



City of Cupertino, Community Development
Department
Attn: Piu Ghosh, Principal Planner
10300 Torre Avenue
Cupertino, CA 95014

July 9, 2018

Re: Draft the Environmental Impact Report (EIR) for the Vallco Special Area Specific Plan Project (File Number EA-2017-05)

Dear M. Ghosh:

Thank you for including the City of Santa Clara in the environmental review process for the Vallco Special Area Specific Plan Project ("Project"). City staff has reviewed the Environmental Impact Report (EIR) prepared for the development of a Specific Plan for the Vallco Special Area that would facilitate development of a minimum of 600,000 square feet of commercial uses, up to 2.0 million square feet of office uses, up to 339 hotel rooms, and up to 800 residential dwelling units within the Plan area. The following comments are provided following our review of the EIR.

Background Information

In section 2.3 Background Information, page 10, it states that the Sand Hill Property Company filed an application pursuant to SB 35 (Government Code section 65913.4) at the Project's subject location. Please clarify whether or not the Sand Hill Property Company application will be covered under the Vallco Special Area Specific Plan Project EIR, or if there will be separate environmental clearance (CEQA).

Sewer Wastewater Treatment/Sanitary Sewer System

The City of Cupertino's waste water service provider, Cupertino Sanitary District (CuSD) provides services to the City of Cupertino, portions of City of Saratoga, Sunnyvale, Los Altos, and surrounding unincorporated areas. Most of the Cupertino Sanitary District's waste water flows through the City of Santa Clara's sanitary sewer system. The EIR recognizes that the City of Santa Clara has an agreement with the CuSD, and per said agreement, the peak flow from CuSD is capped at 13.8 MGD, and the projected flow with the proposed Vallco Special Area Specific Plan (Project) would exceed the peak flow of 13.8 MGD. However; the EIR does not evaluate the sanitary sewer conveyance capacity impacts of the buildout of the Project to the City of Santa Clara's sanitary sewer system.

The EIR provides three mitigation measures (page 390, MM UTIL-2.1, MM UTIL-2.2, and MM UTIL-2.3), however; the impacts and mitigation measures are only for the CuSD's infrastructure. The evaluation needs to continue through the City of Santa Clara sanitary sewer system which takes the flow all the way to the treatment plant. Mitigation measure MM UTIL-2.3 does not address the impacts to the City of Santa Clara sanitary sewer system. The attached exhibit entitled, "Cupertino Sanitary District

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Interceptor Sewer Exhibit”, shows the City of Santa Clara’s major trunks that carry CuSD waste water.

An evaluation of the sanitary sewer conveyance capacity impacts of this Project to the City of Santa Clara’s sanitary sewer system is required and the results of the evaluation along with the mitigation measures need to be included in the EIR. To evaluate impacts, a Sanitary Sewer Hydraulic Model run analyzing the impacts of the buildout of the Project is needed. The modeling and analysis must be done by the City of Santa Clara. The CuSD staff must schedule a meeting with the City of Santa Clara Water and Sewer Utilities and Public Works staff to discuss the Project details, including the proposed flow data and diurnal curve from the CuSD and current sewage discharge capacity agreement between the City of Santa Clara and Cupertino Sanitation District. The sewer model run review process may take up to 4-6 weeks to complete the model run, evaluate impacts, and prepare an evaluation report after the \$8,844 fee is paid and the City of Santa Clara has been provided with all the required information (see the attached exhibit entitled, “Sewer Model Run Request Form”) to perform the sanitary sewer model run.

Transportation/Traffic

Please see the attachment entitled, “Transportation/Traffic Comments” for comments on section 3.17 Transportation/Traffic pages 273, 288, 289, 311, 326, and 330. In addition, please verify if the latest CMP counts were used for the CMP intersections per the date of the NOP.

