Dell Avenue Area Plan Public Review Draft EIR

for the City of Campbell

PlaceWorks

June 22, 2015 | Public Review Draft

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1. Executive Summary

This chapter presents an overview of the Draft Environmental Impact Report (Draft EIR) prepared for the proposed Dell Avenue Area Plan, herein referred to as "proposed Plan."This chapter also provides a summary of the alternatives to the proposed Plan, identifies issues to be resolved and areas of controversy, and summarizes the potential environmental impacts of the proposed Plan. For a complete description of the proposed Plan, see Chapter 3, Project Description, of this Draft EIR. For a discussion of alternatives to the proposed Plan, see Chapter 5, Alternatives to the Proposed Plan, of this Draft EIR.

This Draft EIR addresses the environmental effects associated with the implementation of the proposed Plan. The California Environmental Quality Act (CEQA) requires that local government agencies, prior to taking action on projects over which they have discretionary approval authority, consider the environmental consequences of such projects. An EIR is a public document designed to provide the public and local and State governmental agency decision-makers with an analysis of potential environmental consequences to support informed decision-making. Should an EIR identify a significant impact, the City Council may approve the EIR if it makes one or more of the following findings with respect to each significant impact:

- Changes or alterations have been required in, or incorporated into, the project which mitigate or avoid the significant effects on the environment;
- Those changes or alterations are within the responsibility and jurisdiction of another public agency and have been, or can and should be, adopted by that other agency; or
- Specific economic, legal, social, technological, or other considerations make the mitigation measures or identified alternatives identified in the EIR infeasible.[1]

This Draft EIR has been prepared pursuant to the requirements of CEQA (California Public Resources Code, Division 13, Section 21000, et seq.) and the State CEQA Guidelines (Title 14 of the California Code of Regulations, Division 6, Chapter 3, Section 15000, et seq.) to determine if approval of the identified discretionary actions and related subsequent development could have a significant impact on the environment. The City of Campbell, as the Lead Agency, has reviewed and revised, as necessary, all submitted drafts, technical studies, and reports to reflect its own independent judgment, including reliance on applicable City technical personnel and review of all technical sub-consultant reports. Information for this Draft EIR was obtained from on-site field observations; discussions with affected agencies; analysis of adopted plans and policies; review of available studies, reports, data, and similar literature in the public domain; and specialized environmental assessments (e.g., air quality, greenhouse gas emissions, noise, and transportation and traffic).

[1] California Environmental Quality Act California Public Resources Code Division 13, Section 21081.

1.1 ENVIRONMENTAL PROCEDURES

This Draft EIR has been prepared to assess the environmental effects associated with implementation of the proposed Plan, as well as anticipated future discretionary actions and approvals. The main purposes of this document as established by CEQA are:

- To disclose to decision-makers and the public the significant environmental effects of proposed activities.
- To identify ways to avoid or reduce environmental damage.
- To prevent environmental damage by requiring implementation of feasible alternatives or mitigation measures.
- To disclose to the public reasons, such as overriding public benefits, for agency approval of projects with significant environmental effects.
- To foster interagency coordination in the review of projects.
- To enhance public participation in the planning process.
- To guide future decision-making on development projects within the Plan area.

An EIR is the most comprehensive form of environmental documentation identified in the statutes and in the CEQA Guidelines. It provides the information needed to assess the environmental consequences of a proposed project, to the extent feasible. EIRs are intended to provide an objective, factually supported, full-disclosure analysis of the environmental consequences associated with a proposed project that have the potential to result in significant, adverse environmental impacts. An EIR is also one of various decision-making tools used by a Lead Agency to consider the merits and disadvantages of a project that is subject to its discretionary authority. Prior to approving a proposed project, the Lead Agency must consider the information contained in the EIR, determine whether the EIR was properly prepared in accordance with CEQA and the CEQA Guidelines, determine that it reflects the independent judgment of the Lead Agency, adopt findings concerning the project's significant environmental impacts and alternatives, and adopt a Statement of Overriding Considerations if the proposed project would result in significant impacts that cannot be avoided.

1.1.1 REPORT ORGANIZATION

This Draft EIR is organized into the following chapters:

- **Chapter 1: Executive Summary.** Summarizes environmental consequences that would result from implementation of the proposed Plan, describes recommended mitigation measures, and indicates the level of significance of environmental impacts before and after mitigation.
- **Chapter 2: Introduction.** Provides an overview describing the Draft EIR document.

- **Chapter 3: Project Description.** Describes the proposed Plan in detail, including the site location and characteristics, objectives, and the structural and technical elements of the proposed action.
- **Chapter 4: Environmental Evaluation.** Organized into 14 sub-chapters corresponding to the environmental resource categories identified in Appendix G of the CEQA Guidelines, this section provides a description of the physical environmental conditions in the vicinity of the proposed Plan as they existed at the time the Notice of Preparation was published, from both a local and regional perspective, as well as an analysis of the potential environmental impacts of the proposed Plan, and recommended mitigation measures, if required, to reduce their significance. The environmental setting included in each sub-chapter provides baseline physical conditions from which the Lead Agency determines the significance of environmental impacts resulting from the proposed Plan. Each sub-chapter also includes a description of the thresholds used to determine if a significant impact would occur; the methodology to identify and evaluate the potential impacts of the proposed Plan; and the potential cumulative impacts associated with the proposed Plan.
- **Chapter 5: Alternatives to the Proposed Plan.** Considers three alternatives to the proposed Plan, including the CEQA-required "No Project" alternative, the Reduced Density Alternative, and the No Proposed Plan West Alternative.
- **Chapter 6: CEQA-Mandated Sections.** Discusses growth inducement, cumulative impacts, unavoidable significant effects, and significant irreversible changes as a result of the proposed Plan. Additionally, this chapter identifies possible significant effects of the proposed Plan that were determined not to be significant pursuant to CEQA Guidelines Section 15128.
- **Chapter 7: Organizations and Persons Consulted.** Lists the people and organizations that were consulted during the preparation of this Draft EIR for the proposed Plan.
- **Appendices:** The appendices for this Draft EIR contain the following supporting documents:
  - Appendix A: Notice of Preparation and Comment Letters
  - Appendix B: Air Quality and Greenhouse Gas Data
  - Appendix C: Noise Data
  - Appendix D: Traffic Data
  - Appendix E: Water Supply Assessment

1.1.2 TYPE AND PURPOSE OF THIS DRAFT EIR

According to Section 15121(a) of the CEQA Guidelines, the purpose of an EIR is to:

> *Inform public agency decision makers and the public generally of the significant environmental effects of a project, identify possible ways to minimize the significant effects, and describe reasonable alternatives to the project.*

As described in the CEQA Guidelines, different types of EIRs are used for varying situations and intended uses. The Dell Avenue Area Plan EIR is a program EIR. A program EIR is an EIR which may be prepared on a series of actions that can be characterized as one large project and are related either:

- Geographically.
- As logical parts in the chain of complicated actions.
- In connection with issuance of rules, regulations, plans, or other general criteria to govern the conduct of a continuing program.
- As individual activities carried out by the same authorizing statutory or regulatory authority and having generally similar environmental effects which can be mitigated in similar ways.

This EIR is intended to review potential environmental impacts associated with the adoption and implementation of the proposed Plan and associated General Plan, Zoning Ordinance, and STANP amendments, and to determine corresponding mitigation measures, as necessary. A program-level EIR does not evaluate the impacts of specific, individual developments that may be allowed by the proposed Plan. Each future project will require environmental review, as required by CEQA, to secure the necessary discretionary development permits. Therefore, while subsequent environmental review may be tiered off this EIR, this EIR is not intended to address impacts of individual projects. Subsequent projects will be reviewed by the City for consistency with the proposed Plan, General Plan, Zoning Ordinance, and this EIR, and subsequent project-level environmental review will be conducted as required by CEQA. Projects successive to this EIR include, but are not limited to, the following:

- Approval and funding of major public projects and capital improvements.
- Issuance of permits and other approvals necessary for implementation of the proposed Plan.
- Development plan approvals, such as tentative maps, variances, conditional use permits, and other land use permits.
- Permit issuances and other approvals necessary for public and private development projects.
- Development agreement processes and approvals.

1.2 SUMMARY OF PROPOSED PLAN

The basic objectives of the proposed Plan established by the Campbell City Council include retaining existing businesses while transforming the area encompassed by the Plan (the "Plan Area") into a modern, technology sector-based employment district that is competitive with other areas in the Silicon Valley. In order to ensure a successful employment district, the proposed Plan stresses the importance of accommodating high-tech businesses, as well as land uses that support and complement the high-tech industry, including an active retail environment, a circulation system that supports all modes of transportation, and housing within close proximity of employment opportunities.

The following is a complete list of the Objectives identified in the proposed Plan:

- **A High-Tech and Innovation Oriented Business District**: Encourage the efficient use of land use through sustainable development patterns, a mixture of uses, and development intensities that support transit and walking. Ensure uses are compatible with and supportive of a high-tech office environment and discourage the continuance of existing uses that are not consistent with this character. Provide opportunities for small start-ups and incubator businesses within the larger workplace infrastructure. Rehabilitate and improve existing buildings and create avenues for independent cafes and restaurants to operate. Ensure that the notion of "technology" is apparent through stunning architecture and a memorable urban environment.
- **Enhanced Open Space and Improved Open Space Access**: Orient and design development to interact with existing ponds and creekside natural areas at Los Gatos Creek Park. Enhance existing trails and create new connections between the Plan Area and Los Gatos Creek Park. Carefully create a central public space around the existing water recharge facility, pending study and coordination with the Santa Clara Valley Water District (SCVWD). Infuse the Plan Area with smaller, functional open spaces in new development that provide places to rest, recreate, and gather. Seek to protect and enhance the natural character of the creek by allowing solar access, creating landscaped building edges, and using appropriate building materials. Transition buildings downward in height as they approach the waterfront.
- **An Integrated Network of Multimodal Connections**: Enhance existing roadways with sidewalks and pedestrian amenities, and create new pedestrian, bicycle, and vehicular facilities to improve connectivity. Create clear, safe, and direct pathways to the proposed VTA light rail station, and integrate them into the larger pedestrian network.
- **Environmental and Economic Sustainability**: Encourage new development and public improvements that incorporate green design and stormwater management features to reduce stormwater runoff into existing streams and preserve existing infrastructure. Ensure new buildings incorporate sustainable features in their design, including appliances requiring limited water and energy usage and building design that takes advantage of solar access and incorporates reused materials where possible. Encourage new development that will attract strong and growing businesses to Campbell, whose employees will contribute to the local economy, stimulate business, and strengthen the city's economic stance in the region.
- **Improved Design and Character**: Balance modern development styles with the small-town feel of Campbell. Incorporate and protect cherished amenities, including views and open spaces. Create memorable streets, gateways, nodes, plazas, and other new places for gathering and leisure activity. Consider special architectural elements and enhanced landscaping at key locations.
- **Sensitivity to Existing Businesses**: Provide a framework for which new high-tech development can exist harmoniously with existing businesses. Adapt land uses that are inclusive of and that accommodate businesses of traditional sectors and formats. Protect and enhance the physical layout and functionality

of existing businesses through protective design standards that are focused on better placemaking and quality of life for current and future employees.

- **Enhanced Lifestyle and Vitality**: Provide amenities and places of activity, commerce, and trade that support a high-tech workplace culture. Ensure these amenities, such as restaurants, cafes, workout and spa facilities, childcare, markets, bars, and recreational uses, are also beneficial to the wider community, bringing an after-work-hours energy to the area.
- **Context-Sensitive Mixed-Use Residential Opportunities**: Support high-quality housing in mixed-use formats (retail and residential) on the west side of Winchester Boulevard, which will create an employment-to-housing synergy and enhance the overall character of the street. Encourage ground floor commercial along Winchester Boulevard to support high-tech industry, and provide neighborhood-serving uses that also cater to the needs of adjoining neighborhoods. Ensure that upper floor residential uses transition in scale toward the San Tomas neighborhood to the west.
- **Increased Private Investment**: Align policies, strategies, and City processes to remove barriers to private investment, leverage funding, and increase the support for positive change in the Plan Area.

These objectives would be accomplished by altering land use regulations in the Plan Area through implementation of a new land use concept, new development standards, and new design guidelines.

1.3 SUMMARY OF ALTERNATIVES TO THE PROPOSED PLAN

This Draft EIR analyzes alternatives to the proposed Plan that are designed to reduce the significant environmental impacts of the proposed Plan and feasibly attain the basic objectives of the proposed Plan. There is no set methodology for comparing the alternatives or determining an environmentally superior alternative under CEQA. Identification of the environmentally superior alternative involves weighing and balancing the environmental advantages and disadvantages of each alternative in comparison with the proposed project or plan. The following alternatives to the proposed Plan were considered and analyzed in detail:

- **No Project Alternative:** Consistent with Section 15126.6(e)(2) of the CEQA Guidelines, under the No Project Alternative, the Plan Area would remain in its existing condition. Under the No Project Alternative, the proposed Plan would not be adopted and future development in the Plan Area would continue to be subject to existing policies, regulations, development standards, and land use designations as per the City of Campbell's adopted General Plan and the San Tomas Neighborhood Area Plan. It is projected that this alternative would result in no new housing units and no immediate increases in office, commercial, or light industrial development. The No Project Alternative is required as part of the "reasonable range of alternatives," and the purpose of the No Project Alternative is to compare the impacts of implementing the proposed Plan to what would occur under continued implementation of existing land uses, development standards, and other policies and regulations.

- **Reduced Development Alternative:** Under the Reduced Development Alternative, development would occur consistent with the policies and overarching land use concept of the proposed Plan, with the exception that maximum floor-area ratios (FAR) allowed for new development would be reduced to 0.75 for the DAAP-Central and DAAP-Waterfront areas east of Winchester Boulevard. Under the Reduced Development Alternative, individual development would occur at intensity levels roughly half of what is assumed under the proposed Plan. The purpose of the Reduced Development Alternative is to explore how potential impacts may be lessened through reductions to both the eventual amount of office space developed and the number of jobs created in the Plan Area.
- **No Proposed Plan West:** Under the No DAAP-West Alternative, the DAAP would cover only areas east of Winchester Boulevard and areas west of Winchester Boulevard would be removed from the DAAP completely. As such, new development in areas west of Winchester Boulevard would occur consistent with the policies, development standards, and overarching land use concepts adopted under the City's General Plan. Office/retail uses to the east of Winchester would develop in a manner consistent with the proposed Plan. The purpose of the No DAAP-West Alternative is to explore how potential impacts may be lessened by preserving existing uses along the west side of Winchester Boulevard, rather than allowing their conversion to mixed-use residential/pedestrian-oriented retail.

Chapter 5, Alternatives to the proposed Plan, of this Draft EIR, includes a complete discussion of these alternatives and of alternatives that were considered but not carried forward for detailed analysis.

1.4 AREAS OF CONTROVERSY

The City issued a Notice of Preparation (NOP) of the EIR for the proposed Plan on July 16, 2014. Between July 16, 2014 and August 14, 2014, the City invited interested agencies and the public to submit comments on the scope and content of the environmental information to be included in the EIR. During this scoping period, the City received 24 comment letters from the following parties:

- Santa Clara Valley Transportation Authority
- Santa Clara Valley Water District
- California Department of Transportation
- County of Santa Clara Roads and Airport Department
- Four Business and/or Property Owners within the Plan Area (including one letter signed by more than 40 businesses)
- 18 Campbell Residents

The following areas of concern were identified through the scoping process as issues to be resolved and/or areas of controversy:

- Water supply and service.
- Traffic operations and congestion.
- Parking management.
- Bicycle and pedestrian circulation.

- Impacts to public services.
- Noise levels.
- Aesthetics and security.

In an additional effort to allow for adequate public comment, the City held a scoping meeting at the September 9, 2014 Campbell Planning Commission meeting. The purpose of this meeting was to receive comments from the public and Planning Commission on the preparation of this Draft EIR. At this Planning Commission hearing, the public provided comment on issues related to noise, traffic, and land use compatibility.

Section 15123(b)(3) of the CEQA Guidelines requires that an EIR identify issues to be resolved, including the choice among alternatives and whether or how to mitigate significant impacts. With regard to the proposed Plan, the major issues to be resolved include decisions by the City of Campbell, as Lead Agency, related to:

- Whether this Draft EIR adequately describes the environmental impacts of the proposed Plan.
- Whether the benefits of the proposed Plan override those environmental impacts that cannot feasibly be avoided or mitigated to a level of insignificance.
- Whether the proposed land use changes are compatible with the character of the existing area.
- Whether the identified goals, policies, or mitigation measures should be adopted or modified.
- Whether there are other mitigation measures that should be applied to the proposed Plan besides those Mitigation Measures identified in the Draft EIR.
- Whether there are any alternatives to the proposed Plan that would substantially lessen any of the significant impacts of the proposed Plan and achieve most of the basic objectives.

1.5 SIGNIFICANT IMPACTS AND MITIGATION MEASURES

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 and aesthetic significance." While the proposed Plan has the potential to generate significant environmental impacts in a number of areas, as described in Chapter 6.0, CEQA Mandated Sections, of this Draft EIR, the proposed Plan would have no significant environmental impact on the following resources:

- Agricultural and Forestry Resources
- Mineral Resources

Because there is no potential for significant environmental impact to these resources as a result of the proposed Plan, impacts to these resources are not analyzed further in this Draft EIR.

Table 1-1 summarizes the potential environmental impacts of the proposed Plan and identifies mitigation measures presented in this Draft EIR to reduce those impacts to a level of insignificance. Table 1-1 is organized to correspond with the environmental issues discussed more completely in Section 4, Chapter 4.0 through 4.14, of this Draft EIR. The table is arranged in four columns: 1) environmental impacts; 2) significance prior to mitigation; 3) mitigation measures; and 4) significance after mitigation. The terms used to describe the significance of the environmental impact in Table 1-1 are:

- **No Impact**. No Impact indicates that the proposed Plan would not cause a direct impact on the environment. The No Impact findings described in Table 1-1 were determined because the Standard of Significance did not apply to the proposed Plan.
- **Less than Significant (LTS**). A Less than Significant impact falls below the CEQA Standard of Significance and would not cause a direct environmental impact.
- **Significant (S)**. A Significant impact indicates that the proposed Plan would have a direct impact on the environment that may or may not be able to be mitigated to a less than significant impact.

Significant and Unavoidable (SU). A significant and unavoidable impact indicates that the proposed Plan would have a direct impact on the environment that cannot be mitigated to a less than significant level. As shown in Table 1-1, some significant impacts would be reduced to a less-than-significant level if the mitigation measures recommended in this Draft EIR are implemented.

TABLE 1-1 SUMMARY OF IMPACTS AND MITIGATION MEASURES

Significant Impact	Significance Before Mitigation	Mitigation Measures	Significance After Mitigation
AESTHETICS			
AES-1. Implementation of the proposed Plan would not have a substantial adverse effect on a scenic vista.	LTS	N/A	N/A
AES-2. The proposed Plan would not substantially damage scenic resources, including but not limited to, trees, rock outcroppings, and historic buildings within a State scenic highway.	No Impact	N/A	N/A
AES-3. The proposed Plan would not substantially degrade the existing visual character or quality of the site and its surroundings.	LTS	N/A	N/A
AES-4. The proposed Plan would not create a new source of light or glare which would adversely affect day or nighttime views of the area.	LTS	N/A	N/A
AES-5. Implementation of the proposed Plan, in combination with past, present and reasonably foreseeable projects, would not result in significant cumulative impacts with respect to aesthetics.	LTS	N/A	N/A
AIR QUALITY			
AIR-1. Implementation of the proposed Plan would not conflict with or obstruct implementation of the applicable air quality plan.	LTS	N/A	N/A
AIR-2. Implementation of the proposed Plan would violate an air quality standard or contribute substantially to an existing or projected air quality violation.	S	AIR-2a: Applicant-provided appliances shall be Energy Star appliances (e.g., dishwashers, refrigerators, clothes washers, and dryers). Installation of Energy Star appliances shall be verified by the City of Campbell Building Division during plan check.	SU
		AIR-2b: Applicants, or their designee, for large non-residential development projects (e.g., employers with 50 employees at work site) shall establish an employee trip commute reduction program (CTR), in conformance with the Bay Area Air Quality Management District's Commuter Benefits Program (California Government Code Section 65081). The program shall offer one of the following commuter benefit options, or what is available through similar benefits at the time a development is proposed:	SU

TABLE 1-1 SUMMARY OF IMPACTS AND MITIGATION MEASURES

Significant Impact	Significance Before Mitigation	Mitigation Measures	Significance After Mitigation
		▪ Pre-tax benefit: Allow employees to exclude their transit or vanpooling expenses from taxable income, up to $130 per month. ▪ Employer-provided subsidy: Provide a subsidy to reduce or cover employees' monthly transit or vanpool costs, up to $75 per month. ▪ Employer-provided transit: Provide a free or low-cost transit service for employees, such as a bus, shuttle, or vanpool service. ▪ Alternative commuter benefit: Provide an alternative commuter benefit that is as effective in reducing single-occupancy commute trips as the options above. The employer shall also provide information about other commute options and connect commuters for carpooling, ridesharing, and other activities. The CTR program shall identify alternative modes of transportation to the project site, including transit schedules, bike and pedestrian routes, and carpool/vanpool availability. Information regarding these programs shall be readily available to employees and clients and shall be posted in a highly visible location and/or made available online. The project applicant shall consider the following additional incentives for commuters as part of the CTR program: ▪ Preferential carpool parking. ▪ Flexible work schedules for carpools. ▪ Telecommute and/or flexible work hour programs. ▪ Car-sharing program (e.g., Zipcar). ▪ Bicycle end-trip facilities, including bike parking, showers, and lockers. The CTR program shall be prepared to the satisfaction of the Planning Division Manager prior to occupancy permits.	
		AIR-2c. As part of the City's development approval process, the City shall require applicants for future development projects to comply with the current Bay Area Air Quality Management District's basic control measures for fugitive dust control, including:	SU

TABLE 1-1 SUMMARY OF IMPACTS AND MITIGATION MEASURES

Significant Impact	Significance Before Mitigation	Mitigation Measures	Significance After Mitigation
		▪ Water all active construction areas at least twice daily, or as often as needed to control dust emissions. Watering should be sufficient to prevent airborne dust from leaving the site. Increased watering frequency may be necessary whenever wind speeds exceed 15 miles per hour. Reclaimed water should be used whenever possible. ▪ Pave, apply water twice daily or as often as necessary to control dust, or apply (non-toxic) soil stabilizers on all unpaved access roads, parking areas, and staging areas at construction sites. ▪ Cover all trucks hauling soil, sand, and other loose materials or require all trucks to maintain at least two feet of freeboard (i.e. the minimum required space between the top of the load and the top of the trailer). ▪ Sweep daily (with water sweepers using reclaimed water if possible) or as often as needed all paved access roads, parking areas and staging areas at the construction site to control dust. ▪ Sweep public streets daily (with water sweepers using reclaimed water if possible) in the vicinity of the project site, or as often as needed, to keep streets free of visible soil material. ▪ Hydroseed or apply non-toxic soil stabilizers to inactive construction areas. ▪ Enclose, cover, water twice daily, or apply non-toxic soil binders to exposed stockpiles (dirt, sand, etc.). ▪ Limit vehicle traffic speeds on unpaved roads to 15 mph. ▪ Replant vegetation in disturbed areas as quickly as possible.	
AIR-3. Implementation of the proposed Plan would result in a cumulatively considerable net increase of any criteria pollutant for which the project region is in nonattainment under an applicable federal or State ambient air quality standard (including releasing emissions that exceed quantitative thresholds for ozone precursors).	S	AIR-3: Implement Mitigation Measures AIR-2a through AIR-2c.	SU
AIR-4. Implementation of the proposed Plan would expose sensitive receptors to substantial concentrations	S	AIR-4: Applicants of residential and other sensitive land use projects (e.g., hospitals, nursing homes, and day care centers) within 1,000	LTS

TABLE 1-1 SUMMARY OF IMPACTS AND MITIGATION MEASURES

Significant Impact	Significance Before Mitigation	Mitigation Measures	Significance After Mitigation
of air pollution.		feet of a major sources of TACs (e.g., warehouses, industrial areas, freeways, and roadways with traffic volumes over 10,000 vehicle per day), as measured from the property line of the project to the property line of the source/edge of the nearest travel lane, shall submit a health risk assessment (HRA) to the City of Campbell prior to future discretionary project approval. The HRA shall be prepared in accordance with policies and procedures of the State Office of Environmental Health Hazard Assessment (OEHHA) and the Bay Area Air Quality Management District. The latest OEHHA guidelines shall be used for the analysis, including age sensitivity factors, breathing rates, and body weights appropriate for children age 0 to 16 years. If the HRA shows that the incremental cancer risk exceeds ten in one million (10E-06), $PM_{2.5}$ concentrations exceed 0.3 µg/m^3, or the appropriate non-cancer hazard index exceeds 1.0, the applicant will be required to identify and demonstrate that mitigation measures are capable of reducing potential cancer and non-cancer risks to an acceptable level (i.e., below ten in one million or a hazard index of 1.0), including appropriate enforcement mechanisms. Measures to reduce risk may include but are not limited to: ▪ Air intakes located away from high volume roadways and/or truck loading zones. ▪ Heating, ventilation, and air conditioning systems of the buildings provided with appropriately sized Maximum Efficiency Rating Value (MERV) filters. Mitigation measures identified in the HRA shall be identified as mitigation measures in the environmental document and/or incorporated into the site development plan as a component of the proposed Plan. The air intake design and MERV filter requirements shall be noted and/or reflected on all building plans submitted to the City and shall be verified by the City's Planning Division.	
AIR-5. Implementation of the proposed Plan would not create or expose a substantial number of people to objectionable odors.	LTS	N/A	N/A

TABLE 1-1 SUMMARY OF IMPACTS AND MITIGATION MEASURES

Significant Impact	Significance Before Mitigation	Mitigation Measures	Significance After Mitigation
AIR-6. Implementation of the proposed Plan would cumulatively contribute to air quality impacts in the San Francisco Bay Area Air Basin.	S	AIR-6: Implement Mitigation Measures AIR-2a through AIR-2c.	SU
BIOLOGICAL RESOURCES			
BIO-1. The proposed Plan would have a substantial adverse effect, either directly, or through habitat modifications, on any species identified as a candidate, sensitive, or special status species in local or regional plans, policies, or regulations, or by the California Department of Fish and Wildlife or US Fish and Wildlife Service.	S	BIO-1: Prior to site preparation or construction on parcels containing mature trees and/or vegetated areas, a qualified biologist shall evaluate the need for and/or potentially conduct a survey. In the event that special-status species are found to be present on-site, a qualified biologist will make recommendations to reduce or avoid impacts to the special-species, as feasible, and these recommendations will be incorporated into project construction and/or operation. In particular, nests of raptors and other birds shall be protected when in active use, as required by the federal Migratory Bird Treaty Act and the California Department of Fish and Wildlife (CDFW) Code. If construction activities and any required tree removal occur during the breeding season (February 1 and August 31), a qualified biologist shall be required to conduct surveys prior to tree removal or construction activities. Preconstruction surveys are not required for tree removal or construction activities outside the nesting period. If construction would occur during the nesting season (February 1 to August 31), preconstruction surveys shall be conducted no more than 14 days prior to the start of tree removal or construction. Preconstruction surveys shall be repeated at 14-day intervals until construction has been initiated in the area after which surveys can be stopped. Locations of active nests containing viable eggs or young birds shall be documented and protective measures implemented under the direction of the qualified biologist until the nests no longer contain eggs or young birds. Protective measures shall include establishment of clearly delineated exclusion zones (i.e., demarcated by identifiable fencing, such as orange construction fencing or equivalent) around each nest location as determined by a qualified biologist, taking into account the species of birds nesting, their tolerance for disturbance and proximity to existing development. In general, exclusion zones shall be a minimum of 300	LTS

TABLE 1-1 SUMMARY OF IMPACTS AND MITIGATION MEASURES

Significant Impact	Significance Before Mitigation	Mitigation Measures	Significance After Mitigation
		feet for raptors and 75 feet for passerines and other birds. The active nest within an exclusion zone shall be monitored on a weekly basis throughout the nesting season to identify signs of disturbance and confirm nesting status. The radius of an exclusion zone may be increased by the qualified biologist if project activities are determined to be adversely affecting the nesting birds. Exclusion zones may be reduced by the qualified biologist only in consultation with CDFW. The protection measures shall remain in effect until the young have left the nest and are foraging independently or the nest is no longer active.	
BIO-2. The proposed Plan would have a substantial or adverse effect on a riparian habitat or other sensitive natural community identified in local or regional plans, policies, or regulations, or by the California Department of Fish and Wildlife or US Fish and Wildlife Service.	S	BIO-2: Minimize, avoid, and compensate for impacts to riparian habitat by avoiding individual riparian trees during construction. If avoidance is not feasible obtain a 1602 Streambed Alteration Agreement from the CDFW for impacts to riparian habitat. In addition, mitigation for impacted riparian habitat will be needed and can be accomplished by planting three native riparian trees for every one removed. To reduce indirect impacts to riparian habitat, the City shall require the use of Best Management Practices (BMPs) to protect preserved waters of the US/State and to ensure that water quality standards are not compromised. These practices can include installing orange construction fencing buffers, straw waddles to keep fill from entering preserved/avoided riparian habitats and other waters, and other protective measures; and requiring a biological monitor be onsite during project construction to monitor the integrity of any preserved wetlands and other waters during mass grading or filling of the project site.	LTS
BIO-3. The proposed Plan would have a substantial or adverse effect on federally protected wetlands as defined by Section 404 of the Clean Water Act (including but not limited to, marsh, vernal pool, coastal, etc.) through direct removal, filling, hydrological interruption, or other means.	S	BIO-3: To avoid impacts to wetlands and Waters of the US, a jurisdictional wetland delineation should be conducted and verified by the USACE. If the engineered channel is determined to be a Waters of the US, a free spanning pedestrian crossing should be used to span the engineered channel. If this is infeasible and a culvert bridge is required that results in fill impacts to Waters of the US, a Section 404 permit should be obtained from the USACE. To	LTS

