City of Santa Clara
The Center of What's Possible

Planning Division

January 8, 2020

City of San Jose, Department of Planning, Building, and Code Enforcement
Attn: Thai-Chau Le, Environmental Project Manager
200 East Santa Clara Street, 3rd Floor Tower
San Jose CA 95113-1905

Re: Notice of Preparation for the 3896 Stevens Creek Commercial Project Draft Environmental Impact Report (C19-020, CP19-031, T19-038)

Dear Ms. Le:

Thank you for including the City of Santa Clara (Santa Clara) in the environmental review process for the 3896 Stevens Creek Commercial Project (Project) and for informing Santa Clara of the Notice of Preparation of a Draft Environmental Impact Report for the Project. The Project includes a Conforming Rezoning from Commercial Neighborhood & Commercial General Zoning District to Commercial Pedestrian Zoning District; a Conditional Use Permit to allow the demolition of 4 commercial buildings, late night use (4a.m. to midnight) for a fitness center, and to allow the construction of an approximately 270,000-square foot office building, 150,000-square foot fitness center, and 16,000-square foot of ground floor retail; and a Tentative Map to combine 5 existing lots into 2 on an approximately 6.30-gross acre site.

Santa Clara requests the following information be included in the environmental analysis being prepared for this Project:

Traffic Study Work Scope: Santa Clara understands the City of San Jose no longer views congestion as a CEQA impact and Vehicles Miles Travelled (VMT) is now the adopted CEQA metric to measure transportation environmental impacts per City Council Policy 5-1. However, the City is kindly requesting a "local transportation analysis" per the City of San Jose's Transportation Analysis Handbook dated April 2018 for this project. Local operational analysis at signalized intersections using level of service and delay is requested. The City of Santa Clara uses criteria of the VTA TIA Guidelines as a basis for determining study intersections. Accordingly, municipal and CMP intersections with ten or more project trips per approach lane should be analyzed along Stevens Creek Boulevard, San Tomas Expressway, Lawrence Expressway, Kiely Boulevard, Pruneridge Avenue, Homestead Road, Winchester Boulevard/Lincoln Street and Saratoga Avenue corridors as project trips most likely will utilize these corridors. Santa Clara would also like to review and comment on the scope of work related to the local transportation and VMT analysis to be prepared for this project.

The residential neighborhoods within Santa Clara to the north of Stevens Creek Boulevard are very sensitive to cut-through traffic intrusion. This should be analyzed as part of the local

transportation analysis and any measures to combat the intrusion should be identified and discussed with the City of Santa Clara.

The local transportation analysis must also include an analysis of bicycle and pedestrian facilities in terms of their availability, project effects on future bike/pedestrian plans, and improvements proposed by the project. Maps and information on existing and planned bicycle facilities within Santa Clara can be found on the City's website at https://www.santaclaraca.gov/our-city/departments-g-z/public-works/engineering/committees/bicycle-and-pedestrian-advisory-committee.

The project site is located near the southern boundary of the City of Santa Clara. Relevant approved projects within Santa Clara need to be included in the study estimates of the Background traffic volumes. This is consistent with the CMP TIA Guidelines. A list of approved projects within the City of Santa Clara is attached. Similarly, pending projects within Santa Clara need to be incorporated in the Cumulative traffic volume estimates, in order to reflect the growth in both local and regional traffic. A list of pending projects within the City of Santa Clara is attached.

Any physical improvements required or planned at study intersections need to evaluate secondary impacts to alternative modes of transportation.

Fair share contributions should be made for significant impacts found along roadways and/or intersections, including along Stevens Creek Boulevard and Saratoga Avenue.

Per the Santana West settlement agreement, any impacts found at protected intersections, including Winchester Boulevard/Stevens Creek Boulevard, which will also impact traffic in the City of Santa Clara will require payment of fees to be used for transportation system improvements to alleviate the increased traffic congestion in Santa Clara. The City of San Jose shall be in conformance with the Santa Clara and San Jose settlement agreement related to Stevens Creek Boulevard corridor. A clear explanation of how fees are calculated should be provided, and offsetting improvements should be identified with specificity and coordinated with the City of Santa Clara.

In order to reduce single-occupant vehicles accessing the site, a Travel Demand Management (TDM) plan with monitoring, reporting, and penalties should be required for the office component of the project.

Bird Strike Analysis: It appears as if the building design utilizes clear glass. Please include analysis and any measures to reduce the risk of bird strike.

Shade and Shadow Impacts: Given the potential heights of the proposed buildings and their proximity to the City of Santa Clara, please include an analysis of the potential for shade and shadow impacts on Santa Clara businesses.

Thank you for the opportunity to comment on the Notice of Preparation for the Project. Santa Clara looks forward to meeting with the City of San Jose to discuss the findings of the local transportation analysis.

Should you have any questions regarding this letter, please contact Reena Brilliot, Planning Manager via email at rbrilliot@santaclaraca.gov or phone 408-615-2452.

Best Regards,

Andrew Crabtree
Director of Community Development
Cc: Michael Liw, Assistant Director of Public Works