Conclusion

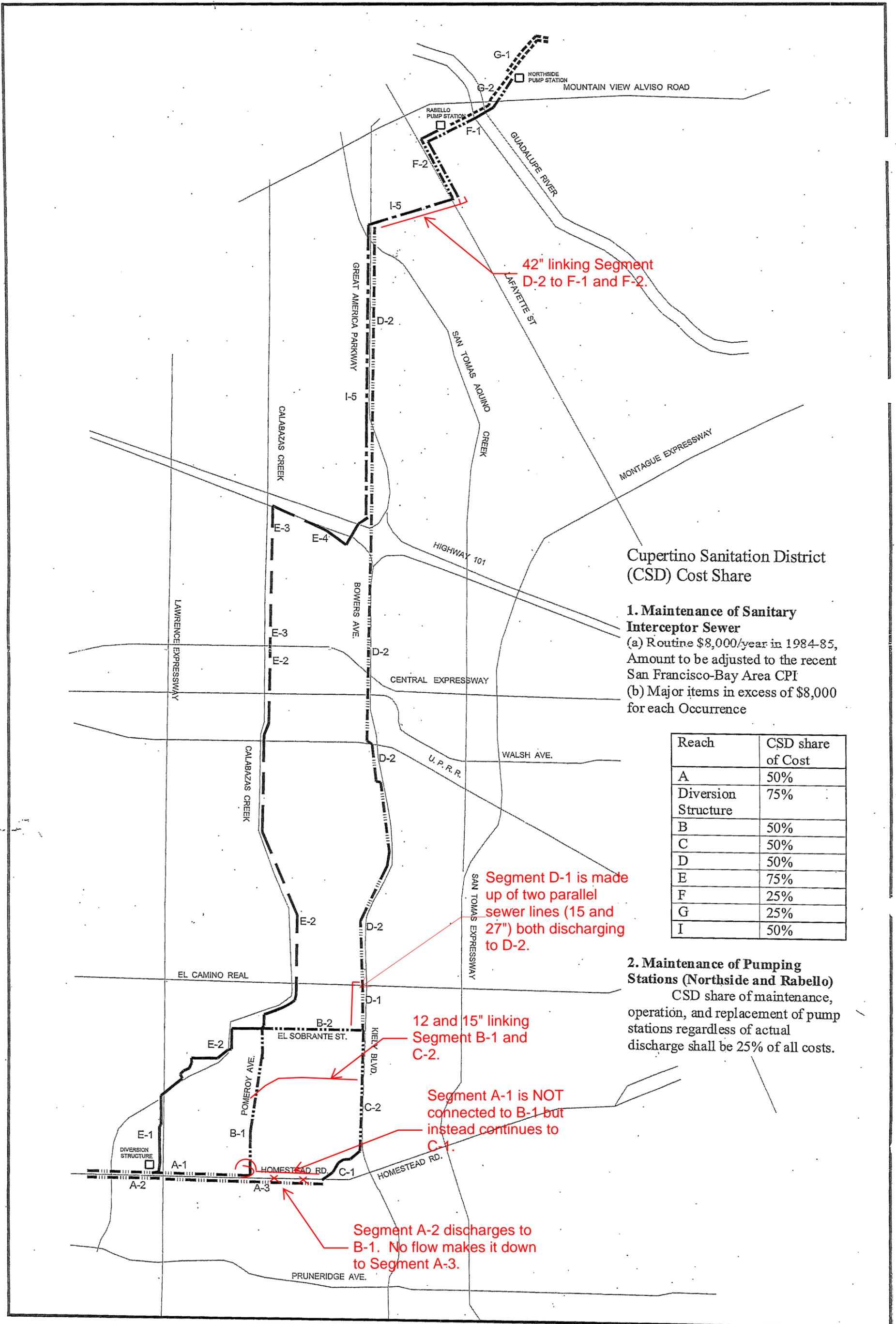
Please revise the EIR and technical reports per the comments above. Should you have any questions regarding this letter, please contact Reena Brilliot, Planning Manager, via email at rbrilliot@SantaClaraCA.gov or phone at 408-615-2452.

Best regards,



Andrew Crabtree
Director of Community Development

CUPERTINO SANITARY DISTRICT INTERCEPTOR SEWER EXHIBIT



Cupertino Sanitation District (CSD) Cost Share

1. Maintenance of Sanitary Interceptor Sewer

- (a) Routine \$8,000/year in 1984-85, Amount to be adjusted to the recent San Francisco-Bay Area CPI
- (b) Major items in excess of \$8,000 for each Occurrence

Reach	CSD share of Cost
A	50%
Diversion Structure	75%
B	50%
C	50%
D	50%
E	75%
F	25%
G	25%
I	50%

2. Maintenance of Pumping Stations (Northside and Rabello)

CSD share of maintenance, operation, and replacement of pump stations regardless of actual discharge shall be 25% of all costs.