TABLE 1-1 SUMMARY OF IMPACTS AND MITIGATION MEASURES

Significant Impact	Significance Before Mitigation	Mitigation Measures	Significance After Mitigation
		comply with the USACE "No Net Loss" policy, mitigation should be conducted to compensate for impacts to Waters of the US. This shall include conducting creek restoration activities in the engineered channel or along the adjacent Los Gatos Creek to provide a functional uplift in wetland functions and values.	
BIO-4. The proposed Plan would not interfere substantially with the movement of any native, resident, or migratory wildlife corridors, or impede the use of native wildlife nursery sites.	LTS	N/A	N/A
BIO-5. The proposed Plan would potentially have a substantial or adverse effect on the habitat value of riparian corridors and would therefore be in conflict with Policy CNR-3.1 of the Campbell General Plan.	S	BIO-5: Implement Mitigation Measure BIO-2.	LTS
BIO-6. The proposed Plan would not conflict with the provisions of an adopted Habitat Conservation Plan, Natural Community Conservation Plan, or other local, regional, or state habitat conservation plan.	LTS	N/A	N/A
BIO-7. Implementation of the proposed Plan, in combination with past, present and reasonably foreseeable projects, would not result in significant cumulative impacts with respect to biological resources.	LTS	N/A	N/A
CULTURAL RESOURCES			
CULT-1 The proposed Plan would not have the potential to cause a substantial adverse change in the significance of a historical resource as defined in Section 15064.5.	LTS	N/A	N/A
CULT-2. The proposed Plan would have the potential to cause a substantial adverse change in the significance of an archeological resource pursuant to Section 15064.5.	S	CULT-2: If a potentially significant subsurface cultural resource is encountered during ground disturbing activities, all construction activities within a 100-foot radius of the find shall cease until a qualified archeologist determines whether the resource requires further study. All developers in the Plan Area shall include a standard inadvertent discovery clause in every construction contract to inform contractors of this requirement. Any previously undiscovered resources found during construction activities shall be recorded on appropriate Department of Parks and Recreation (DPR) forms and	LTS

TABLE 1-1 SUMMARY OF IMPACTS AND MITIGATION MEASURES

Significant Impact	Significance Before Mitigation	Mitigation Measures	Significance After Mitigation
		evaluated for significance, in terms of CEQA criteria, by a qualified archeologist. If the resource is determined to be significant under CEQA, the qualified archaeologist shall prepare and implement a research design and archaeological data recovery plan that will capture those categories of data for which the site is significant. The archaeologist shall also perform appropriate technical analyses; prepare a comprehensive report complete with methods, results, and recommendations; and provide for the permanent curation of the recovered resources. The report shall be submitted to the City of Campbell, NWIC, and State Historic Preservation Office (SHPO), if required.	
CULT-3. The proposed Plan would have the potential to directly or indirectly destroy a unique paleontological resource, site, or unique geologic feature.	S	CULT-3: If paleontological resources are encountered during grading or excavation, all construction activities within a 50-foot radius shall stop, the City shall be notified, and a qualified paleontologist shall inspect the findings within 24 hours of discovery. The paleontologist shall document the discovery, as needed, in accordance with the Society of Vertebrate Paleontology standards, evaluate the resource, and assess the significance of the find under the criteria set forth in CEQA Guidelines Section 15064.5. The paleontologist shall notify the appropriate agencies to determine procedures that would be followed before construction is allowed to resume at the location of the find. If in consultation with the paleontologist, the project proponent determines that avoidance is not feasible, the paleontologist shall prepare an excavation plan for mitigating the effect of the project on the qualities that make the resource important. Possible mitigation under CEQA emphasizes preservation-in-place measures, including planning construction to avoid paleontological sites, incorporating sites into parks and other open spaces, covering sites with stable soil, and deeding the site into a permanent conservation easement. The project proponent shall submit the excavation plan to the City for review and approval and the project proponent shall implement the approved excavation plan.	LTS
CULT-4. The proposed Plan would not have the potential to disturb human remains, including those interred	LTS	N/A	LTS

TABLE 1-1 SUMMARY OF IMPACTS AND MITIGATION MEASURES

Significant Impact	Significance Before Mitigation	Mitigation Measures	Significance After Mitigation
outside of formal cemeteries.			
CULT-5. The proposed Plan, in combination with past, present, and reasonably foreseeable projects, would result in less than significant cumulative impacts with respect to cultural resources.	LTS	N/A	N/A
GEOLOGY, SOILS, AND SEISMICITY			
GEO-1. Implementation of the proposed Plan would not expose people or structures to potential substantial adverse effects, including the risk of loss, injury, or death involving: surface rupture along a known active fault; strong seismic ground shaking; seismic-related ground failure, including liquefaction; and landslides.	LTS	N/A	N/A
GEO-2. Implementation of the proposed Plan would not result in substantial soil erosion or the loss of topsoil.	LTS	N/A	N/A
GEO-3. Implementation of the proposed Plan would not result in a significant impact related to development on unstable geologic units and soils or result in on- or off-site landslide, lateral spreading, subsidence, liquefaction, or collapse.	LTS	N/A	N/A
GEO-4. Implementation of the proposed Plan would not create substantial risks to life or property as a result of its location on expansive soil, as defined in Section 1803.5.3 of the California Building Code, creating substantial risks to life or property.	LTS	N/A	N/A
GEO-5. Implementation of the proposed Plan would not result in impacts associated with the use of septic tanks or alternative wastewater disposal systems where sewers are not available for the disposal of wastewater.	LTS	N/A	N/A
GEO-6. Implementation of the proposed Plan, in combination with past, present, and reasonably foreseeable projects, would result in less than significant cumulative impacts with respect to geology and soils.	LTS	N/A	N/A

TABLE 1-1 SUMMARY OF IMPACTS AND MITIGATION MEASURES

Significant Impact	Significance Before Mitigation	Mitigation Measures	Significance After Mitigation
GREENHOUSE GAS EMISSIONS			
GHG-1. Implementation of the proposed Plan would not generate GHG emissions, either directly or indirectly, that may have a significant effect on the environment.	LTS	N/A	N/A
GHG-2. Implementation of the proposed Plan would not conflict with an applicable plan, policy, or regulation adopted for the purpose of reducing the emissions of greenhouse gases.	LTS	N/A	N/A
GHG-3. Implementation of the proposed Plan, in combination with past, present, and reasonably foreseeable projects, would not result in significant cumulative impacts with respect to GHG emissions.	LTS	N/A	N/A
HAZARDS AND HAZARDOUS MATERIALS			
HAZ-1. Implementation of the proposed Plan would not create a significant hazard to the public or the environment through the routine transport, use, or disposal of hazardous materials.	LTS	N/A	N/A
HAZ-2. Implementation of the proposed Plan would not create a significant hazard to the public or the environment through reasonably foreseeable upset and accident conditions involving the release of hazardous materials into the environment.	LTS	N/A	N/A
HAZ-3. Implementation of the proposed Plan would not emit hazardous emissions or handle hazardous or acutely hazardous materials, substances, or waste within ¼-mile of an existing or proposed school.	No Impact	N/A	N/A
HAZ-4. Implementation of the proposed Plan would not create a significant hazard to the public or the environment by being located on a site, which is included on a list of hazardous materials sites compiled pursuance to Government Code Section 65962.5.	LTS	N/A	N/A
HAZ-5. The proposed Plan is not located within an airport land use plan or within 2 miles of a public airport or public	No Impact	N/A	N/A

TABLE 1-1 SUMMARY OF IMPACTS AND MITIGATION MEASURES

Significant Impact	Significance Before Mitigation	Mitigation Measures	Significance After Mitigation
use airport.			
HAZ-6. The proposed Plan would not be within the vicinity of a private airstrip and result in a safety hazard for people residing or working in the Plan Area.	No Impact	N/A	N/A
HAZ-7. Implementation of the proposed Plan would not impair implementation of, or physically interfere with, an adopted emergency response plan or emergency evacuation plan.	LTS	N/A	N/A
HAZ-8. Implementation of the proposed Plan would not expose people or structures to a significant risk of loss, injury, or death involving wildland fires, including where wildlands are adjacent to urbanized areas or where residences are intermixed with wildlands.	No Impact	N/A	N/A
HAZ-9. Implementation of the proposed Plan, in combination with past, present, and reasonably foreseeable projects, would result in less-than-significant cumulative impacts with respect to hazards and hazardous materials.	LTS	N/A	N/A
HYDROLOGY AND WATER QUALITY			
HYD-1. Implementation of the proposed Plan would not violate any water quality standards or waste discharge requirements	LTS	N/A	N/A
HYD-2. The proposed Plan would not substantially deplete groundwater supplies or substantially interfere with groundwater recharge.	LTS	N/A	N/A
HYD-3. The proposed Plan would not substantially alter the existing drainage pattern of the Plan Area, including through the alteration of the course of a stream or river, in a manner, which would result in substantial erosion, siltation, or flooding on- or off-site.	LTS	N/A	N/A
HYD-4. The proposed Plan would not create or contribute runoff water that would exceed the capacity of existing or planned stormwater drainage systems or provide	LTS	N/A	N/A

TABLE 1-1 SUMMARY OF IMPACTS AND MITIGATION MEASURES

Significant Impact	Significance Before Mitigation	Mitigation Measures	Significance After Mitigation
substantial additional sources of polluted runoff.			
HYD-5. Implementation of the proposed Plan would not otherwise substantially degrade water quality.	LTS	N/A	N/A
HYD-6. The proposed Plan would not place housing within a 100-year flood hazard area as mapped on a Federal Flood Hazard Boundary or Flood Insurance Rate Map, or other flood hazard delineation map, or place structures that would impede or redirect flood flows within a 100-year flood hazard area.	LTS	N/A	N/A
HYD-7. The proposed Plan would not expose people or structures to a significant risk of loss, injury, or death involving flooding, including flooding as a result of the failure of a levee or dam.	LTS	N/A	N/A
HYD-8. The proposed Plan would not be impacted by inundation as a result of a seiche, tsunami, or mudflow.	LTS	N/A	N/A
HYD-9. The proposed Plan, in combination with past, present, and reasonably foreseeable projects, would result in less-than-significant cumulative impacts with respect to hydrology and water quality.	LTS	N/A	N/A
LAND USE AND PLANNING			
LAND-1. The proposed Plan would not physically divide an established community.	LTS	N/A	N/A
LAND-2. The proposed Plan would conflict with an applicable land use plan, policy, or regulation adopted for the purpose of avoiding or mitigating an environmental effect.	LTS	N/A	N/A
LAND-3. The proposed Plan would not conflict with an applicable habitat conservation plan or natural community conservation plan.	LTS	N/A	N/A
LAND-4. The proposed Plan, in combination with past, present, and reasonably foreseeable projects, would result in less than significant cumulative impacts with respect to land use and planning.	LTS	N/A	N/A

TABLE 1-1 SUMMARY OF IMPACTS AND MITIGATION MEASURES

Significant Impact	Significance Before Mitigation	Mitigation Measures	Significance After Mitigation
NOISE			
NOISE-1. Implementation of the proposed Plan would not result in the exposure of persons to or generation of noise levels in excess of standards established in the General Plan or Municipal Code, or applicable standards of other agencies.	LTS	N/A	N/A
NOISE-2. Implementation of the proposed Plan could result in the exposure of persons to or generation of excessive groundborne vibration or groundborne noise levels.	S (Const. Vibration) LTS (Operations Vibration)	NOISE-2: For construction that would use vibration-intense equipment such as pile driving, rock blasting and vibratory rollers that would occur within 200 feet of existing residential, commercial, and school buildings, a construction vibration mitigation plan shall be developed in close coordination with Campbell City staff so that alternative construction techniques or scheduling approaches are undertaken. The construction vibration mitigation plan shall consider the following available controls to reduce construction noise levels as low as practical: ▪ During project review, City staff shall coordinate with the applicant and/or construction contractor to discuss alternative methods of construction for vibration-intense activities in close proximity to sensitive uses or existing structures. As part of this coordination, the applicant and/or construction contractor shall identify construction methods not involving vibration-intensive equipment or activities. For example, drilled foundation caisson holes that would produce less vibration than pile driving methods, or the use of non-explosive rock breaking methods. ▪ The applicant or constructor contractor shall implement reduced-vibration alternative methods identified during project review during subsequent excavation, grading, and construction for work conducted in close proximity to sensitive structures or uses. ▪ If at all possible, vibration-intense construction activities should take place during times when nearby sensitive receptors, such as schools, are at their lowest utilization/occupancy. ▪ During plan review and/or prior to the start of construction activities, the applicant and/or construction contractor shall	LTS

TABLE 1-1 SUMMARY OF IMPACTS AND MITIGATION MEASURES

Significant Impact	Significance Before Mitigation	Mitigation Measures	Significance After Mitigation
		inspect and report on the current foundation and structural condition of the existing buildings in the immediate vicinity of the construction site. ▪ During construction, if any vibration levels cause cosmetic or structural damage to existing buildings in close proximity to a project site, the applicant shall immediately issue "stop-work" orders to the construction contractor to prevent further damage. Work shall not restart until the building is stabilized and/or preventive measures are implemented to relieve further damage to the building(s).	
NOISE-3. Implementation of the proposed Plan would not result in a substantial permanent increase in ambient noise levels in the Plan Area and vicinity above levels existing without implementation of the Plan.	LTS	N/A	N/A
NOISE-4. Implementation of the proposed Plan would not result in a substantial temporary or periodic increase in ambient noise levels in the Plan Area and vicinity above levels existing without implementation of the Plan.	LTS	N/A	N/A
NOISE-5. Implementation of the proposed Plan would not expose people residing or working in the vicinity of the Plan Area to excessive aircraft noise levels, for a project located within an airport land use plan, or where such a plan has not been adopted, within 2 miles of a public airport or public use airport.	No Impact	N/A	N/A
NOISE-6. Implementation of the proposed Plan would not expose people residing or working in the Plan Area to excessive noise levels, for a project within the vicinity of a private airstrip.	LTS	N/A	N/A
NOISE-7. Implementation of the proposed Plan would not contribute to cumulative noise impacts in the area.	LTS	N/A	N/A
POPULATION AND HOUSING			
POP-1. Implementation of the proposed Plan would not induce substantial unexpected population growth, or	LTS	N/A	N/A

TABLE 1-1 SUMMARY OF IMPACTS AND MITIGATION MEASURES

Significant Impact	Significance Before Mitigation	Mitigation Measures	Significance After Mitigation
growth for which inadequate planning has occurred, either directly (for example, by proposing new homes and businesses) or indirectly (for example, through extension of roads or other infrastructure).			
POP-2. Implementation of the proposed Plan would not displace substantial numbers of existing housing, necessitating the construction of replacement housing elsewhere.	LTS	N/A	N/A
POP-3. Implementation of the proposed Plan would not displace substantial numbers of people, necessitating the construction of replacement housing elsewhere.	LTS	N/A	N/A
POP-4. Implementation of the proposed Plan would not contribute to cumulative population and housing impacts in the area.	LTS	N/A	N/A
PUBLIC SERVICES AND RECREATION			
PS-1. Implementation of the proposed Plan would not result in the provision of or need for new or physically altered fire protection facilities, the construction or operation of which could cause significant environmental impacts.	LTS	N/A	N/A
PS-2. Implementation of the proposed Plan, in combination with past, present, and reasonably foreseeable projects, would result in less than significant cumulative impacts with respect to fire protection service.	LTS	N/A	N/A
PS-3. Implementation of the proposed Plan would not result in the provision of or need for new or physically altered police protection facilities, the construction or operation of which could cause significant environmental impacts.	LTS	N/A	N/A
PS-4. Implementation of the proposed Plan, in combination with past, present, and reasonably foreseeable projects, would result in less than significant cumulative impacts with respect to police protection	LTS	N/A	N/A

TABLE 1-1 SUMMARY OF IMPACTS AND MITIGATION MEASURES

Significant Impact	Significance Before Mitigation	Mitigation Measures	Significance After Mitigation
services.			
PS-5. The proposed Plan would not result in the provision of or need for new or physically altered school facilities, the construction or operation of which could cause significant environmental impacts.	LTS	N/A	N/A
PS-6. The proposed Plan, in combination with past, present, and reasonably foreseeable projects, would result in less-than-significant cumulative impacts with respect to schools.	LTS	N/A	N/A
PS-7. The proposed Plan would not result in the provision of or need for new or physically altered library facilities.	LTS	N/A	N/A
PS-8. The proposed Plan, in combination with past, present, and reasonably foreseeable projects, would result in less than significant cumulative impacts with respect to libraries.	LTS	N/A	N/A
PS-9. The proposed Plan would not result in the provision of or need for new or physically altered parks and recreation facilities.	LTS	N/A	N/A
PS-10. The proposed Plan would not increase the use of existing neighborhood and regional parks or other recreational facilities, such that substantial physical deterioration of the facility would occur, or be accelerated.	LTS	N/A	N/A
PS-11. The proposed Plan would not include or require the construction or expansion of recreational facilities that might have an adverse physical effect on the environment.	LTS	N/A	N/A
PS-12. The proposed Plan, in combination with past, present, and reasonably foreseeable projects, would result in less-than-significant cumulative impacts with respect to parks and recreational facilities.	LTS	N/A	N/A
TRANSPORTATION AND TRAFFIC			

TABLE 1-1 SUMMARY OF IMPACTS AND MITIGATION MEASURES

Significant Impact	Significance Before Mitigation	Mitigation Measures	Significance After Mitigation
TRAF-1. Implementation of the proposed Plan would cause seven intersections to fall below the level of service standard.	S	TRAF-1a. Intersection Improvements – San Tomas Expressway/SR 17 SB Ramps. Under Existing and Existing plus Plan Conditions, this intersection is expected to operate unacceptably. Modifying the intersection to provide two additional southbound right-turn lanes, one additional eastbound right-turn lane and one additional westbound through lane, as well as the necessary receiving lanes and traffic signal modifications would result in acceptable operations. This results in the following lane configuration: ▪ Southbound: two left-turn lanes, one shared through and left-turn lane, three right-turn lanes ▪ Eastbound: three through lanes, two right-turn lanes ▪ Westbound: two left-turn lanes, four through lanes If this mitigation measure is implemented then the proposed Plan's impact after mitigation would be less than significant. However, the amount of roadway widening required to achieve acceptable operations would require right-of-way acquisition and potential reconstruction of elevated freeway structures. As such, any improvements to this intersection would best be considered, adopted, and implemented as part of regional transportation planning efforts, not as part of an individual project or plan. Additionally, it is noted that San Tomas Expressway is a County-operated route and part of the CMP network, therefore any modifications to the intersection would require coordination and approval from both the County of Santa Clara and VTA. Given these limits on feasibility, including physical constraints and the need for inter-jurisdictional approval, the proposed Plan's impact is significant and unavoidable.	SU
		TRAF-1b. Intersection Improvements – Camden Avenue/White Oaks Road-Curtner Avenue. Under Existing and Existing plus Plan Conditions, this intersection is expected to operate unacceptably. Modifying the intersection to provide one additional northbound left-turn lane, a dedicated southbound through lane and a second eastbound right-turn lane, as well as the necessary receiving lanes and traffic signal modifications would result in acceptable operations	SU

TABLE 1-1 SUMMARY OF IMPACTS AND MITIGATION MEASURES

Significant Impact	Significance Before Mitigation	Mitigation Measures	Significance After Mitigation
		This would result in the following lane configuration: ▪ Northbound: three left-turn lanes, one through lane, one right-turn lane ▪ Southbound: one left-turn lane, one through lane, one right-turn lane ▪ Eastbound: one left-turn lane, three through lanes, two right-turn lanes ▪ Westbound: one left-turn lane, four through lanes, one shared through and right-turn lane Additionally, the signal phasing would need to be modified on the northbound and southbound approaches to provide protected left-turn phasing. With this mitigation measure, the proposed Plan's impact after mitigation would be less than significant. However, the level of roadway widening required to achieve acceptable operations would require right-of-way acquisition, and potential reconstruction of the adjacent SR 17 elevated freeway structures. As such, any improvements to this intersection would best be considered, adopted and implemented as part of regional transportation planning efforts, not as part of an individual development project or plan. Additionally, it is noted that this intersection directly connects to freeway on-ramps, and as such coordination and approval from Caltrans would likely be necessary prior to implementing modifications. Given these constraints and limits on feasibility, including physical constraints and the need for inter-jurisdictional approval, the proposed Plan's impact is significant and unavoidable.	
		TRAF-1c. Intersection Improvements – Winchester Boulevard/Hacienda Avenue. Under Existing and Existing plus Plan Conditions, this intersection is expected to operate unacceptably. Modifying the intersection to include a dedicated northbound right-turn lane, a second southbound left-turn lane and reconfiguration of the eastbound and westbound approaches as described below, as well as the necessary receiving lanes and traffic signal modifications	SU

TABLE 1-1 SUMMARY OF IMPACTS AND MITIGATION MEASURES

Significant Impact	Significance Before Mitigation	Mitigation Measures	Significance After Mitigation
		would result in acceptable operations. This would result in the following lane configuration: ▪ Northbound: one left-turn lane, two through lanes, and one right-turn lane ▪ Southbound: two left-turn lanes, two through lanes, one right-turn lane ▪ Eastbound: two left-turn lanes, one shared through and right-turn lane ▪ Westbound: one left-turn lane, one through lane, two right-turn lanes With this mitigation measure, the proposed Plan's impact after mitigation would be less than significant. However, installation of these modifications would be limited by the presence of the stormwater retention pond located on the southwest corner of the intersection, as well as the railroad tracks located parallel to Winchester Boulevard, to the east of the intersection. Given these limits on feasibility, including physical constraints and the need for inter-jurisdictional approval, the proposed Plan's impact is significant and unavoidable.	

TABLE 1-1 SUMMARY OF IMPACTS AND MITIGATION MEASURES

Significant Impact	Significance Before Mitigation	Mitigation Measures	Significance After Mitigation
		TRAF-1d. Intersection Improvements – East Sunnyoaks Avenue/Dell Avenue. Under Existing plus Plan Conditions, this intersection is expected to operate unacceptably. Signalization of the intersection, which would roughly cost $400,000 per traffic signal, is expected to result in acceptable operations. While a lane configuration was assumed for analysis purposes, it is recommended that a finalized lane configuration be designed as more detailed development plans are created for the area. Since the City does not currently assess transportation impact fees, a direct funding source for this improvement does not exist. Therefore, to fund this improvement, the City should complete a nexus study upon adoption of the proposed Plan to determine the appropriate transportation impact fee. Once the intersection reaches LOS E and the traffic signal warrants are met, as defined by the California Manual of Uniform Traffic Control Devices, the signalization improvements should be implemented. The City should also complete yearly traffic monitoring to determine when the intersection reaches the signalization improvement thresholds. With this mitigation measure, impacts associated with the implementation of the proposed Plan would be *less than significant*.	SU
		TRAF-1e. Intersection Improvements – Hacienda Avenue/Dell Avenue. Under Existing plus Plan Conditions, this intersection is expected to operate unacceptably. Signalization of the intersection (which would roughly cost $400,000 per traffic signal) is expected to result in acceptable operations. While a lane configuration was assumed for analysis purposes, it is recommended that a finalized lane configuration be designed as more detailed development plans are created for the area. Since the City does not currently assess transportation impact fees, a direct funding source for this improvement does not exist. Therefore, to fund this improvement, the City should complete a nexus study upon adoption of the proposed Plan to determine the appropriate transportation impact fee. Once the intersection reaches LOS E and the traffic signal warrants are met, as defined by the California Manual of Uniform Traffic Control Devices, the signalization improvements should be	SU

TABLE 1-1 SUMMARY OF IMPACTS AND MITIGATION MEASURES

Significant Impact	Significance Before Mitigation	Mitigation Measures	Significance After Mitigation
		implemented. The City should also complete yearly traffic monitoring to determine when the intersection reaches the signalization improvement thresholds. With this mitigation measure, impacts associated with the implementation of the proposed Plan would be *less than significant*.	
		TRAF-1f. Intersection Improvements – Winchester Boulevard/Knowles Drive. Under Existing plus Plan Conditions, this intersection is expected to operate unacceptably. Modifying the westbound approach to have two left-turn lanes, a single through lane, and right-turn lane, as well as the necessary receiving lanes and traffic signal modifications would result in acceptable operations. The modification would result in the following lane configuration: ▪ Northbound: two left-turn lane, two through lanes, one right-turn lane ▪ Southbound: one left-turn lane, two though lanes, one right-turn lane ▪ Eastbound: one left-turn lane, one through lane, one right-turn lane ▪ Westbound: two left-turn lanes, one through lane, one right-turn lane With this mitigation measure, the proposed Plan's impact after mitigation would be less than significant. However, installation of these modifications may be limited by the railroad tracks located parallel to Winchester Boulevard, to the east of the intersection. Additionally, it is noted that portions of the intersection fall under the jurisdiction of the Town of Los Gatos, and would therefore require the Town's approval to implement modifications. Therefore, due to limitations on feasibility, including physical constraints and the need for inter-jurisdictional approvals, the proposed Plan's impact is significant and unavoidable.	SU

TABLE 1-1 SUMMARY OF IMPACTS AND MITIGATION MEASURES

Significant Impact	Significance Before Mitigation	Mitigation Measures	Significance After Mitigation
TRAF-2. Implementation of the proposed Plan would cause freeway segments to fall below the level of service standard.	S	TRAF-2. Freeway Operations. Implementation of the proposed Plan would result in 15 freeway mixed-flow segments and five HOV lane segments experiencing an unacceptable increase in volume. A typical mitigation measure would seek to widen the road to add travel lanes and capacity. However, impacts to freeways would remain significant and unavoidable because these roadways are under the jurisdiction of Caltrans, and depending on location, also VTA, City of San Jose, and/or the Town of Los Gatos, and not under the jurisdiction of the City of Campbell. In addition, freeway improvement projects, which add travel lanes are planned and funded on a regional scale and would be too costly for a single project to be expected to fund. Therefore, due to limitations on feasibility, including physical constraints and the need for inter-jurisdictional approvals, the proposed Plan's impact is significant and unavoidable.	SU
TRAF-3. Implementation of the proposed Plan would not substantially increase hazards due to a design feature (e.g., sharp curves or dangerous intersection) or incompatible uses (e.g., farm equipment).	LTS	N/A	N/A
TRAF-4. Implementation of the proposed Plan would not result in inadequate emergency access.	LTS	N/A	N/A
TRAF-5. Implementation of the proposed Plan would not conflict with adopted policies, plans, or programs regarding public transit, bicycle, or pedestrian facilities, or otherwise decrease the performance or safety of such facilities.	LTS	N/A	N/A
TRAF-6. Implementation of the proposed Plan would not result in a change in air traffic patterns, including either an increase in traffic levels or a change in location, that results in substantial safety risks.	LTS	N/A	N/A
TRAF-7. Implementation of the proposed Plan would not result in a substantial under-supply of parking that would contribute to excessive vehicle circulation and congestion due to drivers searching for parking.	LTS	N/A	N/A

TABLE 1-1 SUMMARY OF IMPACTS AND MITIGATION MEASURES

Significant Impact	Significance Before Mitigation	Mitigation Measures	Significance After Mitigation
TRAF-8. Implementation of the proposed Plan, in combination with past, present, and reasonably foreseeable projects, would result in additional cumulatively considerable impacts.	S	TRAF-8a. Intersection Improvements – San Tomas Expressway/SR 17 Southbound Ramps. Under Background plus Plan Conditions, this intersection is expected to operate unacceptably. Modifying the intersection to include the following lane configuration, as well as the necessary receiving lanes and traffic signal modifications would result in acceptable operations. This is in addition to the modifications presented in Mitigation Measure TRAF-1a, as noted below. ▪ Southbound: two left-turn lanes, one shared through and left-turn lane, three right-turn lanes ▪ Eastbound: five through lanes, two right-turn lanes (two more through lanes than identified in Mitigation Measure TRAF-1a) ▪ Westbound: two left-turn lanes, five through lanes (one more through lane than identified in Mitigation Measure TRAF-1a) With this mitigation measure, the proposed Plan's impact after mitigation would be less than significant. However, the level of roadway widening required to achieve acceptable operations would require right-of-way acquisition and potential reconstruction of elevated freeway structures. As such, any improvements to this intersection would best be considered, adopted, and implemented as part of regional transportation planning efforts, not as part of an individual development project or plan. Additionally, it is noted that San Tomas Expressway is a County-operated route and part of the CMP network, therefore any modifications to the intersection would require coordination and approval from both the County of Santa Clara and VTA. Given these limits on feasibility, including physical constraints and the need for inter-jurisdictional approval, the proposed Plan's impact is significant and unavoidable.	SU
		TRAF-8b. Intersection Improvements – Camden Avenue/White Oaks Road-Curtner Avenue. Under Background plus Plan Conditions, this intersection is expected to operate unacceptably. Modifying the intersection to include the following lane configuration, as well as the necessary receiving lanes and traffic signal modifications would result in acceptable operations. This is in addition to modifications	SU

