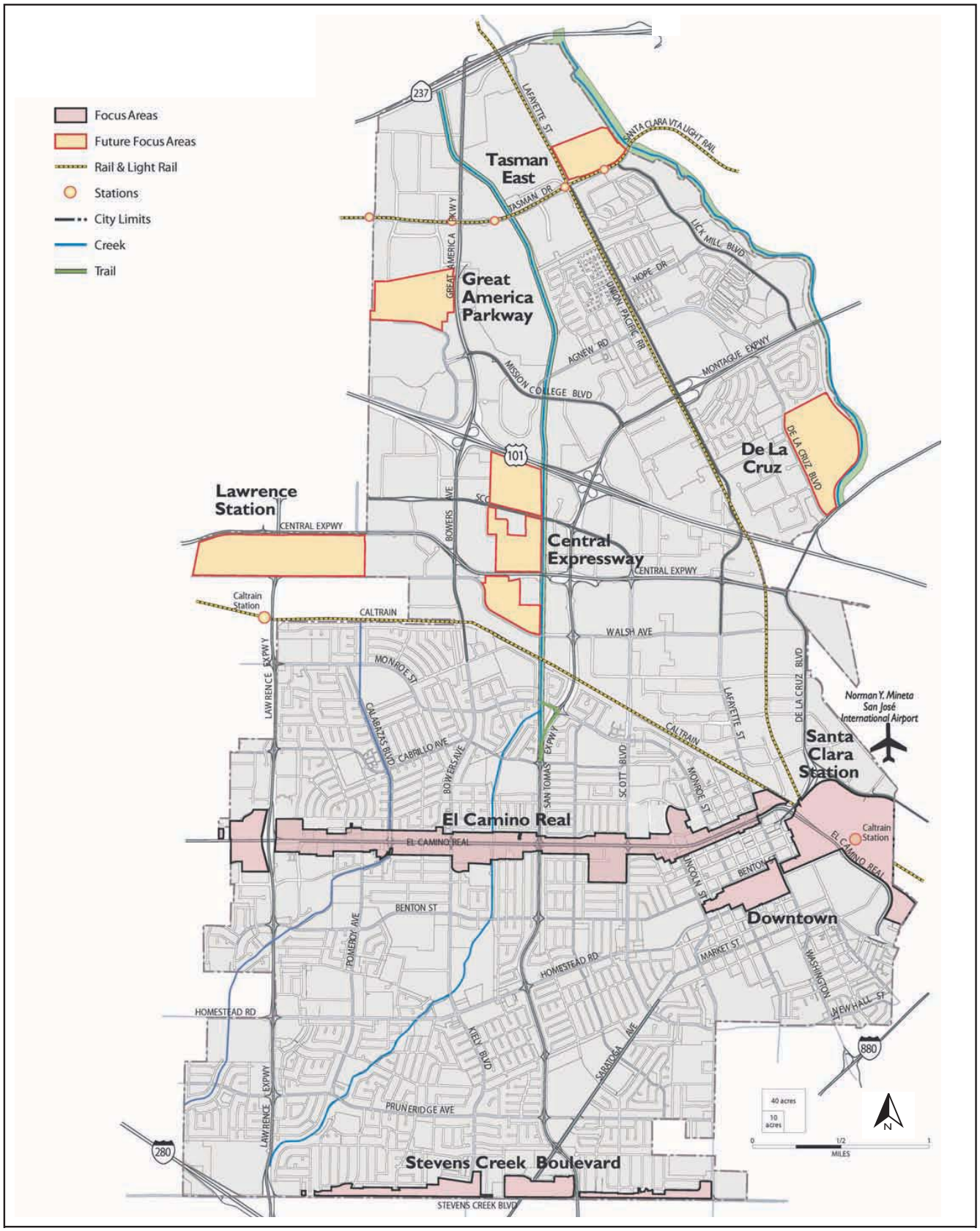
In the proposed Land Use component update, the timing of Phases II and II have been adjusted to realign with the Housing Element update cycles, which occur every eight years as mandated by HCD. Under the proposed Land Use component update, Phase II implementation would occur from 2015 to 2023, rather than 2025, to align with the sixth Housing Element update cycle. Phase III would be implemented from 2024 to 2035, which would include the seventh Housing Element update cycle from 2024 to 2032 and a portion of the eighth cycle. Phase III would also include the remaining three years of the General Plan Planning period. Prior to the start of Phase III, the City will determine how best to treat the remaining three years of the planning period (2032-2035); however, it is assumed that the City will likely be updating the General Plan again at that time.

Proposed Land Use Changes

The General Plan Land Use Diagram for Phase I is shown as **Figure 4.** The proposed Land Use Diagram for Phase II, **Figure 5**, includes land use changes that reflect the City's development priorities from 2015-2023, including those established in the City's Housing Element which is further discussed below. Specifically, land use changes occur within the Lawrence Station Focus Area, east of Lawrence Expressway, and the Tasman East Focus Area from Light Industrial to Medium Density Residential and High Density Residential. In addition, land use changes occur near Santa Clara University, east of El Camino Real, from Community Mixed Use to High Density Residential and at Saratoga Avenue and Stevens Creek Boulevard from Community and Neighborhood Mixed Use to Community and Regional Commercial.

For Phase III of the General Plan, 2024-3025, **Figure 6**, land use changes occur within the Lawrence Station Focus Area, west of Lawrence Expressway, from Light Industrial to Medium Density Residential and High Density Residential. In the De La Cruz Focus Area, land changes occur from Light and Heavy Industrial to Medium Density Residential. All land within the Central Expressway Focus Area and Great America Parkway Focus Area would also change from Light Industrial to High Density Residential.

The City is in the process of updating the Zoning Ordinance to more closely track the 2010-2035 General Plan. The Zoning Ordinance update would be consistent with the land use changes in the proposed Land Use component update, including the proposed Phase II and III Land Use Diagrams.



SOURCE: City of Santa Clara, Draft 2010-2035 General Plan EIR, 2011

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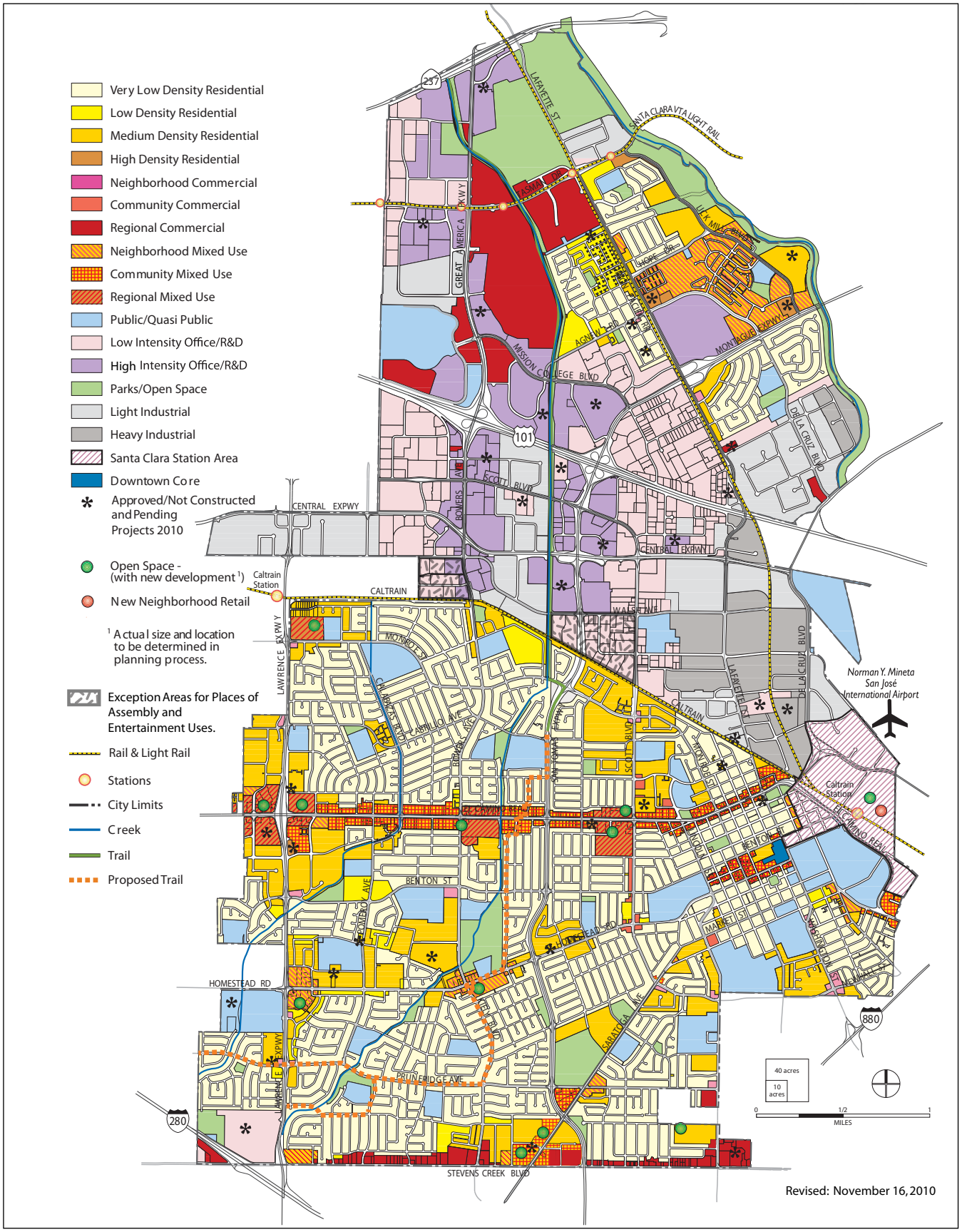
Figure 3

General Plan Focus Areas



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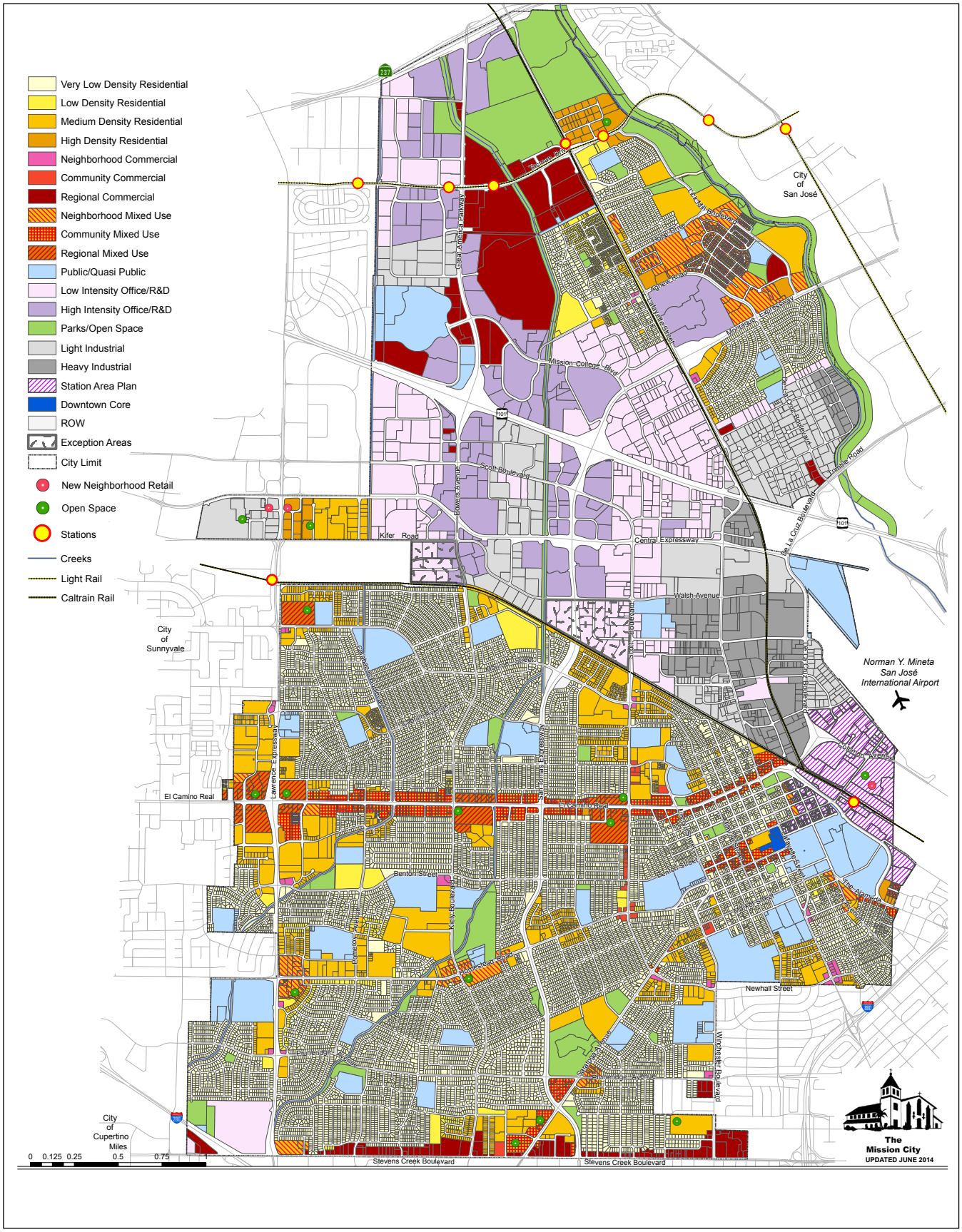
SOURCE: City of Santa Clara, Draft 2010-2035 General Plan EIR, 2011