Segment D-1 is made up of two parallel sewer lines (15 and 27") both discharging to D-2.

12 and 15" linking Segment B-1 and C-2.

Segment A-1 is NOT connected to B-1 but instead continues to C-1.

Segment A-2 discharges to B-1. No flow makes it down to Segment A-3.

3.17 TRANSPORTATION/TRAFFIC

The following discussion is based on a Transportation Impact Analysis (TIA) prepared for the project and project alternatives by Fehr & Peers in May 2018. The project site is located in the City of Cupertino, however, transportation facilities outside the City would be affected by the project (and project alternatives). Thus, the transportation impacts of the project (and project alternatives) were evaluated following the standards and methodologies used by the cities of Cupertino, Santa Clara, Sunnyvale, Saratoga, San José, Caltrans, and VTA for facilities within their respective jurisdictions. Because the project (and project alternatives) would generate more than 100 peak hour vehicle trips, an analysis was prepared in accordance with the VTA's TIA Guidelines, which were adopted by all cities and the County, to provide local jurisdictions with a uniform program for evaluating the transportation impacts of land use decisions. A copy of the TIA is included in Appendix H of this EIR.

3.17.1 Environmental Setting

3.17.1.1 *Regulatory Framework*

Below is a summary of the regulatory framework. Refer to Appendix H of this EIR for additional details regarding the transportation regulatory framework.

State and Regional

Senate Bill 743

SB 743 was adopted in 2013 and requires lead agencies to use alternatives to LOS for evaluating transportation impacts, specifically, VMT. Since the adoption of SB 743, OPR has been working on guidelines and regulations to implement SB 743 and the required shift to VMT as the criterion for transportation impacts under CEQA. SB 743 also includes several important changes to CEQA that apply to transit oriented developments, including aesthetics and parking. Specifically with regard to parking, SB 743 requires that the parking impacts of a residential, mixed-use residential, or employment center project, as defined, on an infill site, as defined, within a transit priority area, as defined, shall not be considered significant impacts on the environment. Amendments to the CEQA Guidelines to address SB 743 are expected to be adopted in mid-2018 and are scheduled to apply statewide on January 1, 2020.

Regional Transportation Planning

MTC is the transportation planning, coordinating, and financing agency for the nine-county San Francisco Bay Area, including Santa Clara County. MTC is charged with regularly updating the Regional Transportation Plan, a comprehensive blueprint for the development of mass transit, highway, airport, seaport, railroad, bicycle, and pedestrian facilities in the region. MTC and ABAG adopted *Plan Bay Area 2040* in July 2017, which includes the region's Sustainable Communities Strategy (integrating transportation, land use, and housing to meet GHG reduction targets set by CARB) and Regional Transportation Plan (including a regional transportation investment strategy for revenues from federal, state, regional and local sources over the next 24 years).