TABLE 1-1 SUMMARY OF IMPACTS AND MITIGATION MEASURES

Significant Impact	Significance Before Mitigation	Mitigation Measures	Significance After Mitigation
		recommended in Mitigation Measure TRAF-1b, as noted below. ▪ Northbound: three left-turn lanes, one through lane, one right-turn lane ▪ Southbound: one left-turn lane, one through lane, two right-turn lane (one additional right-turn lane than identified in Mitigation Measure TRAF-1b) ▪ Eastbound: one left-turn lane, three through lanes, two right-turn lanes ▪ Westbound: one left-turn lane, four through lanes, one shared through, and right-turn lane Additionally, the signal phasing would need to be modified on the northbound and southbound approaches to provide protected left-turn phasing. If this mitigation measure is implemented, then the proposed Plan's impact after mitigation would be less than significant. However, the amount of roadway widening required to achieve acceptable operations would require large areas of right-of-way acquisition, and potential reconstruction of adjacent SR 17 elevated freeway structures. As such, any improvements to this intersection would best be considered, adopted and implemented as part of regional transportation planning efforts, not as part of an individual development project or plan. Additionally, it is noted that this intersection directly connects to freeway on-ramps, and as such coordination and approval from Caltrans would likely be necessary prior to implementing modifications. Given these constraints and limits on feasibility, including physical constraints and the need for inter-jurisdictional approval, the proposed Plan's impact is potential significant and unavoidable.	
		TRAF-8c. Intersection Improvements – Winchester Boulevard/Hacienda Avenue. This is identical to Mitigation Measure TRAF-1c identified under the Existing plus Plan scenario. For reference, the mitigation measure is repeated below. Modifying the intersection to include a dedicated northbound right-	SU

TABLE 1-1 SUMMARY OF IMPACTS AND MITIGATION MEASURES

Significant Impact	Significance Before Mitigation	Mitigation Measures	Significance After Mitigation
		turn lane, a second southbound left-turn lane and reconfiguration of the eastbound and westbound approaches as described below, as well as the necessary receiving lanes and traffic signal modifications would result in acceptable operations. This would result in the following lane configuration: ▪ Northbound: one left-turn lane, two through lanes. one right-turn lane ▪ Southbound: two left-turn lanes, two through lanes, one right-turn lane ▪ Eastbound: two left-turn lanes, one shared through. and right-turn lane ▪ Westbound: one left-turn lane, one through lane, two right-turn lanes With this mitigation measure, the proposed Plan's impact after mitigation would be less than significant. However, installation of these modifications may be limited by the presence of the stormwater retention pond located on the southwest corner of the intersection, as well as the railroad tracks located parallel to Winchester Boulevard, to the east of the intersection. Given these limits on feasibility, including physical constraints and the need for inter-jurisdictional approval from the Santa Clara Valley Water District, VTA, and the Union Pacific Railroad, the proposed Plan's impact is significant and unavoidable.	
		TRAF-8d. Intersection Improvements – East Sunnyoaks Avenue/Dell Avenue. This is identical to Mitigation Measure TRAF-1d identified under the Existing plus Plan scenario. For reference, the mitigation measure is repeated below. Under Existing plus Plan Conditions, this intersection is expected to operate unacceptably. Signalization of the intersection, which would roughly cost $400,000 per traffic signal, is expected to result in acceptable operations. While a lane configuration was assumed for analysis purposes, it is recommended that a finalized lane configuration be designed as more detailed development plans are	LTS

TABLE 1-1 SUMMARY OF IMPACTS AND MITIGATION MEASURES

Significant Impact	Significance Before Mitigation	Mitigation Measures	Significance After Mitigation
		created for the area. Since the City does not currently assess transportation impact fees, a direct funding source for this improvement does not exist. Therefore, to fund this improvement, the City should complete a nexus study upon adoption of the proposed Plan to determine the appropriate transportation impact fee. Once the intersection reaches LOS E and the traffic signal warrants are met, as defined by the California Manual of Uniform Traffic Control Devices, the signalization improvements should be implemented. The City should also complete yearly traffic monitoring to determine when the intersection reaches the signalization improvement thresholds. With this mitigation measure, impacts associated with the implementation of the proposed Plan would be *less than significant*.	
		TRAF-8e. Intersection Improvements – Hacienda Avenue/Dell Avenue. This is identical to Mitigation Measure TRAF-1e identified under the Existing plus Plan scenario. For reference, the mitigation measure is repeated below. Under Existing plus Plan Conditions, this intersection is expected to operate unacceptably. Signalization of the intersection, which would roughly cost $400,000 per traffic signal, is expected to result in acceptable operations. While a lane configuration was assumed for analysis purposes, it is recommended that a finalized lane configuration be designed as more detailed development plans are created for the area. Since the City does not currently assess transportation impact fees, a direct funding source for this improvement does not exist. Therefore, to fund this improvement, the City should complete a nexus study upon adoption of the proposed Plan to determine the appropriate transportation impact fee. Once the intersection reaches LOS E and the traffic signal warrants are met, as defined by the California Manual of Uniform Traffic Control Devices, the signalization improvements should be implemented. The City should also complete yearly traffic monitoring to determine when the intersection reaches the signalization improvement thresholds. However, because there is	LTS

TABLE 1-1 SUMMARY OF IMPACTS AND MITIGATION MEASURES

Significant Impact	Significance Before Mitigation	Mitigation Measures	Significance After Mitigation
		currently no funding mechanism in place for this improvement, the proposed Plan's impact on this intersection is significant and unavoidable.	
		TRAF-8f. Intersection Improvements – Winchester Boulevard/Knowles Drive. Under Background plus Plan Conditions, this intersection is expected to operate unacceptably. The improvements recommended to achieve acceptable operations are identical to what was identified in Mitigation Measure TRAF-1f, which is copied below for reference. Modifying the westbound approach to have two left-turn lanes, a single through lane and right-turn lane, as well as the necessary receiving lanes and traffic signal modifications would result in acceptable operations. The modification would result in the following lane configuration: ▪ Northbound: two left-turn lane, two through lanes, one right-turn lane ▪ Southbound: one left-turn lane, two though lanes, one right-turn lane ▪ Eastbound: one left-turn lane, one through lane, one right-turn lane ▪ Westbound: two left-turn lanes, one through lane, one right-turn lane With this mitigation measure, the proposed Plan's impact after mitigation would be less than significant. However, installation of these modifications may be limited by the railroad tracks located parallel to Winchester Boulevard, to the east of the intersection. Additionally, it is noted that portions of the intersection fall under the jurisdiction of the Town of Los Gatos, and would therefore require the Town's approval to implement modifications. Therefore, due to limitations on feasibility, including physical constraints and the need for inter-jurisdictional approvals, the proposed Plan's impact is significant and unavoidable.	SU

TABLE 1-1 SUMMARY OF IMPACTS AND MITIGATION MEASURES

Significant Impact	Significance Before Mitigation	Mitigation Measures	Significance After Mitigation
		TRAF-8g. Intersection Improvements – Winchester Boulevard/Lark Avenue. Under Background plus Plan Conditions, this intersection is expected to operate unacceptably. Modifying the northern leg to have a dedicated receiving lane for the westbound right-turn movement. This would allow the westbound right-turn movement to be free-flowing, thereby decreasing the overall intersection delay. This is consistent with recommendations made in the Town of Los Gatos 2013 Albright Office Park EIR analysis. The receiving lane on the northern leg would need to be long enough to facilitate a merging maneuver into the continuous northbound through lanes. Based on correspondence with Town of Los Gatos staff, this improvement has been funded and is expected to be implemented in 2015-2016. With this modified intersection configuration, which is scheduled to be implemented independently of the proposed Plan, the proposed Plan's impact would be less than significant.	LTS
		TRAF-8h. Intersection Improvements – San Tomas Expressway/Hamilton Avenue. Under Cumulative plus Plan Conditions, this intersection is expected to operate unacceptably. Modifying the intersection to include the following lane configuration would result in acceptable operations. Northbound: two left-turn lanes, four though lanes (one lane would be HOV only during the AM peak), one right-turn lane (one additional left-turn lane and through lane than the current configuration). ▪ Southbound: two left-turn lanes, four though lanes (one lane would be HOV only during the PM peak), one right-turn lane (one additional through lane than the current configuration). ▪ Eastbound: two left-turn lanes, three through lanes, one right-turn lane ▪ Westbound: two left-turn lanes, three through lanes, one right-turn lane If this mitigation measure is implemented then the proposed Plan's impact after mitigation would be less than significant. This would require roadway widening, including possible acquisition of right-of way. However, San Tomas Expressway is a County-operated route	SU

TABLE 1-1 SUMMARY OF IMPACTS AND MITIGATION MEASURES

Significant Impact	Significance Before Mitigation	Mitigation Measures	Significance After Mitigation
		and part of the CMP network. Therefore, any modifications to the intersection would require coordination and approval from both the County of Santa Clara and VTA. Since the improvements would result in the addition of through lanes, it would be necessary that the improvements be implemented on a corridor basis, not just at the study intersection. Additionally, since San Tomas Expressway is a regional route that is expected to experience growth in traffic due to regional development, any improvements to the route are best considered, adopted, and implemented as part of a corridor-wide planning effort, and not practical for any one development project or plan to mitigate. Therefore, due to physical constraints, the need for inter-jurisdictional approvals, and the fact that improvements to the facility are best addressed on a regional planning basis, the proposed Plan's impact is significant and unavoidable.	
		TRAF-8i. Intersection Improvements – San Tomas Expressway/Campbell Avenue. Under Cumulative plus Plan Conditions, this intersection is expected to operate unacceptably. Modifying the intersection to include the following lane configuration, as well as the necessary receiving lanes and traffic signal modifications would result in acceptable operations: ▪ Northbound: two left-turn lanes, four though lanes (one lane would be HOV only during the AM peak), one right-turn lane (this is one additional through lane over existing conditions) ▪ Southbound: two left-turn lanes, four though lanes (one lane would be HOV only during the PM peak), one right-turn (this is one additional through lane over existing conditions) ▪ Eastbound: two left-turn lanes, two through lanes, one right-turn lane ▪ Westbound: two left-turn lanes, one through lane, one shared through and right-turn lane With this mitigation measure, the proposed Plan's impact after mitigation would be less than significant. However, San Tomas	SU

TABLE 1-1 SUMMARY OF IMPACTS AND MITIGATION MEASURES

Significant Impact	Significance Before Mitigation	Mitigation Measures	Significance After Mitigation
		Expressway is a County-operated route and part of the CMP network. Therefore, any modifications to the intersection would require coordination and approval from both the County of Santa Clara and VTA. Since the improvements would result in the addition of through lanes, it would be necessary that the improvements be implemented on a corridor basis, not just at the study intersection. Additionally, since San Tomas Expressway is a regional route that is expected to experience growth in traffic due to regional development, any improvements to the route are best considered as part of a corridor-wide planning effort, and not practical for any one development plan to mitigate. Therefore, due to physical constraints, the need for inter-jurisdictional approvals and the fact that improvements to the facility are best addressed on a regional planning basis, the proposed Plan's impact is significant and unavoidable.	
		TRAF-8j. Intersection Improvements – San Tomas Expressway/SR 17 Southbound Ramps. Under Cumulative plus Plan Conditions, this intersection is expected to operate unacceptably. Modifying the intersection to include the following lane configuration, as well as the necessary receiving lanes and traffic signal modifications would result in acceptable operations. This is in addition to the modifications presented in Mitigation Measure TRAF-8a, as noted below. ▪ Southbound: two left-turn lanes, one shared through and left-turn lane, three right-turn lanes ▪ Eastbound: eight through lanes, two right-turn lanes (three more through lanes than identified in Mitigation Measure TRAF-8a) ▪ Westbound: three left-turn lanes, six through lanes(one more left-turn lane and one more through lane than identified in Mitigation Measure TRAF-8a) If this mitigation measure is implemented, then the proposed Plan's impact after mitigation would be less than significant. However, the level of roadway widening required to achieve acceptable operations	SU

TABLE 1-1 SUMMARY OF IMPACTS AND MITIGATION MEASURES

Significant Impact	Significance Before Mitigation	Mitigation Measures	Significance After Mitigation
		would require right-of-way acquisition, and potential reconstruction of elevated freeway structures. Additionally, widening of the scale proposed would need to be completed on a corridor-wide basis, not at an individual intersection. As such, any improvements to this intersection would best be considered, adopted, and implemented as part of regional transportation planning efforts, not as part of an individual development project. Additionally, it is noted that San Tomas Expressway is a County-operated route and part of the CMP network, therefore any modifications to the intersection would require coordination and approval from both the County of Santa Clara and VTA. Given these limits on feasibility, including physical constraints and the need for inter-jurisdictional approval, the proposed Plan's impact is significant and unavoidable.	
		TRAF-8k. Intersection Improvements – Camden Avenue/White Oaks Road-Curtner Avenue. Under Cumulative plus Plan Conditions, this intersection is expected to operate unacceptably. Modifying the intersection to include the following lane configuration, as well as the necessary receiving lanes and traffic signal modifications would result in acceptable operations. These modifications are in addition to what was identified in Mitigation Measure TRAF-8b for Background plus Plan conditions, as noted below. ▪ Northbound: three left-turn lanes, two through lanes, one right-turn lane (one additional dedicated left-turn lane and one additional dedicated through lane in addition to Mitigation Measure TRAF-8b) ▪ Southbound: one left-turn lane, one through lane, three right-turn lane (conversion to dedicated left-turn and through lanes, plus two addition right turn lanes compared to Mitigation Measure TRAF-8b) ▪ Eastbound: three left-turn lanes, four through lanes, one right-turn lane (two additional left-turn lanes compared to Mitigation Measure TRAF-8b) ▪ Westbound: two left-turn lane, six through lanes, one right-turn lane (one additional left-turn lane and one addition through lane	SU

TABLE 1-1 SUMMARY OF IMPACTS AND MITIGATION MEASURES

Significant Impact	Significance Before Mitigation	Mitigation Measures	Significance After Mitigation
		compared to Mitigation Measure TRAF-8b) If this mitigation measure is implemented then the proposed Plan's impact after mitigation would be less than significant. However, the level of roadway widening required to achieve acceptable operations would require large amounts of right-of-way acquisition, and potential reconstruction of elevated freeway structures. As such, any improvements to this intersection would best be considered, adopted, and implemented as part of regional transportation planning efforts, not as part of an individual development project or plan. Additionally, it is noted that this intersection directly connects to freeway on-ramps, and as such, coordination and approval from Caltrans would likely be necessary prior to implementing modifications. Given these constraints and limits on feasibility, including physical constraints and the need for inter-jurisdictional approval, the proposed Plan's impact is significant and unavoidable.	
		TRAF-8l. Intersection Improvements – Winchester Boulevard/Sunnyoaks Avenue. Under Cumulative plus Plan Conditions, this intersection is expected to operate unacceptably. Modifying the intersection to include a second eastbound left-turn lane, as well as the necessary traffic signal modifications would result in acceptable operations. This would result in the following lane configuration: ▪ Northbound: one left-turn lane, three through lanes, one right-turn lane ▪ Southbound: two through lanes, one right-turn lane ▪ Eastbound: two left-turn lanes, one right-turn lane With this mitigation measure, the intersection would operate acceptably. However, widening would be restricted by that fact that there are developments on both sides of West Sunnyoaks Avenue, adjacent to the intersection, thereby requiring acquisition of right-of-way, private property, as well as reconfiguration of access, and potentially loss of buildings and/or parking spaces on these parcels. Because of these limitations, implementation of the mitigation	SU

TABLE 1-1 SUMMARY OF IMPACTS AND MITIGATION MEASURES

Significant Impact	Significance Before Mitigation	Mitigation Measures	Significance After Mitigation
		measure is not considered to be feasible. Therefore, the proposed Plan's impact would be significant and unavoidable.	
		TRAF-8m. Intersection Improvements – Winchester Boulevard/Hacienda Avenue. This is identical to Mitigation Measure TRAF-1c identified under the Existing plus Plan scenario and Mitigation Measure TRAF-8c identified under the Background plus Plan scenario. For reference, the mitigation measure is repeated below. Modifying the intersection to include a dedicated northbound right-turn lane, a second southbound left-turn lane and reconfiguration of the eastbound and westbound approaches as described below, as well as the necessary receiving lanes and traffic signal modifications would result in acceptable operations. This would result in the following lane configuration: ▪ Northbound: one left-turn lane, two through lanes, one right-turn lane ▪ Southbound: two left-turn lanes, two through lanes, one right-turn lane ▪ Eastbound: two left-turn lanes, one shared through and right-turn lane ▪ Westbound: one left-turn lane, one through lane, two right-turn lanes With this mitigation measure, the proposed Plan's impact after mitigation would be less than significant. However, installation of these modifications may be limited by the presence of the stormwater retention pond located on the southwest corner of the intersection, as well as the railroad tracks located parallel to Winchester Boulevard, to the east of the intersection. Given these limits on feasibility, including physical constraints and the need for inter-jurisdictional approval from the Santa Clara Valley Water District, VTA, and the Union Pacific Railroad, the proposed Plan's impact is significant and unavoidable.	SU

TABLE 1-1 SUMMARY OF IMPACTS AND MITIGATION MEASURES

Significant Impact	Significance Before Mitigation	Mitigation Measures	Significance After Mitigation
		TRAF-8n. Intersection Improvements – East Sunnyoaks Avenue/Dell Avenue. This is identical to Mitigation Measure TRAF-8d identified under the Existing plus Plan scenario. For reference, the mitigation measure is repeated below. Under Cumulative plus Plan Conditions, this intersection is expected to operate unacceptably. Signalization of the intersection, which would roughly cost $400,000 per traffic signal, is expected to result in acceptable operations. While a lane configuration was assumed for analysis purposes, it is recommended that a finalized lane configuration be designed as more detailed development plans are created for the area. Since the City does not currently assess transportation impact fees, a direct funding source for this improvement does not exist. Therefore, to fund this improvement, the City should complete a nexus study upon adoption of the proposed Plan to determine the appropriate transportation impact fee. Once the intersection reaches LOS E and the traffic signal warrants are met, as defined by the California Manual of Uniform Traffic Control Devices, the signalization improvements should be implemented. The City should also complete yearly traffic monitoring to determine when the intersection reaches the signalization improvement thresholds. With this mitigation measure, impacts associated with the implementation of the proposed Plan would be *less than significant*.	LTS
		TRAF-8o. Intersection Improvements – Hacienda Avenue/Dell Avenue. This is identical to Mitigation Measure TRAF-8e identified under the Existing plus Plan scenario. For reference, the mitigation measure is repeated below. Under Cumulative plus Plan Conditions, this intersection is expected to operate unacceptably. Signalization of the intersection, which would roughly cost $400,000 per traffic signal, is expected to result in acceptable operations. While a lane configuration was assumed for analysis purposes, it is recommended that a finalized lane configuration be designed as more detailed development plans are created for the area. Since the City does not currently assess	LTS

TABLE 1-1 SUMMARY OF IMPACTS AND MITIGATION MEASURES

Significant Impact	Significance Before Mitigation	Mitigation Measures	Significance After Mitigation
		transportation impact fees, a direct funding source for this improvement does not exist. Therefore, to fund this improvement, the City should complete a nexus study upon adoption of the proposed Plan to determine the appropriate transportation impact fee. Once the intersection reaches LOS E and the traffic signal warrants are met, as defined by the California Manual of Uniform Traffic Control Devices, the signalization improvements should be implemented. The City should also complete yearly traffic monitoring to determine when the intersection reaches the signalization improvement thresholds. With this mitigation measure, impacts associated with the implementation of the proposed Plan would be *less than significant*.	
		TRAF-8p. Intersection Improvements – Bascom Avenue/Camden Avenue . Under Cumulative plus Plan Conditions, this intersection is expected to operate unacceptably. Modifying the intersection to include the following lane configuration, as well as the necessary receiving lanes and traffic signal modifications would result in acceptable operations: ▪ Northbound: three left-turn lanes, two through lanes, one shared through and right-turn lane ▪ Southbound: two left-turn lanes, four through lanes, two right-turn lanes (this is an addition of one through lane and two right-turn lanes) ▪ Eastbound: two left-turn lanes, three through lanes, one right-turn lane (this is an addition of one through lane) ▪ Westbound: one left-turn lane, three through lanes, one right-turn lane (this is the addition of one right-turn lane) If this mitigation measure is implemented, then the proposed Plan's impact after mitigation would be less than significant. However, the level of roadway widening required to achieve acceptable operations would require large amounts of right-of-way acquisition, thereby restricting the feasibility of implementing the recommended improvements. Additionally, these are regional routes and as such	SU

TABLE 1-1 SUMMARY OF IMPACTS AND MITIGATION MEASURES

Significant Impact	Significance Before Mitigation	Mitigation Measures	Significance After Mitigation
		any improvements to this intersection would best be considered, adopted, and implemented as part of regional transportation planning efforts, not as part of an individual development project. Additionally, it is noted this intersection is under the jurisdiction of the City of San Jose, therefore any modifications to the intersection would require coordination and approval from both the City of San Jose and the Santa Clara VTA. Given the limits on feasibility, including physical constraints, the fact that improvements would be best achieved through a regional planning process and the need for inter-jurisdictional approvals, the proposed Plan's impact is significant and unavoidable.	
		TRAF-8q. Intersection Improvements – Winchester Boulevard/Knowles Drive. Under Cumulative plus Plan Conditions, this intersection is expected to operate unacceptably. The improvements recommended to achieve acceptable operations are identical to what was identified in Mitigation Measure TRAF-8f, which is copied below for reference. Modifying the westbound approach to have two left-turn lanes, a single through lane and right-turn lane, as well as the necessary receiving lanes and traffic signal modifications would result in acceptable operations. The modification would result in the following lane configuration: ▪ Northbound: two left-turn lanes, two through lanes, one right-turn lane ▪ Southbound: one left-turn lane, two though lanes, one right-turn lane ▪ Eastbound: one left-turn lane, one through lane, one right-turn lane ▪ Westbound: two left-turn lanes, one through lane, one right-turn lane With this mitigation measure, the proposed Plan's impact after mitigation would be less than significant. However, installation of these modifications may be limited by the railroad tracks located	SU

TABLE 1-1 SUMMARY OF IMPACTS AND MITIGATION MEASURES

Significant Impact	Significance Before Mitigation	Mitigation Measures	Significance After Mitigation
		parallel to Winchester Boulevard to the east of the intersection. Additionally, portions of the intersection fall under the jurisdiction of the Town of Los Gatos, and would therefore require the Town's approval to implement modifications. Therefore, due to limitations on feasibility, including physical constraints and the need for inter-jurisdictional approvals, the proposed Plan's impact is significant and unavoidable.	
		TRAF-8r. Intersection Improvements – Winchester Boulevard/SR 85 Northbound Ramps. Under Cumulative plus Plan Conditions, this intersection is expected to operate unacceptably. Installation of a second northbound left-turn lane would result in acceptable operations. If this mitigation measure is implemented, then the proposed Plan's impact after mitigation would be less than significant. However, installation of these modifications may be limited by the need to acquire right-of-way. Additionally, portions of the intersection fall under the jurisdiction of Caltrans and the Town of Los Gatos, and would therefore require the two agencies' approval to implement modifications. Therefore, due to limitations on feasibility, including physical constraints, the need for right-of-way acquisition, and the need for inter-jurisdictional approvals, the proposed Plan's impact is significant and unavoidable.	SU
		TRAF-8s. Intersection Improvements – Winchester Boulevard/SR 85 Southbound Ramps. Under Cumulative plus Plan Conditions, this intersection is expected to operate unacceptably. Modifying the intersection to include the following lane configuration would result in acceptable operations: ▪ Northbound: two through lanes ▪ Southbound: two though lanes ▪ Eastbound: two left-turn lanes and one right-turn lane (this is a second left-turn lane) If this mitigation measure is implemented, then the proposed Plan's impact after mitigation would be less than significant. However,	SU

TABLE 1-1 SUMMARY OF IMPACTS AND MITIGATION MEASURES

Significant Impact	Significance Before Mitigation	Mitigation Measures	Significance After Mitigation
		installation of these modifications may be limited by the need to acquire right-of-way. Additionally, portions of the intersection fall under the jurisdiction of Caltrans and the Town of Los Gatos, and would therefore require the two agencies' approval to implement modifications. Therefore, due to limitations on feasibility, including physical constraints, the need for right-of-way acquisition, and the need for inter-jurisdictional approvals, the proposed Plan's impact is significant and unavoidable.	
		TRAF-8t. Intersection Improvements – Winchester Boulevard/ Wimbledon Drive. Under Cumulative plus Plan Conditions, this intersection is expected to operate unacceptably. Modifying the intersection to include the following lane configuration would result in acceptable operations: ▪ Northbound: one left-turn lane and two through lanes ▪ Southbound: two through lanes and one right-turn lane (this is an addition of a right-turn lane) ▪ Eastbound: one left-turn lane and one right-turn lane (these are additional dedicated turn lanes) With this mitigation measure, the proposed Plan's impact after mitigation would be less than significant. However, the intersection falls under the jurisdiction of the Town of Los Gatos and would, therefore, require the Town's approval to implement modifications. Therefore, it is recommended that the City of Campbell coordinate with the Town of Los Gatos to seek approval for this modification, and subsequently develop a mechanism to implement the modification. With the implementation of this mitigation measure, the proposed Plan's impact would be less than significant. However, due to limitations on feasibility and lack of funding mechanism, the proposed Plan's impact is significant and unavoidable.	SU
		TRAF-8u. Intersection Improvements – Winchester Boulevard/Lark Avenue. Under Cumulative plus Plan Conditions, this intersection is expected to operate unacceptably. The improvements recommended to achieve acceptable operations are identical to what was identified in Mitigation Measure TRAF-8g, which is copied	LTS

TABLE 1-1 SUMMARY OF IMPACTS AND MITIGATION MEASURES

Significant Impact	Significance Before Mitigation	Mitigation Measures	Significance After Mitigation
		below for reference. Modifying the northern leg to have a dedicated receiving lane for the westbound right-turn movement. This would allow the westbound right-turn movement to be free-flowing, thereby decreasing the overall intersection delay. This is consistent with recommendations made in the Albright Office Park EIR analysis. The receiving lane on the northern leg would need to be long enough to facilitate a merging maneuver into the continuous northbound through lanes. Based on correspondence with Town of Los Gatos staff, this improvement has been funded and is expected to be implemented in 2015-2016. With this modified intersection configuration, which is scheduled to be implemented independently of the proposed Plan, the proposed Plan's impact would be less than significant	
		TRAF-8v. Intersection Improvements – Lark Avenue/SR 17 Southbound Ramps. Under Cumulative plus Plan Conditions, this intersection is expected to operate unacceptably. Modifying the intersection to add an additional eastbound shared through and right-turn lane would result in acceptable operations. This is consistent with mitigation measures presented in the North 40 Specific Plan EIR analysis. However, at the time of this analysis, funding for this improvement has not been identified, nor is there a scheduled timeline for implementation. If this mitigation measure is implemented, then the proposed Plan's impact after mitigation would be less than significant. The intersection falls under the jurisdiction of the both Town of Los Gatos and Caltrans, and would therefore require both agencies' approvals to implement modifications. Therefore, it is recommended that the City of Campbell coordinate with the Town of Los Gatos and Caltrans to seek approval for this modification, and subsequently develop a funding mechanism to implement the modification. However, due to limitations on feasibility (i.e., lack of funding and unknown timing of the improvement), the proposed Plan's impact on this intersection is significant and unavoidable	SU

TABLE 1-1 SUMMARY OF IMPACTS AND MITIGATION MEASURES

Significant Impact	Significance Before Mitigation	Mitigation Measures	Significance After Mitigation
		TRAF-8w. Intersection Improvements – Winchester Boulevard/Daves Avenue. Under Cumulative plus Plan Conditions, this intersection is expected to operate unacceptably. Modifying the intersection to include the following lane configuration would result in acceptable operations: ▪ Northbound: one left-turn lane, one through lane, one shared through and right-turn lane ▪ Southbound: one left-turn lane, one through lane, one right-turn lane ▪ Eastbound: one left-turn lane, one shared through and right-turn lane (currently there is a single lane for all movements) ▪ Westbound: one left-turn lane, one shared through and right-turn lane (currently there is a single lane for all movements) Additionally, the traffic signal phasing would need to be modified to provide protected phasing on the eastbound and westbound approaches. If this mitigation measure is implemented, then the proposed Plan's impact after mitigation would be less than significant. However, installation of these modifications may be limited due to the fact that the westbound approach is a private driveway and modifications would require the approval of the landowner. Installation of this improvement would be further limited by the fact that adjacent development would restrict the necessary roadway widening. Additionally, the intersection falls under the jurisdiction of the Town of Los Gatos, and would therefore require the Town's approval to implement modifications. Therefore, because this improvement is not funded, and due to limitations on feasibility, including physical constraints, the need for private landowner approval, and the need for inter-jurisdictional approval, the proposed Plan's impact is significant and unavoidable.	SU
		TRAF-8x. Intersection Improvements – Blossom Hill Road/Santa Cruz Avenue-Winchester Boulevard. Under Cumulative plus Plan Conditions, this intersection is expected to operate unacceptably. Modifying the intersection to include the following lane	SU