Figure 4

General Plan Land Use Phase I

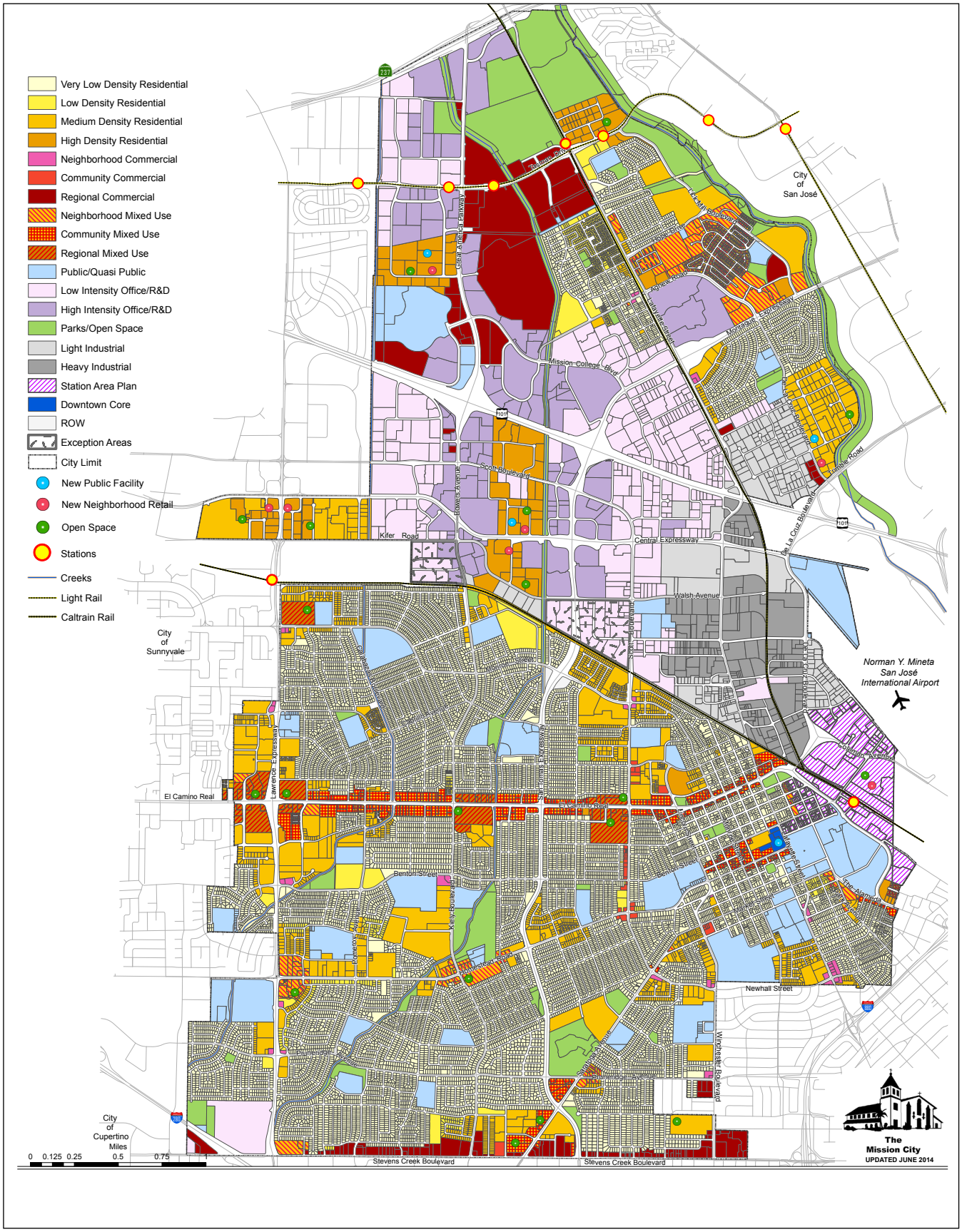


City of Santa Clara Housing & General Plan Land Use . 140020

SOURCE: City of Santa Clara, Land Use Element, 2014

Figure 5

General Plan Land Use Phase II



City of Santa Clara Housing & General Plan Land Use . 140020

SOURCE: City of Santa Clara, Land Use Element, 2014

Figure 6

General Plan Land Use Phase III

D. Proposed Housing Element Update

The purpose of the Housing Element is to examine the housing needs of residents, create and guide housing policy in the City, and identify locations to accommodate the City's Regional Housing Need Allocation (RHNA).The Housing Element is a mandatory component of the General Plan under state law. The Housing Element is required to be updated every four to eight years and is the only General Plan element subject to mandatory review by a State agency, the California Department of Housing and Community Development (HCD). Upon review by HCD and obtaining State certification, local jurisdictions would qualify for certain State and Federal housing loans and grants.

The 2007-2014 Housing Element was adopted by the City Council on October 25, 2011 and certified by the State on January 6, 2012. This project includes an update of the Housing Element, which focuses on housing needs from January 31, 2015 through January 31, 2023, in accordance with the Housing Element planning period for San Francisco Bay Area jurisdictions established by State law.

Housing Element Components

The draft Housing Element is formatted into the following seven sections:

- **8.12-1: Introduction** – provides an introduction to the Housing Element, its scope and purpose, its content, its relationship to other General Plan elements, and a summary of the public outreach that was conducted in preparation of the document.

- **8.12-2: Program Accomplishments** – contains the City's accomplishments throughout the previous planning period, including the effectiveness, progress and appropriateness of programs in the 2007-2014 Housing Element.

- **8.12-3: Housing Needs Assessment** – provides a discussion of demographic characteristics in the City, as well as an assessment of housing needs for special groups.

- **8.12-4: Financing and Subsidies** – discusses federal, state, local, and regional financing and subsidy resources.

- **8.12-5: Housing Constraints** – describes potential constraints to the development of affordable housing, including governmental constrains, environmental and infrastructural constraints, and non-governmental constraints.

- **8.12-6: Housing Opportunities** – describes the City's RHNA for the planning period, the process by which housing opportunity sites were chosen to satisfy the RHNA, and the three main housing focus areas where sites were selected.

- **8.12-7: Housing Plan** – provides the City's Housing Plan, including revised and new goals and policies, implementing actions, and the City's quantified objectives for the 2015-2023 Housing Element.

- **Appendix** – Appendix A provides further details about the City's accomplishments during the 2007-2014 planning period, while Appendix B provides detailed information

about the sites that were selected to satisfy the RHNA for the 2015-2023 Housing Element.

The Goals, Policies and Programs within the Housing Plan build upon the identified housing needs in the community. Section 8.12-2 has been reformatted from the previous Housing Element to be consistent with HCD requirements. The Housing Plan contains fewer programs since many of them have been consolidated with the new formatting. One of the major changes in the draft Housing Element is that new objectives were added to the existing programs as required by HCD, to address continuing housing issues, the lack of affordable housing, and replacement of older affordable units that could be demolished. These and other issues are addressed in the Housing Element through the strengthening of the City's existing affordable housing fees, the production of new affordable rental units, and other policies and programs.

Regional Housing Needs Allocation

Per Government Code Section 65584, HCD is mandated to determine the State-wide housing need, which is then allocated to the regional Metropolitan Planning Organizations (MPOs) for distribution among jurisdictions. The Association of Bay Area Governments (ABAG) is the Bay Area's MPO and is responsible for assigning the Regional Housing Needs Allocation (RHNA) for each jurisdiction, which must work to provide opportunities for the development of these units. Working with local governments, ABAG developed an allocation methodology for assigning units, by income category, to each city and county in the nine-county Bay Area. The local jurisdiction is not required to construct these units, they are only mandated to identify an adequate number of sites to accommodate and facilitate production of the City's RHNA.

The RHNA allocation for the City of Santa Clara for 2014-2022 is 4,093 units, as shown in **Table 1**. Of that, 1,745 units must be affordable to lower income households, 755 units must be affordable to moderate income households, and 1,593 units must serve above moderate income households. Households are categorized in these income groups based on household size and percentages of the Area Medium Income (AMI). Generally, lower income households have an annual income that is less than or equal to 80 percent of the AMI, while moderate income households earn greater than 80 percent and less than or equal to 120 percent of the AMI, and above moderate income households earn more than 120 percent of the AMI. These income limits are established annually by HCD.

TABLE 1
REGIONAL HOUSING NEEDS ASSESSMENT, 2014-2022

Income Group	Percent AMI	Units Assigned	Percent of Total
Extremely Low	Less than 30%	525	13%
Very Low	31% to 50%	525	13%
Low	51% to 80%	695	17%
Moderate	81% to 120%	755	18%
Above Moderate	Over 120%+	1,593	39%
Total		**4,093**	**100%**

Source: Regional Housing Needs Plan, ABAG.

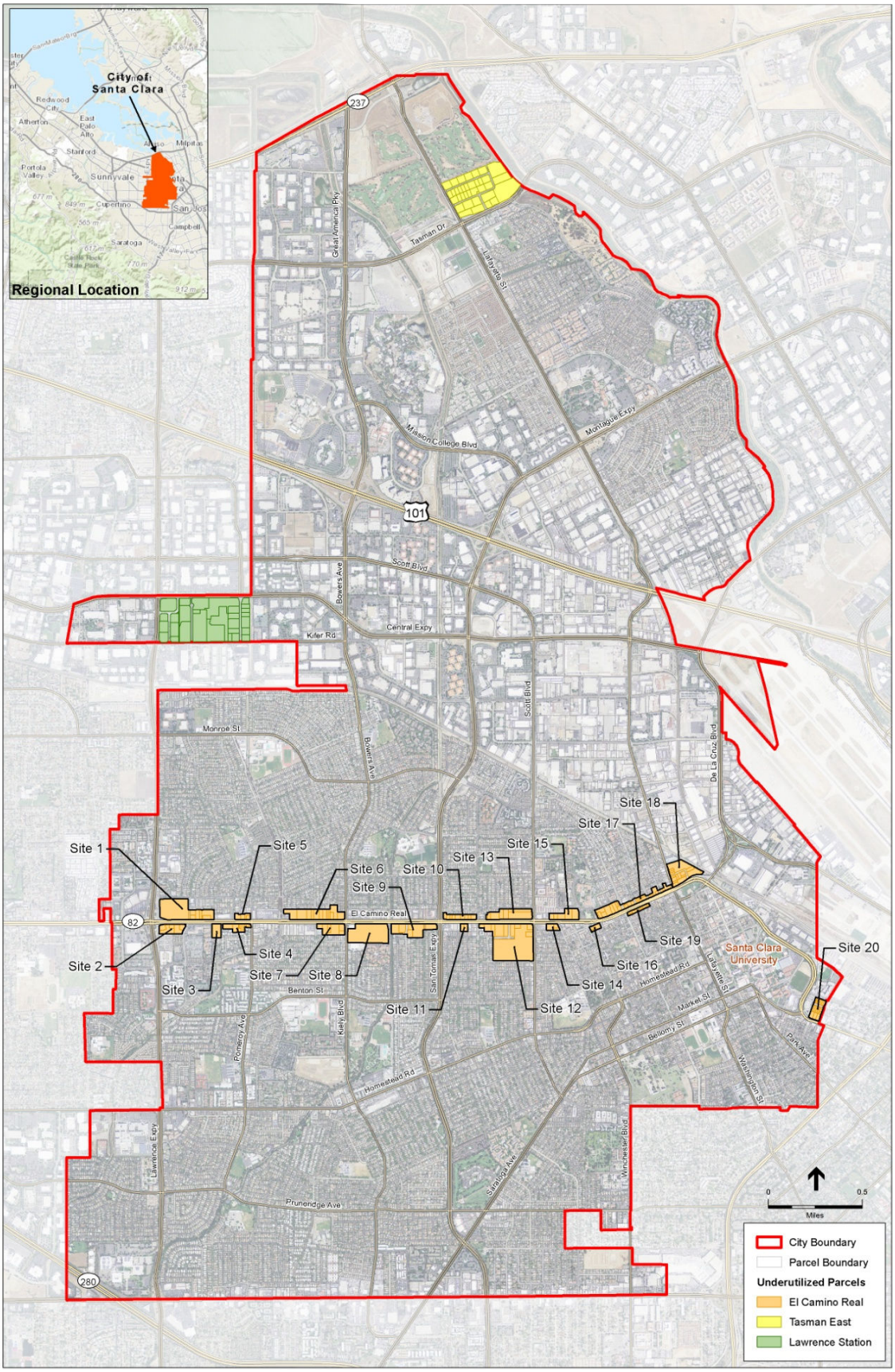
* The City's extremely low income need is assumed to be 50 percent of the very low income allocation of 1,050 units.

To accommodate the 2015-2023 RHNA allocation, the City has identified key underutilized parcels designated for residential or mixed use development that are likely to redevelop during the Housing Element planning period. The lack of vacant land in Santa Clara and the relatively high value of new development mean that the City regularly sees the redevelopment of underutilized sites, including ones that contain functioning industrial, residential, and commercial uses. Appendix 8.12-A provides additional information on the sites that have been selected to help the City fulfill its RHNA.

Section 8.12-7, Housing Resources, identifies "adequate sites" to accommodate the City's RHNA; pursuant to California Government Code section 65583(c)(1), adequate sites are those with appropriate zoning and development standards, with services and facilities, needed to facilitate and encourage the development of a variety of housing for all income levels. For the 2015-2023 Housing Element planning period, the City has identified three focus areas that permit residential only and mixed use development at densities up to 50 units per acre. The three Housing Element focus areas are shown in **Figure 7** and include parcels within the Tasman East Focus Area, Lawrence Station Focus Area, and parcels grouped within the El Camino Real Focus Area. These three areas are identified within the 2010-2035 General Plan as either existing or future focus areas that represent locations and opportunities for more intense development. **Table 2** describes the combined number of estimated units that could be accommodated in each of the three housing focus areas that are identified in the General Plan.

TABLE 2
ACCOMODATION OF THE 2014-2022 RHNA

Name of Focus Area	Permitted Density	Acres	Total Units
2015-2023 RHNA	-	-	4,093
El Camino Real Focus Area	20-50 du/ac	113.7	2,073
Lawrence Station Focus Area	20-50 du/ac	65.3	2,127
Tasman East Focus Area	37-50 du/ac	41.9	1,676
Sites Subtotal	-	220.9	5,876
Total surplus/(deficit)			**1,783**



City of Santa Clara Housing & General Plan Land Use . 140020

SOURCE: City of Santa Clara, 2015-2023 Housing Element, 2014

Figure 7

Housing Element Focus Areas

As part of the housing opportunities site selection process, eligible sites must provide for adequate density to accommodate a variety of housing types, and thereby accommodate the City's housing needs for all income levels. Pursuant to Government Code Section 65583.2, Santa Clara may utilize "default" density standards to demonstrate that sites are adequate for lower-income households. As a "suburban" jurisdiction within the Bay Area Metropolitan Statistical Area, Santa Clara's default density standard was 20 units per acre for the fourth cycle RHNA but increased to 30 units per acre for the fifth cycle RHNA as a jurisdiction with a population exceeding 100,000 according to the 2010 Census.[1] Consequently, if a site permits residential densities at these density thresholds for the corresponding periods, units associated with that site may be counted as meeting the housing need for lower-income households.

As discussed above, in 2014, the City of Santa Clara initiated an update to their Zoning Ordinance to ensure consistency with the 2010-2035 General Plan, adopted in 2010. Prior to the adoption of the Zoning Ordinance update, the City has allowed developers to utilize the residential densities specified in the General Plan land use designations, if developers rezoned their properties to PD (Planned Development). Typically, the 2010-2035 General Plan allows up to 50 dwelling units per acre in most mixed use and high density residential site locations. While the Zoning Ordinance is being updated, the City will continue to approve development projects consistent with Chapter 18.54, Regulations for PD – Planned Development and Combined Zoning Districts.

Tasman East Focus Area

The Tasman East Focus Area (**Figure 8**) includes approximately 42 acres of developed land located near the northern City boundary. The Focus Area includes a rectangular grouping of 36 parcels situated east of Lafayette Street, north of Tasman Drive, west of the Guadalupe River Trail, and south of the Santa Clara Tennis and Golf Club property. The Focus Area has approximately 25 owners and is currently developed with a mix of light industrial and business park uses. The majority of the buildings on-site are one-story constructed in the 1960-70s with large surface parking areas. Figure 3 shows the boundary and existing conditions of the area.