20. Stevens Creek Boulevard/Portal Avenue – City of Cupertino
21. Stevens Creek Boulevard/Perimeter Road – City of Cupertino
22. Wolfe Road/El Camino Real* – City of Sunnyvale
23. Wolfe Road/Fremont Avenue – City of Sunnyvale
24. Wolfe Road/Marion Way – City of Sunnyvale
25. Wolfe Road/Inverness Way – City of Sunnyvale
26. Wolfe Road/Homestead Road – City of Cupertino
27. Wolfe Road/Apple Park – City of Cupertino
28. Wolfe Road/Pruneridge Avenue – City of Cupertino
29. Wolfe Road/I-280 Ramps (north) * – City of Cupertino
30. Wolfe Road/I-280 Ramps (south) * – City of Cupertino
31. Wolfe Road/Vallco Parkway – City of Cupertino
32. Wolfe Road-Miller Avenue/Stevens Creek Boulevard* – City of Cupertino
33. Miller Avenue/Calle de Barcelona – City of Cupertino
34. Miller Avenue/Phil Lane – City of Cupertino
35. Miller Avenue/Bollinger Road – City of San José
36. Miller Avenue/Rainbow Drive – City of San José
37. Stevens Creek Boulevard/ Finch Avenue – City of Cupertino
38. Tantau Avenue/Homestead Road – City of Cupertino
39. Tantau Avenue/Pruneridge Avenue – City of Cupertino
40. N Tantau Ave/Apple Parkway – City of Cupertino
41. Tantau Avenue/Vallco Parkway – City of Cupertino
42. Stevens Creek Boulevard/Tantau Avenue – City of Cupertino
43. Stevens Creek Boulevard/Stern Avenue – City of Santa Clara
44. Stevens Creek Boulevard/Calvert Drive/I-280 Ramps (west)* – City of Santa Clara
45. Stevens Creek Boulevard/Agilent Driveway – City of Santa Clara
46. Stevens Creek Boulevard/Lawrence Expressway Ramps (west)* – Santa Clara County
47. Lawrence Expressway/El Camino Real* – Santa Clara County
48. Lawrence Expressway/Homestead Road* – Santa Clara County
49. Lawrence Expressway/Pruneridge Avenue* – Santa Clara County
50. Stevens Creek Boulevard/ Lawrence Expressway Ramps (east)* – Santa Clara County
51. Lawrence Expressway/Calvert Drive-I-280 Southbound Ramp* – City of San José
52. Lawrence Expressway/Mitty Way* – Santa Clara County
53. Lawrence Expressway/Bollinger Road* – Santa Clara County
54. Lawrence Expressway/Doyle Road* – Santa Clara County
55. Lawrence Expressway/Prospect Road* – Santa Clara County
56. Lawrence Expressway/Saratoga Avenue* – Santa Clara County
57. Saratoga Avenue/Cox Avenue – City of Saratoga
58. Saratoga Avenue/SR 85 Ramps (north) – Caltrans
59. Saratoga Avenue/SR 85 Ramps (south) – Caltrans
60. Stevens Creek Boulevard/Cabot Avenue – City of Santa Clara
61. Stevens Creek Boulevard/Cronin Drive-Albany Drive – City of Santa Clara
62. Stevens Creek Boulevard/Woodhams Road – City of Santa Clara

46. City of Santa Clara
50. City of Santa Clara

Table 3.17-5: Existing Intersection Levels of Service

Study Intersection – Jurisdiction	LOS Threshold	Peak Hour	Delay	LOS
19. Stevens Creek Boulevard/Blaney Avenue – City of Cupertino	D	AM PM	34.9 33.5	C- C-
20. Stevens Creek Boulevard/Portal Avenue – City of Cupertino	D	AM PM	21.8 13.0	C+ B
21. Stevens Creek Boulevard/Perimeter Road – City of Cupertino	D	AM PM	9.5 15.2	A B
22. Wolfe Road/El Camino Real* – City of Sunnyvale	E	AM PM	51.0 48.1	D- D
23. Wolfe Road/Fremont Avenue – City of Sunnyvale	D	AM PM	49.7 47.9	D D
24. Wolfe Road/Marion Way – City of Sunnyvale	D	AM PM	15.9 18.8	B B-
25. Wolfe Road/Inverness Way – City of Sunnyvale	D	AM PM	18.3 22.8	B- C+
26. Wolfe Road/Homestead Road – City of Cupertino	D	AM PM	32.9 43.0	C- D
27. Wolfe Road/Apple Park – City of Cupertino	D	AM PM	9.8 15.4	A B
28. Wolfe Road/Pruneridge Avenue – City of Cupertino	D	AM PM	23.5 16.5	C B
29. Wolfe Road/I-280 Ramps (north) * – City of Cupertino	D	AM PM	13.2 12.0	B B
30. Wolfe Road/I-280 Ramps (south) * – City of Cupertino	D	AM PM	12.1 8.4	B A
31. Wolfe Road/Vallco Parkway – City of Cupertino	D	AM PM	19.6 31.2	B- C
32. Wolfe Road-Miller Avenue/Stevens Creek Boulevard* – City of Cupertino	D	AM PM	41.7 41.4	D D
33. Miller Avenue/Calle de Barcelona – City of Cupertino	D	AM PM	7.5 3.0	A A
34. Miller Avenue/Phil Lane – City of Cupertino	D	AM PM	5.3 4.1	A A
35. Miller Avenue/Bollinger Road – City of San José	D	AM PM	37.1 41.5	D+ D
36. Miller Avenue/Rainbow Drive – City of San José	D	AM PM	23.1 22.8	C C+
37. Stevens Creek Boulevard/ Finch Avenue – City of Cupertino	D	AM PM	28.8 21.6	C C+
38. Tantau Avenue/Homestead Road – City of Cupertino	D	AM PM	34.4 43.2	C- D
39. Tantau Avenue/Pruneridge Avenue – City of Cupertino	D	AM PM	20.8 24.5	C+ C
40. N Tantau Ave/Apple Parkway – City of Cupertino	D	AM PM	17.6 18.3	B B-
41. Tantau Avenue/Vallco Parkway – City of Cupertino	D	AM PM	25.1 31.3	C C
42. Stevens Creek Boulevard/Tantau Avenue – City of Cupertino	D	AM PM	44.7 42.8	D D
43. Stevens Creek Boulevard/Stern Avenue – City of Santa Clara	D	AM PM	37.6 40.5	D+ D