TABLE 1-1 SUMMARY OF IMPACTS AND MITIGATION MEASURES

Significant Impact	Significance Before Mitigation	Mitigation Measures	Significance After Mitigation
		configuration, as well as the necessary receiving lanes and traffic signal modifications, would result in acceptable operations: ▪ Northbound: one left-turn lane, two through lanes, one right-turn lane (this would be an increase of one left-turn lane and one through lane) ▪ Southbound: one left-turn lane, one through lane, one right-turn lane (this would be an addition of one right-turn lane) ▪ Eastbound: single shared left-turn, through and right-turn lane ▪ Westbound: one shared left-turn and through lane, one right-turn lane If this mitigation measure is implemented, then the proposed Plan's impact after mitigation would be less than significant. However, installation of these modifications may be limited by the fact that adjacent buildings and private development would restrict the ability to widen the roadway without significant right-of-way acquisition. Additionally, the intersection falls under the jurisdiction of the Town of Los Gatos and would, therefore, require the Town's approval to implement modifications. Therefore, due to the lack of funding, limitations on feasibility, including physical constraints, and the need for right-of-way, the proposed Plan's impact is significant and unavoidable.	
		TRAF-8y. Intersection Improvements – Saratoga Los Gatos Road/University Avenue. Under Cumulative plus Plan Conditions, this intersection is expected to operate unacceptably. Modifying the intersection to provide dedicated right-turn lanes on the northbound, southbound, and eastbound approaches, as well as the necessary traffic signal modifications, would result in acceptable operations. This would result in the following lane configuration: ▪ Northbound: one left-turn lane, one through lane, one right-turn lane ▪ Southbound: one left-turn lane, one through lane, one right-turn lane ▪ Eastbound: one left-turn lane, two through lanes, one right-turn	SU

TABLE 1-1 SUMMARY OF IMPACTS AND MITIGATION MEASURES

Significant Impact	Significance Before Mitigation	Mitigation Measures	Significance After Mitigation
		lane ▪ Westbound: one left-turn lane, two through lanes, one right-turn lane With this mitigation measure, the proposed Plan's impact after mitigation would be less than significant. However, the intersection falls under the jurisdiction of the Town of Los Gatos and would, therefore, require the Town's approval to implement modifications. Additionally, implementation of the mitigation measure may require acquisition of right-of-way and reconfiguration of adjacent parcels. Therefore, due to the lack of funding, limitations on feasibility, including physical constraints, and the need for right-of-way, the proposed Plan's impact is significant and unavoidable.	
		TRAF-8z. Transportation Demand Management. A partial mitigation measure to reduce impact on study facilities would be the implementation of a Transportation Demand Management (TDM) Program. A TDM would include measures to encourage reductions in vehicle trips. This may include, but not be limited to, subsidization of transit passes, carpool/vanpool matching services, preferential parking for carpool/vanpool vehicles, alternative work schedules, and enhanced pedestrian and bicycle facilities. Implementation of a TDM Program can result in an incremental decrease in traffic generated by a development. While this decrease in traffic may not be enough to reduce impacts to a less than significant level, any reductions in Plan-generated traffic would be beneficial to congestion, air quality, and health. Therefore, it is recommended that a TDM Program be implemented for the proposed Plan as a partial mitigation to reduce, but not fully alleviate, traffic-related impacts.	SU
UTILITIES AND SERVICE SYSTEMS			
UTIL-1. Implementation of the proposed Plan would have sufficient water supplies available to serve the Plan from existing entitlements and resources, and new or expanded entitlements are not needed.	LTS	N/A	N/A

TABLE 1-1 SUMMARY OF IMPACTS AND MITIGATION MEASURES

Significant Impact	Significance Before Mitigation	Mitigation Measures	Significance After Mitigation
UTIL-2. Implementation of the proposed Plan would not require or result in the construction of new water facilities or expansion of existing facilities, the construction of which would cause significant environmental effects.	LTS	N/A	N/A
UTIL-3. Implementation of the proposed Plan, in combination with past, present, and reasonably foreseeable projects, would not result in significant cumulative impacts with respect to water supply.	LTS	N/A	N/A
UTIL-4. Implementations of the proposed Plan would not exceed wastewater treatment requirements of the applicable Regional Water Quality Control Board.	LTS	N/A	N/A
UTIL-5. Implementation of the proposed Plan would not require or result in the construction of new wastewater treatment facilities or expansion of existing facilities, the construction of which could cause significant environmental effects.	LTS	N/A	N/A
UTIL-6. Implementation of the proposed Plan would not result in a determination by the wastewater treatment provider, which serves, or may serve the Plan, that it does not have adequate capacity to serve the Plan's projected demand in addition to the provider's existing commitments.	LTS	N/A	N/A
UTIL-7. Implementation of the proposed Plan, in combination with past, present, and reasonably foreseeable projects, would not result in a significant cumulative impacts with respect to wastewater treatment.	LTS	N/A	N/A
UTIL-8. Implementation of the proposed Plan would not require the construction of new storm drainage facilities or expansion of existing facilities, the construction of which would cause significant environmental effects.	LTS	N/A	N/A
UTIL-9. Implementation of the proposed Plan would not contribute to cumulative stormwater impacts in the area.	LTS	N/A	N/A

TABLE 1-1 SUMMARY OF IMPACTS AND MITIGATION MEASURES

Significant Impact	Significance Before Mitigation	Mitigation Measures	Significance After Mitigation
UTIL-10. The proposed Plan would be served by a landfill with sufficient permitted capacity to accommodate the Plan's solid waste disposal needs.	LTS	N/A	N/A
UTIL-11. The proposed Plan would comply with federal, State, and local statutes and regulations related to solid waste.	LTS	N/A	N/A
UTIL-12. The proposed Plan, in combination with past, present, and reasonably foreseeable development, would result in less than significant impacts with respect to solid waste.	LTS	N/A	N/A
UTIL-13. Implementation of the proposed Plan would not result in a substantial increase in natural gas and electrical service demands, and would not require new energy supply facilities and transmission infrastructure or capacity enhancing alterations to existing facilities.	LTS	N/A	N/A

2. Introduction

Pursuant to the California Environmental Quality Act (CEQA) Guidelines, Chapter 14 California Code of Regulations, Section 15378[a], the Dell Avenue Area Plan is considered a "project" subject to environmental review as its implementation is "an action [undertaken by a public agency] which has the potential for resulting in either a direct physical change in the environment or a reasonably foreseeable indirect physical change in the environment."This Draft Environmental Impact Report (Draft EIR) provides an assessment of the potential environmental consequences of adopting and implementing the Dell Avenue Area Plan, herein referred to as the "proposed Plan." Additionally, this Draft EIR identifies mitigation measures and alternatives to the proposed Plan that would avoid or reduce significant impacts to the environment resulting from the proposed Plan. This Draft EIR compares the environmental impacts that may result from implementation of the proposed Plan with existing environmental conditions (i.e., baseline conditions) to determine whether significant impacts will occur, described in detail in each section of Chapter 4.0, Environmental Analysis, of this Draft EIR. The City of Campbell (City) is the Lead Agency for the proposed Plan. This Draft EIR is intended to inform the City's decision-makers, other responsible agencies, and the public-at-large of the nature of the proposed Plan and its effect on the environment. Responsible agencies include, the California Department of Transportation, California Department of Fish and Game, Native American Heritage Commission, Public Utilities Commission, Regional Water Quality Control Board, Department of Toxic Substances Control, Bay Area Air Quality Management District, San Francisco Bay Regional Water Quality Control Board, Metropolitan Transportation Commission, Association of Bay Area Governments, Santa Clara Valley Transportation Authority, Santa Clara Valley Water District, City of Los Gatos, City of San Jose, and Santa Clara County.

2.1 PROPOSED ACTION

The proposed action analyzed by this Draft EIR is the adoption and implementation of the proposed Plan and associated amendments to the City's General Plan, Zoning Ordinance, and San Tomas Area Neighborhood Plan. The proposed Plan contains land use, urban design, and circulation goals, policies, and actions to guide investment and land use development in the Plan Area throughout the 2040 buildout horizon. Section 15126.2 of the California Environmental Quality Act (CEQA) Guidelines requires that an EIR focus on the significant "direct and indirect" and "short-term and long-term" effects of a project. To ensure a conservative approach in analyzing environmental effects under CEQA, EIRs typically analyze what could be considered a worst-case scenario in order to capture as many significant environmental effects as could reasonably be expected as a result of implementation of the Plan. For a programmatic evaluation of a land use plan, this entails projecting buildout calculations to carry through the environmental review process. These projections reflect the estimated number of housing units, amount of commercial

development, and resident and employment populations that are reasonably foreseeable for the 25-year duration of the proposed Plan. The actual rate and amount of development will be dependent on market conditions and regulatory processes.

The associated amendments to the General Plan, Zoning Ordinance, and San Tomas Neighborhood Plan (STANP) would ensure that the City's land use and zoning designations, policies, and development standards identified in these documents are consistent with the proposed Plan. The proposed Plan and associated amendments to the General Plan, Zoning Ordinance, and STANP are described in more detail in Chapter 3, Project Description.

2.2 EIR SCOPE

This document is a program EIR, as described in Section 15168 of the CEQA Guidelines. A program EIR is appropriate when an agency proposes a series of actions that can be characterized as one large project and are related:

- Geographically;
- As logical parts in the chain of contemplated actions;
- In connection with issuance of rules, regulations, plans, or other general criteria to govern the conduct of a continuing program; or
- As individual activities carried out under the same authorizing statutory or regulatory authority and having generally similar environmental effects that can be mitigated in similar ways.

Preparation of a program EIR, rather than a series of individual EIRs, allows a public agency to characterize the overall program—here, the proposed Plan—as the project that is proposed for approval. This process avoids preparation of multiple EIRs for activities within the program if the program EIR contains a specific and comprehensive evaluation of the effects of the proposed activity.

Under the program EIR approach, this EIR will be used as a starting point for reviewing the potential environmental impacts of future projects or phases identified in the proposed Plan. Whether additional environmental review for each project will be necessary, will depend on:

- Whether the planned characteristics of the project are substantially different from those defined in the program EIR;
- Whether the project would require additional mitigation measures; or
- Whether specific impacts were not evaluated in sufficient detail in the program EIR.

If any of these conditions apply, then additional environmental documentation will be required under CEQA.

This EIR is intended to review potential environmental impacts associated with the adoption and implementation of the proposed Plan and associated General Plan, Zoning Ordinance, and STANP amendments, and to determine corresponding mitigation measures, as necessary. As stated, a program-level EIR does not evaluate the impacts of specific, individual developments that may be allowed by the proposed Plan. Each future project will require environmental review, as required by CEQA, to secure the necessary discretionary development permits. Therefore, while subsequent environmental review may be tiered off this EIR, this EIR is not intended to address impacts of individual projects. Subsequent projects will be reviewed by the City for consistency with the proposed Plan, General Plan, Zoning Ordinance, and this EIR, and subsequent project-level environmental review will be conducted as required by CEQA. Projects successive to this EIR include, but are not limited to, the following:

- Approval and funding of major public projects and capital improvements.
- Issuance of permits and other approvals necessary for implementation of the proposed Plan.
- Development plan approvals, such as tentative maps, variances, conditional use permits, and other land use permits.
- Permit issuances and other approvals necessary for public and private development projects.
- Development agreement processes and approvals.

This Draft EIR analyzes the potential environmental effects identified for the proposed Plan in (1) the Notice of Preparation (NOP) that was circulated for public review between July 16, 2014 and August 14, 2014, and (2) the comment letters received in response to the NOP. These comment letters are included in Appendix A of this Draft EIR and address the following concerns:

- Water supply and service.
- Traffic operations and congestion.
- Parking management.
- Bicycle and pedestrian circulation.
- Impacts to public services.
- Noise levels.
- Aesthetics and security.

In an additional effort to allow for adequate public comment, the City held a scoping meeting at the September 9, 2014 Campbell Planning Commission meeting. The purpose of this meeting was to receive comments from the public and Planning Commission on the preparation of this Draft EIR. At this Planning Commission hearing, the public provided comment on issues related to noise, traffic, and land use compatibility.

2.3 ENVIRONMENTAL REVIEW PROCESS

2.3.1 DRAFT EIR

Pursuant to State CEQA Guidelines Section 15063, the City of Campbell conducted an initial study of the proposed Plan and determined that approval and implementation of the proposed Plan could result in potentially significant environmental impacts. In compliance with Section 21080.4 of the California Public Resources Code, the City circulated an NOP of this Draft EIR to the Office of Planning and Research (OPR) State Clearinghouse, interested agencies, including responsible and trustee agencies, and persons on July 16, 2014 for a 30-day review period (see Appendix A).

This Draft EIR will be available for review by the public and interested parties, agencies, and organizations for a 45-day comment period beginning on June 22, 2015 and ending on August 10, 2015. During the comment period, the public is invited to submit written comments on the adequacy and accuracy of the Draft EIR to the City of Campbell Community Development Department. Written comments should be submitted to:

Paul Kermoyan
Community Development Director
City of Campbell
70 N. First Street
Campbell, CA 95008

2.3.2 FINAL EIR

Upon completion of the 45-day review period, the City of Campbell will review all written comments received and prepare written responses for each comment. A Final EIR will then be prepared, incorporating all of the comments received, responses to the comments, and any changes to the Draft EIR that result from the comments received. The Final EIR will then be presented at a public hearing to the City Council of the City of Campbell for certification as the environmental document for the proposed Plan. All persons who commented on the Draft EIR will be notified of the availability of the Final EIR and the date of the public hearing before the City Council. Public input is encouraged at all public hearings before the City.

After the City Council certifies the Final EIR, it may consider approval of the proposed Plan or any of the alternatives analyzed in the EIR. For each of the significant effects on the environment identified in this EIR, the City Council must include as conditions of approval the measures specified in this Draft EIR that mitigate or avoid the significant effects on the environment. Alternately, the City Council may find that the mitigation measures are within the responsibility and jurisdiction of another public agency and have been, or can and should be, adopted by that other agency, or that specific economic, legal, social, technological, or other considerations make infeasible the mitigation measures or alternatives identified in the EIR. In the latter case, the City Council must find that these overriding considerations or other benefits of the project

outweigh the significant effects on the environment and that the significant impacts are therefore unavoidable.

2.3.3 MITIGATION MONITORING

Public Resources Code Section 21081.6 requires that the Lead Agency adopt a monitoring or reporting program for any project for which potentially significant impacts have been identified and findings have been made pursuant to Public Resources Code 21081. Such a program is intended to ensure the implementation of all mitigation measures adopted through the preparation of an EIR. The Mitigation Monitoring Program for the proposed Plan will be completed as part of the Final EIR and adopted at the time of Plan approval.

3. Project Description

The City of Campbell has prepared this Draft Environmental Impact Report (Draft EIR) to provide a programmatic analysis of the potential environmental impacts associated with implementation of the Dell Avenue Area Plan, herein referred to as the "proposed Plan." This Draft EIR also provides an analysis of the amendments to the City's General Plan, Zoning Code, and San Tomas Area Neighborhood Plan (STANP) required to ensure consistency between the proposed Plan and these City planning documents. In compliance with the California Environmental Quality Act (CEQA), this chapter provides a detailed description of the proposed Plan, including the location and existing setting of the proposed Plan, the principal characteristics of the proposed Plan, the primary objectives, and the intended uses of the EIR.

3.1 OVERVIEW

The overall purpose of the proposed Plan is to retain existing businesses and promote the development of a high-tech office environment that provides community amenities. The proposed Plan encourages efficient uses of land by promoting development patterns that promote biking and walking, a mixture of uses, and connections for vehicles, bicyclists, and pedestrians. To achieve this, the proposed Plan defines permitted land uses and building regulations, identifies street and sidewalk improvements, and sets an overall policy framework for future development and public improvements in the Plan Area. The proposed Plan contains the following chapters:

- The **Introduction** chapter describes the purpose and intent of the Plan, the regional and local setting, planning concepts and context, the planning process, and Plan contents.
- The **Vision** chapter provides a vision statement, Plan goals, and urban design concept.
- The **Regulating Plan** chapter describes the permitted land uses, site design and building standards, development incentives, and open space and landscape requirements.
- The **Implementation** chapter describes the City-required actions, potential funding sources, and implementation strategies.

3.2 LOCATION AND SETTING

Regional Setting

The City of Campbell occupies more than 6 square miles in a valley nestled in the heart of Silicon Valley. It is approximately 50 miles south of San Francisco and 45 miles south of Oakland. Campbell is bounded on the north, west, and east by the cities of San Jose and Saratoga, and on the south by the Town of Los Gatos.

Campbell is bisected by the San Tomas Expressway and State Route 17 (SR 17), both running north-south through the city and connecting to Interstate 280 (I-280) and State Highway 85. Campbell is also connected to the region via the Santa Clara Valley Transportation Authority (VTA) light rail system. The City of Campbell is shown within its broader regional context in Figure 3-1.

Local Setting

As shown in Figure 3-2, the Plan Area encompasses approximately 113 acres in the south-eastern portion of Campbell's city limits, just south of Downtown Campbell and along the western edge of State Route 17. The Plan Area is generally bounded on the east by Hacienda Percolation Ponds and Los Gatos Creek, the north by Hacienda Avenue, the west by Winchester Boulevard, and the south by Knowles Drive. The Plan Area is proximate to and surrounded by a major citywide and regional transportation corridor in each direction. Winchester Boulevard is a major thoroughfare running north-south within the western edge of the Plan Area that connects the Plan Area directly to the Downtown and the rest of the city. Adjacent to Winchester Boulevard are the VTA-owned train tracks which would serve the proposed Vasona Corridor light rail extension and would bring VTA light rail service directly to the Plan Area, with a station near the Hacienda Avenue/Winchester Boulevard intersection planned for the long-term. The proposed Hacienda Station would connect the Plan Area to Downtown and other parts of the region directly by light rail.

3.2.2 EXISTING CONDITIONS

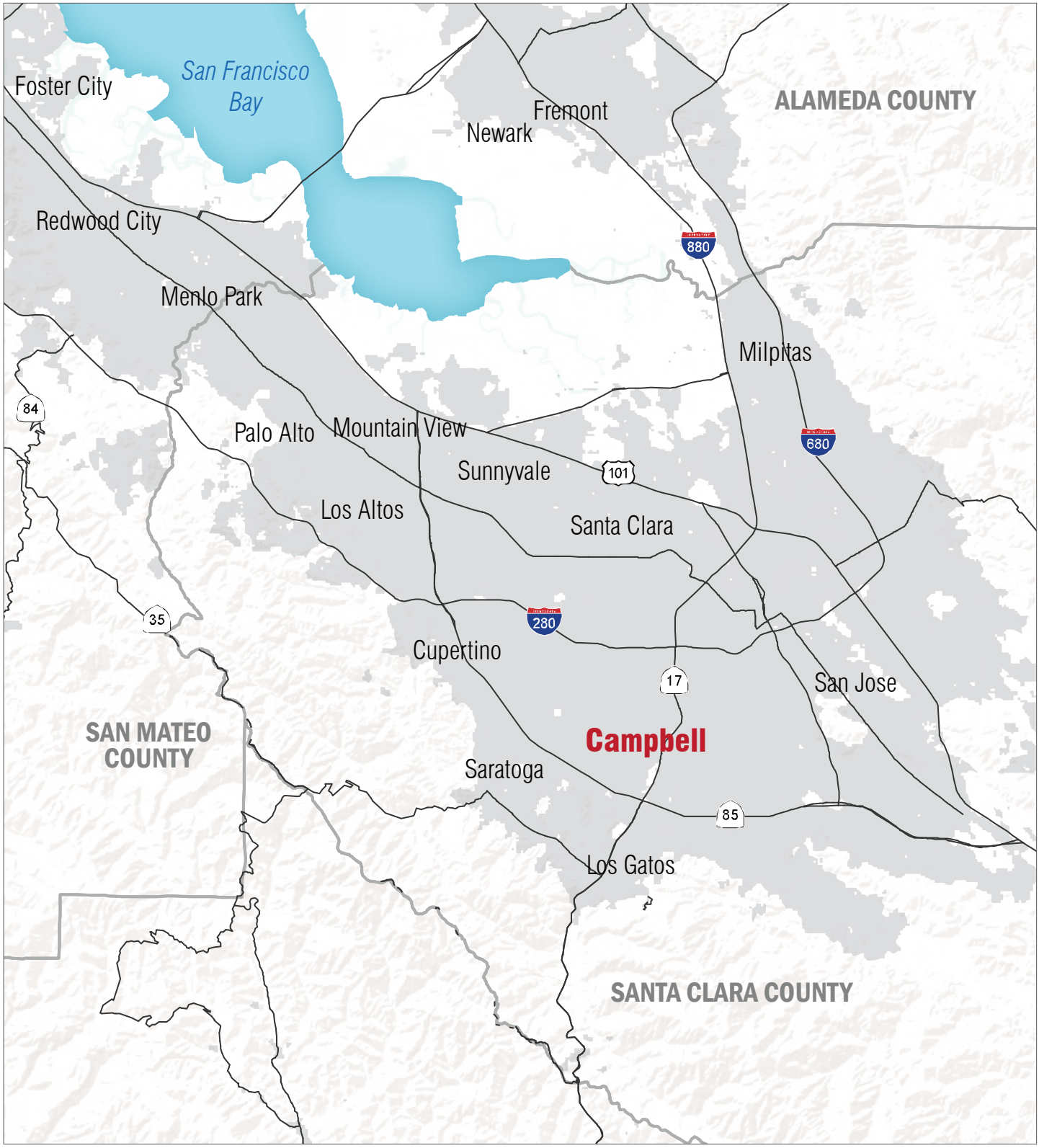
3.2.2.1 SITE CHARACTERISTICS

The Plan Area covers approximately 113 acres within the city limits. Accordingly, under existing conditions, the Plan Area is subject to the requirements and policies of the Campbell General Plan, Zoning Ordinance, STANP, and other applicable regulatory and policy documents. The Campbell General Plan Land Use Map designates the Plan Area Light Industrial, Research and Development, and General Commercial, as shown on Figure 3-3:[1]

City of Campbell General Plan

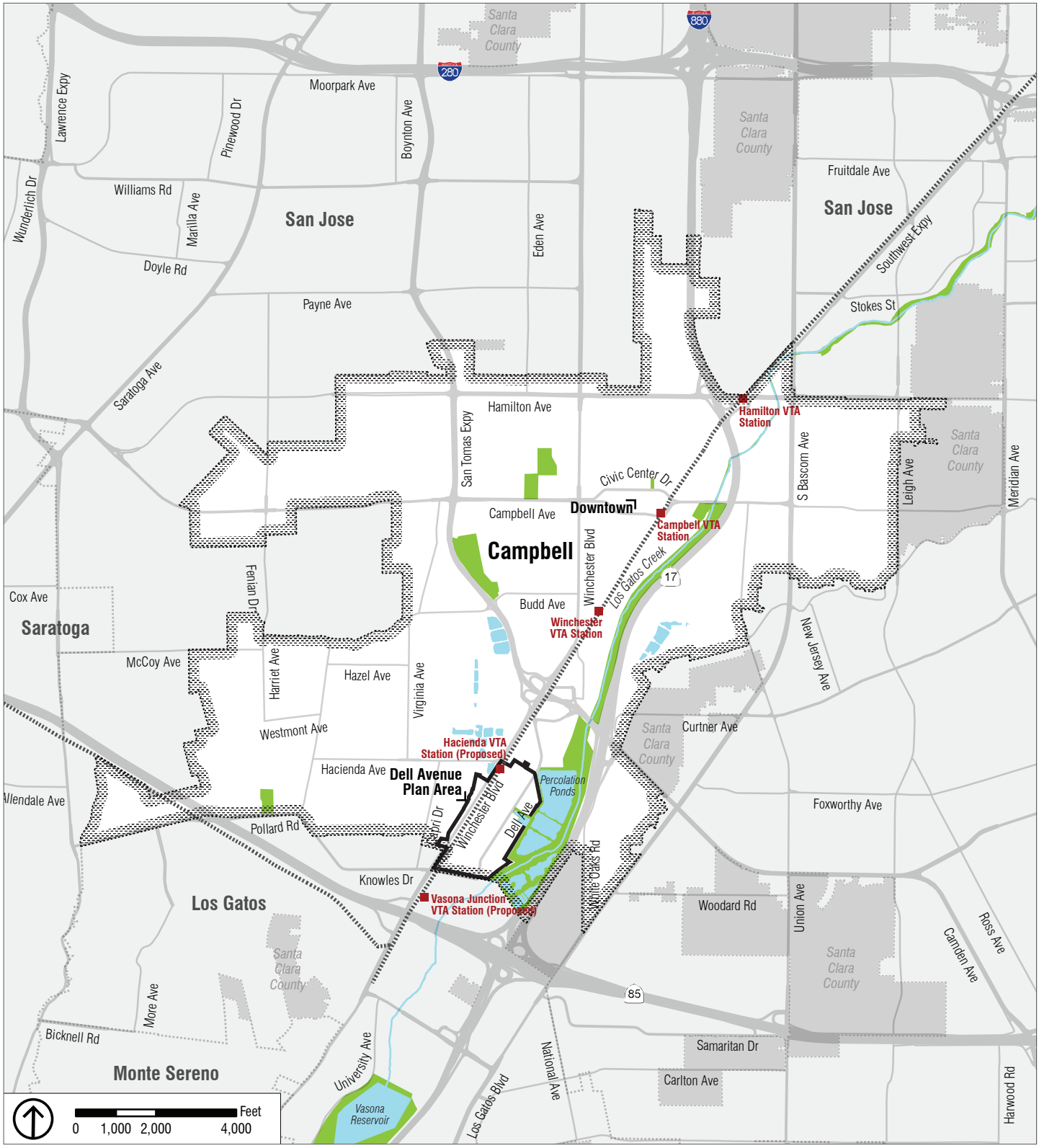
The City of Campbell General Plan, adopted in 2001, designates almost the entire Plan Area east of Winchester Boulevard as Research & Development, except for three parcels that are designated Open Space, as shown in Figure 3-3. The General Plan stipulates the Research & Development (R&D) designation as one that "accommodates campus-like environments for corporate headquarters, R&D facilities, and offices. The R&D designation accommodates uses such as incubator research facilities, testing, packaging, publishing, and printing."

[1] City of Campbell, 2001, Zoning Map.