As part of the phased development identified in the General Plan, Tasman East is anticipated to transition from a Light Industrial designation and use to High Density Residential in Phase II. The High Density Residential designation promotes residential development at densities ranging from 37 to 50 units per gross acre. Development on the site is expected to have an urban feel, with mid-rise buildings, structured or below-grade parking, and shared open space. This development intensity is appropriate to accommodate the large number of employees in the area and support existing public transit located adjacent to the Focus Area. Three public transportation providers serve the Focus Area, including the Santa Clara Valley Transportation Authority (VTA), providing both light rail and bus service at the Lick Mill and Tasman Station, as well as Amtrak and the Altamont Corridor Express (ACE) served by the Great America station. It is expected that additional analysis of water, sewer, and other infrastructure and public services would be required as part of the development process.

The Tasman East Focus Area allows and encourages densities that are appropriate to accommodate the City's overall RHNA allocation. Assuming a maximum permitted density of 50

[1] The fourth cycle RHNA for the ABAG region covers from January 1, 2007 through January 31, 2015, as amended by SB 375. The fifth cycle RHNA covers from January 1, 2014 through October 31, 2022.

units per acre and that each site is developed at 80 percent of its potential capacity, the Tasman East Focus Area can accommodate a total of 1,676 units.

Lawrence Station Focus Area

According to the 2010-2035 General Plan Land Use component, the Lawrence Station Focus Area (**Figure 9**) includes approximately 92 acres of developed land located at the City's western limit. The Lawrence Station Focus Area, shown in Figure 3, generally includes a rectangular grouping of 41 parcels with 23 property owners. While the larger Lawrence Station Focus Area totals approximately 92 acres, the sites inventory focuses on 65 acres that are most likely to redevelop into residential uses during the 2015-2023 Housing Element planning period. The 65 acres identified for redevelopment includes all parcels located east of Lawrence Expressway, south of Central Expressway, north of Kifer Road, and including parcels fronting both sides of Corvin Drive. This smaller area includes 31 properties currently developed with a mix of light industrial, research and development, and business park uses. The majority of the buildings on-site are one-story constructed in the 1960-70s with large surface parking areas. Figure 8 shows the boundary and existing conditions of the area.

As part of the phased development identified in the General Plan, Lawrence Station is anticipated to transition from a Light Industrial designation and use to High Density Residential and Medium Density Residential designations. The High Density Residential designation promotes development at densities ranging from 37 to 50 units per gross acre. This development intensity is appropriate to accommodate the large number of employees in the area and support existing public transportation systems that includes a Caltrain station located south of the Focus Area. The Medium Density Residential classification is intended for residential development at densities ranging from 20 to 36 units per gross acre. Building types can include a combination of low-rise apartments, townhouses and rowhouses with garage or below grade parking. It is expected that additional analysis of water, sewer, and other infrastructure would be required as part of the development process. It is also likely that other Public Works requirements may apply, such as new signals, water and sewer line upgrades, and roadway improvements. Such improvements are typical to the redevelopment of existing older and underutilized uses and should not unduly constrain development in the area.

The Lawrence Station Focus Area allows and encourages densities that are appropriate to accommodate the City's overall RHNA allocation. Assuming a development capacity of 80 percent and a maximum permitted density of 50 units per acre for sites classified as High Density Residential and 36 units per acre for sites classified as Medium Density Residential, the Lawrence Station Focus Area can accommodate a total of 2,172 units.

El Camino Real Focus Area

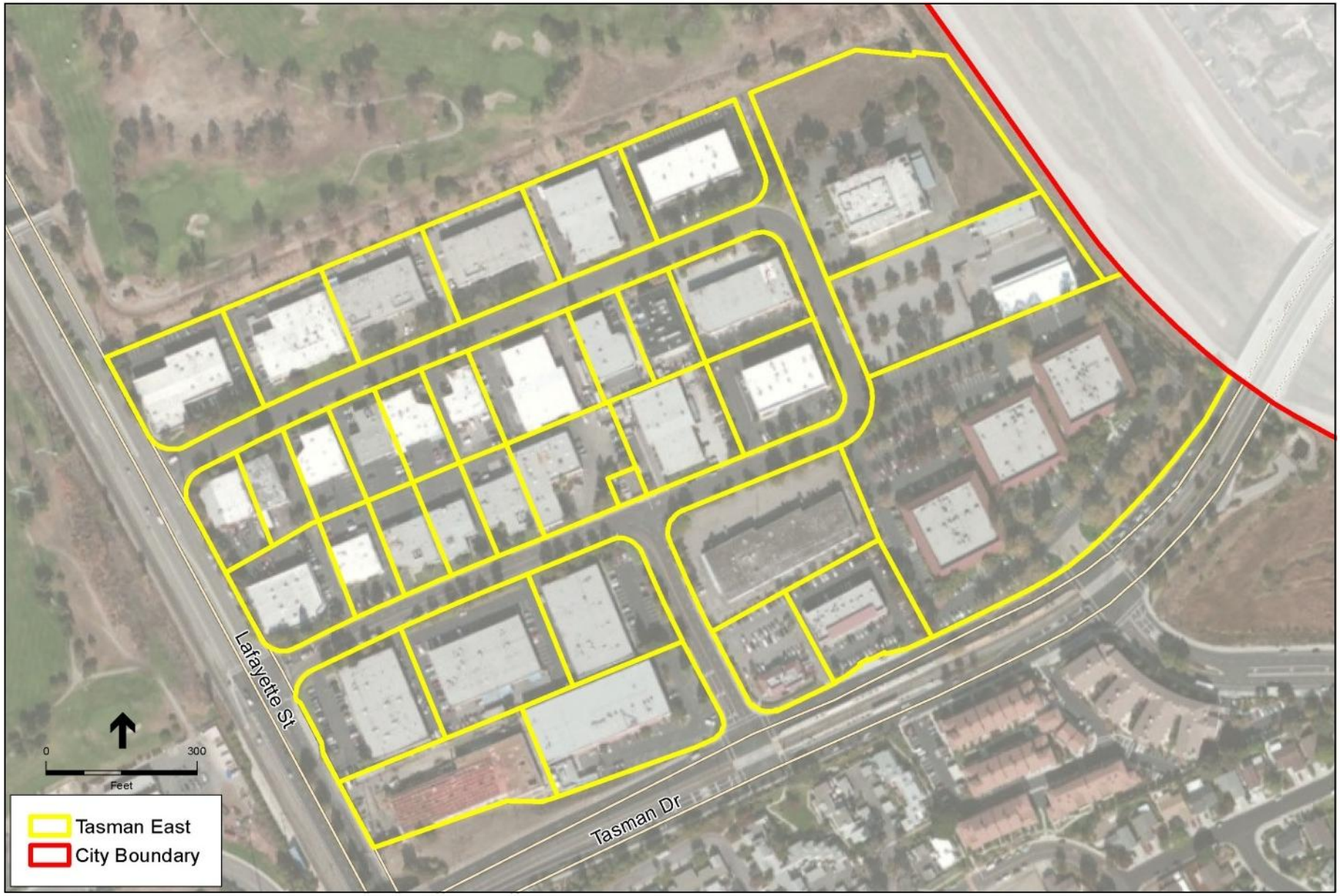
As noted in the 2010-2035 General Plan Land Use component, the El Camino Real Focus Area (**Figure 10 and 11**) is the City's most visible and identifiable commercial corridor. El Camino Real is a primary east-west route and State highway, proving commercial services for, many of the City's residential neighborhoods. As the majority of the properties along the corridor were developed in the 1950-60s a number of them are presently underutilized, providing a unique opportunity for revitalization including the introduction of new residential uses. While the El Camino Real Focus Area identified in the General Plan includes all parcels fronting El Camino Real as it extends through the City, the Housing Element sites inventory focuses on 20 parcel groupings or "sites", along the corridor that are most likely to redevelop into residential uses during the 2015-2023 Housing Element planning period. The 20 identified sites total

approximately 114 acres and were formed to encourage the development or large cohesive development projects. Figures 5 and 6 show the boundary and existing conditions of the El Camino Real Focus Area.

Existing development along El Camino Real consists of a mix of small-scale auto-oriented commercial uses and services, as well as mid- to large-scale strip mall developments. Building heights are generally one story, with parking located towards the street edge. The roadway itself is wide and can accommodate higher speeds, coupled with inconsistent landscaping and narrow sidewalks, thereby reducing pedestrian accessibility and walkability.

The 2010-2035 General Plan vision for El Camino Real is to transform this Focus Area from a series of automobile-oriented strip-malls to a tree-lined, pedestrian- and transit-oriented corridor with a mix of residential and retail uses. Larger properties are typically designated as Regional Mixed Use and located at key intersections, with smaller mid-block properties designated Community Mixed Use. The Regional Mixed Use classification is intended to promote high-intensity, mixed use development along major transportation corridors in the City permitting all types of retail, local serving office, hotel, and service uses, except for auto-oriented uses, to meet local and regional needs. A minimum residential development of 37 to 50 units per gross acre is required. Similarly, the Community Mixed Use classification is intended to encourage a mix of residential and commercial uses along major streets. Retail, commercial and neighborhood office uses are allowed at a minimum FAR of 0.10, in conjunction with residential development between 20 and 36 units per acre. For both designations, parking is encouraged to be behind buildings, below-grade or in structures, to ensure that active uses face public streets. It is expected that additional analysis of water, sewer, and other infrastructure would be required as part of the development process.

The El Camino Real Focus Area allows and encourages densities that are appropriate to accommodate the City's 2014-2022 RHNA allocation. Assuming a development capacity of 50 percent for mixed use sites and a maximum permitted density of 50 units per acre for sites classified as Regional Mixed Use and 36 units per acre for sites classified as Community Mixed Use, the El Camino Real Focus Area can accommodate a total of 2,073 units.