Table 3.17-5: Existing Intersection Levels of Service

Study Intersection – Jurisdiction		LOS Threshold	Peak Hour	Delay	LOS
44.	Stevens Creek Boulevard/Calvert Drive/I-280 Ramps (west)* – City of Santa Clara	E	AM PM	57.4 52.7	E+ D-
45.	Stevens Creek Boulevard/Agilent Driveway – City of Santa Clara	D	AM PM	36.7 24.0	D+ C
46.	Stevens Creek Boulevard/Lawrence Expressway Ramps (west)* – Santa Clara County	E	AM PM	28.9 25.4	C C
47.	Lawrence Expressway/El Camino Real* – Santa Clara County	E	AM PM	34.6 27.1	C- C
48.	Lawrence Expressway/Homestead Road* – Santa Clara County	E	AM PM	71.5 66.3	E E
49.	Lawrence Expressway/Pruneridge Avenue* – Santa Clara County	E	AM PM	44.0 44.5	D D
50.	Stevens Creek Boulevard/ Lawrence Expressway Ramps (east)* – Santa Clara County	E	AM PM	31.6 28.0	C C
51.	Lawrence Expressway/Calvert Drive-I-280 Southbound Ramp* – City of San José	E	AM PM	32.8 30.2	C -C
52.	Lawrence Expressway/City West* – Santa Clara County	E	AM PM	23.1 16.6	C B
53.	Lawrence Expressway/Elgin Road* – Santa Clara County	E	AM PM	60.3 54.2	E D-
54.	Lawrence Expressway/Elgin Road* – Santa Clara County	E	AM PM	43.2 14.7	D B
55.	Lawrence Expressway/Prospect Road* – Santa Clara County	E	AM PM	58.3 46.7	E+ D
56.	Lawrence Expressway/Saratoga Avenue* – Santa Clara County	E	AM PM	44 45.7	D D
57.	Saratoga Avenue/Cox Avenue – City of Saratoga	D	AM PM	45.1 37.8	D D+
58.	Saratoga Avenue/SR 85 Ramps (north) - Caltrans	C	AM PM	19.1 26.7	B- C
59.	Saratoga Avenue/SR 85 Ramps (south) - Caltrans	C	AM PM	16.8 18.5	B B-
60.	Stevens Creek Boulevard/Cabot Avenue – City of Santa Clara	D	AM PM	47.0 46.3	D D
61.	Stevens Creek Boulevard/Cronin Drive-Albany Drive – City of Santa Clara	D	AM PM	27.4 22.7	C C+
62.	Stevens Creek Boulevard/Woodhams Road – City of Santa Clara	D	AM PM	18.8 21.1	B- C+
63.	Stevens Creek Boulevard/Kiely Boulevard* – City of San José	D	AM PM	41.6 37.1	D D+
64.	Vallco Parkway/Perimeter Road – City of Cupertino	D	AM PM	11.6 17.1	B+ B
65.	Lawrence Expressway/Kifer Road Avenue* – Santa Clara County	E	AM PM	36.2 71.5	D+ E
66.	Lawrence Expressway/Reed Avenue-Monroe Street* – Santa Clara County	E	AM PM	56.1 55.1	E+ E+
67.	Lawrence Expressway/Cabrillo Avenue* – Santa Clara County	E	AM PM	32.7 29.2	C- C

46. City of Santa Clara
50. City of Santa Clara

Notes: * denotes CMP intersection; bold text indicates intersection operates at an unacceptable level of service; AM = morning peak hour; PM = evening peak hour; LOS = level of service.