Miles
0 1 2 4

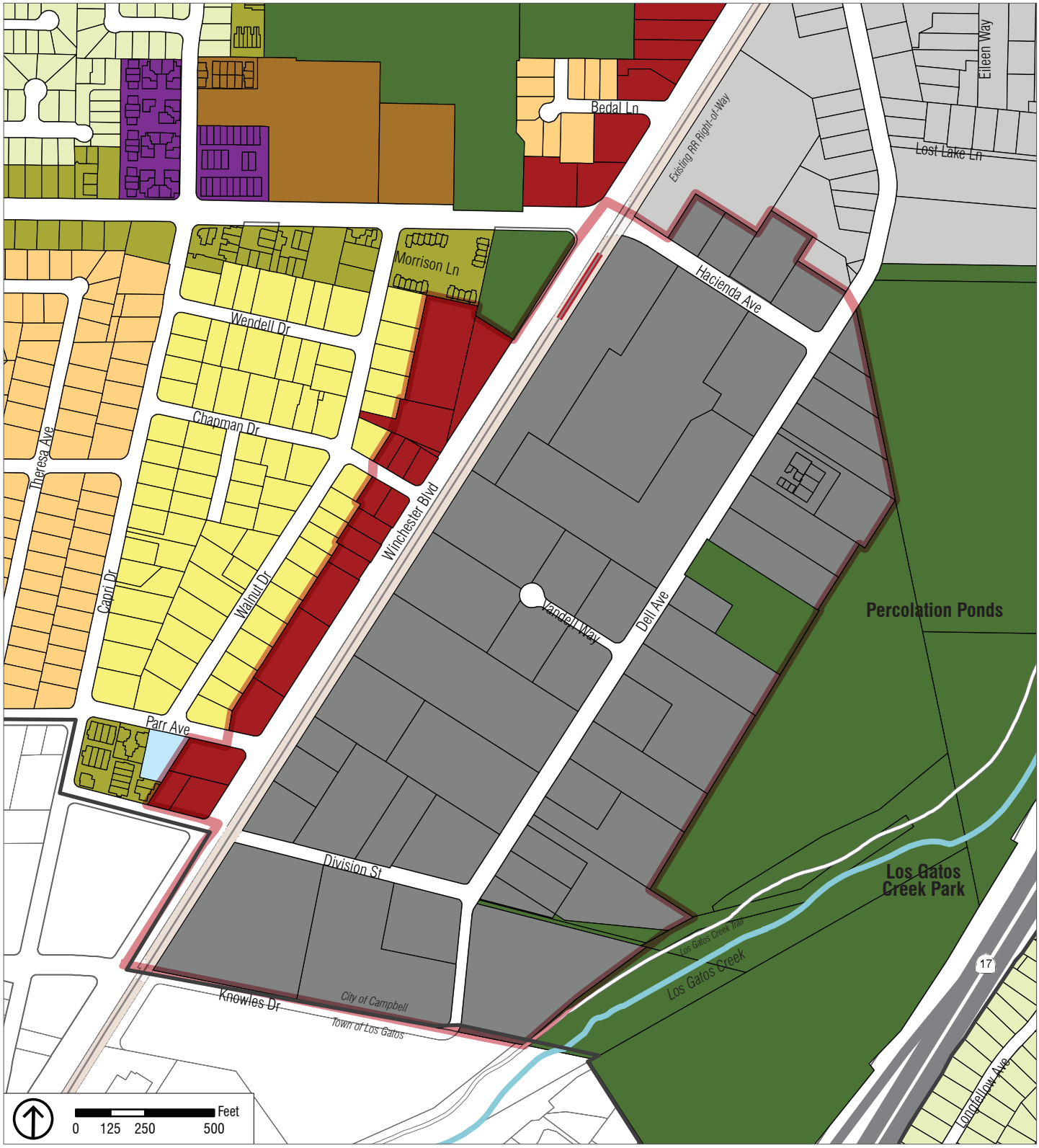
Figure 3-1
Regional Location



Campbell City Limits

Plan Area Boundary

Figure 3-2
Local Context



Low Density Residential (< 3.5 units/acre)
Low Density Residential (< 4.5 units/acre)
Low Density Residential (<6 units/acre)
Low-Medium Density Residential (14-20 units/acre)
Medium Density Residential (14-20 units/acre)
High Density Residential (21-27 units/acre)
General Commercial
Light Industrial
Research & Development
Institutional
Open Space

Figure 3-3
General Plan Land Use

Parcels fronting the west side of Winchester Boulevard are almost entirely designated General Commercial, except for one parcel at the very north end, which is designated Open Space and is not included in the Plan Area. The General Plan defines the General Commercial designation as one that:

> "….permits commercial uses that need exposure to high volumes of automobile traffic or access to transit corridors. Most of the land in Campbell that is designated for General Commercial is located along both sides of Bascom and Hamilton Avenues and parts of Winchester Avenue. Commercial development in these areas is highly visible, hence the placement and scale of buildings is especially important to the community image. The building forms should typically frame the street, with parking lots either behind or under the building. Auto related uses, such as auto repair, are not allowed from locating in the General Commercial areas."

However, there are many automobile-related uses along Winchester Boulevard. The automobile-related uses are identified as conditionally permitted which are not considered to be the preferred "permitted" land uses anticipated by the General Plan along Winchester Boulevard.

The General Plan designates areas to the west of the Plan Area as a mix of Low Density Residential, Medium Density Residential, and High Density Residential. Areas to the north are designated Light Industrial, which is intended to foster manufacturing and processing land uses, as well as service commercial such as auto repair facilities. Areas to the east of the Plan Area are designated Open Space, preserving the City's percolation ponds and Los Gatos Creek. To the south, across Knowles Drive, is the Town of Los Gatos.

3.4 PROJECT OBJECTIVES

The overall purpose of the proposed Plan is to transform the Plan Area into a 21st Century business park that retains and attracts high-tech businesses. In order to ensure a successful business park, the proposed Plan stresses the importance of retaining existing businesses and accommodating new high-tech uses as well as uses that support and complement high-tech industry. The project objectives for the proposed Plan are described as follows:

- **A High-Tech and Innovation Oriented Business District**: Encourage the efficient use of land use through sustainable development patterns, a mixture of uses, and development intensities that support transit and walking. Ensure uses are compatible with and supportive of a high-tech office environment and discourage the continuance of existing uses that are not consistent with this character. Provide opportunities for small start-ups and incubator businesses within the larger workplace infrastructure. Rehabilitate and improve existing buildings and create avenues for independent cafes and restaurants to operate. Ensure that the notion of "technology" is apparent through stunning architecture and a memorable urban environment.
- **Enhanced Open Space and Improved Open Space Access**: Orient and design development to interact with existing ponds and creekside natural areas at Los Gatos Creek Park. Enhance existing trails and create new connections between the Plan Area and Los Gatos Creek Park. Carefully create a central public space around the existing water recharge facility, pending study and coordination with the Santa

Clara Valley Water District (SCVWD). Infuse the Plan Area with smaller, functional open spaces in new development that provide places to rest, recreate, and gather. Seek to protect and enhance the natural character of the creek by allowing solar access, creating landscaped building edges, and using appropriate building materials. Transition buildings downward in height as they approach the waterfront.

- **An Integrated Network of Multimodal Connections**: Enhance existing roadways with sidewalks and pedestrian amenities, and create new pedestrian, bicycle, and vehicular facilities to improve connectivity. Create clear, safe, and direct pathways to the proposed VTA light rail station, and integrate them into the larger pedestrian network.
- **Environmental and Economic Sustainability**: Encourage new development and public improvements that incorporate green design and stormwater management features to reduce stormwater runoff into existing streams and preserve existing infrastructure. Ensure new buildings incorporate sustainable features in their design, including appliances requiring limited water and energy usage and building design that takes advantage of solar access and incorporates reused materials where possible. Encourage new development that will attract strong and growing businesses to Campbell, whose employees will contribute to the local economy, stimulate business, and strengthen the city's economic stance in the region.
- **Improved Design and Character**: Balance modern development styles with the small-town feel of Campbell. Incorporate and protect cherished amenities, including views and open spaces. Create memorable streets, gateways, nodes, plazas, and other new places for gathering and leisure activity. Consider special architectural elements and enhanced landscaping at key locations.
- **Sensitivity to Existing Businesses**: Provide a framework for which new high-tech development can exist harmoniously with existing businesses. Adapt land uses that are inclusive of and that accommodate businesses of traditional sectors and formats. Protect and enhance the physical layout and functionality of existing businesses through protective design standards that are focused on better placemaking and quality of life for current and future employees.
- **Enhanced Lifestyle and Vitality**: Provide amenities and places of activity, commerce, and trade that support a high-tech workplace culture. Ensure these amenities, such as restaurants, cafes, workout and spa facilities, childcare, markets, bars, and recreational uses, are also beneficial to the wider community, bringing an after-work-hours energy to the area.
- **Context-Sensitive Mixed-Use Residential Opportunities**: Support high-quality housing in mixed-use formats (retail and residential) on the west side of Winchester Boulevard, which will create an employment-to-housing synergy and enhance the overall character of the street. Encourage ground floor commercial along Winchester Boulevard to support high-tech industry, and provide neighborhood-serving uses that also cater to the needs of adjoining neighborhoods. Ensure that upper floor residential uses transition in scale toward the San Tomas neighborhood to the west.

Increased Private Investment: Align policies, strategies, and City processes to remove barriers to private investment, leverage funding, and increase the support for positive change in the Plan Area.

3.5 PLANNING PROCESS

The proposed Plan was developed using an interactive public engagement process, which included:

- **Stakeholder Interviews:** City staff and planning consultants hosted interviews with interested stakeholders as a first step to identifying key issues and establishing broad goals for the Plan Area. The stakeholders interviewed included property owners, businesses within the Plan Area, developers and investors, members of the Chamber of Commerce, and other interested parties.
- **Community Workshop:** The City hosted a community workshop in December of 2013 to report the existing conditions and findings, provide a general overview of the project's scope and purposes, and ultimately present and solicit input on the alternatives.
- **City Council Study Session:** The City and consultant team incorporated the feedback received at the community workshop into a preferred alternative, which was presented to the City Council in a special study session in February 2014, along with draft land use districts and development standards. The session provided the public with opportunity to give feedback on the project to date.
- **Citizen Advisory Committee**: To ensure that the proposed Plan forged a progressive vision for the future while balancing the needs of the community, a Citizen Advisory Committee (CAC) was formed to help guide the planning process. The committee met six times during the development of the proposed Plan and made sure that proposed concepts and recommendations were feasible and consistent with the vision of the community. CAC members included property owners, business owners, and other interested parties with experience and knowledge of pertinent development issues.
- **Notice of Preparation Process and Planning Commission Public Meeting**: On July 2, 2014, the City issued a Notice of Preparation (NOP) of an EIR for the proposed Project which began a 30-day public review period. This comment period allowed agencies and members of the public to suggest environmental issues which should be analyzed in the Draft EIR. The comments on the NOP focused on issues related to water supply and service, traffic operations and congestion, parking management, bicycle and pedestrian circulation, impacts to public services, noise levels, and aesthetics and security.

  In an additional effort to allow for adequate public comment, the City held a scoping meeting at the September 9, 2014 Campbell Planning Commission meeting. The purpose of this meeting was to receive comments from the public and Planning Commission on the preparation of this Draft EIR. At this Planning Commission hearing, the public provided comment on issues related to noise, traffic, and land use compatibility.

3.6 MAJOR PROJECT COMPONENTS

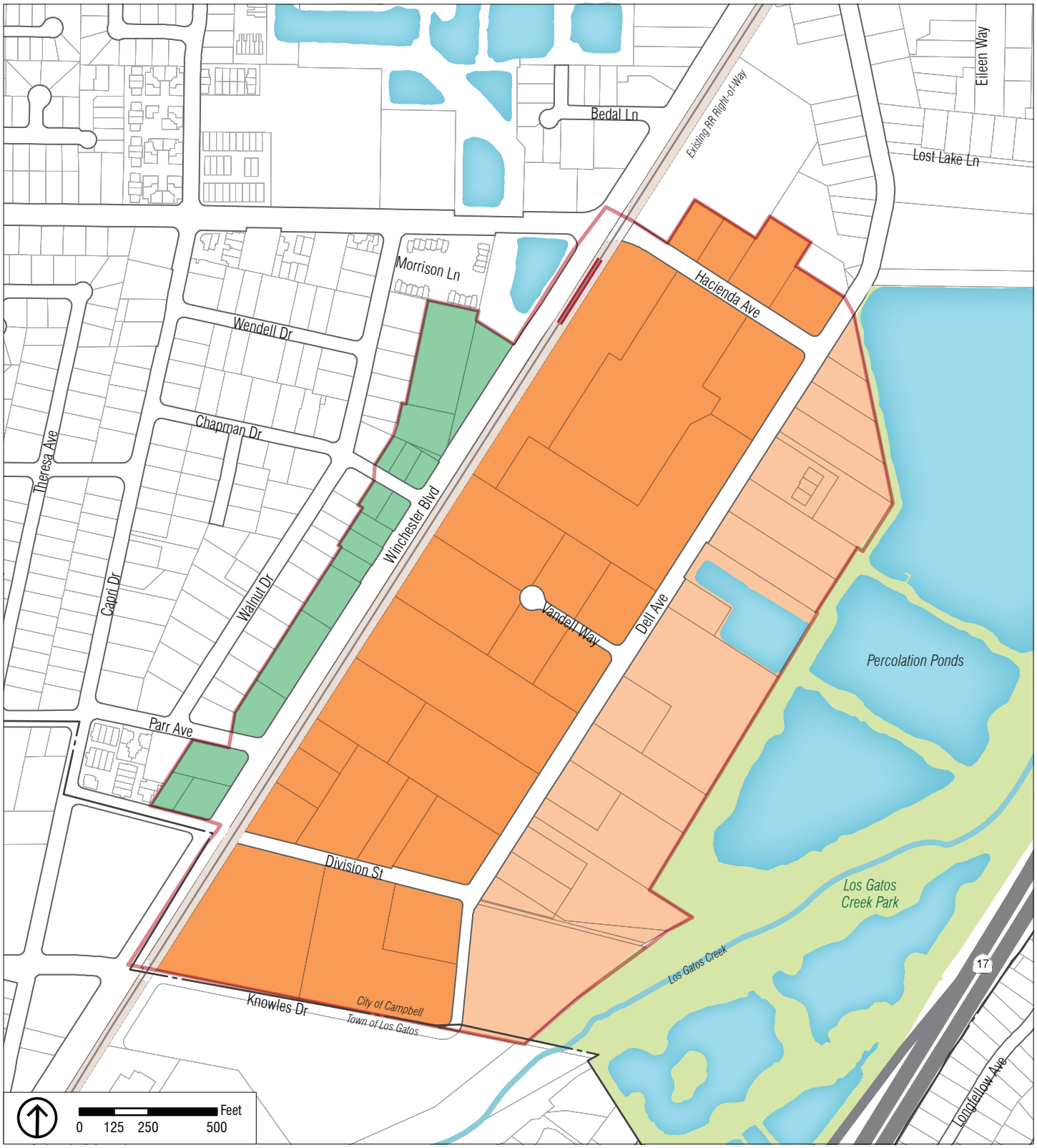
This section identifies the major land uses proposed in the Plan to meet the objectives identified above.

3.6.1 LAND USE CONCEPT

The proposed Plan's Land Use Concept is shown in Figure 3-4 and calls for a variety of land uses that support the Project Objectives listed above. The proposed Plan divides the Plan Area into three distinct Districts: DAAP-Waterfront, DAAP-Central, and DAAP-West, as shown in Figure 3-5. These Districts are described in Section 3.6.3, below. The proposed Plan identifies the authorized land uses in each District, including those that are subject to a conditional use permit or an administrative use permit. The proposed Plan Land Use Concepts include:

- **Core Tech Uses:** Core Tech Uses are professional offices geared directly toward the tech industry, and specifically those related to the innovation and product development for electronics, software, and web solutions for consumers and businesses. Additional Core Tech Uses include, mobile device and software development, social media companies and startups, data processing and web hosting, online retail, information systems, and research & development that is supportive of these uses.
- **Core Tech Complementary Uses:** Core Tech Complementary Uses are those that are not explicitly related to the tech industry, but that include professional offices with similar physical attributes to desired Core Tech Uses. Core Tech Complementary Uses are allowed on a limited basis so as to not overshadow the goal of retaining and attracting high-tech businesses and may include professional services, such as professional consultants, engineering and design firms, and financial, insurance and real estate services. Similarly, biotechnology, scientific labs, and healthcare facilities, along with technology component manufacturing or technology product assembly at a small scale, may also be appropriate on a limited basis.
- **Service and Support Uses**: Service and Support Uses are critical land uses that support the activities of Core Tech Uses and Core Tech Complementary Uses, but that are subservient to the foremost goal of retaining and attracting high tech businesses to the Plan Area. Service and Support Uses include the amenities necessary to support, attract, and retain both high-tech employers and employees by providing opportunities to efficiently attend to day-to-day personal and social needs close to their place of work. Service and Support Uses include restaurants, cafes and coffee shops, convenience stores (as ancillary uses at a limited scale), childcare facilities, salons, dry cleaners, bars, small retail shops, exercise facilities (as ancillary uses at a limited scale), and other similar uses. Service and Support Uses that accommodate business needs of Core Tech Uses must also be accommodated. These uses include printing and shipping services, hotels, travel agencies, and other uses serving critical business needs. Service and Support Uses should be located within larger Class A office buildings as independent tenants, or as ground floor uses below residential on the west side of Winchester Boulevard.

Figure 3-4
Dell Avenue Area Plan Land Use Concept



DAAP-Waterfront
DAAP-Central
DAAP-West

Figure 3-5
Dell Avenue Area Plan Land Use Districts

- **Waterfront Uses:** Waterfront Uses are specialized uses, such as food and drink establishments, which are encouraged for buildings fronting or oriented to the Los Gatos Creek Park areas. The DAAP envisions a lively and active waterfront edge populated by employees and visitors. Waterfront Uses should be located within larger Class A office buildings or in stand-alone buildings in proximity to and fronting the Park.
- **Employee Housing**: Employee include options for employees to live close to their office. Since housing proximity is a key factor for tech companies looking to locate or expand in Silicon Valley, it is important that the Plan Area provide housing opportunities where appropriate. High-density residential uses above ground-floor retail in mixed-use buildings should be supported in the Plan Area on the west side of Winchester Boulevard. This location responds to the current practice of encouraging mixed-use (commercial/residential) on Winchester Boulevard in the city. A variety of residential unit types should be encouraged, including for-sale condominiums and rental apartments. Varying unit sizes should also be encouraged and should include a significant percentage of studios and one-bedroom units to accommodate young singles and couples.

3.7.1 DEVELOPMENT STANDARDS

The proposed Plan includes development standards that are used to regulate the form of new buildings and development in the Plan Area to ensure that all new development supports the Plan vision. Development standards are organized into three distinct Districts: DAAP-Waterfront, DAAP-Central, and DAAP-West, as shown in Figure 3-6. The Development Standards provide additional guidance and regulation for the land use concept shown in Figure 3-4 and are described in more detail in Table 3-1.

- **DAAP-West.** The DAAP-West District is intended to accommodate mixed-use buildings with ground floor retail spaces facing Winchester Boulevard and upper floor offices or apartments that transition appropriately to adjacent single-family neighborhoods to the west.
- **DAAP-Central.** The DAAP-Central District is intended to primarily accommodate core tech uses in new Class A office buildings at maximum building heights that incorporate service and support uses within ground floor spaces. New development in this District is expected to contribute to the establishment of a multi-modal and publicly accessible circulation system that connects Winchester Boulevard and the future VTA light rail station with Dell Avenue and the Los Gatos Creek Park.
- **DAAP-Waterfront.** The DAAP-Waterfront District is intended to primarily accommodate core tech uses in new Class A office buildings that incorporate service and support uses within ground floor spaces, but transition in scale and intensity at the Plan Area's border with Los Gatos Creek Park. Additionally, the DAAP-Waterfront District is intended to accommodate new waterfront uses that orient toward Los Gatos Creek Park and serve as amenities for the wider Campbell community.

TABLE 3-1 PROPOSED FAR AND BUILDING HEIGHT DEVELOPMENT STANDARDS

	Waterfront	Central	West
Maximum Height	60-foot base, 75-foot height bonus	60-foot base, 75-foot height bonus	45 feet
Maximum FAR	1.5	1.5	1.5
Minimum Setbacks			
Dell Avenue	15 feet	15 feet	N/A
Hacienda	N/A	10 feet	N/A
Division Street	N/A	10 feet	5 feet
Knowles Drive	N/A	10 feet	N/A
Winchester Boulevard	N/A	N/A	5 feet
Parr Avenue	N/A	N/A	5 feet
Chapman Drive	N/A	N/A	5 feet

3.7.1.1 SPECIAL DAAP-WATERFRONT STANDARDS

Special Waterfront Transition Standards are required for development in the DAAP-Waterfront District to ensure appropriate transitions in scale and intensity adjacent to the Los Gatos Creek Park. The following specific standards apply:

- No structure is allowed within 20 feet of a parcel line.
- Buildings heights are limited to 20 feet when placed between 20 feet and 60 feet of the waterfront setback line. Roof deck railings, flagpoles, plantings, patio umbrellas, or other similar structures would be allowed above the 20-foot limit provided that no additional space above the 20-foot limit is allowed for providing additional floor area.
- Building heights are limited to 60 feet when placed between 60 feet and 75 feet of the waterfront-facing parcel line.
- Buildings may have a height of 75 feet when placed 75 feet or greater from the waterfront-facing parcel line and when granted additional allowable height up to 75 feet per a special development incentive. No building shall extend above 75 feet.
- New development must provide a pedestrian path between Dell Avenue and the Los Gatos Creek Park (as identified in Figure 3-6).

3.7.1.2 SPECIAL DAAP-CENTRAL STANDARDS

Special standards apply to all new development in the DAAP-Central District and include the following:

- New structures on properties adjacent to the rail right-of-way shall be set back a minimum of 15 feet from the parcel line.
- New development must provide a pedestrian path between the railroad right-of-way and Dell Avenue.

3.7.1.3 SPECIAL DAAP-WEST STANDARDS

All new development in the DAAP-West District that is adjacent to existing single-family residential uses shall adhere to special development standards to ensure adequate transition in development scale downward to the single-family residential development. Such requirements include the following:

- No buildings shall be permitted in the 24-foot residential setback area. The 24-foot neighborhood setback area can be developed with landscaping, rear yards, or paved surfaces for parking and access.
- Building heights shall follow a "wedding-cake" model, locating taller building elements along the street frontage. Future development must maintain a 2:1 ratio of distance from the residential setback line to building height.

3.7.1.4 LANDSCAPING

Implementation of the proposed Plan should include the following standards for landscaping for all new development within the Plan Area:

- In the DAAP-Central and DAAP-Waterfront Districts, 10 percent of the site must be publicly accessible open space (or developers must pay an in-lieu fee), 12 percent of the site must be landscaped, and parking lots must include 25 square feet of landscaping per parking space. As defined in the proposed Plan, publicly accessible open space is "programmed, usable, and accessible open spaces that are visually and architecturally distinct from a larger site design with a minimum dimension of 10,000 square feet."
- In the DAAP-West District, 5 percent of the site must be publicly-accessible open space (or developers must pay an in-lieu fee), 12 percent of the site must be landscaped, and parking lots must include 25 square feet of landscaping per parking space.

3.7.1.5 PARKING

The proposed Plan defers to the parking requirements within Section 21.28 of the Campbell Municipal Code as shown in Table 3-2. However, if new developments with a Core Tech Use designation can demonstrate through a parking study that parking demand can be reduced, the City may reduce parking requirements to as low as one parking space per 350 square feet of leasable floor area.

TABLE 3-2 PARKING REQUIREMENTS

Land Use	City Land Use	Municipal Code
General Office	Professional Offices	1 space for each 225 sf gfa[a]
General Light Industrial	General Industrial	1 space for each 400 sf gfa
Shopping Center	Retail Stores	1 space for each 200 sf gfa
Apartment	Multi-Family dwellings	
	Studio or 1 Bedroom Units	2 covered spaces plus a half guest space per unit
	2+ Bedroom Units	2 covered spaces plus a half guest space per unit

a. sf gfa = square feet of gross floor area.

3.7.1.6 STREETSCAPE STANDARDS

Streetscape standards are applied to the areas of Winchester Boulevard, Dell Avenue from Division to Hacienda, Dell Avenue south of Division, Dell Avenue north off Hacienda, Hacienda Avenue, Knowles Drive, Division Street, Vandell Way, and include recommendations for any future private, but publicly accessible, access roads. The standards establish minimum requirements for lane, sidewalk, and setback widths, street trees, bicycle parking, and pedestrian improvements.

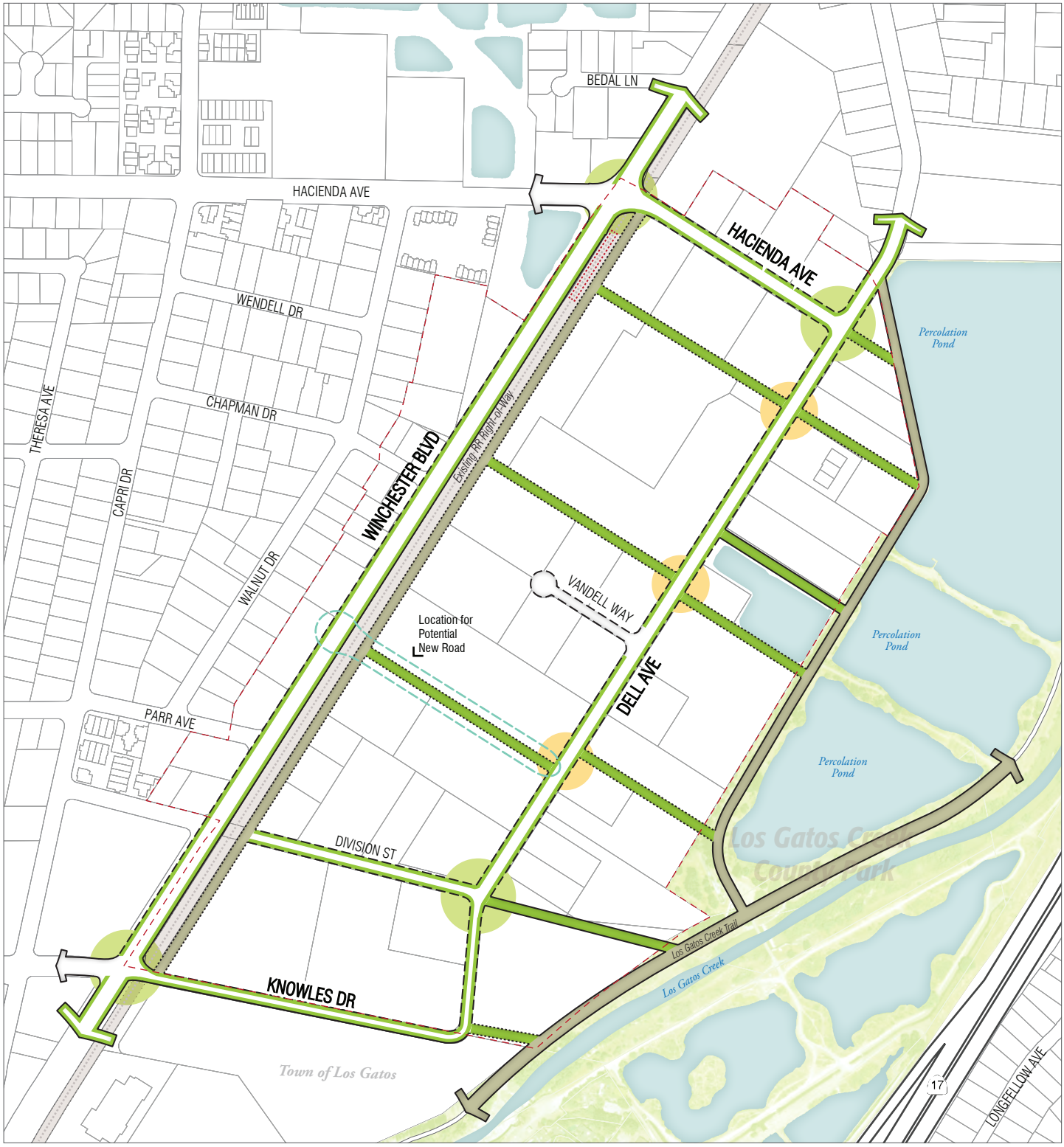
3.7.2 TRANSPORTATION AND CIRCULATION

The proposed Plan outlines several circulation improvements to the pedestrian, bicycle, and street network in the Plan Area to create a multi-modal network within the Plan Area. The transportation and circulation improvements are shown on Figure 3-6 and are described below.

3.7.2.1 PEDESTRIAN CIRCULATION

The proposed Plan includes a series of recommendations to improve the pedestrian environment, including:

- Widening sidewalks along Winchester Boulevard.
- Constructing new sidewalks along Hacienda Avenue, Dell Avenue, Vandell Way, Division Street, and the north side of Knowles Drive.
- Establishing a multi-use path along the east side of the railway.
- Installing a series of pedestrian pathways throughout the Plan Area, including adding two pedestrian crossings over an engineered channel that runs along a portion of the eastern Plan Area boundary (roughly between the Santa Clara Valley Water District settling basin for the Upper Page Distribution System and Division Street) to connect to the Los Gatos Creek Trail.



Plan Area
Existing/Improved Pedestrian Path
Proposed Pedestrian Path
Existing/Improved Multi-Use Trail
Proposed Multi-Use Trail
Widened/New Sidewalks
On-Street Bike Facilities
Intersection Improvements
New Mid-block Crossing

Figure 3-6
Dell Avenue Area Plan Conceptual Circulation System

- Improving pedestrian crossings by installing new ramps, crosswalks, bulbouts, special paving, and other features as feasible at the following intersections: Winchester Boulevard at Hacienda Avenue and at Knowles Drive, Hacienda Avenue at Dell Avenue, Division Street at Dell Avenue, and Knowles Drive at Dell Avenue.
- Installing lighting, landscaping, and signage/wayfinding infrastructure.
- Creating a multi-use path along the east side of the railway.

3.7.2.2 BICYCLE CIRCULATION

To enhance the bicycle infrastructure and connections within the Plan Area, the proposed Plan includes the following improvements:

- Improved Class I bicycle paths along east side of railroad tracks.
- Class II bicycle lanes along Winchester Boulevard and Hacienda Avenue. Class II bicycle lanes are on-street, striped, and signed bicycle lanes designated for the exclusive or semi-exclusive use of bicycles next to through travel by motor vehicles
- Class III bicycle routes on Dell Avenue, Knowles Drive, and Division Street. Class III bicycle routes are on-street, signed bicycle routes designated for shared use by bicyclists and motorists.
- Bicycle parking at key locations such as intersection bulbouts and gateway locations.

3.7.2.3 TRANSIT

The Santa Clara Valley Transportation Authority (VTA) has plans to extend its light rail service by building a new light rail station at the intersection of Hacienda Avenue and Winchester Boulevard. If this occurs, the proposed Plan's recommended and required pedestrian and bicycle circulation improvements would increase connectivity to the station.