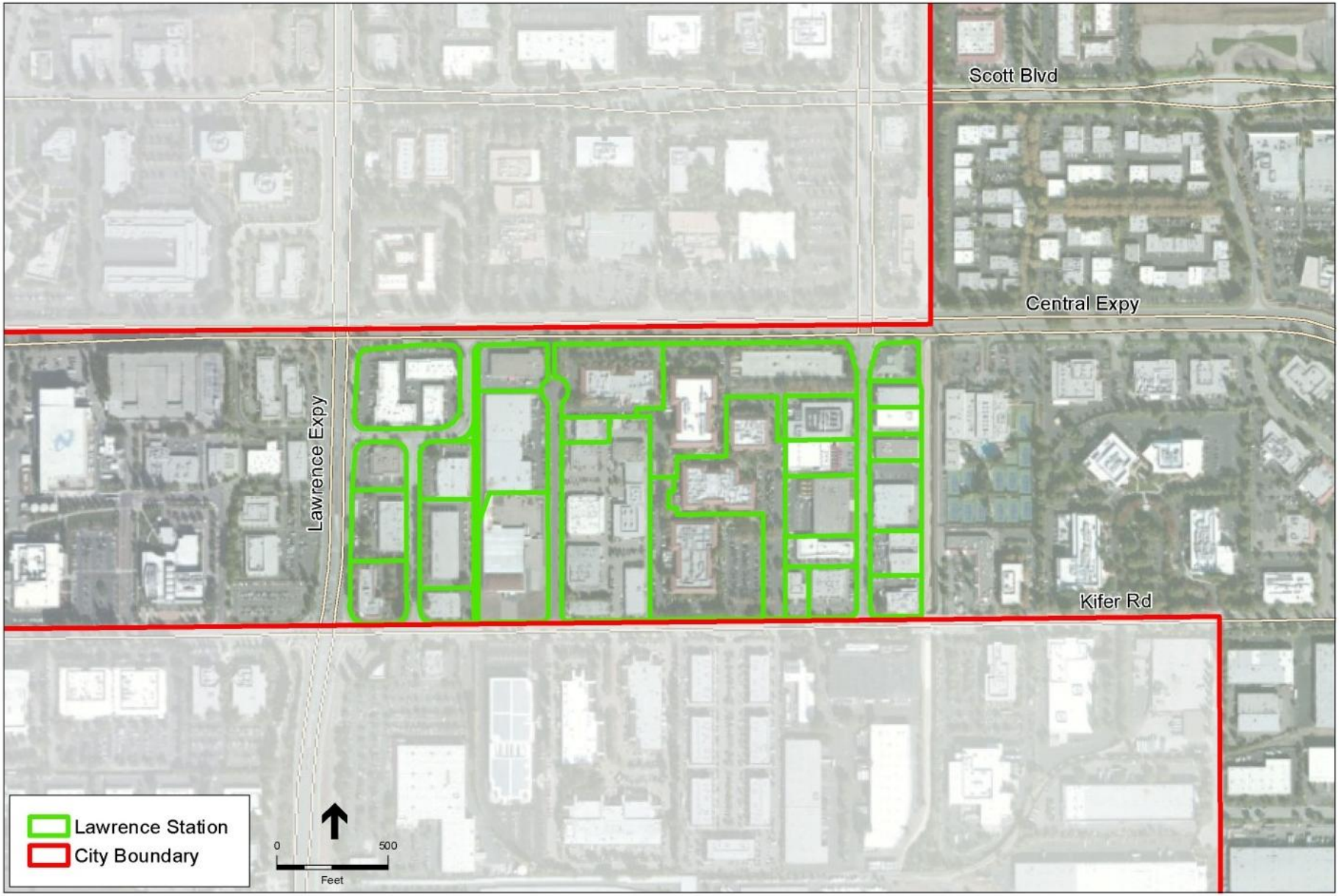


City of Santa Clara Housing & General Plan Land Use . 140020

SOURCE: City of Santa Clara, 2015-2023 Housing Element, 2014

Figure 8

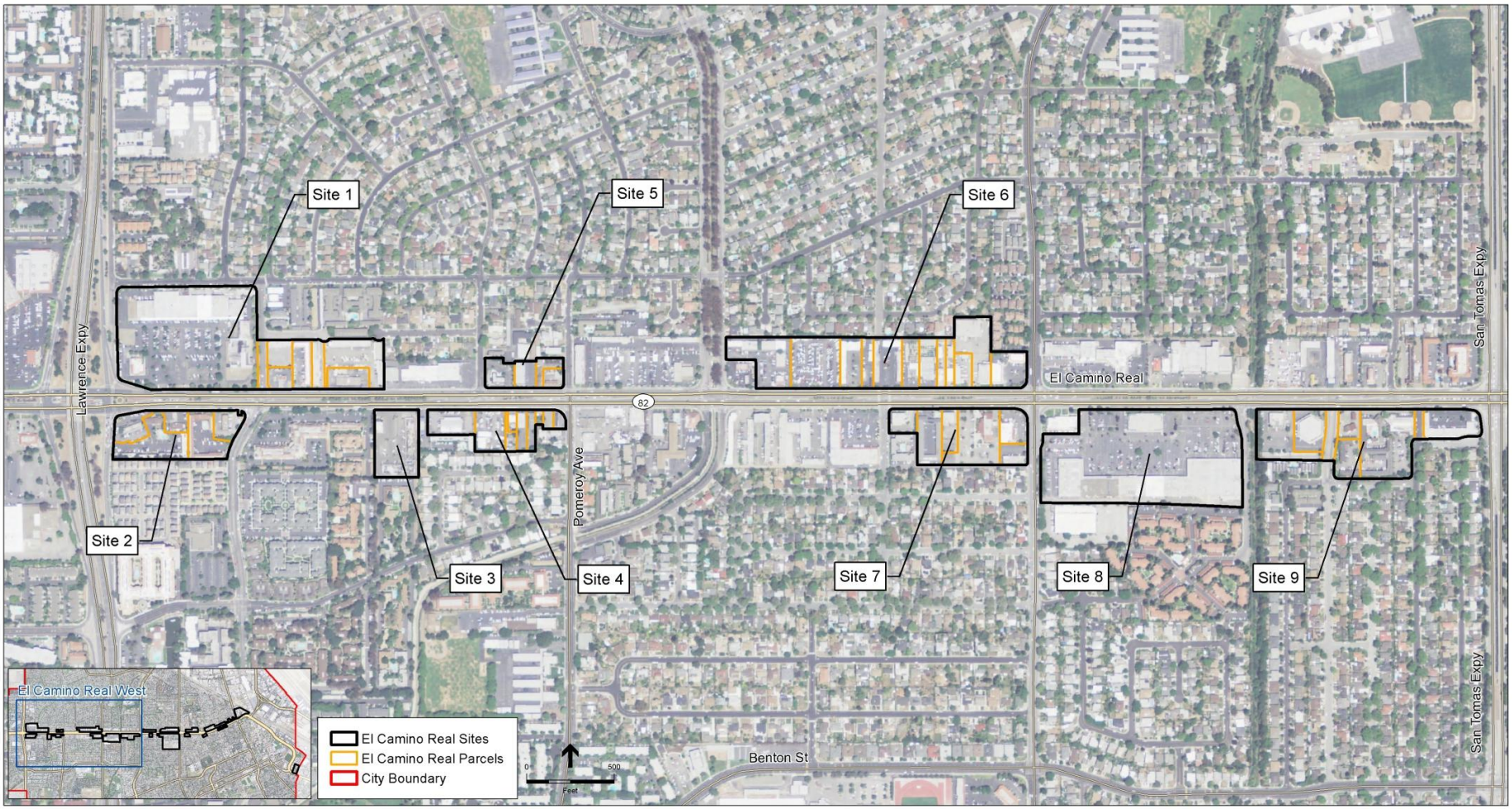
Tasman East Focus Area



City of Santa Clara Housing & General Plan Land Use . 140020

SOURCE: City of Santa Clara, 2015-2023 Housing Element, 2014

Figure 9
Lawrence Station Focus Area

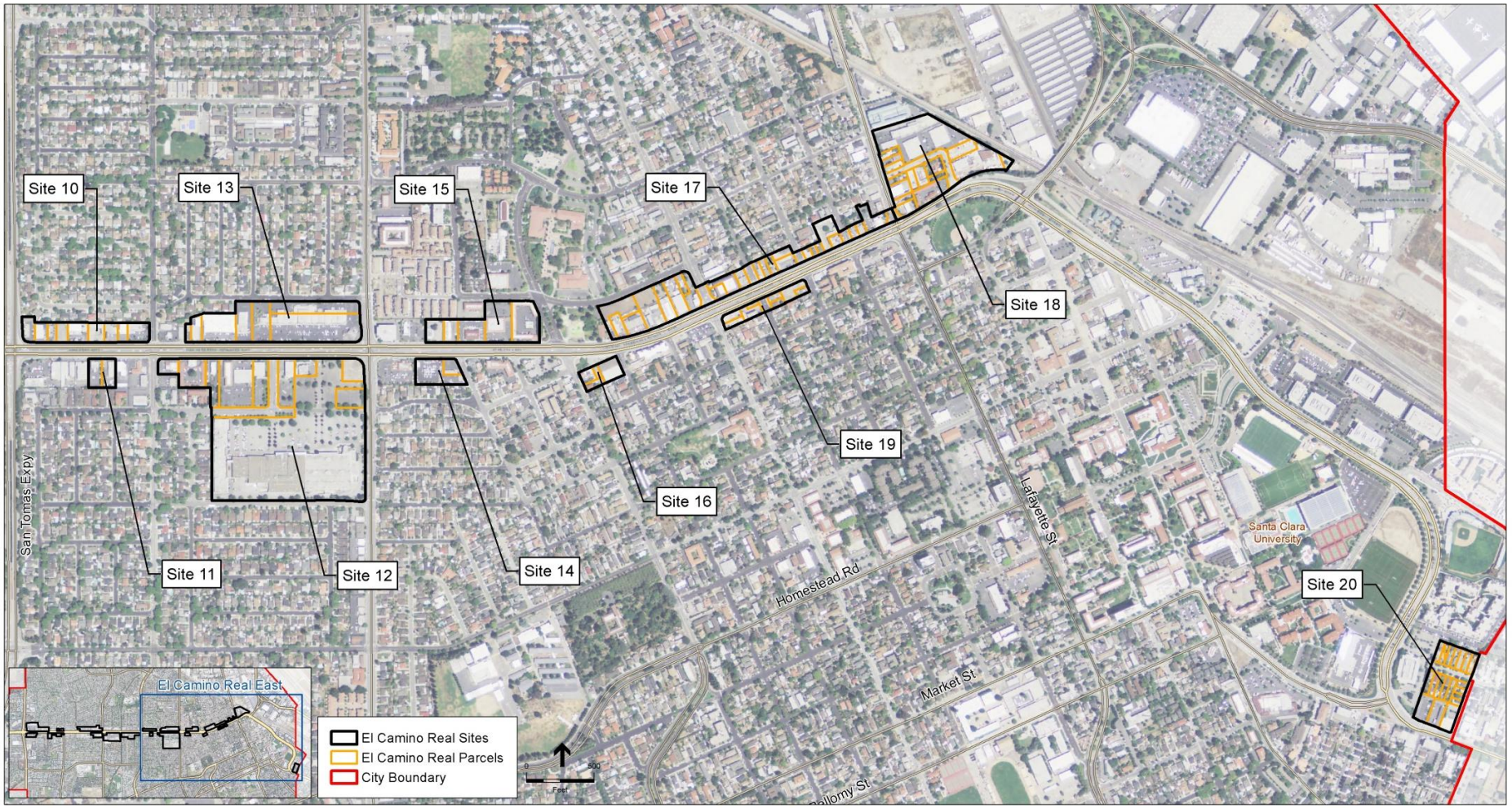


SOURCE: City of Santa Clara, 2015-2023 Housing Element, 2014

City of Santa Clara Housing & General Plan Land Use . 140020

Figure 10

El Camino Focus Area (west end)



SOURCE: City of Santa Clara, 2015-2023 Housing Element, 2014

City of Santa Clara Housing & General Plan Land Use . 140020

Figure 11

El Camino Focus Area (east end)

Proposed Zoning Ordinance Amendments

Several Zoning Ordinance amendments are proposed as part of the project, which the City intends to adopt along with the proposed Housing Element Update. These amendments ensure that the City will be in compliance with recent changes to state law, including certain zoning requirements that support multi-family housing, farmworker housing, emergency shelters, supportive housing, and transitional housing. The proposed Zoning Ordinance amendments are described below.

- **Chapter 18.xx Regulations for [all Residential Districts]– [all residential] Zoning Districts.** This zone now allows transitional housing and supportive housing, as a permitted use for six persons or fewer, and a conditionally permitted use for seven or more persons subject to the Transitional and Supportive Housing standards in Section 18.20.170.

- **Chapter 18.78 Residential Density Bonus Standards.** California Government Code Section 65915 requires local jurisdictions to grant density bonus and regulatory concessions and incentives to developers who agree to construct a specified percentage of housing for lower income households, very low income households, moderate income households, or qualifying residents. State law also mandates density bonuses in some circumstances for developers who donate land for affordable housing, or who provide child care facilities as part of a residential development.

- **Chapter 18.118 Reasonable Accommodation.** Pursuant to federal and state fair housing laws, this Chapter is intended to provide individuals with disabilities reasonable accommodation in the application of the city's rules, policies, practices, and procedures, as necessary, to ensure equal access to housing and facilitate the development of housing for individuals with disabilities.

- **Chapter 18.120 Emergency Shelters.** Intended to establish procedures and standards for the establishment of emergency shelters in at least one zone in the City, pursuant to California Government Code 65583 and 65589.5.

E. Infrastructure Improvements

Because most new development in the City will be infill, infrastructure is already in place to serve new development.

Water Supply

The City receives its potable water supply from the San Francisco Public Utilities Commission (SFPUC), the Santa Clara Valley Water District (SCVWD), and groundwater from City-owned wells. The SCVWD's 2010 Urban Water Management Plan has stated that it will be able to provide all water demands for Santa Clara County (including the City of Santa Clara) through 2025. Supplies are projected to be sufficient during all but the more severe drought years. SFPUC projections indicate as much as a system wide water shortage of up to 20 percent in the event of a multiple-year drought.

The City has an interruptible contract for water deliveries from SFPUC. However, in the event of a severe drought, the Water Shortage Allocation Plan (a multi-party agreement adopted in 2009 and again in 2011 between the City, San Francisco and 27 other agency members of Bay Area Water Supply and Conservation Agency) provides the City with a share of the City's usual supply from SFPUC during system wide water shortages up to 20 percent. This reduced share is currently set at 43 percent of the City's base allocation, according to the Tier 2 Drought Implementation Plan.

Recycled water offers one important new non-potable supply of water—a fourth source of water for the City and the region. The City is part owner of the South Bay Water Recycling Project (SBWRP), funded primarily by sewer utilities tributary to the San Jose/Santa Clara Water Pollution Control Plant. While recycled water is not intended to replace potable in all types of uses, it does provide a reliable drought-proof supply. It is approved by the State for "unrestricted use" and, as such, it does replace potable supplies for landscape irrigation and certain industrial uses. With the current distribution system, more than 10 percent of the City's total annual water demand is being met with recycled water.

Wastewater

Wastewater is collected by sewer systems in the cities of Santa Clara and San José and conveyed by pipeline to the San José-Santa Clara Water Pollution Control Plant (WPCP). The WPCP is also used by six other cities as well as unincorporated areas within Santa Clara County, serving approximately 1.4 million residents and about 17,000 main commercial/industrial sewer connections in the cities of San José, Santa Clara, Milpitas, Cupertino, Campbell, Los Gatos, Monte Sereno, and Saratoga. The plant has the capacity to treat up to 167 million gallons per day (mgd), but the population driven flows are projected to reach 172 million gallons per day (mgd) during the "dry season" by 2040. As of 2010, influent flows are currently at less than 110 mgd—well under the plant's current treatment capacity. Influent wastewater flows to the plant have actually decreased over the past 15 years due to the loss of industry and increased water conservation. The City anticipates that it will continue to be able to accommodate growth over the 8-year planning period (2015-2023).

However, flows are expected to increase in the future as new homes are built to house the 400,000 new residents anticipated in San José over the next 30 years. In order to meet this increased need, the WPCP's 2012 Master Plan has established a new vision for a rebuilt plant that will address the impact of future regulations, flows and loads. The Master Plan identifies rebuilding, rehabilitation, and replacement projects occurring in each of the plant's treatment processes and establishes a 30-year capital improvement program (CIP). The project cost of implementing the projects ranges from $1.8 to $2.2 billion. With these improvements, the WPCP is expected to be able to meet the wastewater needs of new residential development in subsequent Housing Element planning periods (from 2023-2025).

Energy

The City owns and operates the municipal electric utility, Silicon Valley Power (SVP), which services over 50,000 residential, commercial, industrial, and customers in the City. It owns, operates and participates in more than 510 megawatts of electric generating resources supplemented by purchase agreements for 261 megawatts (MW) of additional capacity. Approximately 44 percent of SVP-owned generating capacity comes from renewable energy sources—either geothermal, hydroelectric, or wind. Residential electricity demand is low

compared with the energy needs of data centers and other high-tech firms that are located in Santa Clara. In 2009, Santa Clara electricity consumption across all sectors was approximately 2.8 million megawatt hours, about nine percent of which was from residential uses.

Although the City is largely built-out and future growth will be accommodated almost entirely through infill development, additional growth in the City will increase energy demand. SVP forecasts power demand using three primary factors: historical patterns, new substantial requests for power, and econometrics that focus on financial health of SVP's largest-served industries. SVP expects continued moderate (1-3 percent) load growth for the next ten years, with periods of rapid growth as new large projects are completed— primarily large office projects and data centers. Given current usage rates per residential unit and per square foot for the various non-residential land use types (commercial, industrial, public/quasi-public), electric energy usage is forecast to increase to 4.0 MWh and natural gas usage to increase to 130,000,000 therms by 2035. Both SVP and Pacific Gas & Electric Company (PG&E) are capable of meeting this demand and it is not anticipated that either utility will need to construct new energy facilities to accommodate any increased demand. Moreover, SVP offers a range of energy efficiency programs, including rebates for installing energy-efficient systems in homes and businesses.

Street System

Vehicular circulation in the City includes a wide network of surface streets. With the influx of workers into the job-rich City during the day, commute patterns are northbound in the morning and southbound in the evening. Existing and perceived future traffic delays are a major concern expressed by residents during community outreach activities. Since most of the City streets are fully improved with limited opportunity for widening, alternative travel modes, such as public transit, bicycling, and walking, offer opportunities to address traffic constraints.

Traffic volume projections for 2035 were developed using the Santa Clara Travel Demand Model. The model anticipates a reduction in trips originating and/or ending in Santa Clara by 2035 (14.35 VMT per person in 2008 versus 12.19 VMT per person in 2035). This reduction is attributable in part to the mix of land uses outlined in the General Plan that will result in shorter trips for residents because of the closer proximity of jobs and services to housing as well as the increased availability and accessibility of other modes of travel, such as bicycling and walking.

Seismic, Geologic, and Soil Hazards

The San Francisco Bay Area is a seismically active region with numerous active faults. No active faults run through the City, although several are present in the surrounding region. Geologists with the U.S. Geological Survey and other agencies foresee a 62 percent probability of a magnitude 6.7 or greater earthquake in the San Francisco Bay region before 2032.

The City is almost entirely within a liquefaction hazard zone. Development in a liquefaction hazard zone requires adherence to the guidelines for evaluating and addressing seismic hazards as required by Public Resources Code Section 2695(a). Before a development permit can be granted within this zone, a geotechnical investigation of the site must be conducted and appropriate measures, such as edge containment structures, driving piles or treatment of soils, incorporated into the project design.

The General Plan recognizes these seismic hazards and provides policies to address safety for earthquake activity and geologic conditions. In addition, the City has adopted the California

Building Code with local amendments, which is implemented and enforced by the City's Building Inspection Division. The Building Code includes provisions to address appropriate design and construction in seismically active areas. It also includes provisions to ensure that foundation and building design is appropriate to site soil conditions, including standards to address expansive soils conditions.

Flooding

Flood zone mapping by the Federal Emergency Management Authority (FEMA) indicates that approximately ten percent of the City is located within a Special Flood Hazard Area (SFHA). Development may occur within the SFHA, provided it complies with local floodplain management ordinances and meets the minimum federal requirements. Policies to reduce hazards associated with flooding and to monitor potential sea level rising as a result of global warming are included in the General Plan. In addition, the City has adopted the Flood Damage Prevention Code, 1987 ed., to address requirements for flood protection.