Mitigation measures that would change the roadway geometry or signal operations have potential secondary effects on pedestrian and bicycle travel. Pursuant to the VTA TIA Guidelines, since mitigation measure MM TRN-1.2 would change the signal operations, a pedestrian and bicycle QOS analysis was completed. The pedestrian QOS score is 3, both without and with mitigation measure MM TRN-1.2. As explained in Section 3.17.2.1, a score of 3 denotes that walking is uninviting but possible at intersections. The bicycle QOS score is 4, both without and with the mitigation measure, denoting that most cyclists might find it uncomfortable crossing the intersection. There are no right-turn lanes on De Anza Boulevard so bicycles that continue straight could conflict with the right-turning vehicles. The mitigation measure would not change roadway geometry, pedestrian facility, or bicycle facility; thus, the pedestrian and bicycle QOS score remain the same without and with mitigation measure MM TRN-1.2.

Intersection 43, Stevens Creek Boulevard/Stern Avenue: In order to mitigate the impact identified at Intersection 43, Stevens Creek Boulevard/Stern Avenue, three through lanes and a dedicated right-turn in both the eastbound and westbound directions on Stevens Creek Boulevard would be required. This improvement would reduce the impact from the project (and General Plan Buildout with Maximum Residential Alternative and Occupied/Re-Tenanted Mall Alternative) to a less than significant level. While intersection delay would improve under the proposed project with this improvement, the intersection would continue to operate unacceptably at LOS E+ and the impact would remain significant and unavoidable. Right-of-way constraints would limit the feasibility of this potential mitigation measure, however. A dedicated right-turn lane, through lane, and a bike lane would require a minimum width of 25 feet. The available widths between the number two through lane and the curb are about 18 feet in the eastbound direction and 20 feet in the westbound direction. Therefore, mitigation would not be feasible and the impact to Intersection 43 is considered significant and unavoidable. (Significant and Unavoidable Impact)

can restriping the lanes to get 20' curb lane? Right turn can sneak through when there's no bike.

General Plan Buildout with Maximum Residential Alternative

As summarized in Table 3.17-8, the implementation of the General Plan Buildout with Maximum Residential Alternative would result in a significant level of service impact under existing with project conditions at Intersection 43, Stevens Creek Boulevard/Stern Avenue, in the PM peak hour, as does the proposed project. See Impact TRN-1. As discussed above, there is no feasible mitigation measure to reduce this impact to a less than significant level. (Significant and Unavoidable Impact)

Retail and Residential Alternative

As summarized in Table 3.17-8, the implementation of the Retail and Residential Alternative would not result in significant intersection level of service impacts under existing with project conditions. (Less than Significant Impact)

Occupied/Re-Tenanted Mall Alternative

While implementation of the Occupied/Re-Tenanted Mall Alternative would result in significant level of service impacts under existing with project conditions at Intersection 43, Stevens Creek Boulevard/Stern Avenue during the PM peak hour, a discussion of this alternative is provided in the EIR for informational purposes only. This alternative is a permitted land use, and can be implemented without further discretionary approvals from the City or environmental review under

cut-through in that neighborhood is the direct result of the project (or project alternatives). Nonetheless, the Specific Plan would be required as a Condition of Approval to include a traffic calming monitoring program to help assess any cut-through traffic in Sunnyvale as a result of the Proposed Project.

2. **Parking Intrusion** – Depending on the amount of parking provided on-site under the proposed project or project alternatives, the parking supply could be lower than the parking demand, which could result in overflow parking. The two potential locations for overflow parking are the neighborhood to the west of the Specific Plan area and the neighborhoods off Miller Avenue south of Stevens Creek Boulevard.

Parking demand is anticipated to be lower with increased use of Transportation Network Companies (TNC) such as Uber and Lyft. TNCs reduce parking demand because one can easily travel to/from a destination without a car that needs to be parked. Further, one of the expected effects of autonomous (or driverless) vehicles being introduced into the vehicle fleet in the near future is a greater reduction in parking demand. These vehicles will likely increase passenger pick-up/drop-off activities and would not be parked during peak times.