3.7.2.4 VEHICULAR CIRCULATION

To improve vehicular circulation within the Plan Area and connectivity to surrounding areas, the proposed Plan proposes lane reconfiguration recommendations to accommodate wider sidewalks and bike facilities, and to reduce car speeds on Winchester Boulevard, Dell Avenue, Hacienda Street, Division Street, and Vandell Way. As shown on Figure 3-6, the proposed Plan also includes a conceptual location for a new street between Division and Hacienda Streets. This street is not considered as part of this environmental analysis since it is highly conceptual and creation of a new at-grade railroad crossing would require approval from the Rail Crossings Engineering Branch (RCEB) of the California Public Utility Commission (CPUC), the State agency charged with railroad safety, making its feasibility highly unlikely. If the City decides to pursue this improvement, additional environmental review would be required.

3.7.3 BUILDOUT PROJECTIONS

Section 15126.2 of CEQA Guidelines requires that an EIR focus on the significant "direct and indirect" and "short-term and long-term" effects of a project. To ensure a conservative approach in analyzing environmental effects under CEQA, EIRs typically analyze what could be considered a worst-case scenario in order to capture as many significant environmental effects as could reasonably be expected as a result of the project. For a programmatic evaluation of a land use plan, this entails projecting buildout calculations to carry through the environmental review process. These projections reflect the estimated number of housing units, amount of non-residential development, and resident and employment populations that are reasonably foreseeable throughout the 2040 buildout horizon of the proposed Plan. The actual rate and amount of development will be dependent on market conditions and regulatory processes.

The buildout projections for the proposed Plan are provided in Table 3-3. As shown in Table 3-3, the proposed Plan is anticipated to add 300 new housing units, 20,000 square feet of net new retail space, and 2,292,000 square feet of net new office space.

If implementation of the Plan is fully realized, future development could result in up to 726 new residents and 7,394 net new jobs.

The buildout projections provided in this section are based on a careful study of several opportunity sites in the Plan Area that are likely to redevelop throughout the 2040 buildout horizon. The buildout projections represent an estimate of the amount of new building square footage and residential unit counts that are provided for in the Plan. Several assumptions were made in order to estimate the amount of commercial and residential development that the Plan Area could support, including the following:

- For opportunity sites with an Employee Housing Use classification, it is assumed that the majority of new mixed-use development would be buildings with ground floor retail and residential units above.
- For residential sites located in the DAAP-West District, the maximum density is 27 dwelling units per acre.
- The average unit size for new residential units in the Plan Area is assumed to be 1,000 square feet.
- Floor area ratios (FARs) for new office development are assumed to be between 0.55 and 1.4 in the Plan Area.
- Residential population projections assume an average household size of 2.42 for the Plan Area.[2]
- Commercial job projections assume 1 job per 500 square feet of R&D, 1 job per 400 square feet of retail, and 1 job per 300 square feet of office.[3]

[2] ABAG Projections, 2013.

[3] The proposed Plan will allow a range of office types, including some that are more or less dense. The assumption of 1 job per 300 square feet is an average of the anticipated density range. Furthermore, the 1 job per 300 square feet of office assumption takes into account total square footage of a given project, including meeting rooms, cafeterias, storage areas, amenity uses, etc.

TABLE 3-3 BUILDOUT PROJECTIONS

	Existing	Existing to be Removed	New Development	Net Increase	Total at Buildout
Residential (Units)	4	0	300	300	304
R&D Square Feet	650,000	498,000	350,000	-148,000	502,000
Office Square Feet	710,000	558,000	2,850,000	2,292,000	3,002,000
Retail & Services Square Feet	56,000	52,000	72,000	20,000	76,000
Jobs	3,807	2,986	10,380	7,394	11,201
Population	10	0	726	726	736

Source: PlaceWorks, 2014.

3.7.4 DESIGN GUIDELINES

The proposed Plan includes Design Guidelines that are applicable for the DAAP-Central and DAAP-Waterfront Districts. The Design Guidelines provide additional guidance on building design, architecture, parking, pedestrian and bicycle access, and open space and landscape design. The Design Guidelines are meant to provide flexible guidance to architects and developers. Upon implementation of the proposed Plan, City staff will review projects for consistency with these Design Guidelines to ensure that projects follow the intent of the guidelines.

3.8 IMPLEMENTATION

Implementation of the proposed Plan would involve the following approvals:

- **General Plan Amendment.** The General Plan must be amended concurrently with the proposed Plan. General Plan Amendments will ensure that land use designations and other pertinent policies are consistent between the proposed Plan and the *City of Campbell General Plan, 2001*. Please see Section 4.9, Land Use and Planning, for a complete list of the General Plan land use designations and policies relevant to the proposed Project.
- **Zoning Ordinance Amendment.** Adoption of the proposed Plan requires an amendment to the City's Zoning Ordinance and map to create a new proposed Plan zoning classification, called "DAAP Zone." This "DAAP Zone" will stipulate in the City's Zoning Code that zoning regulations in the Plan Area are in the proposed Plan. Some requirements in the citywide Zoning Ordinance will continue to apply to new development in the Plan Area, but if there are any conflicts between these two documents, the proposed Plan takes precedence. This amendment will be adopted concurrently with the proposed Plan.

- **San Tomas Area Neighborhood Plan.** Adoption of the proposed Plan would require an amendment to the San Tomas Area Neighborhood Plan (STANP) to exclude the parcels that overlap with the proposed Plan to ensure consistency between the two plans. This amendment will be adopted concurrently with the proposed Plan.
- **Private Improvements and Developers.** Private developers would implement other improvements and development called for by the proposed Plan.

3.9 INTENDED USES OF THE EIR AND PROJECT

This EIR is intended to review potential environmental impacts associated with the adoption and implementation of the proposed Plan and associated General Plan, Zoning Ordinance, and STANP amendments, and to determine corresponding mitigation measures, as necessary. This EIR is a program-level EIR and does not evaluate the impacts of specific, individual developments that may be allowed by the proposed Plan. Each future project will require environmental review, as required by CEQA, to secure the necessary discretionary development permits. Therefore, while subsequent environmental review may be tiered off this EIR, this EIR is not intended to address impacts of individual projects. Subsequent projects will be reviewed by the City for consistency with the proposed Plan, General Plan, Zoning Ordinance, and this EIR, and subsequent project-level environmental review will be conducted as required by CEQA. Projects successive to this EIR include, but are not limited to, the following:

- Approval and funding of major public projects and capital improvements.
- Issuance of permits and other approvals necessary for implementation of the proposed Plan.
- Development plan approvals, such as tentative maps, variances, conditional use permits, and other land use permits.
- Permit issuances and other approvals necessary for public and private development projects.
- Development agreement processes and approvals.

4. Environmental Evaluation

This chapter evaluates the direct, indirect, and cumulative environmental impacts of the Dell Avenue Area Plan (proposed Plan) by examining the following environmental issue areas:

- Aesthetics
- Air Quality
- Biological Resources
- Cultural Resources
- Geology, Soils, and Seismicity
- Greenhouse Gas Emissions
- Hazards and Hazardous Materials
- Hydrology and Water Quality
- Land Use and Planning
- Noise
- Population and Housing
- Public Services and Recreation
- Transportation and Traffic
- Utilities and Service Systems

CHAPTER ORGANIZATION

This chapter consists of 14 analysis sections (Sections 4.1 through 4.14) that evaluate the environmental impacts of the proposed Plan. Each analysis section uses the same format and consists of the following subsections:

- The *Environmental Setting* section provides an overview of federal, State, regional, and local laws and regulations relevant to each environmental issue, together with a description of the existing environmental conditions, providing a baseline against which the impacts of the proposed Plan can be compared.
- The *Standards of Significance* section refers to the quantitative or qualitative standards or conditions used to compare the existing setting with and without the proposed Plan to determine whether the impact is significant. These standards are based primarily on the California Environmental Quality Act (CEQA) Guidelines, and may reflect established health standards, ecological tolerance standards, public service capacity standards, or guidelines established by agencies or experts.

- The *Impact Discussion* section gives an overview of the potential impacts of the proposed Plan and explains why impacts were found to be significant or less than significant prior to mitigation.
- The *Cumulative Impacts* section analyzes impacts that the proposed Plan may have when considered in addition to other past, present, and reasonably foreseeable projects. (See further discussion below.)
- The *Summary of Significant Impacts and Mitigation Measures* section lists impacts identified as potentially significant, as well as suggested measures that would mitigate each impact. In each case, the significance following mitigation is also explained.

CUMULATIVE IMPACT ANALYSIS

A cumulative impact consists of an impact created as a result of the combination of the project evaluated in the EIR, together with other past, present, and reasonably foreseeable projects causing related impacts. CEQA Guidelines Section 15130 requires an EIR to discuss cumulative impacts of a project when the project's incremental effect is "cumulatively considerable." Used in this context, cumulatively considerable means that the incremental effects of an individual project are considerable when viewed in connection with the effects of past projects, the effects of other current projects, and the effects of probable future projects. Where the incremental effect of a project is not "cumulatively considerable," a lead agency need not consider that effect significant, but must briefly describe its basis for concluding that the incremental effect is not cumulatively considerable. Where the cumulative impact caused by the project's incremental effect and the effects of other past, present, and reasonably foreseeable projects is not significant, the EIR must briefly indicate why the cumulative impact is not significant.

GEOGRAPHIC AREA FOR CUMULATIVE ANALYSIS

The cumulative discussions in Sections 4.1 through 4.14 explain the geographic scope of the area affected by each cumulative effect (e.g., immediate plan vicinity, city, county, watershed, or air basin). The geographic area considered for each cumulative impact depends upon the impact that is being analyzed. For example, in assessing aesthetic impacts, only development within the vicinity of the Plan Area would contribute to a cumulative visual effect because that is the only area in which the Plan Area is visible. In assessing macro-scale air quality impacts, on the other hand, all development within the San Francisco Bay Area Air Basin contributes to regional emissions of criteria pollutants, and basin-wide projections of emissions is the best tool for determining the cumulative effect.

CUMULATIVE PROJECTS CONSIDERED

CEQA Guidelines Section 15130 outlines two approaches to analyzing cumulative impacts. The first is the "list approach," which requires a listing of past, present, and reasonably anticipated future projects producing related or cumulative impacts. The second is "the projections-based approach," which uses the relevant growth projections contained in an adopted General Plan or related planning document designed to evaluate regional or area-wide conditions. A reasonable combination of the two approaches may also be used.

The cumulative impact analysis in this Draft EIR relies on a list-based approach that considers past, present, and reasonably foreseeable future projects in the vicinity of the Plan Area that, when considered with the effects of the proposed Plan, may result in cumulative effects. Specific projects considered in the cumulative impact analysis are summarized in Table 4-1. For some environmental topics (i.e., traffic, air quality, greenhouse gas emissions, and noise), a greater geographic extent is used for the cumulative analysis, and foreseeable development projects outside of the City of Campbell are taken into consideration.

TABLE 4-1 CUMULATIVE PROJECTS

Project Name	Location	Lot Size (Acres)	Commercial/ Office (SF)	Retail & Service (SF)	Residential Units
Residential					
County Courthouse	375 Knowles Ave	3.4			45 multi-family units
Commercial/Office					
Albright	Los Gatos, CA – corner of Winchester Boulevard and Highway 85	21.5	475,000		
Mixed-Use					
North 40	Los Gatos, CA - southeast corner of the intersection of Highways 85 and 17	40	394,000	269,000	150 hotel rooms 73 single-family units 291 multi-family units

Note: SF = square feet
Source: W-Trans, 2014.

4.1 AESTHETICS

This chapter describes the existing aesthetic character of the Plan Area and evaluates the potential environmental consequences on visual resources from future development that could occur by adopting and implementing the Dell Avenue Area Plan (proposed Plan).

4.1.1 ENVIRONMENTAL SETTING

4.1.1.1 REGULATORY FRAMEWORK

This section summarizes key State and local regulations related to aesthetics concerning the proposed Plan. There are no federal regulations pertaining to aesthetics that apply to the proposed Plan.

State Regulations

California Scenic Highway Program

The California Scenic Highway Program, administered by the California Department of Transportation (Caltrans), protects scenic State highway corridors from changes that would diminish the aesthetic value of lands adjacent to those highways.[1] State Routes 85 and 17 run closely by the Plan Area. However, neither the entire corridor of State Route 85 nor the section of the State Route 17 from which the Plan Area is visible is a designated State scenic corridor.[2]

California Building Code

The California Building Code (CBC), Part 2 of Title 24 in the California Code of Regulations (CCR), is based on the International Building Code and combines three types of building standards from three different origins:

- Building standards that have been adopted by State agencies without change from building standards contained in the International Building Code.
- Building standards that have been adopted from the International Building Code to meet California conditions.
- Building standards, authorized by the California legislature, that constitute extensive additions not covered by the International Building Code that have been adopted to address particular California concerns.

[1] Streets and Highways Code Section 260 et seq.

[2] California Department of Transportation website, Officially Designated State Scenic Highways, Santa Clara County, http://www.dot.ca.gov/hq/LandArch/scenic_highways/index.htm, accessed August 4, 2014.

The CBC includes standards for outdoor lighting that are intended to improve energy efficiency, and to reduce light pollution and glare by regulating light power and brightness, shielding, and sensor controls.

Local Regulations

General Plan

The City of Campbell General Plan, adopted on November 6, 2001, includes several goals and policies that relate to aesthetics. Specifically, the Land Use and Transportation Element includes goals and policies aimed at protecting and enhancing the City's physical and visual character. Table 4.1-1 lists goals and policies pertaining to urban form and visual character.

Gateways

The Community Design Element identifies primary locations for gateways and encourages creating a "sense of arrival" to the city or a district, including Downtown. Within the Plan Area, the intersections of Winchester Boulevard/Hacienda Avenue and Winchester Boulevard/Knowles Drive are identified as a District Entry and a City Entry, respectively.

Building Mass along Los Gatos Creek

The Community Design Element requires structures adjoining the Los Gatos Creek Trail be designed to enhance the views from the Trail and Highway 17. It suggests using the following techniques:

- Minimize the width of building elevations facing the trail (e.g., orient the side of the structure towards the trail).
- Provide movement and variation in building wall planes.
- Provide variation in roof elements.
- Step-back upper story elements away from the Creek Trail.
- Provide tree species with large, dense canopies to screen the structures.

San Tomas Area Neighborhood Plan

The General Plan includes a neighborhood plan and policies for the San Tomas Area, which encompasses 1.5 square miles in the southwest portion of the city, generally bounded by San Tomas Aquino Creek to the north, San Tomas Expressway and Winchester Boulevard to the east, and the city boundary to the south and west. Last amended in 2000, the goals of the San Tomas Area Neighborhood Plan (STANP) are to preserve and enhance the unique characteristics of the neighborhood and to ensure that new development and additions are compatible with the surrounding area. Goal LUT-17 and associated policy and strategies of the General Plan reinforce goals and objectives of the STANP. In the Plan Area, the parcels west of Winchester Boulevard are within the STANP boundaries and are subject to the provisions of the STANP.

TABLE 4.1-1 CITY OF CAMPBELL GENERAL PLAN GOALS, POLICIES, AND STRATEGIES PERTAINING TO AESTHETICS

Goal/Policy/ Strategy Number	Goal/Policy/Strategy Text
Goal LUT-4:	*A community that has a strong identity, community image and "sense of place."*
Policy LUT-4:	Campbell Community Design Study: Ensure projects comply with the recommendations of the Campbell Community Design Study.
Goal LUT-5	*Preservation and enhancement of the quality character and land use patterns that support the neighborhood concept.*
Policy LUT-5.1	Neighborhood Integrity: Recognize that the City is composed of residential, industrial and commercial neighborhoods, each with its own individual character; and allow change consistent with reinforcing positive neighborhood values, while protecting the integrity of the city's neighborhoods.
Strategy LUT-5.3a	Commercial Design Guidelines: Establish commercial and mixed-use design guidelines to ensure attractive and functional buildings and site design, and to ensure compatibility with adjacent land uses.
Strategy LUT-5.3b	Minimal Setbacks: Design commercial and office buildings city-wide to have minimal setbacks from the sidewalk except to allow for pedestrian oriented features such as plazas, recessed entryways, and wider sidewalks for outdoor cafes. Discourage parking areas between the public right-of-way and the front façade of the building.
Strategy LUT-5.3k	Auto Services: Restrict auto related uses to minor auto services (e.g., oil changers and auto parts stores) on major streets that define Campbell's image. These "image" streets are defined in the Streetscape Standards located in Appendix A.
Strategy LUT-5.4b	Residential Adjacent to Industrial: Amend Area Plans and Zoning Ordinances to ensure that conflicts between residential and industrial uses are minimized.
Strategy LUT-5.6a	Performance Standards: Develop performance standards to mitigate negative impacts on adjacent uses that surround industrial areas, including noise, light and vibration.
Strategy LUT-5.6b	Visual Barriers: Reduce the visual impact of excessive lighting and glare, mechanical equipment, trash enclosures, outdoor storage and loading docks.
Strategy LUT-5.6c	Provide landscaped buffers, sidewalks and equipment screening to provide a visual and noise-abating buffer between uses.
Policy LUT-5.7	Industrial Areas: Industrial development should have functional and safe vehicular and pedestrian circulation, good site and architectural design, be sensitive to surrounding uses, connect to public transit, and be energy efficient. New projects should contribute to the positive character of industrial areas and the overall image of the City.
Strategy LUT-5.7a	Industrial Design Guidelines: Develop Industrial Design Guidelines with specific policies including, but not limited to the following: ▪ Require varied, high-quality, finished construction materials such as glass, stucco, plaster, or brick. No exposed concrete block or flat sheet metal. ▪ Enhance the street frontage of a building with landscaping and an emphasis on the office portion of the building. ▪ Orient service activities such as loading docks to the rear of the site.
Strategy LUT-5.7c:	Screening: Screen the service portion of industrial buildings such as outdoor storage, trash enclosures and loading areas, especially those adjacent to roadways or public amenities, with extensive landscaping and architectural treatments.
Strategy LUT-5.7d	Auto Repair Facility Design: Promote the design of auto repair facilities that provide sufficient screened vehicle staging areas that are independent from the parking required for customers, employees and loading.
Goal LUT-6	*Strong and identifiable City boundaries that provide a sense of arrival into the City and its districts to reinforce Campbell's quality small town image.*
Policy LUT-6.1	Entries to the City and Special Districts: Identify entries to the city and special districts (Downtown, San Tomas Neighborhood, and others) with special features.

TABLE 4.1-1 CITY OF CAMPBELL GENERAL PLAN GOALS, POLICIES, AND STRATEGIES PERTAINING TO AESTHETICS

Goal/Policy/ Strategy Number	Goal/Policy/Strategy Text
Strategy LUT-6.1a	Identification Signs: Install city identification signs including distinctive landscaping and lighting or other markers at community gateways to signify entry.
Strategy LUT-6.1b	Landmark Gateway Buildings: Anchor gateway intersections with landmark buildings that incorporate distinctive architectural character. Orient landmark buildings to face and frame the corners of intersections.
Strategy LUT-6.1c	Gateway Intersections: Develop major gateway intersections such as Highway 17 / Hamilton Avenue and San Tomas Expressway / Winchester Boulevard with signage, lighting and abundant landscaping, using tall trees and under-planting.
Strategy LUT-7.2b	Public Improvements Design: Design public improvements to meet safety, accessibility and aesthetic guidelines. Consider adopting an "Art in Public Places" program.
Strategy LUT-7.2g	Landscaped and Tree Lined Streets: Provide attractive, user friendly, tree-lined streets and install creative landscaping in street improvement projects, where feasible.
Policy LUT-9.3	Design and Planning Compatibility: Promote high quality, creative design and site planning that is compatible with surrounding development, public spaces and natural resources.
Strategy LUT-9.3d	Building Design: Design buildings to revitalize streets and public spaces by orienting the building to the street, including human scale details and massing that engages the pedestrian.
Strategy LUT-9.3e	Building Materials: Encourage the use of long-lasting, high quality building materials on all buildings to ensure the long-term quality of the built environment.
Strategy LUT-9.3f	Development Orientation: Orient new development toward public and private amenities or open space, in particular: ▪ Orient front entrances, living/office area, and windows toward the amenity or open space. ▪ Orient high activity areas such as outdoor dining areas and plazas, and major pedestrian routes toward the amenity or open space.
Strategy LUT-9.3h	Art in Private Development: Consider implementing an “Art in Private Development” program to provide for the visual arts within commercial, industrial and multiple-family residential projects.
Strategy LUT-9.3j	Landmark Preservation: Encourage preservation of existing landmark features on buildings and on building sites.
Strategy LUT-9.3k	Screening Guidelines: Create guidelines for ensuring that visual and noise impacts of storage, loading areas and mechanical equipment are minimized, which may include provisions for larger setbacks, screening, walls, substantial landscaping, acoustic materials, equipment usage and building modifications.
Strategy LUT-9.3m	Location of Service Areas: Locate parking areas, truck loading areas, drive-through lanes and drive-through windows away from streets, out of immediate public view, while minimizing land use conflicts and traffic impacts.
Strategy LUT-9.3n	Signs: Revise the Zoning Code or develop guidelines that ensure high quality, attractive signs that are appropriate for each Zoning District.
Strategy LUT-9.3p	Site Lighting Guidelines: Ensure that lighting does not create glare and overflow on adjacent properties by developing standards and guidelines that are incorporated into the Zoning Ordinance.
Goal LUT-10	Landscaping, natural resources and amenities that are visible and accessible to the public.
Policy LUT-10.1	Landscaping: Encourage the retention and planting of landscaping to enhance the natural and built environment.
Strategy LUT-10.1a	Natural Feature Retention: Encourage site design that incorporates or otherwise retains natural features such as mature trees, terrain, vegetation, wildlife and creeks.
Strategy LUT-10.1b	Landscape Standards: Revise the Landscape and Tree Protection Ordinance to require enhanced landscaping standards, including standards for providing a variety of species, sizes and adequate number of trees, shrubs and drought-tolerant planting.

TABLE 4.1-1 CITY OF CAMPBELL GENERAL PLAN GOALS, POLICIES, AND STRATEGIES PERTAINING TO AESTHETICS

Goal/Policy/ Strategy Number	Goal/Policy/Strategy Text
Strategy LUT-10.1e	Parking Lot Screening: Plant landscaping or build decorative walls at the interior and perimeter of parking areas as a visual screen.
Policy LUT-10.2	Roadway Landscaping: Landscape public roadways to define the character of districts and neighborhoods.
Strategy LUT- 10.2a	Streetscape Standards: Implement Streetscape Standards with landscaped boulevard treatment on arterial streets, and implement the installation of street trees per the Standard Street Improvements.
Goal LUT-17	*Preserve the informal neighborhood character, low-density residential areas and reduce auto traffic.*
Strategy LUT-17.1b	Landscaping: Ensure that new developments provide new tree planting, shrubs, greenery and other landscaping materials, and preserve existing trees and shrubs.

Source: City of Campbell General Plan, 2001.

Streetscape Standards[3]

The City of Campbell adopted Streetscape Standards on August 3, 1993 and included them in the City's General Plan as Appendix A2. The Streetscape Standards include design standards, implementation guides, and technical requirements for sidewalks and landscaping that apply to Hamilton Avenue, Bascom Avenue, Winchester Boulevard, and a portion of West Campbell Avenue. These standards are intended to be used in tandem with Chapter 21.26 of the Municipal Code. The street cross-section drawing for Winchester Boulevard calls for a 10-foot wide sidewalk with a 4-foot tree well adjacent to a curb, as well as a 5 to 8-foot landscaping strip behind the sidewalk at a minimum. It also requires street trees to be planted every 30 feet in the tree well. The Streetscape Standards require Chinese Pistache (*Pistacia chinensis*) as street trees for the section of Winchester Boulevard within the Plan Area.

City of Campbell Municipal Code

Besides the General Plan, the City of Campbell Municipal Code is the primary tool that shapes the form and character of physical development in the Plan Area. The following provisions from the Municipal Code help minimize visual impacts associated with new development projects in the Plan Area:

- **Site and Architectural Review**: Chapter 21.42 of the Municipal Code sets forth review procedures and standards for new development to ensure compliance with the required standards and design guidelines and to minimize potential visual impacts.
- **Landscaping Requirements**: Chapter 21.26 of the Municipal Code includes landscaping requirements that are intended to enhance aesthetics of development, ensure landscape buffers where necessary, preserve visual character throughout the city, and conserve water resources.

[3] City of Campbell, Streetscape Standards, August 3, 1993, http://www.ci.campbell.ca.us/DocumentCenter/View/168, accessed on August 4, 2014

- **Tree Protection Regulations**: Chapter 21.32 of the Municipal Code contains standards to protect and manage trees on private property and to enhance Campbell's small town quality and character.
- **Site Development Standard**: Chapter 21.18 of the Municipal Code establishes development standards related to aesthetics, including fencing, screening, lighting, and signage design.
- **General Performance Standards**: Chapter 21.16 of the Municipal Code provides performance standards to ensure that construction and operation of new or existing development does not cause negative impacts related to air quality, noise, vibration, light, glare, odor, water pollution, and site maintenance to the extent that they endanger the public health, safety, comfort, or welfare. Section 21.16.030 of the Municipal Code requires non-residential projects that need discretionary approval to submit plans and studies to the community development director to help determine potential impacts.

4.1.1.2 EXISTING CONDITIONS

Visual Character

The Plan Area exhibits a distinctly light industrial character that feels unified in scale and function, except for the area west of Winchester Boulevard where a mix of building types, including strip malls, auto body shops, office buildings, and single-family homes exist. Since there are only a few streets in the Plan Area, some of which do not connect to each other or dead end, there are large blocks in the Plan Area. The east side of Winchester Boulevard in the Plan Area is comprised of three blocks of varying sizes and a small portion of a fourth block, based on the circulation pattern of a single loop that runs through the site. Winchester Boulevard, Hacienda Avenue, Dell Avenue, and Division Street form a large block with a length of over 2,000 feet (over one third of a mile). Facing this block to the east is another long block of over 2,000 feet, bounded by Dell Avenue and the edge of the Santa Clara County's percolation ponds. In the southwest portion of the Plan Area, Division Street, Dell Avenue, Winchester Boulevard, and Knowles Drive form a slightly smaller block of 1,100 feet in length.

Although comprised of several different small and large buildings of varying architecture, for the most part, buildings in the Plan Area are utilitarian in character, with construction and detail that emphasizes their industrial, research and development, and office use. Based on a visual assessment, it appears that many buildings were built in the 1960s and 1970s. Buildings are generally one- to two-stories tall, with 15-foot or more floor heights, and contain the minimum architectural features necessary to provide business function, such as doors, windows, and garages. The tall floor height accommodates trucking, loading, and shipping activities. Virtually all buildings are set back from the street and buffered by a landscaping strip or surface parking, are comprised of blocky rectilinear shapes, and have long stretches of blank walls. Most buildings lack additional architectural treatments, such as articulation, massing variation, roof detailing, and varied siting, such as building frontage along the street, that would generally create a more distinct visual interest. Furthermore, many buildings are emphasized horizontally rather than vertically; that is, they are delineated with lines or sections that are horizontal on the building.

There is a high proportion of surface asphalt parking lots to building footprints, and buildings are consistently separated from one another by parking lots of varying shapes and sizes. Whereas the majority of Plan Area buildings exhibit a light industrial or office park character, buildings fronting along Winchester Boulevard in the western edge of the Plan Area are typified by their use as auto-oriented and auto-serving businesses along a heavily traversed corridor. Because travel speeds are fast (with a speed limit of 40 miles per hour), coupled with a lack of pedestrian-scale amenities, businesses are geared towards automobile traffic. Most buildings are set back from the street by parking areas, and are single story, with a low average height of 10 to 15 feet. Many buildings are older auto services and body shops and contain a variety of signage printed directly on the building in large lettering or on large signage structures that abut the sidewalk. There are exceptions: a newer, two-story office building built close to the sidewalk occupies a large parcel close to the Hacienda Boulevard and Winchester Boulevard intersection; and a couple of single-story single-family homes fronting the Chapman Drive intersection.

Topography and Scenic Vistas

The City's General Plan has not established official scenic vistas in the city or required protecting such views. Scenic vistas are generally interpreted as long-range views of a specific scenic feature, such as open space lands, mountain ridges, or bodies of water. The Plan Area is located in the southwestern Santa Clara Valley, and potential scenic features in its viewsheds include the Santa Cruz Mountain Range to the west and the percolation ponds, Los Gatos Creek County Park, and the Los Gatos Creek and trail to the South.

The Plan Area is relatively flat and is largely built out, and therefore views of the scenic vistas are limited. In particular, the views of the percolation ponds are only visible from the Los Gatos Creek Trail and the sections of roads immediately adjacent to the ponds. Given the flat nature and low building heights of the Plan Area, glimpses of the Santa Cruz Mountain Range can be captured from portions of major north-south corridors, including Dell Avenue and Winchester Boulevard.

Light and Glare

Light pollution refers to all forms of unwanted light in the night sky, including glare, light trespass, sky glow, and over-lighting. Excessive light and glare can be visually disruptive to humans and nocturnal animal species, and often reflects an unnecessarily high level of energy consumption. Light pollution has the potential to become an issue of increasing concern as new development contributes additional outdoor lighting installed for safety and other reasons.

Existing sources of nighttime light in the Plan Area include those common to urban areas, such as street lights, parking lot lights, building lighting, vehicle headlamps, and interior lighting visible through windows.