References

City of Santa Clara, 2011. 2010-2035 General Plan Integrated Final Environmental Impact Report, January 2011.

City of Santa Clara, 2014. General Plan, Section 5 Land Use component, draft September, 2014.

City of Santa Clara, 2014. General Plan, Section 8.12 Housing Element, HCD review draft, August, 2014.

SECTION 3
Environmental Impacts and Mitigation Measures

As noted in Section 1, Background and Purpose of this Addendum, this Addendum compares the potential environmental impacts from the proposed Land Use component and Housing Element updates with the environmental documentation prepared previously for the 2010-2035 General Plan. The purpose of this analysis is to determine if the Housing Element update would require major revisions of the 2010-2035 General Plan EIR due to:

- new significant impacts or a substantial increase in the severity of previously identified significant effects as a result of either a change to the project or due to substantial changes with respect to the circumstances under which the project is being undertaken,

- new information of substantial importance, which was not known and could not reasonably have been known at the time the EIR was certified, has become available that shows that the project would have new significant impacts, that the project would cause substantially more severe significant impacts, that mitigation measures previously thought to be infeasible have become feasible, or that previously unconsidered mitigation measures would substantially reduce one or more significant impacts.

The environmental issues analyzed in the 2010-2035 General Plan are discussed below to document that none of the changes described above have occurred since certification of the 2010-2035 General Plan.

A. Land Use

Impacts Identified in the General Plan EIR

The EIR did not identify significant impacts related to land use and planning policy that would occur as a result of implementation of the 2010-2035 General Plan. No mitigation measures were identified.

Proposed Land Use Component and Housing Element Updates

The proposed project would not result in any new significant impacts related to land use. The proposed Land Use component update identifies new complementary land uses for properties that are underutilized and could accommodate infill development. These changes are also reflected the proposed Housing Element, in which the City has identified additional housing sites that can accommodate housing needs under existing zoning and development standards.

As mentioned in the Project Description, the City of Santa Clara initiated an update to the Zoning Ordinance in early 2014 to track the 2010-2035 General Plan more closely. Prior to the adoption of the Zoning Ordinance update, the City will continue to utilize Planned Development (PD) rezoning for selected developments.

The proposed Land Use Element and Housing Element updates would not establish any new roadway or other physical features that would disrupt existing patterns of circulation or socialization within the community. The Housing Element is a policy document focused on facilitating preservation of the existing housing stock and accommodating new development to satisfy the RHNA. Further, the proposed Housing Element supports the continuity of established urban development and placements of housing by identifying opportunity sites for residential development. Opportunity sites were identified based on the site's ability to accommodate residential land uses.

One of the Major Strategies of the 2010-2035 General Plan is to ensure that the City's existing neighborhoods and community character are maintained as the City grows. The 2010-2035 General Plan encourages new uses that are contextually appropriate, both in land use as well as in scale and design. This compatibility is supported through discretionary use and transition policies that allow flexibility to accommodate unique sites, development conditions, and the transition between existing and new development.

All housing sites identified in the proposed Housing Element were considered in the General Plan EIR; therefore, there would be no change to findings regarding land use incompatibilities or conflicts. Furthermore, housing sites that are identified, particularly for low and moderate income groups, include underutilized properties, the redevelopment of which would improve the character of existing communities and adjacent land uses. The proposed project does not directly propose any physical improvements in the planning area; however, all future development projects would be subject to applicable City requirements, as well as to further CEQA analysis of project-specific impacts, if warranted.

B. Population and Housing

Impacts Identified in the General Plan EIR

The General Plan EIR identified the following impacts related to Population, Housing, and Employment:

- Since the proposed project will induce substantial population growth at other locations, the impact is significant. As further discussed in detail in the Transportation, Air Quality, and Climate Change sections of the 2010-2035 General Plan EIR, the City's continued jobs/housing imbalance will contribute to air pollutant emissions (including greenhouse gas emissions) and congestion on area freeways, roadways and intersections, and constitutes a significant unavoidable impact. (Significant and Unavoidable)

    - Mitigation: no mitigation measures identified.

Proposed Land Use Element and Housing Element Updates

While over the long-term the 2010-2035 General Plan accommodates the population growth forecast by ABAG and the required RHNA goals, the EIR estimated that the jobs-to-housing ratio across the City in 2035 would be 1.77 jobs per employed resident. As a result, the City is considered 'job-rich' because it provides for more employment than housing and would lead to insufficient housing opportunities for future Santa Clara workers. To accommodate these workers, substantial residential development would need to be built elsewhere in the region to provide adequate housing opportunities for future workers. As discussed in detail in the Transportation, Air Quality, and Climate Change sections of the EIR, the City's jobs/housing imbalance would contribute secondary impacts to transportation, air quality, and climate change impacts, including: increased air pollutant and greenhouse gas emissions and increased congestion on area freeways, roadways and intersections. The EIR concluded that such secondary effects would constitute a significant unavoidable impact. Nevertheless, the proposed project would not result in any new significant impacts relating to population and housing.

The proposed Land Use Element update involves land use changes that would encourage the development of residential land uses, including medium and high density housing developments, which would serve a portion of the City's growing work force. These land use changes are tied to the housing opportunity sites identified in the proposed Housing Element, which accommodate the City's RHNA, and are consistent with the development that was analyzed under the General Plan for the Tasman East, Lawrence Station, and El Camino Real Focus Areas. The housing sites identified in the proposed Housing Element would result in a net increase of up to 5,876 new units or 15,453 new residents (5,876 units at 2.63 persons per household). This increase is consistent with the City's growth projections and would adequately accommodate future residential growth. The proposed project does not directly propose any physical improvements in the planning area; however, all future development projects would be subject to applicable City requirements, as well as to further CEQA analysis of project-specific impacts. Although the project provides opportunities and incentives for residential development, it does not guarantee that any housing will in fact be built; therefore, the project would not directly affect the jobs-to-housing balance issue identified in the General Plan EIR. However, the project is intended to enable the development of affordable housing near jobs in the City indirectly, and the project proposes denser residential land uses for opportunity sites than what was considered for the General Plan EIR. Therefore, the project would contribute somewhat to the reduction of the high

jobs to housing ratio that was determined in the EIR, and thus would help reduce the significant unavoidable impact that was identified. However, the impact would remain significant and unavoidable.

C. Aesthetics and Visual Resources

Impacts Identified in the General Plan EIR

The EIR did not identify significant impacts related to aesthetics and visual resources that would occur as a result of implementation of the 2010-2035 General Plan.

Proposed Land Use Element and Housing Element Updates

Although visual quality is subjective, it can reasonably be concluded that the proposed redevelopment and infill of future projects would not result in a significant negative aesthetic effect. Redevelopment would result in substantial changes in visual character due to the construction of new buildings, on-site landscaping, frontage improvements, and an overall intensification of on-site development. Redevelopment of an opportunity site would improve the visual quality of the area by redeveloping mostly underutilized sites.

The programs, policies, and proposed land use changes in the proposed Land Use Element and Housing Element updates are consistent with the vision for each of the General Plan Focus Areas, and would in fact act to implement the vision for each Focus Area during the Phase II planning period. The vision for the El Camino Real Focus Area is to transform the area from a series of automobile-oriented strip-malls to a tree-lined, pedestrian- and transit-oriented corridor with a mix of residential and retail uses. As required by General Plan transition goals and policies, in conjunction with the El Camino Real Focus Area policies, new development facilitated by the proposed Land Use Element and Housing Element updates would respect the existing historic character and development patterns of the surrounding area. Development facilitated by the proposed Land Use Element and Housing Element update would also be consistent with the vision for the Lawrence Station and Tasman East Focus Areas, which would ultimately consist of medium- and high-density residential, alongside open space and neighborhood retail. All new development would be subject to review by the City's Architectural Committee prior to issuance of building permits. Development facilitated by the proposed Land Use Element and Housing Element updates would not substantially degrade the existing visual character or quality of any of the opportunity sites or their surroundings and no significant impacts would occur.

The City's scenic resources would be managed consistent with City adopted regulations and policies, in combination with State regulations. Long-range views from public viewpoints throughout Santa Clara are already partially or completely obscured by existing development or vegetation. Additionally, conformance to height and setback requirements would result in a structure that would not impede views of scenic vistas and would be consistent with their surroundings. There are no scenic highways or corridors, as designated by the State, within or in the vicinity of Santa Clara. Long range views of the Santa Cruz Mountains, the Diablo Range, and the Ulistac Natural Area are available from the system of roadways and formal and informal public trails; however, these views are mostly obscured from private properties by adjacent development. The 2010-2035 General Plan includes a range of policies to ensure high quality design that maintains the quality of these scenic vistas, therefore, scenic resources, views, and vistas would not be adversely affected from potential development facilitated by the proposed Land Use Element and Housing Element updates.

The proposed Land Use Element and Housing Element updates would not directly create new sources of light or glare. Indirectly, new development facilitated by the project would create new sources of light and glare. Sources of light and glare would include external housing lights, street-lights, parking lot lights, security lights, vehicular headlights, internal building lights, and reflective building surfaces and windows. As discussed above, development would go through the City's Architectural Committee prior to issuance of building permits, and would be reviewed for consistency with the City's Design Guidelines. The City's light and glare will be reduced and managed consistent with City adopted regulations and policies, in combination with State regulations, including Santa Clara City Code Chapter 18.76 and the Architectural Committee Community Design Guidelines. Furthermore, the General Plan contains policies that provide program-level mitigation for effects to surrounding neighborhoods from new light and glare. Impacts from new sources of light and glare would be less-than-significant.

All future development projects would be subject to applicable City requirements, including all design and development codes, as well as to further CEQA analysis of project-specific impacts. The proposed project would not result in any new significant impacts, or increase the severity of previously identified impacts, related to visual and aesthetic resources.

D. Hydrology and Water Quality

Impacts Identified in the General Plan EIR

The EIR did not identify significant impacts related to hydrology and water quality that would occur as a result of implementation of the 2010-2035 General Plan.

Proposed Land Use Element and Housing Element Updates

Any development proposed pursuant to the proposed Land Use Element and Housing Element policies would be required to comply with water quality standards and waste discharge regulations set forth by the Regional Water Quality Control Board (RWQCB). No industrial wastewater discharges would be associated with the land uses anticipated under Land Use Element and Housing Element implementation.

Future development projects consisting of five or more acres in land would be required to comply with National Pollutant Discharge Elimination Systems (NPDES) permit requirements, which include retaining storm water from the impervious areas created by the project and allowing it to recharge into the ground and to adhere to specific water quality BMPs. By retaining the water on site, there would be no violations to water quality standards, and no additional impact to the storm water system from new development. Adherence to BMPs would ensure no erosion or siltation would occur as a result of construction activities. All construction would conform to the requirements of the NPDES Municipal Regional Storm water Permit regarding erosion and sedimentation control during construction. In addition, individual projects would be required to manage discharge of storm water runoff under the Clean Water Act, through the preparation and implementation of a Storm Water Pollution Prevention Program (SWPPP), which addresses appropriate measures for reducing construction and post construction impacts.

The 2010-2035 General Plan includes policies that address storm water runoff and water quality. Where land use changes are proposed, most of the sites are currently paved or covered over with impervious surfaces which contribute to the presence of debris, soils, oil/grease, and other pollutants being transported into the storm drains on site. The redevelopment of these sites would typically construct new features and improvements that would address storm water runoff and reduce storm water pollutant levels, including the addition of planted areas and increased pervious surface areas. Given the developed character of the land in the City there is likely to be an improvement in the quality of storm water runoff.

The proposed project is designed to promote the redevelopment of vacant and underutilized sites for more intensive uses which would include new medium and high density residential uses. An increase in local population resulting from housing development has the potential to increase demand on water resources, which would result in additional demand for potable water. The City of Santa Clara receives the majority of its potable water supply from the San Francisco Public Utilities Commission (SFPUC) and the Santa Clara Valley Water District (SCVWD), with some water coming from the South Bay Water Recycling Project (SBWRP) and City-owned groundwater resources. The recharge area for the potable water aquifer is approximately 26 acres, located at the City's southwest corner that is currently developed as residential uses. There is very limited development proposed for the area under the General Plan, and none of the land use changes under the proposed project fall within the recharge area; therefore, development facilitated by the proposed Land Use Element and Housing Element updates would not interfere with groundwater recharge rates.

All future development would be required to employ applicable water conservation measures for interior plumbing and landscaping. Once specific sites are slated for development, the City would determine the nature and extent of the required infrastructure as part of the development review and plan check process. All future development projects would be subject to applicable City requirements, as well as to further CEQA analysis of project-specific impacts. The proposed project would not result in any new significant impacts related to hydrology and water quality.

E. Geology and Soils

Impacts Identified in the General Plan EIR

The EIR did not identify significant impacts related to geology, soils and seismicity that would occur as a result of implementation of the 2010-2035 General Plan.

Proposed Land Use Element and Housing Element Updates

Santa Clara is located in a seismically active region. Seismic shaking of this intensity can trigger ground failures caused by liquefaction, potentially resulting in foundation damage, disruption of utility service and roadway damage. Because the City does not contain any faults mapped as Alquist-Priolo Earthquake Fault zones which extend through the City, the risk for surface fault rupture within the City is considered low.

Seismic design criteria must conform to engineering recommendations in accordance with the seismic requirements of the 2013 California Building Code (CBC) (Title 24) additions and with subsequent updates to the CBC. The proposed Land Use Element and Housing Element updates do not include policies that would interfere with the implementation of the CBC. The effects of seismic activity could result in significant impacts to the housing opportunity sites; however, adherence to General Plan and CBC would ensure impacts from the project would be less than significant.

Under the County of Santa Clara Hazard Mapping, most of the City of Santa Clara is considered susceptible to liquefaction hazards, including the nine Focus Areas proposed for development in the 2010-2035 General Plan. Future projects approved within the liquefaction hazard area are required under the Seismic Hazard Mapping Program and building code and City Code requirements to evaluate site-specific liquefaction and ground failure hazards and mitigate those hazards to an acceptable level.

Landslide hazard mapping compiled by the County of Santa Clara shows the City, with its relatively flat topography, is outside the landslide hazard zone; therefore, landslide- or mudslide-related impacts would be less than significant. No land use changes or additional density allowances are proposed by the proposed Land Use Element and Housing Element where landslides are identified as a risk. Adherence to existing CBC requirements related to geotechnical investigations during the building permit process would ensure that appropriate design measures and mitigation are incorporated to ensure slope stability where necessary.

There are no significant mineral resources or exploitable oil or gas resources present in the City boundaries. City is not subject to risk of earthquake-induced landslides. The City is not located within a tsunami inundation area, nor is the City at a high risk for seiches due to seismic shaking.

For future development over one acre in size, erosion hazards would be minimized through implementation of site-specific erosion measures in SWPPPs under the NPDES General Construction Permit and grading and excavation requirements in the City Code. Given that many future development projects would be on properties less than one acre, requirements for BMPs under the City's NPDES Municipal Permit, urban runoff policies, and the City Code would be the primary means of enforcing erosion control measures through the grading and building permit process.