Given the uncertainty related to the parking supply for the project (and project alternative) and the anticipated changes in parking demand; there is potential for neighborhood parking intrusion. The project and project alternatives would be required as a Condition of Approval to include provisions for a residential permit parking program to manage neighborhood parking intrusion should it become an issue.

Condition of Approval: To ensure neighborhood cut-through traffic and parking intrusion are minimized, future development under the proposed project (or General Plan Buildout with Maximum Residential Alternative and Retail and Residential Alternative) shall fund neighborhood cut-through traffic monitoring studies and provide fees in the amount of \$350,000 to the City of Cupertino and \$150,000 to the City of Sunnyvale to monitor and implement traffic calming improvements and a residential parking permit program to minimize neighborhood cut-through traffic and parking intrusion, if determined to be needed by the City’s Public Works Department. The details of the neighborhood parking and traffic intrusion monitoring program shall be determined when the conditions of approval for project development are established. The monitoring program shall include the following components: (1) identifying the monitoring areas (roadways where the monitoring would occur), (2) setting baseline conditions (number of parked vehicles and traffic volumes on the roadways), (3) determining thresholds for parking and traffic volume increases requiring action, (4) establishing the monitoring schedule, and (5) creating reporting protocols. The baseline conditions shall be established prior to but within one year of initial occupancy. Monitoring shall then occur annually for five years.

Implementation of the proposed project (and General Plan Buildout with Maximum Residential Alternative and Retail and Residential Alternative), with the above condition of approval, would not result in significant traffic or parking intrusion in the adjacent residential neighborhood. (Less than Significant Impact)

For City of Santa Clara also?

Project

As summarized in Table 3.17-14, implementation of the proposed project would result in a significant intersection level of service impacts under background with project conditions at the following 11 intersections:

11. De Anza Boulevard/Stevens Creek Boulevard (City of Cupertino) – PM peak hour;
12. De Anza Boulevard/McClellan Road (City of Cupertino) – PM peak hour;
31. Wolfe Road and Vallco Parkway (City of Cupertino) – PM peak hour;
32. Wolfe Road-Miller Avenue/Stevens Creek Boulevard (City of Cupertino)* – AM and PM peak hours;
42. Stevens Creek Boulevard/Tantau Avenue (City of Cupertino) – AM peak hour;
43. Stevens Creek Boulevard/Stern Avenue (City of Santa Clara) – AM and PM peak hours;
44. Stevens Creek Boulevard/Calvert Drive/I-280 Ramps (west) (City of Santa Clara)* – AM and PM peak hours;
45. Stevens Creek Boulevard/Agilent Driveway (City of Santa Clara) – AM peak hour;
48. Lawrence Expressway/Homestead Road (Santa Clara County)* – PM peak hour;
51. Lawrence Expressway/Calvert Drive-I-280 Southbound Ramp (City of San José)* – AM peak hour; and
53. Lawrence Expressway/Bollinger Road (Santa Clara County)* – AM and PM peak hours.

City of Santa Clara

Mitigation Measures:

MM TRN-2.1: Implement MM TRN-1.1. The TDM program is expected to reduce the severity of intersection and freeway impacts, although not necessarily to a less than significant level. (Significant and Unavoidable Impact with Mitigation Incorporated)

Intersection 11, De Anza Boulevard/Stevens Creek Boulevard: In order to mitigate the impact identified at Intersection 11, De Anza Boulevard/Stevens Creek Boulevard, the eastbound and westbound approaches on Stevens Creek Boulevard would need to be widened to provide for three through lanes (for a total of two left-turn lanes, three through lanes, a right-turn lane, and a bike lane). This would be accomplished by widening Stevens Creek Boulevard for about 150 feet from the intersection to provide for the right-turn pocket in each direction. However, there are right-of-way constraints that limit the feasibility of the mitigation measure. The added right-turn lane would require an additional 10 to 11 feet of right-of-way in each direction. Further, this mitigation measure would increase the pedestrian crossing distance on an already very wide intersection and would likely have secondary effects on pedestrian travel at the De Anza Boulevard/Stevens Creek Boulevard intersection. Thus according to General Plan Policy M-3.4, which strives to preserve and enhance citywide pedestrian and bicycle connectivity by limiting street widening purely for automobiles to improve traffic flow, the this improvement is not feasible, and the impact is considered significant and unavoidable. (Significant and Unavoidable Impact)