4.1.2 STANDARDS OF SIGNIFICANCE

The proposed Plan would result in a significant aesthetic impact if it would result in any of the following:

1. Have a substantial adverse effect on a scenic vista.
2. Substantially damage scenic resources, including, but not limited to, trees, rock outcroppings, and historic buildings within a State scenic highway.
3. Substantially degrade the existing visual character or quality of the site and its surroundings.
4. Create a new source of substantial light or glare which would adversely affect day or nighttime views of the area.

4.1.3 ENVIRONMENTAL IMPACT DISCUSSION

This section analyzes potential project-specific and cumulative impacts to aesthetics.

AES-1	**Implementation of the proposed Plan would not have a substantial adverse effect on a scenic vista.**

The proposed Plan would have a significant aesthetics impact if future development or infrastructure projects allowed by the proposed Plan had a substantial adverse effect on a scenic vista if new or intensified development blocked views of areas that provide or contribute to such vistas.

As stated in Section 4.1.1, Environmental Setting, the current General Plan does not designate scenic vistas. For this analysis, the following views are considered to be scenic vistas:

- Southward views along Dell Avenue and Winchester Boulevard of the foothills and ridgelines of the Santa Cruz Mountains.
- Near-field views from the Los Gatos Creek Trail and the roads immediately adjacent to Santa Clara County's percolation ponds of the ponds and associated open space.

Development allowed by the proposed Plan has the potential to block the far-field views of the Santa Cruz Mountain Range and foothills from various vantage points because the Plan would allow new buildings of up to 45 feet in height on the west side of Winchester Boulevard and up to 75 feet in height along Dell Avenue. While the proposed height limit on the west side of Winchester Boulevard is lower than the existing maximum allowable height of 75 feet under existing regulations, the height limit along Dell Avenue is proposed to be higher than the existing maximum allowable height of 45 feet. However, since the topography in the Plan Area is essentially flat and is largely developed, the views from many vantage points in the Plan Area are already obstructed by existing conditions, such as buildings, structures, and mature trees or vegetation. Future development in all areas would be subject to the City's Site and Architectural

Review process, in accordance with Chapter 21.42 of the Municipal Code, to minimize the effects of increased building heights on existing views of the Santa Cruz Mountain Range and foothills.

Chapter 3 of the proposed Plan applies the following required design standards to all parcels within the DAAP-Waterfront District (the area that fronts the percolation ponds as shown in Figure 3-6) to avoid impacting views of Santa Clara County's percolation ponds and associated open space:

- No structure is allowed within 20 feet of the parcel line.
- Buildings are limited to 20 feet when placed between 20 feet and 60 feet of the waterfront setback line.
- Buildings are limited to 60 feet when placed between 60 feet and 75 feet of the waterfront-facing parcel line.

In addition, development allowed by the proposed Plan would be subject to existing General Plan goals and policies that seek to protect or enhance existing views and vistas within Campbell. In particular, the Community Design Element of the General Plan requires structures adjoining the Los Gatos Creek Trail be designed to enhance the views from the trail and Highway 17. Goal LUT-10 of the General Plan also requires landscaping, natural resources, and amenities to be visible and accessible to the public.

Consistency with the existing and proposed policies, combined with compliance with the City's Site and Architectural Review process, would ensure that future development under the proposed Plan would result in a less-than-significant impact to scenic vistas.

Significance Before Mitigation: Less than significant.

AES-2	**The proposed Plan would not substantially damage scenic resources, including but not limited to, trees, rock outcroppings, and historic buildings within a State scenic highway.**

There are no State-designated scenic highways in the vicinity of the Plan Area. Therefore, no impact to scenic resources visible from a State Scenic Highway would occur with the implementation of the proposed Plan.

Significance Before Mitigation: No impact.

AES-3	**The proposed Plan would not substantially degrade the existing visual character or quality of the site and its surroundings.**

Future development allowed by the proposed Plan would degrade the visual character of the Plan Area if the form and appearance of new development would deteriorate the quality of the existing setting. The Plan Area is largely comprised of office and light industrial uses in buildings that are not architecturally notable.

Future development allowed by the proposed Plan would introduce building form and massing that is more intense than the current character of the area.

As described above, the area west of Winchester Boulevard is within the boundary of the San Tomas Area Neighborhood Plan, which calls for preserving the existing residential character. Along the west side of Winchester Boulevard, the proposed Plan would allow mixed-use buildings up to four stories in height on parcels adjacent to a residential neighborhood (the San Tomas Area neighborhood). This could cause visual incompatibility between new development and the existing single-family residential neighborhood. The proposed Plan, however, includes the following required setback policies and design standards to reduce visual inconsistency and promote design that is complementary to and harmonious with adjacent properties and the surrounding area:

- Buildings in the DAAP-Waterfront District, the district fronting the percolation ponds and views of Los Gatos Creek, are required to be 20 to 60 feet from the parcel line depending on the location of the parcel.
- Parcels in the DAAP-West District that are adjacent to existing single-family residential uses are required to ensure transitions in development scale downward to the single-family residential development. No buildings are permitted within 24 feet of single-family residences.
- Building heights in the DAAP-West District are required to follow a "wedding-cake" model, locating taller building elements along the street frontage.

In addition, the design standards in the proposed Plan would require all new development along Winchester Boulevard to be more visually pleasing to pedestrians than existing uses, most of which are auto-oriented and includes surface parking lots along the sidewalk. For example, new buildings would be required to include high-quality design, pedestrian-oriented frontages, and landscaping. The proposed Plan also includes required landscape standards in addition to the City's existing landscape requirements to promote appropriate setbacks and buffers, screen undesirable views, provide tree canopies in parking lots and sidewalks, and preserve existing trees. The required standards for each District include:

- DAAP-Waterfront and DAAP-Central Districts. Within the DAAP-Waterfront and DAAP-Central Districts, 10 percent of the site shall include publicly-accessible open space or the developer shall pay an in-lieu fee. In addition, 12 percent of the site shall include landscaped areas.
- DAAP-West District. Within the DAAP-West District, 5 percent of the site shall include publicly-accessible open space or the developer shall pay an in-lieu fee. In addition, 12 percent of the site shall include landscaped areas.

Similar to the west side of Winchester Boulevard, the proposed Plan would allow more intense development in the areas east of Winchester Boulevard. Office buildings up to six stories in height would change the visual character of the area, but this change would be complementary to the existing and surrounding areas, as required by the goals and policies set forth in the proposed Plan. In particular, the proposed Plan would

require setbacks from the waterfront-facing parcel line to preserve the natural character along this edge. All office development would be required to include high-quality materials and appropriate open space, and be broken into smaller masses to be compatible with adjacent buildings. Additionally, as described in Section 4.1.1 above, Chapter 21.42 of the Municipal Code requires that all development proposals go through the Site and Architectural Review process for the approval of designs to ensure a project is compatible with its surroundings. The Site and Architectural Review process would ensure compliance with the General Plan and consistency with the proposed Plan's design guidelines for architectural quality.

The General Plan goals and policies that seek to protect the existing visual character and the quality of the Plan Area include:

- Goal LUT-5: Preservation and enhancement of the quality character and land use patterns that support the neighborhood concept.
- Policy LUT-5.1: Neighborhood Integrity. Recognize that the City is composed of residential, industrial, and commercial neighborhoods, each with its own individual character; and allow change consistent with reinforcing positive neighborhood values, while protecting the integrity of the city's neighborhoods.
- Strategy LUT-5.3a: Commercial Design Guidelines. Establish commercial and mixed-use design guidelines to ensure attractive and functional buildings and site design, and to ensure compatibility with adjacent land uses.
- Policy LUT-9.3: Design and Planning Compatibility. Promote high quality, creative design and site planning that is compatible with surrounding development, public spaces, and natural resources.
- Strategy LUT-5.3k: Auto Services. Restrict auto related uses to minor auto services (e.g., oil changers and auto parts stores) on major streets that define Campbell's image. These "image" streets are defined in the Streetscape Standards located in Appendix A.
- Strategy LUT-5.6c: Physical Buffers. Provide landscaped buffers, sidewalks, and equipment screening to provide a visual and noise-abating buffer between uses.
- Policy LUT-9.3: Design and Planning Compatibility. Promote high quality, creative design and site planning that is compatible with surrounding development, public spaces, and natural resources.
- Strategy LUT-9.3d: Building Design. Design buildings to revitalize streets and public spaces by orienting the building to the street, including human scale details and massing that engages the pedestrian.
- Strategy LUT-9.3e: Building Materials. Encourage the use of long-lasting, high quality building materials on all buildings to ensure the long-term quality of the built environment.
- Strategy LUT-10.1a: Natural Feature Retention. Encourage site design that incorporates or otherwise retains natural features such as mature trees, terrain, vegetation, wildlife, and creeks.

- Policy LUT-10.2: Roadway Landscaping. Landscape public roadways to define the character of districts and neighborhoods.

In addition the proposed Plan would encourage new development to include gateway features, including unique architectural quality and site landscaping features, at the intersections of Winchester Boulevard/Hacienda Avenue and Winchester Boulevard/Knowles Drive, in compliance with the General Plan's gateway goals and policies, which are listed below.

- Goal LUT-6: Strong and identifiable City boundaries that provide a sense of arrival into the City and its districts to reinforce Campbell's quality small town image.
- Policy LUT-6.1: Entries to the City and Special Districts. Identify entries to the city and special districts (Downtown, San Tomas Neighborhood, and others) with special features.
- Strategy LUT-6.1a: Identification Signs. Install city identification signs including distinctive landscaping and lighting or other markers at community gateways to signify entry.
- Strategy LUT-6.1b: Landmark Gateway Buildings. Anchor gateway intersections with landmark buildings that incorporate distinctive architectural character. Orient landmark buildings to face and frame the corners of intersections.
- Strategy LUT-6.1c: Gateway Intersections. Develop major gateway intersections such as Highway 17 / Hamilton Avenue and San Tomas Expressway / Winchester Boulevard with signage, lighting and abundant landscaping, using tall trees, and under-planting.

Existing policies and procedures, as well as additional policies and standards set forth in the proposed Plan, would ensure that the overall visual character and quality of the area would not be substantially degraded. Therefore, future development allowed by the proposed Plan would result in a less-than-significant impact to visual character.

Significance Before Mitigation: Less than significant.

AES-4	**The proposed Plan would not create a new source of light or glare which would adversely affect day or nighttime views of the area.**

Substantial light in the Plan Area would come mainly from commercial areas, safety lighting, street lights, and traffic on major arterials. Substantial glare in the Plan Area would come mainly from building materials and parked cars.

The Plan Area is currently developed with commercial, office, industrial, and limited residential land uses, which are lighted. Future development under the proposed Plan would add multi-family residential units, which would introduce 24-hour uses that could involve more nighttime lighting than currently exists in the Plan Area. Additionally, as described in the Design Guidelines component of the proposed Plan, open space

would be designed for day and nighttime use and would include sufficient lighting for safety and comfort. Nevertheless, new development would not add new sources of light pollution to the extent that it would adversely affect nighttime views. However, potential impacts from new lighting would be reduced by complying with the City's lighting design standards as set forth in Municipal Code Sections 21.16 and 21.18.090 as follows:

- Light or glare from mechanical or chemical processes, or from reflective materials used or stored on a site, shall be shielded or modified to prevent emission of light or glare beyond the property line for both new residential and non-residential development.
- Outdoor lights would be placed to eliminate spillover illumination or glare onto adjoining properties and would not interfere with the normal operation or enjoyment of adjoining properties for both new residential and non-residential development.
- Lights would be of the minimum illumination necessary for a given application and would be fully shielded or recessed for both new residential and non-residential development.
- Lights would be completely turned off or significantly dimmed at the close of business hours when the exterior lighting is not essential for security and safety.
- Permanently installed lighting would not blink, flash, or be of unusually high intensity or brightness for both new residential and non-residential development.[4]

Existing sources of glare within the Plan Area include glass and metal building materials and surface parking lots. The proposed Plan could introduce additional sources of glare from glass and metal used for new building materials, including windows and roofing materials, as well as glare from car windshields from cars located on surface parking lots. However, new development would be required to comply with the lighting and glare standards set forth in Sections 21.16 and 21.18.090 of the Municipal Code by shielding adjacent properties from glare and illumination and by controlling the intensity of illumination. Light or glare from mechanical or chemical processes, or from reflective materials used or stored on a site, would be shielded or modified to prevent emission of light or glare beyond property lines.[5] In addition, the proposed Plan's Design Guidelines call for new development to minimize the visual presence of parking through screening, such as low walls, fences, or landscaping and the inclusion of one tree for every eight parking stalls/spaces. Implementation of these Design Guidelines would soften the effects of glare when viewing surface parking from surrounding areas.

The following General Plan policies are intended to complement and support the Municipal Code in reducing or eliminating light pollution and glare impacts.

[4] City of Campbell, Campbell Municipal Code, Section 21.18.090, Lighting Design Standards.
[5] City of Campbell, Campbell Municipal Code, Section 21.16.060, Outdoor Light and Glare.

- Strategy LUT-5.6b: Visual Barriers. Reduce the visual impact of excessive lighting and glare, mechanical equipment, trash enclosures, outdoor storage and loading docks.
- Strategy LUT-9.3p: Site Lighting Guidelines. Ensure that lighting does not create glare and overflow on adjacent properties by developing standards and guidelines that are incorporated into the Zoning Ordinance.

Implementation of these policies, combined with compliance with the City's lighting and glare standards and compliance with the City's building permit review process, would ensure that light and glare associated with future development allowed by the proposed Plan would be minimized by assessing . Therefore, impacts from new sources of substantial light or glare would be *less than significant*.

Significance Before Mitigation: Less than significant.

4.1.4 CUMULATIVE IMPACTS

AES-5	**Implementation of the proposed Plan, in combination with past, present and reasonably foreseeable projects, would not result in significant cumulative impacts with respect to aesthetics.**

The methodology used for the cumulative impact analysis is described in Section 4, Environmental Analysis, of this Draft EIR. The cumulative setting for aesthetics include potential future development under the proposed Plan, combined with the effects of development on land adjacent the Plan Area.

As previously discussed, there are no State-designated scenic highways in the Plan Area or the area of cumulative effect that could be affected by future cumulative development. As such, there would be no cumulative impacts to visual resources along scenic highways.

Future development allowed by the proposed Plan, combined with other future development on land adjacent to the Plan Area , could contribute to aesthetic impacts in the surrounding area. These effects could combine to change the overall visual character of the area and introduce new sources of light and glare. As stated above, future development under the proposed Plan would have a less-than-significant impact on visual resources in the Plan Area. In addition, future development in the city would be required to conform to the City's development regulations and be reviewed against applicable General Plan policies and design standards for design quality and compatibility with adjacent land uses. As discussed above, the proposed Plan includes policies to ensure that future projects in the Plan Area are well designed, attractive, and compatible with surrounding uses. Therefore, the combination of past, present, and reasonably foreseeable projects would not result in a cumulatively considerable significant impact on scenic resources, visual character, or light and glare.

Significance Before Mitigation: Less than significant.

4.1.5 SUMMARY OF SIGNIFICANT IMPACTS AND MITIGATION MEASURES

The proposed Plan would not result in any significant aesthetics impacts. Therefore, no mitigation measures are required.

4.2 AIR QUALITY

This section describes the existing air quality setting and evaluates the potential environmental impacts that could result from adopting and implementing the Dell Avenue Area Plan (proposed Plan). "Emissions" refers to the actual quantity of pollutant, measured in pounds per day or tons per year. "Concentrations" refers to the amount of pollutant material per volumetric unit of air. Concentrations are measured in parts per million (ppm), parts per billion (ppb), or micrograms per cubic meter ($\mu g/m^3$).

This section is based on the methodology recommended by the Bay Area Air Quality Management District (BAAQMD) for plan-level review. The analysis contained herein focuses on air pollution from regional emissions and localized pollutant concentrations from buildout of the proposed Plan. Criteria air pollutant emissions modeling is in Appendix B, Air Quality and Greenhouse Gas Modeling.

4.2.1 ENVIRONMENTAL SETTING

California is divided geographically into 15 air basins for the purpose of managing the air resources of the State on a regional basis. An air basin generally has similar meteorological and geographic conditions throughout. The City of Campbell is in the San Francisco Bay Area Air Basin (SFBAAB or Air Basin). The discussion below identifies the natural factors in the Air Basin that affect air pollution. Air pollutants of concern are criteria air pollutants and toxic air contaminants (TACs). Federal, State, and local air districts have adopted laws and regulations intended to control and improve air quality. The regulatory framework that is potentially applicable to the proposed Plan is summarized below.

4.2.1.1 SAN FRANCISCO AIR BASIN

The BAAQMD is the regional air quality agency for the Air Basin, which comprises all of Alameda, Contra Costa, Marin, Napa, San Francisco, San Mateo, and Santa Clara counties; the southern portion of Sonoma County; and the southwestern portion of Solano County. Air quality in this area is determined by natural factors such as topography, meteorology, and climate, as well as by the presence of existing air pollution sources and ambient conditions.[1]

Meteorology

The Air Basin is characterized by complex terrain—coastal mountain ranges, inland valleys, and bays—that distort normal wind flow patterns. The Coast Range[2] splits in the Bay Area, creating a western coast gap, the Golden Gate, and an eastern coast gap, the Carquinez Strait, which allows air to flow in and out of the Bay Area and the Central Valley.

[1] This section describing the air basin is from Bay Area Air Quality Management District, 2010 (Revised 2011), Appendix C: Sample Air Quality Setting, in *California Environmental Quality Act Air Quality Guidelines*.

[2] The Coast Ranges traverses California's west coast from Humboldt County to Santa Barbara County.

The climate is dominated by the strength and location of a semi-permanent, subtropical high-pressure cell. During the summer, the Pacific high-pressure cell is centered over the northeastern Pacific Ocean, resulting in stable meteorological conditions and a steady northwesterly wind flow. Upwelling of cold ocean water from below the surface because of the northwesterly flow produces a band of cold water off the California coast.

The cool and moisture-laden air approaching the coast from the Pacific Ocean is further cooled by the presence of the cold-water band, resulting in condensation and the presence of fog and stratus clouds along the Northern California coast. In the winter, the Pacific high-pressure cell weakens and shifts southward, resulting in wind flow offshore, the absence of upwelling, and the occurrence of storms. Weak inversions coupled with moderate winds result in a low air pollution potential.

Wind Patterns

During the summer, winds flowing from the northwest are drawn inland through the Golden Gate and over the lower portions of the San Francisco Peninsula. Immediately south of Mount Tamalpais in Marin County, the northwesterly winds accelerate considerably and come more directly from the west as they stream through the Golden Gate. This channeling of wind through the Golden Gate produces a jet that sweeps eastward and splits when it meets the East Bay hills, to the northwest toward Richmond and to the southwest toward San Jose.

Wind speeds may be strong locally in areas where air is channeled through a narrow opening, such as the Carquinez Strait, the Golden Gate, or the San Bruno gap. For example, the average wind speed at San Francisco International Airport in July is about 17 knots (from 3:00 p.m. to 4:00 p.m.), compared with only 7 knots in San Jose and less than 6 knots at the Farallon Islands.

The sea breeze flows in from the coast to the Central Valley and begins developing at or near ground level along the coast in late morning or early afternoon. As the day progresses, the sea breeze layer deepens and increases in velocity while spreading inland. The depth of the sea breeze depends in large part on the height and strength of the inversion. Under normal atmospheric conditions, the air in the lower atmosphere is warmer than the air above it. An inversion is a change in the normal conditions that causes the temperature gradient to be reversed, or inverted. If the inversion is low and strong, and hence stable, the flow of the sea breeze will be inhibited, and stagnant conditions are likely to result.

In the winter, the Air Basin frequently experiences stormy conditions with moderate to strong winds, as well as periods of stagnation with very light winds. Winter stagnation episodes (i.e., conditions where there is little mixing, which occurs when there is a lack of or little wind) are characterized by nighttime drainage flows in coastal valleys. Drainage is a reversal of the usual daytime airflow patterns; air moves from the Central Valley toward the coast and back down toward the Bay from the smaller valleys in the Air Basin.

Temperature

Summertime temperatures in the Air Basin are determined in large part by the effect of differential heating between land and water surfaces. Because land tends to heat up and cool off more quickly than water, a large-scale gradient (differential) in temperature is often created between the coast and the Central Valley, and small-scale local gradients are often produced along the shorelines of the ocean and bays. The temperature gradient near the ocean is also exaggerated, especially in summer, because of the upwelling of cold water from the ocean bottom along the coast. On summer afternoons, the temperatures at the coast can be 35 degrees Fahrenheit cooler than temperatures 15 to 20 miles inland; at night, this contrast usually decreases to less than 10 degrees Fahrenheit.

In the winter, the relationship of minimum and maximum temperatures is reversed. During the daytime, the temperature contrast between the coast and inland areas is small, whereas at night the variation in temperature is large.

Precipitation

The Air Basin is characterized by moderately wet winters and dry summers. Winter rains (November through March) account for about 75 percent of the average annual rainfall. The amount of annual precipitation can vary greatly from one part of the Air Basin to another, even within short distances. In general, total annual rainfall can reach 40 inches in the mountains, but it is often less than 16 inches in sheltered valleys.

During rainy periods, ventilation (rapid horizontal movement of air and injection of cleaner air) and vertical mixing (an upward and downward movement of air) are usually high, and thus pollution levels tend to be low (i.e., air pollutants disperse more readily rather than accumulate under stagnant conditions). However, during the winter, frequent dry periods occur, when mixing and ventilation are low and pollutant levels build up.

Wind Circulation

Low wind speed contributes to the buildup of air pollution because it allows more pollutants to be emitted into the air mass per unit of time. Light winds occur most frequently during periods of low sun (fall, winter, and early morning) and at night. These are also periods when air pollutant emissions from some sources are at their peak, namely, commuter traffic (early morning) and wood-burning appliances (nighttime). The problem can be compounded in valleys, when weak flows carry the pollutants up-valley during the day, and cold air drainage flows move the air mass down-valley at night. Such restricted movement of trapped air provides little opportunity for ventilation and leads to buildup of pollutants to potentially unhealthy levels.

Inversions

As described above, an inversion is a layer of warmer air over a layer of cooler air. Inversions affect air quality conditions significantly because they influence the mixing depth (i.e., the vertical depth available for diluting air contaminants near the ground). There are two types of inversions that occur regularly in the Air Basin. Elevation inversions[3] are more common in the summer and fall, and radiation inversions[4] are more common during the winter. The highest air pollutant concentrations in the Air Basin generally occur during inversions.

4.2.1.2 AIR POLLUTANTS OF CONCERN

A substance in the air that can harm humans and the environment is known as an air pollutant. Pollutants can be in the form of solid particles, liquid droplets, or gases. In addition, they may be natural or human-caused. Pollutants can be classified as primary or secondary. Usually, primary pollutants are directly emitted from a process, such as ash from a volcanic eruption, carbon monoxide from a motor vehicle exhaust, or sulfur dioxide from a factory. Secondary pollutants are not emitted directly, but form in the air when primary pollutants react or interact.

Criteria Air Pollutants

The pollutants emitted into the ambient air by stationary and mobile sources are regulated by federal and State law. Primary air pollutants are carbon monoxide (CO), reactive organic gases (ROG), nitrogen oxides (NO_x), sulfur dioxide (SO_2), coarse inhalable particulate matter (PM_{10}), fine inhalable particulate matter ($PM_{2.5}$), and lead (Pb). Of these, CO, SO_2, NO_2, PM_{10}, and $PM_{2.5}$ are "criteria air pollutants," which means that ambient air quality standards (AAQS) have been established for them (AAQS are discussed further in Section 4.2.1.3). ROG and NO_x are criteria pollutant precursors that form secondary criteria air pollutants through chemical and photochemical reactions in the atmosphere. Ozone (O_3) and nitrogen dioxide (NO_2) are the principal secondary pollutants.

A description of each of the primary and secondary criteria air pollutants and their known health effects is presented below.

- **Carbon Monoxide (CO)** is a colorless, odorless, toxic gas produced by incomplete combustion of carbon substances, such as gasoline or diesel fuel. CO is a primary criteria air pollutant. CO concentrations tend to be the highest during winter mornings with little or no wind, when surface-based inversions trap the pollutant at ground levels. Because CO is emitted directly from internal combustion engines, motor vehicles operating at slow speeds are the primary source of CO in the Air Basin. Emissions are highest during cold starts, hard acceleration, stop-and-go driving, and low speeds.

[3] When the air blows over elevated areas, it is heated as it is compressed into the side of the hill/mountain. When that air comes over the top, it is warmer than the cooler air of the valley.

[4] During the night, the ground cools off, radiating the heat to the sky.

New findings indicate that CO emissions per mile are lowest at about 45 miles per hour (mph) for the average light-duty motor vehicle and begin to increase again at higher speeds. When inhaled at high concentrations, CO combines with hemoglobin in the blood and reduces its oxygen-carrying capacity. This results in less oxygen reaching the brain, heart, and other body tissues. This is especially dangerous for people with cardiovascular diseases, chronic lung disease, or anemia, as well as for fetuses. Even healthy people exposed to high CO concentrations can experience headaches, dizziness, fatigue, unconsciousness, and death.[5] The Air Basin is designated under the California and National AAQS as being in attainment of CO criteria levels.[6]

- **Reactive Organic Gases (ROGs)** are compounds composed primarily of hydrogen and carbon atoms. Internal combustion in motor vehicles is the major source of ROGs. Other sources of ROGs are evaporative emissions from paints and solvents, the application of asphalt paving, and the use of household consumer products such as aerosols. Adverse effects on human health are not caused directly by ROGs, but by reactions of ROGs to form secondary pollutants such as O_3. There are no AAQS established for ROGs. However, because they contribute to the formation of O_3, BAAQMD has established a significance threshold for this pollutant.
- **Nitrogen Oxides (NO_X)** are a by-product of fuel combustion and contribute to the formation of O_3, PM_{10}, and $PM_{2.5}$. The two major components of NO_x are nitric oxide (NO) and nitrogen dioxide (NO_2). The principal component of NO_x produced by combustion is NO, but NO reacts with oxygen to form NO_2, creating the mixture of NO and NO_2 commonly called NO_x. NO_2 acts as an acute irritant and in equal concentrations is more injurious than NO. At atmospheric concentrations, however, NO_2 is only potentially irritating. There is some indication of a relationship between NO_2 and chronic pulmonary fibrosis. Some increase in bronchitis in children (two and three years old) has also been observed at concentrations below 0.3 ppm. NO_2 absorbs blue light; the result is a brownish-red cast to the atmosphere and reduced visibility. NO is a colorless, odorless gas formed from atmospheric nitrogen and oxygen when combustion takes place under high temperature and/or high pressure.[7] The Air Basin is designated an attainment area for NO_2 under the National and California AAQS.[8]
- **Sulfur Dioxide (SO_2)** is a colorless, pungent, irritating gas formed by the combustion of sulfurous fossil fuels. It results from burning high-sulfur-content fuel oils and coal and from chemical processes at chemical plants and refineries. Gasoline and natural gas have very low sulfur content and do not release significant quantities of SO_2. When SO_2 forms sulfates (SO_4) in the atmosphere, these pollutants are referred to collectively as sulfur oxides (SO_x). Thus, SO_2 is both a primary and secondary criteria air pollutant. At sufficiently high concentrations, SO_2 may irritate the upper respiratory tract. At lower

[5] Bay Area Air Quality Management District (BAAQMD), 2010 (Revised 2011), Appendix C: Sample Air Quality Setting, in *California Environmental Quality Act Air Quality Guidelines*.

[6] California Air Resources Board (CARB), 2014, Area Designations: Activities and Maps, http://www.arb.ca.gov/desig/adm/adm.htm, June.

[7] Bay Area Air Quality Management District (BAAQMD), 2010 (Revised 2011). Appendix C: Sample Air Quality Setting, in *California Environmental Quality Act Air Quality Guidelines*.

[8] California Air Resources Board (CARB), June 2014, Area Designations: Activities and Maps, http://www.arb.ca.gov/desig/adm/adm.htm.

concentrations and when combined with particulates, SO_2 may do greater harm by injuring lung tissue.[9] The Air Basin is designated an attainment area for SO_2 under the California and National AAQS.[10]

- **Suspended Particulate Matter (PM_{10} and $PM_{2.5}$)** consists of finely divided solids or liquids such as soot, dust, aerosols, fumes, and mists. Two forms of fine particulates are recognized and regulated. Inhalable coarse particles, or PM_{10}, have an aerodynamic diameter of 10 microns (10 millionths of a meter or 0.0004 inch) or less. Inhalable fine particles, or $PM_{2.5}$, have an aerodynamic diameter of 2.5 microns or less (2.5 millionths of a meter or 0.0001 inch).