New development under the proposed project would occur primarily as intensification of previously developed areas throughout the City. Hazards associated with expansive soils, weak soils, and artificial fill will be reduced and managed consistent with City adopted regulations and policies, in combination with State building regulations. The proposed project provides program-level mitigation for geologic and soil hazards within the City. Implementation of proposed policies and existing regulations and programs would substantially reduce hazards to people and property.

The adoption of the proposed Land Use Element and Housing Element would not in itself result in projects that would be located on a geologic unit or soils that are unstable or expansive, creating substantial risk to life or property. By adhering to the standards of the CBC and because construction that conforms to these Standards is presumed to meet the Seismic Design Category, the potential impacts from seismic ground shaking and seismic ground failure, including liquefaction are considered (on any future, new construction) less than significant.

The proposed project would not result in any new significant impacts, or increase the severity of previously identified impacts, related to geology, soils, and seismicity. The amendments to the Land Use Element and Housing Element are consistent with the development assumptions analyzed under the General Plan. The proposed project does not directly propose any physical improvements in the planning area; however, all future development projects would be subject to applicable City requirements, as well as to further CEQA analysis of project-specific impacts. In addition, future development projects would be required to comply with all current and applicable building and fire codes and would be required to follow all updated standard mitigation measures and development conditions related to geotechnical/soils investigation and environmental site assessments.

F. Public Services

Impacts Identified in the General Plan EIR

The EIR did not identify significant impacts related to public services that would occur as a result of implementation of the 2010-2035 General Plan.

Proposed Land Use Element and Housing Element Updates

Fire and life safety services in the City of Santa Clara are provided by the Santa Clara Fire Department (SCFD). Police protection services are provided by the Santa Clara Police Department (SCPD). Schools that serve children in grades K-12 who reside in the City of Santa Clara are operated by six school districts: Santa Clara Unified School District (SCUSD), San José Unified School District, Cupertino Union School District, Fremont Union High School District, Campbell Union School District, and Campbell Union High School District. While the majority of students residing in the City of Santa Clara attend SCUSD schools, SCUSD also serves

children in the cities of Santa Clara, Sunnyvale and San José, and is responsible for 16 elementary, three middle, two high, one K-8, and two continuation high schools, as well as one adult education school. Existing libraries in Santa Clara are the Central Park Library, the Main Library, the Mission Library Family Reading Center, and the Northside Branch Library and there are several arts, cultural, and community facilities in the City.

The EIR determined that although development under the 2010-2035 General Plan would increase the demand for fire, life safety, and police services, the additional personnel that would be needed could be housed in existing facilities, and there would be no need to expand those facilities. The EIR estimated that implementation of the General Plan would result in an additional 2,000 students needing public education services from SCUSD. Because SCUSD has four school sites that are currently closed and new facilities were recently built in San Jose, the district would be able to accommodate the increase in students under the General Plan. The EIR determined that new library facilities may be needed to serve development in the northern part of the City, but that the need for these facilities would be evaluated as part of the planning process for future Focus Areas. In addition, there would not be a need for additional arts, cultural, and community facilities that would constitute a significant impact.

The proposed Land Use Element and Housing Element updates would not in itself result in substantial adverse physical impacts associated with the provision of public services. However, residential development constructed pursuant to the Land Use Element and Housing Element updates may incrementally increase demands for those services. The demand for public services and facility/equipment maintenance needs would increase gradually over the incremental implementation of the proposed project and staff, equipment, and maintenance services on an as-needed basis in order to accommodate these increased demands. This increase was considered in the General Plan, which includes policies that reduce or avoid possible impacts and ensure police and school service levels are maintained and impacts are reduced to less than significant.

The proposed project would not result in any new significant impacts or increase the severity of previously identified impacts related to public services. The amendments to the Land Use Element and Housing Element are consistent with the development assumptions analyzed under the General Plan; therefore, the demand for public services would not change significantly from that which was analyzed in the General Plan EIR. The proposed project does not directly propose any physical improvements in the planning area; however, all future development projects would be subject to applicable City requirements, as well as to further CEQA analysis of project-specific impacts.

G. Public Utilities

Impacts Identified in the General Plan EIR

The EIR identified the following impacts related to Public Utilities from implementation of the 2010-2035 General Plan:

- Future pumping by the City of Santa Clara, in combination with the multiple other users of the Santa Clara Sub-Basin, would not be expected to contribute to cumulative groundwater pumping impacts, i.e. withdrawals above the basin's safe yield, given the Water District's reasonably foreseeable recharge and groundwater management programs. However, should the District's recharge program be affected by reduced availability of imported water, there is the potential for future cumulative groundwater

basin demand to exceed the aquifer's safe yield. (Less than Significant Impact with Mitigation)

  - Mitigation: To prevent a cumulatively considerable contribution to a potential future overdraft of the Santa Clara Sub-Basin, the City shall update the forecast groundwater pumping supply quantities every five years with each UWMP to align water supply availability with the water demand associated with each General Plan Phase. Future Santa Clara UWMPs will be coordinated with the Water District and implement alternative sources (i.e. recycled water and increased conservation) if cumulative groundwater pumping, based on all water retailer UWMPs, would exceed the Santa Clara Sub-Basin safe yield. With implementation of this program mitigation measure, potential future impacts associated with supplying future development envisioned by the General Plan would be reduced to a less than significant level.

- Development allowed under the proposed 2010-2035 General Plan would be served by a landfill with sufficient permitted capacity to accommodate the project's solid waste disposal needs through 2024. The City has no specific plan for disposing of solid waste beyond 2024, but will undertake a process to identify a solution prior to 2024. (Significant Impact)

Proposed Land Use Element and Housing Element Updates

The City of Santa Clara receives the majority of its potable water supply from the San Francisco Public Utilities Commission (SFPUC) and the Santa Clara Valley Water District (SCVWD), with some water coming from the South Bay Water Recycling Project (SBWRP) and City-owned groundwater resources. The EIR analyzed the potential for water supply shortages as a result of increased demand under the General Plan. The SCVWD's baseline projection calls for countywide water demand to grow from approximately 382,000 acre-feet per year to approximately 475,000 acre-feet per year in year 2040, an increase of about 24 percent. Over this same period, countywide population is expected to grow by 54 percent, from 1.7 million people to 2.6 million. Santa Clara's growth in population and associated water demand, as represented by the 2010-2035 General Plan, are included in these projections. Although the SCVWD forecasts that supplies will be adequate to meet needs in wet and average years, there are expected to be dry-year shortages that grow over time from approximately 50,000 acre-feet in 2010 to 75,000 acre-feet by 2040.

The City anticipates that future water demand associated with the 2010-2035 General Plan growth would be met by the continued use of the four identified supply sources, with the assumption that groundwater and recycled water use and conservation would increase over time to meet future demand. As discussed in the EIR, there is the potential for decreased SCVWD and/or SFPUC imported surface deliveries, in which case the City would turn to groundwater supplies. In this case, the City's projected aquifer pumping would fall within the range of historically sustainable pumping, given the Water District's reasonably foreseeable recharge and groundwater management programs. The EIR concluded that although there would not likely be impacts due to potential future overdraft conditions, the District's recharge program could be affected by reduced availability of imported water. There is the potential for future cumulative groundwater basin demand to exceed the aquifer's safe yield, resulting in a potentially significant impact for which mitigation was identified.

As new development occurs according to the General Plan, wastewater flows are projected to increase, but would not likely exceed the current wastewater conveyance system or treatment allocation prior to implementation of Phase III of the General Plan. In addition, the General Plan would not result in significant impacts due to inadequate capacity of the City's wastewater conveyance or the regional WPCP.

According to the California Integrated Waste Management Board (CIWMB) 2008 Annual Report Summary, the City of Santa Clara has exceeded the 50 percent diversion goal by achieving a generation rate of 6.9 lbs/person per day for the population calculation and 7.2 lbs/person per day for the employment calculation. The proposed General Plan includes policies to minimize waste generation and to continue to meet state diversion requirements, and therefore is consistent with the County Integrated Waste Management Plan (IWMP). At the time the EIR was adopted, the City did not have a plan for solid waste disposal beyond 2024. Solid waste impacts would be less than significant, so long as the City determines a plan for solid waste disposal beyond 2024.

The adoption of the proposed Land Use Element and Housing Element updates would not directly result in substantial adverse impacts to public utilities, including water, wastewater, and solid waste services. However, development constructed as a result of the proposed Land Use Element and Housing Element programs and policies would incrementally increase the demand for utility services and infrastructure, which could require the construction of new infrastructure or expansion of existing infrastructure in order to serve new development. This incremental increase in demand was considered in the General Plan EIR, which determined that no significant impacts would occur with mitigation, and noted that the City would identify a solution for post-2024 solid waste disposal. The proposed project would not result in any new significant impacts related to public utilities. The amendments to the Land Use Element and Housing Element are consistent with the development assumptions analyzed under the General Plan; therefore, the demand for utility systems and services would not change from that which was analyzed in the General Plan EIR. The project does not directly propose any physical improvements in the planning area; however, all future development projects would be subject to applicable City requirements, as well as to further CEQA analysis of project-specific impacts.

H. Open Space, Parks, Trails, and Recreation

Impacts Identified in the General Plan EIR

The EIR did not identify significant impacts related to open space, parks, trails, and recreation that would occur as a result of implementation of the 2010-2035 General Plan.

Proposed Land Use Element and Housing Element Updates

The EIR determined that an increase in population resulting from implementation of the 2010-2035 General Plan may place a higher demand on area parks, open space or recreation facilities; however, the 2010-2035 General Plan includes policies to ensure that adequate parks and recreation facilities are provided to accommodate the increase in new residents. Physical deterioration of existing park and recreation facilities will be reduced and managed consistent with City adopted regulations and policies, in combination with State regulations. In addition, new parkland and recreation facilities would be needed in the City to accommodate the increase in population under the General Plan, however, the City's recently adopted parkland dedication ordinance is designed to ensure that future development of parkland within the City would not have an adverse physical effect on the existing environment.

The adoption of the proposed Land Use Element and Housing Element updates would not directly result in substantial adverse impacts to open space, parks, trails, and recreation. However, residential development constructed as a result of Housing Element programs and policies would incrementally increase the demand for utility services and infrastructure, which could require the construction of new infrastructure or expansion of existing infrastructure in order to serve new development. This incremental increase in demand was considered in the General Plan EIR, which determined that no significant impacts would occur. Since the adoption of the EIR, the City has added a parkland dedication ordinance to the City Code, requiring residential developers to maintain and increase the supply of parkland and recreational facilities. Consequently, the impacts on parkland under the current City Code would be less than those analyzed in the EIR. The proposed project would not result in any new significant impacts related to open space, parks, trails, and recreation.

The proposed Land Use Element update includes revised prerequisites policies that ensure adequate parkland is provided alongside development. Prerequisite policy 5.1.1-P1 requires that the City evaluates the appropriate measures to maintain a parkland ratio of between 2.53 to 3.0 acres per 1,000 residents, prior to implementation of Phase III, which the City has implemented by adopting its parkland dedication ordinance. Prerequisite policy 5.1.1-P21 requires that the City identifies the location for new parkland and/or recreational facilities to serve employment centers prior to 2023, and pursues funding to develop these facilities by 2035. Prerequisite policy 5.1.1-P24 requires the City complete a Parks and Open Space Needs Assessment (Parks Master Plan), or similar planning effort, prior to 2023 to implement General Plan park and recreation policies, including potential adjustment to the parks/population ratio as well as identification of potential funding opportunities for new parkland and/or recreational facilities.

The amendments to the Land Use Element and Housing Element are consistent with the development assumptions analyzed under the General Plan; therefore, the demand for open space, parks, trails, and recreation would not change from that which was analyzed in the General Plan EIR. The project does not directly propose any physical improvements in the planning area; however, all future development projects would be subject to applicable City requirements, as well as to further CEQA analysis of project-specific impacts.

I. Biological Resources

Impacts Identified in the General Plan EIR

The General Plan EIR identified the following impacts related to biological resources:

- Over the course of the General Plan's 25 year horizon, the Congdon's tarplant could become established at any time on a vacant parcel containing ruderal grasslands. Therefore, future development of vacant parcels containing ruderal grasslands has the potential to impact the Congdon's tarplant, should the tarplant be present at the time of development. (Less than Significant Impact with Mitigation)

    - **Mitigation:** On parcels with ruderal grasslands, surveys will be conducted prior to future development to document the presence/absence of Congdon's tarplant. In the event the species is present, the project design will incorporate an adequate buffer, as determined by a qualified biologist, to ensure the Congdon's tarplant is not threatened by development. (Less than Significant Impact after Mitigation)

- On parcels with ruderal grasslands, surveys will be conducted prior to future development to document the presence/absence of Congdon's tarplant. In the event the species is present, the project design will incorporate an adequate buffer, as determined by a qualified biologist, to ensure the Congdon's tarplant is not threatened by development. The WBO could become established (i.e. forage and/or breed) at any time on a vacant parcel containing ruderal grasslands. Development of vacant parcels could result in impacts to individual burrowing owls if owls moved onto the site prior to project construction. If owls are using active nests when construction activity commences, grading of the site could result in destruction of nests and individual owls. (Less than Significant Impact with Mitigation)

    - **Mitigation:** Future development on parcels with ruderal grasslands will include the standard measures identified in Section 4.9 Biological Resources of the EIR to reduce potential WBO impacts to a less than significant level. (Less than Significant Impact after Mitigation)

Proposed Land Use Element and Housing Element Updates

The General Plan EIR determined that future development under the 2010-2035 General would likely result in minimal direct impacts due to habitat loss since there are very few vacant, undeveloped parcels left in the City proposed for urban development that provide habitat value. The vast majority of new development anticipated under the 2010-2035 General Plan would occur on parcels already developed with an urban use. Most impacts to wildlife will be indirect impacts, whether through construction impacts or the operation of new urban uses, in proximity to wildlife habitat, such as the creek corridors that cut through the City.

The only Focus Areas that could be affected are El Camino, Santa Clara Station Area, and Tasman East, which have small isolated vacant parcels that provide for marginal habitat for wildlife; therefore, future development of these vacant parcels has the potential to impact wildlife species if those species are present in the future, and would constitute a significant impact. The species with the highest potential to occur in the City include Congdon's tarplant and western burrowing owl. The mitigation above would be required to reduce the potential for significant impacts. In addition the 2010-2035 General Plan has many policies to protect biological resources. The EIR determined that there would be less than significant impacts to riparian habitat and other sensitive natural communities, protected wetlands, and waterways, and the General Plan would not conflict with the provisions of an adopted conservation plan, or local policies or ordinances protection biological resources. The EIR concluded that it is highly unlikely that development under the proposed General Plan would degrade the quality of the environment to such an extent as to cause a significant drop in a wildlife population, a significant drop in habitat area, or the elimination or restriction of an endangered plant or animal community.

The Land Use Element and Housing Element updates largely encourages the redevelopment of existing facilities within the urban areas of the City where the presence of special-status species is unlikely or absent due to the lack of suitable habitat and topography. Impacts on special-status species, habitat, and protected biological features resulting from development of sites identified in the Land Use Element and Housing Element would be less than significant as adherence to regulatory requirements would ensure protection of biological resources when they do occur.

The proposed project would not result in any new significant impacts or increase the severity of previously identified impacts, related to biological resources. The amendments to the Land Use

Element and Housing Element are consistent with the development assumptions analyzed under the General Plan. No new land disturbances would occur as a result of the project, including conservation of open space lands, and no new biological resource disturbances would result; therefore, no new impacts to biological resources would occur. The project does not directly propose any physical improvements in the planning area; however, all future development projects would be subject to applicable City requirements, as well as to further CEQA analysis of project-specific impacts. In addition, new development would demonstrate consistency with the mitigation procedures as described in detail in the 2010-2035 General Plan EIR.

J. Air Quality

Impacts Identified in the General Plan EIR

The General Plan EIR identified the following impacts related to Air Quality:

- Implementation of the 2010-2035 General Plan may involve the placement of new residences and/or sensitive receptors near localized sources of Toxic Air Contaminants ("TACs"). The March 2010 Public Review Draft 2010-2035 General Plan did not provide adequate buffers between existing sources of TAC and new residences and/or sensitive receptors. (Less than Significant with Mitigation)
    - Mitigation: Policy 5.1.1-P25 should be added to the Prerequisite section as follows:
        - Policy 5.1.1-P25: The BAAQMD CEQA Guidelines also recommend that communities adopt a Community Risk Reduction Plan (CRRP) to address TACs. Prior to 2015, develop and adopt a CRRP, to bring TAC and PM2.5 concentrations down to acceptable levels as identified by BAAQMD, including risk and exposure reduction targets, measures to reduce emissions, monitoring procedures, and a public participation process.
    - Policy 5.10.5-P34 should be added to the Safety section as follows:
        - Policy 5.10.5-P34: Include minimum setbacks of 500 feet for freeways (or busy arterial roadways with average daily trips of 100,000 or more) and 100 feet for railroad tracks. Exceptions may be made for projects that do not meet the distance requirements, but can be determined compatible with adjacent uses through a project specific study that determines potential health risks. Complete modeling for health risks for individual projects located within the minimum setbacks for roadways and railroads. Mitigation measures such as (but not limited to); site redesign, tiered plantings of trees, air filtration systems, and location of air intakes and design windows to reduce exposure, shall be required to reduce these risks to acceptable levels.
- Implementation of the 2010-2035 General Plan may involve the placement of new residential and other uses with sensitive receptors near localized sources of odors. The March 2010 Public Review Draft 2010-2035 General Plan did not provide adequate

buffers between sources of odors and new residences or sensitive receptors. (Less than significant impact with mitigation)

- Mitigation: Policy 5.10.5-P35 should be added to the Safety section as follows:
  - Policy 5.10.5-P35: Implement BAAQMD guidelines that establish minimum screening or buffer distances between odor sources and sensitive receptors. Exceptions may be made for projects that do not meet the distance requirements, but can be determined compatible with adjacent uses through a project-specific study that determines potential nuisance. Mitigation measures shall be required to reduce these risks to acceptable levels. The mitigation measures will vary depending on the source of the odor (i.e., wastewater treatment plant, landfill, food services, etc.) and could include scrubbers, filters and covers.

Proposed Land Use Element and Housing Element Updates

The Bay Area 2010 Clean Air Plan (2010 CAP) provides an updated comprehensive plan to improve Bay Area air quality and protect public health, taking into account future growth projections to 2035. The legal impetus for the Bay Area 2010 CAP is to update the most recent ozone plan, the Bay Area 2005 Ozone Strategy, to comply with State air quality planning requirements as codified in the California Health & Safety Code. The policies under the 2010-2035 General Plan support and reasonably implement the applicable Bay Area 2005 Ozone Strategy and the Bay Area 2010 Clean Air Plan transportation control measures (TCMs). Therefore, the 2010-2035 General Plan would be consistent with the 2010 CAP.

The proposed Land Use Element and Housing Element updates would accommodate increases in population based on ABAG's demographic projections. The proposed Housing Element would be consistent with the Bay Area Air Quality Management District (BAAQMD) Attainment Plan because it is based on demographic projections for the City that form the basis of the regional emissions inventories.

Residential development facilitated by the proposed Land Use Element and Housing Element policies and pursuant to the General Plan can be expected to contribute to increases in pollutant loads throughout the Basin. New residential development resulting from the implementation of the project would generate pollutant emissions, including but not limited to site grading, operation and construction equipment, and vehicle activities. New housing units would generate pollutant emissions due to the use of stationary equipment, new vehicular trips, offsite power, and natural gas generation.

Although the number of residential units accommodated in the Land Use Element and Housing Element would not cause the City to exceed the number of residential units assumed at buildout, the long-term air pollutant emission associated with residential and commercial development are expected to be significant. Air pollutant emissions associated with new vehicle trips and stationary sources would result in emissions levels that exceed the thresholds established by the BAAQMD for particulate matter less than 10 microns in size (i.e., PM10). Although residential development does not contribute to PM10 in this manner, residential development would be subject to appropriate emission reduction measures and BAAQMD Rules and Regulations.

Prior to the implementation of Phase III, General Plan prerequisite Policy 5.1.1-P25 required the City to include a Community Risk Reduction Plan ("CRRP") for acceptable Toxic Air Contaminant ("TAC") concentrations, consistent with the Bay Area Air Quality Management District ("BAAQMD") CEQA Guidelines, including risk and exposure reduction targets, measures to reduce emissions, monitoring procedures, and a public participations process. In addition, the City adopted a Climate Action Plan on December 3, 2013, required as mitigation in the EIR, to reduce greenhouse gas emissions and other air pollutants that result from energy use, transportation, and solid waste disposal activities within the City.

The proposed Land Use Element and Housing Element updates would not result in any new significant impacts, or increase the severity of previously identified impacts, related to air quality. The amendments to the Land Use Element and Housing Element are consistent with the development assumptions analyzed under the General Plan. No additional housing or other development would be associated with the Land Use Element and Housing Element updates; therefore, there would be no change with respect to air quality impacts. The project does not directly propose any physical improvements in the planning area. All future development projects would be subject to applicable City requirements, as well as to further CEQA analysis of project-specific impacts. In addition, future development projects would be subject to applicable mitigation measures included in the 2010-2035 General Plan EIR, as shown above.

K. Cultural and Historic Resources

Impacts Identified in the General Plan EIR

The EIR did not identify significant impacts related to cultural resources that would occur as a result of implementation of the 2010-2035 General Plan.

Proposed Land Use Element and Housing Element Updates

The EIR considered potential impacts to historic resources, located in the City's downtown area, within the El Camino Real Focus Area, and the Santa Clara Station Focus Area. Impacts could occur to identified historic structures and sites through redevelopment and development under the General Plan, and structures that are not currently designated as historic but could meet the criteria for a historic register upon reaching 50 years of age might be impacted by development activity. Project specific impacts to known and potentially historic resources would be further studied at the time a development project is proposed. However, the General Plan contains a range of policies to ensure the protection of historic resources, and there are multiple existing regulations and programs that protect historic resources, which are described in detail in the EIR.

Although the proposed Land Use Element and Housing Element updates have the potential to impact archeological and paleontological resources, existing federal, State, and local regulations establish a series of protections against such impacts. New developments are subject to studies to identify archaeological and paleontological resources; the City reviews applications for projects that would potentially involve land disturbance; the City imposes a project-level standard condition of approval that addresses unanticipated archaeological and or paleontological discoveries; and if resources are encountered during any development activity, specific mitigation measures to properly handle those resources are included in environmental documents. In the event of an unanticipated discovery of archaeological resources during grading and excavation of the site, a qualified archaeologist would assess the find and develop a course of action to preserve the find.

Because development facilitated by the Land Use Element and Housing Element updates would demonstrate consistency with all federal, state, and local policies and regulations, the project would not result in any new significant impacts or increase the severity of previously identified impacts related to cultural resources. No mitigation measures were identified for cultural resources in the EIR. The amendments to the Land Use Element and Housing Element are consistent with the development assumptions analyzed under the General Plan. No new land disturbances or conversion of open space, that could contain cultural, archaeological or paleontological resources, is proposed; therefore, no new impacts to cultural resources would occur.

L. Transportation and Traffic

Impacts Identified in the General Plan EIR

The General Plan EIR identified the following impacts related to Transportation, Circulation and Parking:

- Operating levels of City roadway segments degrade beyond the current City Level of Service standard with the addition of General Plan growth. (Significant and Unavoidable)

- Operating levels of the City roadway segments degrade beyond the current County CMP Level of Service standard with the addition of General Plan growth under the 2010-2035 General Plan. (Significant and Unavoidable)

- Operating levels of Caltrans roadway and free segments degrade beyond the current CMP Level of Service standard with the addition of General Plan growth under the 2010-2035 General Plan. (Significant and Unavoidable)

- Substantial increase in levels of traffic congestion, as measured by the percentage of congested lane miles, with the 2010-2035 General Plan would occur in one of the four geographic zones. (Significant and Unavoidable)

- Increased motor vehicle traffic and increased congestion with the 2010-2035 General Plan would result in increased transit travel times on transit corridors. (Significant and Unavoidable)

    - The 2010-2035 General Plan also includes policies to support transit and relieve congestion along transit routes – including a key policy to support Bus Rapid Transit or similar service on El Camino Real. However, because implementation feasibility of transit-only lanes would be evaluated in more detailed studies and the effect of these policies is not fully known, the impact is considered significant and unavoidable.

- Motor vehicle traffic and congestion due to the 2010-2035 General Plan would increase on roadway segments in other jurisdictions (Significant and Unavoidable)

- Increased motor vehicle traffic and increased congestion with the General Plan would result in increased emergency response times. (Significant and Unavoidable)

- Mitigation: The City will adopt prerequisite policy 5.1.1-P5, which states that prior to the implementation of Phase II and III of the 2010-2035 General Plan, evaluate appropriate measures to maintain emergency response time standards. With this policy, the impact is less-than-significant.

Proposed Land Use Element and Housing Element Updates

Implementation of the Land Use Element and Housing Element updates, as a component of the 2010-2035 General Plan, would contribute to additional traffic and vehicular congestion as identified in the EIR. While anticipated City, County, and VTA improvements would improve roadway operations, projected future traffic volumes would still exceed the capacity of certain roadway segments such that it would not be possible to maintain the current standard and no feasible mitigation exists. In addition, the EIR determined that increased traffic could result in increased emergency response times. The EIR determined that the increase in pedestrians and bicyclists that would result from General Plan implementation would not overload existing sidewalks, pedestrian paths and non-motorized multi-use paths, and bicycle parking, and would not add pedestrians and bicyclists to locations with unsafe conditions.

The proposed project would not result in any new significant impacts, or increase the severity of previously identified impacts, related to transportation and traffic. Importantly, the proposed Land Use Element and Housing Element updates identify sites that could accommodate residential development at land use densities that were previously analyzed in the General Plan EIR. Because the amendments to the Land Use Element and Housing Element are consistent with the development assumptions analyzed under the General Plan, there would be no change with respect to overall transportation and traffic impacts. Further, the Focus Areas would accommodate higher land use densities in proximity to existing transit facilities, which would allow for future residents to have mode choices which could reduce single occupancy vehicles, and thus, roadway congestion.

The adoption of the proposed Land Use Element and Housing Element updates would not approve specific developments, but instead identify opportunity sites for residential development. As a result, all future development and implementation of housing programs must be evaluated and potentially approved on a case-by-case basis. If warranted by the development application, impacts on traffic associated with a large-scale development would be analyzed to reduce traffic increases, when feasible; however, the above mentioned impacts would remain significant unavoidable.

M. Hazards and Hazardous Materials

Impacts Identified in the General Plan EIR

The EIR did not identify significant impacts related to hazards and hazardous materials that would occur as a result of implementation of the 2010-2035 General Plan.

Proposed Land Use Element and Housing Element Updates

The proposed Land Use Element and Housing Element updates would allow for the location of residential uses in proximity to businesses which could expose sensitive receptors to hazardous materials used, stored or disposed of as waste by industrial or in some cases, commercial, operations, particularly where land use changes occur from light or heavy industrial to medium

and high density residential. The presence of hazardous materials on future development and redevelopment sites could result in hazardous materials exposure of construction workers during the site preparation, demolition, and/or construction of new structures. In addition to federal, state, and local regulations regarding hazardous materials, the General Plan contains policies that provide program-level mitigation for risks associated with the use, storage, and disposal of hazardous materials within the City. The EIR did not find any significant impacts that would result from the interruption of adopted emergency response plans.

The City's eastern border is adjacent to the Norman Y. Mineta San Jose International Airport. Portions of Santa Clara, including the Tasman East Focus Area, fall within the height restriction area, as defined in the adopted Santa Clara County Airport Land Use Commission Land Use Plan. The policies and criteria in the 2010-2035 General Plan were deemed consistent with the portion of the Land Use Plan. Development facilitated under the Land Use Element and Housing Element would be compatible with the Land Use Plan by demonstrating consistency with City adopted regulations and policies, in combination with State regulations. In addition, the 2010-2035 General Plan also includes safety policies to address new development consistency with the Surfaces height restrictions.

Both the Land Use Element and Housing Element are a policy and programmatic documents intended to protect existing land uses and facilitate maintenance of the existing housing stock and production of new housing to meet the targeted housing needs of the community. New development that could occur as a result of the project would consist predominantly of residential development, with some commercial and retail uses alongside residential uses in areas designated for mixed use development. Mixed use commercial and residential development does not require and is not expected to require the manufacturing, use, transportation, disposal, or storage of dangerous quantities of hazardous materials. Residential uses do not generate hazardous wastes or emissions, except for very small quantities of typical household cleaning agents, automotive maintenance products, paints, pesticides, and herbicides. The proposed project would not conflict with any hazardous materials regulations and would not exempt any future housing from the City's programs to control and safely dispose of hazardous materials and wastes or to reduce the volume of wastes requiring landfill disposal.

Existing City development standards require that new development be designed so as not to interfere with an adopted emergency response plan or emergency evacuation plan. The project does not include any goal or policy that would affect the normal operations of City emergency services and any potential increases in population due to increases in housing supply would be reflected in the periodic updates to emergency planning and evacuation plans to ensure that emergency response services continue to meet additional demand.

Development near the Norman Y. Mineta San Jose International Airport would not exceed the height restrictions of the Federal Aviation Regulations (FAR) Part 77 or land use policies in the Norman Y. Mineta San Jose International Airport's Comprehensive Land Use Plan; therefore, the project would not create a significant hazard to navigable airspace.

The proposed project would not result in any new significant impacts, or increase the severity of previously identified impacts, related to hazards and hazardous materials. The project is consistent with the development assumptions analyzed under the General Plan; there would be no change in the potential generation of hazardous materials or exposure to existing or new sources of hazardous materials or hazards. The project does not directly propose any physical improvements in the planning area; however, all future development projects would be subject to

applicable local, state, and federal regulations regarding the transportation, use, and disposal of hazardous materials, and to regulations regarding sites with contaminated soil or groundwater, as well as to further CEQA analysis of project-specific impacts.

N. Noise

Impacts Identified in the General Plan EIR

The General Plan EIR identified the following significant impacts related to Noise:

- **Impact 4.14-3:** New development and redevelopment under the proposed Draft 2010-2035 General Plan could expose people to excessive ground vibration levels exceeding Federal Transit Administration ("FTA") guidelines. (Significant Impact)

    - **Mitigation 4.14-1:** Use the Federal Transit Administration vibration impact criteria, as described above under the Regulatory Setting, to evaluate the land use compatibility of sensitive uses proposed along the railroad/light-rail corridor using the best available information (e.g., High Speed Rail Program EIR) or site-specific measurements and analyses (assuming active railroad operations). Developers of sensitive uses shall demonstrate that potential impacts of existing or potential vibration have been minimized to the maximum feasible extent.

- **Impact 4.14-4:** New development and redevelopment under the proposed Draft 2010-2035General Plan would result in increased traffic noise, and the increases would be substantial for residential land uses along Tasman Drive between Lafayette Street and the easternmost City limits. (Significant and Unavoidable Impact)

    - **Mitigation 4.14-2:** Case studies have shown that the replacement of dense grade asphalt (standard type) with open-grade or rubberized asphalt can reduce traffic noise levels along local roadways by 2 to 3 dBA CNEL. A possible noise reduction of 2 dBA would be expected using conservative engineering assumptions, and future traffic noise increases could be mitigated to a less than significant level by repaving roadways with "quieter pavements." To be a permanent mitigation, subsequent repaving would also have to use "quieter" pavements.

      Existing residential receivers located along Tasman Drive between Lafayette Street and the easternmost City limits either front the roadway (private outdoor use areas are located behind the homes) or have outdoor use areas adjacent to the roadway that may or may not be shielded by fences or noise barriers. In situations where private outdoor use areas are located adjacent to the roadway, new or larger noise barriers could be constructed to provide the additional necessary noise attenuation in private use areas. Typically, increasing the height of an existing barrier results in approximately one dBA of attenuation per one foot of additional barrier height. The design of such noise barriers would require additional analysis. Traffic calming could also be implemented to reduce noise levels expected with the project. Each five mph reduction in average speed provides approximately one dBA of noise reduction on an average basis (Leq/CNEL). Traffic calming measures that regulate speed improve the noise environment by smoothing out noise levels.

Residences could also be provided with sound insulation treatments if further study finds that interior noise levels within the affected residential units would exceed 45 dBA CNEL as a result of the projected increase in traffic noise. Treatments to the homes may include the replacement of existing windows and doors with sound-rated windows and doors and the provision of a suitable form of forced-air mechanical ventilation to allow the occupants the option of controlling noise by closing the windows. The specific treatments for each affected residential unit would be identified on a case-by-case basis.

Each of these mitigation measures involves other non-acoustical considerations that could affect the City's ability to implement them. Other engineering issues may dictate continued use of dense grade asphalt. Noise barriers and sound insulation treatments must be done on private property necessitating agreements with each property owner. Therefore, these measures may not ultimately be feasible. Given their implementation cannot be guaranteed, this impact is considered significant and unavoidable.

- **Impact 4.14-5:** New development and redevelopment under the proposed Draft 2010-2035 General Plan would cause a temporary or periodic increase in construction noise exposure above ambient levels. (Significant Impact)

    - **Mitigation Measure 4.14-3:** Develop construction noise control plans that consider the following available controls in order to reduce construction noise levels as low as practical:

        - Utilize 'quiet' models of air compressors and other stationary noise sources where technology exists

        - Equip all internal combustion engine-driven equipment with mufflers, which are in good condition and appropriate for the equipment;

        - Locate all stationary noise-generating equipment, such as air compressors and portable power generators, as far away as possible from adjacent land uses;

        - Locate staging areas and construction material areas as far away as possible from adjacent land uses

        - Prohibit all unnecessary idling of internal combustion engines;

        - Notify all adjacent land uses of the construction schedule in writing;

        - Designate a 'disturbance coordinator' who would be responsible for responding to any local complaints about construction noise. The disturbance coordinator will determine the cause of the noise complaint (e.g. starting too early, bad muffler, etc.) and will require that reasonable measures warranted to correct the problem be implemented. Conspicuously post a telephone number for the disturbance coordinator at the construction site and include it in the notice sent to neighbors regarding the construction schedule.

Proposed Land Use Element and Housing Element Updates

As part of the 2010-2035 General Plan, the Land Use Element and Housing Element new noise-sensitive development is planned in noisy areas such as along major transportation corridors (e.g., El Camino Real, Stevens Creek Boulevard, U.S . Highway 101), railroads, and in the vicinity of Norman Y. Mineta San José International Airport. However, implementation of the 2010-2035 General Plan Noise Policies would require that the General Plan compatibility standards be used to determine where noise levels in the community are acceptable or unacceptable, and require noise attenuation measures to achieve the "normally acceptable" noise level standards.

New research and development, office, commercial, retail, or other noise-generating uses developed under the General Plan and proposed project could substantially increase noise levels at noise-sensitive land uses or could expose receivers to noise levels that exceed the City Code noise limits. Mixed use development projects under the General Plan would include residential uses located above or in proximity to commercial uses, and would be located primarily in the downtown and along major roadways and the Caltrain rail (future High Speed Rail) corridor. The 2010-2035 General Plan includes policies that: require that all land uses and development proposals, including noise-generators, be reviewed to ensure consistency with the General Plan compatibility standards; and encourage noise control at the source through site design measures and operational noise controls and discourages locating incompatible land uses near to one another. New noise-generating projects developed under the proposed project would be subject to the City's City Code, ensuring that existing residences and other noise-sensitive land uses would not be exposed to excessive noise.

The proposed 2010-2035 General Plan would enable the construction of sensitive land uses within portions of the plan area where known vibration sources exist or are currently planned, primarily along the existing active railroad corridors and the VTA light rail, which would exceed Federal Transportation Administration (FTA) guidelines. Mitigation Measure 4.14-1 would require any proposed projects near the Caltrain corridor to evaluate land use compatibility based on FTA vibration standards and the best available information to ensure impacts are mitigated to a less than significant level.

The General Plan and proposed project would also contribute to significant increases in traffic noise along Tasman Drive and Lafayette Street, and cause a temporary or periodic increase in construction noise exposure above ambient levels. As stated in Mitigation Measure 4.14-3, construction noise control plans would be required, in addition to the 2010-2035 General Plan policies, to ensure that program-level construction noise impacts are reduced.

The City's eastern border is adjacent to the Norman Y. Mineta San Jose International Airport. Portions of Santa Clara, including the Tasman East Focus Area, fall within the noise restriction area as defined in the adopted Santa Clara County Airport Land Use Commission Land Use Plan. The policies and criteria in the 2010-2035 General Plan were deemed consistent with the portion of the Land Use Plan. Development facilitated under the Land Use Element and Housing Element would be compatible with the Land Use Plan by demonstrating consistency with City adopted regulations and policies, in combination with State regulations.

The proposed project does not directly propose development on any particular site but does include policies that could facilitate development in the future. Temporary increases in local noise levels would be associated with construction activities from new development. Construction noise would be controlled through time restrictions. The proposed project would not result in any new

or more severe temporary or long-term noise impacts. Continued enforcement of the City's noise restrictions would reduce temporary noise impacts associated with buildout under the General Plan to less than significant levels, where possible.

The proposed project would not result in any new significant impacts, or increase the severity of previously identified impacts, related to traffic noise. The amendments to the Land Use Element and Housing Element are consistent with the development assumptions analyzed under the General Plan. The project does not directly propose any physical improvements in the planning area; however, all future development projects would be subject to applicable City requirements, as well as to further CEQA analysis of project-specific impacts. All future development would comply with policies and actions in the General Plan which would reduce the severity of the significant impacts, although not always to a less-than-significant level with some impacts remaining significant and unavoidable.

O. Energy

Impacts Identified in the General Plan EIR

The General Plan EIR did not identify any significant impacts and no mitigation measures were identified.

Proposed Land Use Element and Housing Element Updates

The General Plan EIR determined that although the City is largely built-out, and future growth will be accommodated almost entirely through infill development, the General Plan would nonetheless consume additional energy as a result of changes to land use, housing, transportation and water usage patterns. However, it is not anticipated that either Silicon Valley Power (SVP) or Pacific Gas & Electric (PG&E), the City's energy suppliers, would need to construct new energy facilities to accommodate the increase in demand under the General Plan. While vehicle miles traveled (VMT) are expected to reach roughly 3.740 million under the General Plan, increased average fuel economy, reduced VMT per service population, and increased use of alternative transit options would reduce impacts from gasoline fuel use.

In addition, the General Plan includes policies to address energy consumption through a mix of land uses and alternate transportation options which seek to conserve energy, generate energy using renewable sources, and increase in the efficient movement of people and goods. The General Plan EIR concluded that while the substantial new residential, commercial, and industrial development allowed under the 2010-2035 General Plan will result in increased overall consumption of energy compared to existing levels, the new development would not consume energy in a manner that is wasteful, inefficient, or unnecessary and there would be no significant energy impacts.

The proposed project would not result in any new significant impacts related to energy. The amendments to the Land Use Element and Housing Element are consistent with the development assumptions analyzed under the General Plan; therefore, the demand for energy would not change from that which was analyzed in the General Plan EIR. The project does not directly propose any physical improvements in the planning area; however, all future development projects would be subject to applicable City requirements, as well as to further CEQA analysis of project-specific impacts.

P. Climate Change

Impacts Identified in the General Plan EIR

The General Plan EIR identified the following impacts related to Global Climate Change:

- The City's projected 2020 Greenhouse Gas Emissions ("GHG") without further reduction via Climate Action Plan, would constitute a cumulatively considerable contribution to global climate change by exceeding the average carbon-efficiency standard necessary to meet statewide 2020 goals as established by AB 32. (Less than Significant Impact with Mitigation)
    - **Mitigation:** Through its General Plan policies, the City is committed to the preparation, adoption and implementation of a comprehensive GHG emissions reduction strategy (Climate Action Plan or "CAP") to achieve its fair share of statewide emissions reductions for the 2020 timeframe consistent with AB32. With the implementation of the CAP mitigation strategy included in the General Plan, the City's future contribution to climate change will be less than cumulatively considerable for 2020 GHG emissions.
- The City's Project 2035 GHG emissions would constitute a cumulatively considerable contribution to global climate change by exceeding the average carbon-efficiency standard necessary to maintain a trajectory to meet statewide 2050 goals as established by EO S-3-05. (Significant and Unavoidable Impact)

Proposed Land Use Element and Housing Element Updates

Through its 2010-2035 General Plan policies the City had committed to the preparation, adoption, and implementation of a comprehensive greenhouse gas emissions reduction strategy to achieve its fair share of statewide emissions reductions for the 2020 timeframe consistent with the AB 32 Scoping Plan. The City adopted their Climate Action Plan (CAP) on December 3, 2013. The CAP estimated the City's baseline communitywide emissions for 2008 to be around 1,854,300 MTCO2e (metric tons of carbon dioxide equivalent).

The CAP used several growth indicators, based on General Plan development assumptions, to forecast future communitywide emissions to 2020, as well as 2035, including: housing units, population, jobs, service population, and vehicle miles traveled. Without actions or policies to reduce GHGs, community emissions in Santa Clara would grow by 16 percent to 2,148,600 MTCO2e in 2020 and by 37% to 2,531,400 MTCO2e in 2035.

The City adopted a target to reduce GHG emissions 15 percent below the baseline by 2020, and through a combination of local regulatory action, existing local initiatives, and new measures in the CAP, it is anticipated that the City will be able to exceed that goal with a 23.4 percent reduction in GHGs. The City has not yet adopted a target for 2035.

The proposed project would not result in any new significant impacts related to global climate change. The amendments to the Land Use Element and Housing Element are consistent with the development assumptions analyzed under the CAP. Future residential development in Santa Clara would be designed and constructed in accordance with the provisions of the City Code and the

land use policies of the General Plan and CAP. The proposed Land Use Element and Housing Element do not change any land use policy or any building regulations that would raise or otherwise change development levels that could contribute to an increase in GHG emissions. The proposed Land Use Element update incorporates all applicable land use related GHG reduction measures from the Climate Action Plan, and contains Goals and Policies to address sustainability, in Appendix 8.13 of the General Plan, aimed in part at reducing the City's contribution to GHG emissions. Further, residential development that would occur on the housing sites under the proposed Housing Element would be subject to 2013 California Building Code (CBC) (Title 24) which sets forth energy efficient regulations. These regulations would increase energy efficiency in residential buildings, which includes standards that would result in reductions in total energy demand; thereby reducing the level of GHG emissions generated from coal, natural gas, and oil-based energy sources. In addition, housing development that would occur under the Land Use Element and Housing Element would be required to comply with State laws regulating GHG. The proposed Housing Element does not directly propose any physical improvements in the planning area; however, all future development projects would be subject to applicable City requirements, as well as to further CEQA analysis of project-specific impacts. Impacts related to GHG contributions by 2020 would be less than significant.

As recommended by the CAP, the City should adopt a GHG reduction target for 2035(recommended 55 percent below baseline) to ensure progress towards achieving the statewide goals of achieving an 80 percent reduction in emissions by 2050. With adoption of each target, the City will also need to determine the necessary action to achieve these reductions. Until this time, impacts from GHG emissions beyond 2020 would remain significant and unavoidable. As mentioned above, because the proposed Land Use Element and Housing Element updates are consistent with the development assumptions analyzed in the CAP, the project would not increase the severity of these impacts.

SECTION 4
Conclusion

The proposed Land Use Element and Housing Element updates would not directly result in new development in the City of Santa Clara. New development would be facilitated by programs and policies in the Land Use Element and Housing Element, which are intended to implement the 2010-2035 General Plan and to meet the City's RHNA. The population growth associated with implementation of the Land Use Element and Housing Element programs and policies has already been accounted for in the 2010-2035 General Plan projections for citywide population growth; therefore, all potential impacts relating to population growth have been included in the analysis for the EIR. Implementation of the project would not result in new significant environmental impacts, or impacts that would be substantially more severe than those impacts identified in the 2010-2035 General Plan EIR. Furthermore, mitigation measures identified in the 2010-2035 General Plan EIR would be applicable to development that is facilitated by the implementation of the Land Use Element and Housing Element.

Based on the above analysis and discussion, no substantive revisions are needed to the 2010-2035 General Plan EIR because: no new significant impacts or substantially more severe impacts would result from the adoption of the Land Use Element and Housing Element updates; there have been no changes to zoning of potential development sites or changes to population projections that would result in new significant environmental impacts or substantially more severe impacts; and no new information has come to light that would indicate the potential for new significant impacts or substantially more severe impacts than were discussed in the 2010-2035 General Plan EIR. Therefore, no further evaluation is required, and no Subsequent EIR is needed pursuant to State CEQA *Guidelines* Section 15162. This EIR Addendum has therefore appropriately been prepared, pursuant to Section 15164.