  Some particulate matter, such as pollen, occurs naturally. In the Air Basin, most particulate matter is caused by combustion, factories, construction, grading, demolition, agricultural activities, and motor vehicles. Extended exposure to particulate matter can increase the risk of chronic respiratory disease. PM_{10} bypasses the body's natural filtration system more easily than larger particles and can lodge deep in the lungs. The US Environmental Protection Agency (EPA) scientific review concluded that $PM_{2.5}$ penetrates even more deeply into the lungs, which makes it more likely to contribute to health effects and at concentrations well below current PM_{10} standards. These health effects include premature death in people with heart or lung disease, nonfatal heart attacks, irregular heartbeat, aggravated asthma, decreased lung function, and increased respiratory symptoms (e.g., irritation of the airways, coughing, or difficulty breathing). Motor vehicles are currently responsible for about half of the particulates in the Air Basin. Wood burning in fireplaces and stoves is another large source of fine particulates.[11]

  Both PM_{10} and $PM_{2.5}$ may adversely affect the human respiratory system, especially in people who are naturally sensitive or susceptible to breathing problems. These health effects include premature death and increased hospital admissions and emergency room visits (primarily the elderly and individuals with cardiopulmonary disease); increased respiratory symptoms and disease (children and individual with asthma); and alterations in lung tissue and structure and in respiratory tract defense mechanisms.[12] Emerging evidence indicates particulates that are even smaller—an aerodynamic diameter of 0.1 microns or less (0.1 millionths of a meter or 0.000004-inch)—known as ultrafine particulates (UFPs)—also have human health implications; UFPs' toxic components may initiate or facilitate biological processes that may lead to adverse effects to the heart, lungs, and other organs. However, the EPA and the California Air Resources Board (CARB) have yet to adopt AAQS to regulate these particulates. Diesel particulate matter (DPM) is also classified a carcinogen by CARB. The Air Basin is

[9] Bay Area Air Quality Management District (BAAQMD), 2010 (Revised 2011). Appendix C: Sample Air Quality Setting, in *California Environmental Quality Act Air Quality Guidelines*.

[10] California Air Resources Board (CARB), 2014. Area Designations: Activities and Maps, http://www.arb.ca.gov/desig/adm/adm.htm.

[11] Bay Area Air Quality Management District (BAAQMD), 2010 (Revised 2011). Appendix C: Sample Air Quality Setting, in *California Environmental Quality Act Air Quality Guidelines*.

[12] South Coast Air Quality Management District (SCAQMD), 2005. *Guidance Document for Addressing Air Quality Issues in General Plans and Local Planning*.

designated nonattainment under the California AAQS for PM_{10} and nonattainment under both the California and National AAQS for $PM_{2.5}$.[13,14]

- **Ozone (O_3)** is commonly referred to as "smog" and is a gas that is formed when ROGs and NO_x, both by-products of internal combustion engine exhaust, undergo photochemical reactions, which are reactions in the presence of sunlight. O_3 is a secondary criteria air pollutant. O_3 concentrations are generally highest during the summer months when direct sunlight, light winds, and warm temperatures create favorable conditions for its formation. O_3 poses a health threat to those who already suffer from respiratory diseases as well as to healthy people. O_3 levels usually build up during the day and peak in the afternoon. Short-term exposure can irritate the eyes and cause constriction of the airways. Besides causing shortness of breath, it can aggravate existing respiratory diseases such as asthma, bronchitis, and emphysema. Chronic exposure to high ozone levels can permanently damage lung tissue. O_3 can also damage plants, trees, and materials such as rubber and fabrics.[15] The Air Basin is designated nonattainment of the 1-hour California AAQS and 8-hour California and National AAQS for O_3.[16]
- **Lead (Pb)** is a metal found naturally in the environment as well as in manufactured products. The major sources of lead emissions have historically been mobile and industrial sources. As a result of the phase-out of leaded gasoline, metal processing is currently the primary source of lead emissions. The highest levels of lead in air are generally found near lead smelters. Other stationary sources are waste incinerators, utilities, and lead-acid battery manufacturers. Twenty years ago, mobile sources were the main contributor to ambient lead concentrations in the air. In the early 1970s, the EPA set national regulations to gradually reduce the lead content of gasoline. In 1975, unleaded gasoline was introduced for motor vehicles equipped with catalytic converters. The EPA banned the use of leaded gasoline in highway vehicles in December 1995. As a result, emissions of lead from the transportation sector and levels of lead in the air decreased dramatically.[17] The Air Basin is designated in attainment of the California and National AAQS for lead.[18] Because emissions of lead are found only in projects that are permitted by BAAQMD, lead is not an air quality of concern for the proposed Plan.

[13] California Air Resources Board (CARB), 2014. Area Designations: Activities and Maps, http://www.arb.ca.gov/desig/adm/adm.htm.

[14] On January 9, 2013, the EPA issued a final rule to determine that the SFBAAB has attained the 24-hour $PM_{2.5}$ National AAQS. This action suspends federal State Implementation Plan planning requirements for the Bay Area. The SFBAAB will continue to be designated nonattainment for the National 24-hour $PM_{2.5}$ standard until such time as BAAQMD elects to submit a redesignation request and a maintenance plan to EPA and EPA approves the proposed redesignation.

[15] Bay Area Air Quality Management District (BAAQMD), 2010 (Revised 2011). Appendix C: Sample Air Quality Setting, in *California Environmental Quality Act Air Quality Guidelines*.

[16] California Air Resources Board (CARB), 2014. Area Designations: Activities and Maps, http://www.arb.ca.gov/desig/adm/adm.htm.

[17] Bay Area Air Quality Management District (BAAQMD), 2010 (Revised 2011). Appendix C: Sample Air Quality Setting, in *California Environmental Quality Act Air Quality Guidelines*.

[18] California Air Resources Board (CARB), 2014. Area Designations: Activities and Maps, http://www.arb.ca.gov/desig/adm/adm.htm.

Toxic Air Contaminants

Public exposure to TACs is a significant environmental health issue in California. In 1983, the California Legislature enacted a program to identify the health effects of TACs and to reduce exposure to these contaminants to protect the public health. The California Health and Safety Code define a TAC as "an air pollutant which may cause or contribute to an increase in mortality or in serious illness, or which may pose a present or potential hazard to human health." A substance that is listed as a hazardous air pollutant pursuant to Section 112(b) of the federal Clean Air Act (42 US Code Section 7412[b]) is a TAC. Under State law, the California Environmental Protection Agency, acting through CARB, is authorized to identify a substance as a TAC if it is an air pollutant that may cause or contribute to an increase in mortality or serious illness, or may pose a present or potential hazard to human health.

California regulates TACs primarily through AB 1807 (Tanner Air Toxics Act) and AB 2588 (Air Toxics "Hot Spot" Information and Assessment Act of 1987). The Tanner Air Toxics Act sets up a formal procedure for CARB to designate substances as TACs. Once a TAC is identified, CARB adopts an "airborne toxics control measure" for sources that emit designated TACs. If there is a safe threshold for a substance (i.e., a point below which there is no toxic effect), the control measure must reduce exposure to below that threshold. If there is no safe threshold, the measure must incorporate toxics best available control technology to minimize emissions. To date, CARB has established formal control measures for 11 TACs that are identified as having no safe threshold.

Air toxics from stationary sources are also regulated in California under the Air Toxics "Hot Spot" Information and Assessment Act of 1987. Under this law, TAC emissions from individual facilities are quantified and prioritized by the air quality management district or air pollution control district. High priority facilities are required to perform a health risk assessment, and if specific thresholds are exceeded, results must be communicated to the public through notices and public meetings.

As of the last update to the TAC list in December 1999, CARB had designated 244 compounds as TACs.[19] Additionally, CARB has implemented control measures for a number of compounds that pose high risks and show potential for effective control. The majority of the estimated health risks from TACs can be attributed to relatively few compounds, the most significant being particulate matter from diesel-fueled engines.

In 1998, CARB identified DPM as a TAC. Previously, the individual chemical compounds in diesel exhaust were considered TACs. Almost all DPM is 10 microns or less in diameter. Because of their extremely small size, these particles can be inhaled and eventually trapped in the bronchial and alveolar regions of the lungs.

[19] California Air Resources Board (CARB), 1999. *Final Staff Report: Update to the Toxic Air Contaminant List*.

4.2.1.3 REGULATORY FRAMEWORK

This section describes the federal, State, and local regulations applicable to air quality.

Federal and State Regulations

Ambient Air Quality Standards

The Clean Air Act (CAA) was passed in 1963 by the US Congress and has been amended several times. The 1970 Clean Air Act amendments strengthened previous legislation and laid the foundation for the regulatory scheme of the 1970s and 1980s. In 1977, Congress again added several provisions, including nonattainment requirements for areas not meeting National AAQS and the Prevention of Significant Deterioration program. The 1990 amendments are the latest in a series of federal efforts to regulate the protection of air quality in the United States. The CAA allows states to adopt more stringent standards or to include other pollution species. The California Clean Air Act, signed into law in 1988, requires all areas of the State to achieve and maintain the California AAQS by the earliest practical date. The California AAQS tend to be more restrictive than the National AAQS.

The National and California AAQS are the levels of air quality considered to provide a margin of safety in the protection of the public health and welfare. They are designed to protect "sensitive receptors" most susceptible to further respiratory distress, such as asthmatics, the elderly, very young children, people already weakened by other disease or illness, and persons engaged in strenuous work or exercise. Healthy adults can tolerate occasional exposure to air pollutant concentrations considerably above these minimum standards before adverse effects are observed.

Both California and the federal government have established health-based AAQS for seven air pollutants, which are shown in Table 4.2-1. These pollutants are ozone (O_3), nitrogen dioxide (NO_2), carbon monoxide (CO), sulfur dioxide (SO_2), coarse inhalable particulate matter (PM_{10}), fine inhalable particulate matter ($PM_{2.5}$), and lead (Pb). In addition, the State has set standards for sulfates, hydrogen sulfide, vinyl chloride, and visibility-reducing particles. These standards are designed to protect the health and welfare of the populace with a reasonable margin of safety.

Regional Regulations

Bay Area Air Quality Management District

BAAQMD is the agency responsible for ensuring that the National and California AAQS are attained and maintained in the Air Basin. BAAQMD is responsible for:

- Adopting and enforcing rules and regulations concerning air pollutant sources.
- Issuing permits for stationary sources of air pollutants.
- Inspecting stationary sources of air pollutants.
- Responding to citizen complaints.

TABLE 4.2-1 AMBIENT AIR QUALITY STANDARDS FOR CRITERIA POLLUTANTS

Pollutant	Averaging Time	California Standard	Federal Primary Standard	Major Pollutant Sources
Ozone (O_3)	1 hour	0.09 ppm	*	Motor vehicles, paints, coatings, and solvents.
	8 hours	0.070 ppm	0.075 ppm	
Carbon Monoxide (CO)	1 hour	20 ppm	35 ppm	Internal combustion engines, primarily gasoline-powered motor vehicles.
	8 hours	9.0 ppm	9 ppm	
Nitrogen Dioxide (NO_2)	Annual Average	0.030 ppm	0.053 ppm	Motor vehicles, petroleum-refining operations, industrial sources, aircraft, ships, and railroads.
	1 hour	0.18 ppm	0.100 ppm	
Sulfur Dioxide (SO_2)	Annual Arithmetic Mean	*	*[a]	Fuel combustion, chemical plants, sulfur recovery plants, and metal processing.
	1 hour	0.25 ppm	0.075 ppm	
	24 hours	0.04 ppm	*[a]	
Respirable Course Particulate Matter (PM_{10})	Annual Arithmetic Mean	20 µg/m^3	*	Dust and fume-producing construction, industrial, and agricultural operations, combustion, atmospheric photochemical reactions, and natural activities (e.g. wind-raised dust and ocean sprays).
	24 hours	50 µg/m^3	150 µg/m^3	
Respirable Fine Particulate Matter ($PM_{2.5}$)	Annual Arithmetic Mean	12 µg/m^3	12 µg/m^3	Dust and fume-producing construction, industrial, and agricultural operations, combustion, atmospheric photochemical reactions, and natural activities (e.g. wind-raised dust and ocean sprays).
	24 hours	*	35 µg/m^3	
Lead (Pb)	30-Day Average	1.5 µg/m^3	*	Present source: lead smelters, battery manufacturing & recycling facilities. Past source: combustion of leaded gasoline.
	Calendar Quarterly	*	1.5 µg/m^3	
	Rolling 3-Month Average	*	0.15 µg/m^3	
Sulfates (SO_4)	24 hours	25 µg/m^3	*	Industrial processes.
Visibility Reducing Particles	8 hours	ExCo =0.23/km visibility of 10≥ miles	*	Visibility-reducing particles consist of suspended particulate matter, which is a complex mixture of tiny particles that include dry solid fragments, solid cores with liquid coatings, and small droplets of liquid. These particles vary greatly in shape, size, and chemical composition, and can be made up of many different materials such as metals, soot, soil, dust, and salt.

TABLE 4.2-1 AMBIENT AIR QUALITY STANDARDS FOR CRITERIA POLLUTANTS

Pollutant	Averaging Time	California Standard	Federal Primary Standard	Major Pollutant Sources
Hydrogen Sulfide	1 hour	0.03 ppm	*	Hydrogen sulfide (H_2S) is a colorless gas with the odor of rotten eggs. It is formed during bacterial decomposition of sulfur-containing organic substances. Also, it can be present in sewer gas and some natural gas, and can be emitted as the result of geothermal energy exploitation.
Vinyl Chloride	24-hour	0.01 ppm	*	Vinyl chloride (chloroethene), a chlorinated hydrocarbon, is a colorless gas with a mild, sweet odor. Most vinyl chloride is used to make polyvinyl chloride (PVC) plastic and vinyl products. Vinyl chloride has been detected near landfills, sewage plants, and hazardous waste sites, due to microbial breakdown of chlorinated solvents.

Notes: ppm: parts per million; $\mu g/m^3$: micrograms per cubic meter
* Standard has not been established for this pollutant/duration by this entity.
a. On June 2, 2010, a new 1-hour SO_2 standard was established and the existing 24-hour and annual primary standards were revoked.
Source: California Air Resources Board, June 2013, Ambient Air Quality Standards, http://www.arb.ca.gov/research/aaqs/aaqs2.pdf.

- Monitoring ambient air quality and meteorological conditions.
- Awarding grants to reduce motor vehicle emissions.
- Conducting public education campaigns.
- Air quality management planning.

Air quality in the Air Basin has improved significantly since the BAAQMD was created in 1955.[20] The BAAQMD prepares air quality management plans (AQMPs) to attain ambient air quality standards in the Air Basin, ozone attainment plans for the National O_3 standard, and clean air plans for the California O_3 standard. The BAAQMD prepares these AQMPs in coordination with Association of Bay Area Governments (ABAG) and the Metropolitan Transportation Commission (MTC). The most recent adopted comprehensive plan is the 2010 Bay Area Clean Air Plan, which was adopted by BAAQMD on September 15, 2010, and incorporates significant new scientific data, updated emissions inventories, ambient measurements, new meteorological episodes, and new air quality modeling tools.

BAAQMD 2010 Bay Area Clean Air Plan

The purpose of the 2010 Bay Area Clean Air Plan is to: 1) update the Bay Area 2005 Ozone Strategy in accordance with the requirements of the California Clean Air Act to implement all feasible measures to reduce O_3; 2) consider the impacts of O_3 control measures on PM, TAC, and greenhouse gases (GHGs) in a single, integrated plan; 3) review progress in improving air quality in recent years; and 4) establish emission

[20] Bay Area Air Quality Management District (BAAQMD), 2010 (Revised 2011). Appendix C: Sample Air Quality Setting, in *California Environmental Quality Act Air Quality Guidelines*.

control measures in the 2009 to 2012 timeframe. The 2010 Bay Area Clean Air Plan also provides the framework for the Air Basin to achieve attainment of the California and National AAQS.

BAAQMD Community Air Risk Evaluation Program

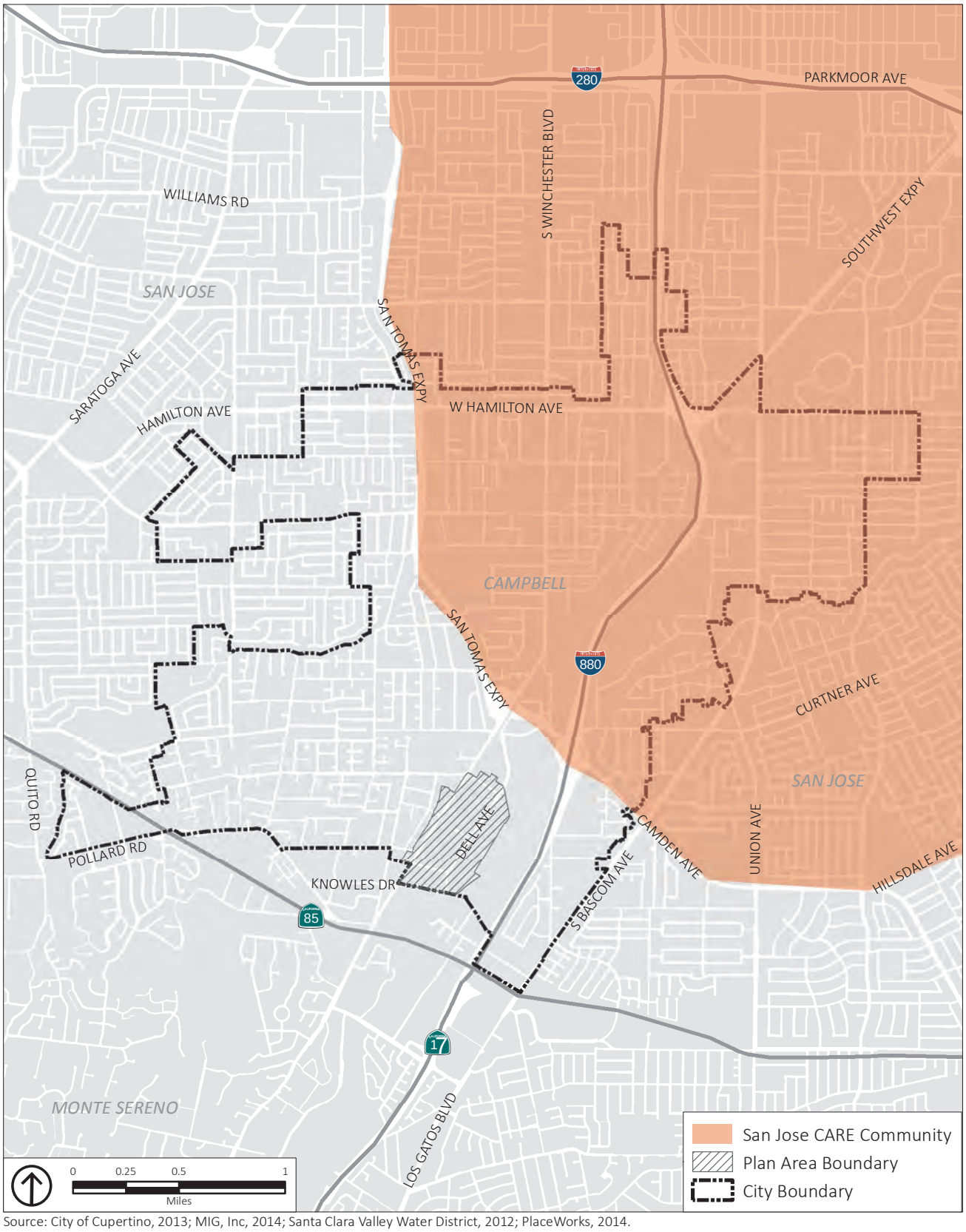
The BAAQMD Community Air Risk Evaluation (CARE) program was initiated in 2004 to evaluate and reduce health risks from outdoor TACs in the Bay Area. The latest report found that DPM accounted for approximately 85 percent of the cancer risk from airborne toxics. Carcinogenic compounds from gasoline-powered cars and light duty trucks were also significant contributors: 1,3-butadiene contributed 4 percent of the cancer risk–weighted emissions, and benzene contributed 3 percent. Collectively, five compounds—DPM, 1,3-butadiene, benzene, formaldehyde, and acetaldehyde—were found responsible for more than 90 percent of the cancer risk attributed to emissions. All of these compounds are associated with emissions from internal combustion engines. The most important sources of cancer risk–weighted emissions were combustion-related sources of DPM, including on-road mobile sources (31 percent), construction equipment (29 percent), and ships and harbor craft (13 percent). A 75 percent reduction in DPM was predicted between 2005 and 2015 when the inventory accounted for CARBs diesel regulations. Overall, cancer risk from TACs dropped by more than 50 percent between 2005 and 2015, when emissions inputs accounted for State diesel regulations and other reductions.[21]

Modeled cancer risks from TACs in 2005 were highest near sources of DPM—core urban areas, major roadways and freeways, and maritime shipping terminals. Peak modeled risks were found east of San Francisco, near West Oakland, and the Maritime Port of Oakland. BAAQMD identified seven impacted communities in the Bay Area:

- Western Contra Costa County and the cities of Richmond and San Pablo
- Western Alameda County along the Interstate 880 corridor and the cities of Berkeley, Alameda, Oakland, and Hayward
- San Jose
- Eastern side of San Francisco
- Concord
- Vallejo
- Pittsburgh and Antioch

San Jose is the closest impacted community to the Plan Area. Based on the Phase II boundaries, the Plan Area lies outside this impacted community, as illustrated in Figure 4.2-1.

[21] Bay Area Air Quality Management District (BAAQMD), April 2014. *Improving Air Quality & Health in Bay Area Communities, Community Air Risk Program (CARE) Retrospective & Path Forward (2004 – 2013).*



Source: City of Cupertino, 2013; MIG, Inc, 2014; Santa Clara Valley Water District, 2012; PlaceWorks, 2014.

Figure 4.2-1
BAAQMD Community Air Risk Evaluation (CARE) Program
Impacted Communities Proximate to Campbell

The major contributor to acute and chronic non-cancer health effects in the Air Basin is acrolein (C_3H_4O). Major sources of acrolein are on-road mobile sources and aircraft near freeways and commercial and military airports.[22] Currently CARB does not have certified emission factors or an analytical test method for acrolein. Since appropriate tools are not available to implement and enforce acrolein emission limits, the BAAQMD does not conduct health risk screening analysis for acrolein emissions.[23]

Santa Clara Valley Transportation Authority

The Santa Clara Valley Transportation Authority (VTA) is the congestion management agency for Santa Clara County. VTA is tasked with developing a comprehensive transportation improvement program among local jurisdictions that will reduce traffic congestion and improve land use decision-making and air quality. VTAs latest congestion management program (CMP) is the 2013 Congestion Management Program. VTAs countywide transportation model must be consistent with the regional transportation model developed by the MTC with ABAG data. The countywide transportation model is used to help evaluate cumulative transportation impacts of local land use decisions on the CMP system. In addition, VTAs updated CMP includes multi-modal performance standards and trip reduction and transportation demand management strategies consistent with the goal of reducing regional VMT in accordance with Senate Bill 375 (SB 375). Strategies identified in the 2013 CMP for Santa Clara County, where local jurisdictions are responsible agencies, include:[24]

- **Traffic Level of Service:** Monitor and submit report on the level of service (LOS) on CMP roadway network intersections using CMP software and procedures.
- **Transportation Model and Database:** Certify that member agency models are consistent with the CMP model.
- **Community Form and Impact Analysis:** Prepare a transportation impact analysis (TIA) for projects that generate 100 or more peak hour trips and submit to the CMP according to TIA Guidelines schedule.
- **Community Form and Impact Analysis:** Submit relevant conditions of approval to VTA for projects generating TIAs.
- **Community Form and Impact Analysis:** Prepare and submit land use monitoring data to the CMP on all land use projects approved from July 1 to June 30 of the previous year.
- **Community Form and Impact Analysis:** Submit an annual statement certifying that the member agency has complied with the CMP Land Use Impact Analysis Program.

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[22] Bay Area Air Quality Management District (BAAQMD), 2006. *Community Air Risk Evaluation Program, Phase I Findings and Policy Recommendations Related to Toxic Air Contaminants in the San Francisco Bay Area*.

[23] Bay Area Air Quality Management District (BAAQMD), 2010. *Air Toxics NSR Program, Health Risk Screening Analysis Guidelines*.

[24] Santa Clara Valley Transportation Authority (VTA), 2013. 2013 Congestion Management Program, http://www.vta.org/sfc/servlet.shepherd/version/download/068A0000001Q7pt.

- **Monitoring and Conformance:** Outline the requirements and procedures established for conducting annual traffic LOS and land use monitoring efforts. Support the Traffic Level of Service and Community Form and Impact Analysis Elements.
- **Capital Improvement Program:** Develop a list of projects intended to maintain or improve the level of service on the designated system and to maintain transit performance standards.
- **Deficiency Plan:** Prepare deficiency plans for facilities that violate CMP traffic LOS standards or that are projected to violate LOS standards using the adopted deficiency plan requirements.
- **Deficiency Plan:** Submit a deficiency plan implementation status report as part of annual monitoring.

Local Regulations

Table 4.2-2 shows the Conservation and Natural Resources Element policies of the City's General Plan relevant to air quality and the proposed Plan.[25]

4.2.1.4 EXISTING CONDITIONS

Attainment Status of the Air Basin

Areas that meet AAQS are classified attainment areas, and areas that do not are classified nonattainment areas. Severity classifications for O_3 range from marginal, moderate, and serious to severe and extreme. Table 4.2-3 shows the attainment status for the Air Basin, which is currently designated a nonattainment area for California and National O_3, California and National $PM_{2.5}$, and California PM_{10} AAQS.

Existing Ambient Air Quality

Existing Air Quality Trends

Existing levels of ambient air quality and historical trends and projections in the vicinity of the proposed Plan Area have been documented by measurements made by the BAAQMD. The Los Gatos Monitoring Station is the closest air quality monitoring station to the City of Campbell. This station monitors ozone only. Therefore, data was obtained from the next closest monitoring station in San Jose for CO, NO_2, PM_{10}, and $PM_{2.5}$. Data from these stations are summarized in Table 4.2-4. The State and federal O_3, federal $PM_{2.5}$, and State PM_{10} standards have been exceeded several times in the last 5 years. The State and federal CO and NO_2 standards have not been exceeded in the last 5 years.

[25] City of Campbell, 2011. *City of Campbell General Plan*, http://www.ci.campbell.ca.us/DocumentCenter/View/2052.

TABLE 4.2-2 CITY OF CAMPBELL GENERAL PLAN POLICIES PERTAINING TO AIR QUALITY

Goal/Policy/ Strategy Number	Goal/Policy/Strategy Text
Conservation and Natural Resources Element	
Policy CNR-11.1	Air Quality Impacts: Reduce adverse air quality impacts of City operations.
Policy CNR-11.2	Effects of Development on Air Quality: Use the City's development review process and the California Environmental Quality Act to evaluate and mitigate the local and cumulative effects of new development on air quality.
Policy CNR-11.3	Air Quality Improvement Programs: Support regional, State and federal programs to improve air quality.
Policy CNR-12.1	Energy Consumption: Reduce City government energy consumption.
Policy CNR-12.2	Advanced Energy Technology and Building Materials: Facilitate the use of advanced energy technology and building materials to create energy-efficient residences and buildings.
Policy CNR-12.3	Landscaping Requirements: Continue to enforce landscaping requirements that facilitate energy efficient use or conservation.
Land Use and Transportation Element	
Policy LUT-1.2	Regional Land Use and Transportation Planning: Promote integrated and coordinated regional land use and transportation planning.
Policy LUT-1.5	Land Use Planning and the Regional Transportation System: Support land use planning that complements the regional transportation system.
Policy LUT-2.1	Alternative Transportation: Encourage the use of alternative transportation such as ridesharing, public transit, walking, and bicycling to reduce reliance on automobile use.
Policy LUT-2.4	Jobs and Housing Balance: Maintain Campbell's balance of jobs and housing units to encourage residents to work in Campbell, and to limit the impact on the regional transportation system.
Policy LUT-9.1	Land Use Pattern: Establish a compatible land use pattern citywide.
Policy LUT-9.3	Design and Planning Compatibility: Promote high quality, creative design and site planning that is compatible with surrounding development, public spaces and natural resources.
Policy LUT-11.1	Physically Connected Transportation Infrastructure: Strive to achieve physically connected transportation infrastructure.
Policy LUT-11.2	Services Within Walking Distance: Encourage neighborhood services within walking distance of residential uses.

Source: City of Campbell General Plan, 2001.

Existing Emissions

Existing land uses in the Plan Area are generally non-manufacturing light industrial and office uses (e.g., automobile services, printers, machine shops, building materials, medical and contracting offices, research and development, informational technology, and bio-technology) and service commercial (fitness centers, catering, and indoor farming). The Plan Area is a built-out environment. There are few, if any, vacant parcels or buildings. The west side of Winchester Boulevard consists mostly of auto-oriented service uses, with a few single-family residential parcels. A large parcel near the northern end of the Plan Area is the corporate

TABLE 4.2-3 ATTAINMENT STATUS OF CRITERIA POLLUTANTS IN THE SAN FRANCISCO BAY AREA AIR BASIN

Pollutant	State	Federal
Ozone – 1-hour	Nonattainment (serious)	Nonattainment
Ozone – 8-hour	Nonattainment	Classification revoked (2005)
PM_{10}	Nonattainment	Unclassified/Attainment
$PM_{2.5}$	Nonattainment	Nonattainment[a]
CO	Attainment	Attainment
NO_2	Attainment	Attainment
SO_2	Attainment	Attainment
Lead	Attainment	Attainment
Sulfates	Attainment	Unclassified/Attainment
All others	Unclassified/Attainment	Unclassified/Attainment

a. On January 9, 2013, the EPA issued a final rule to determine that the Air Basin has attained the 24-hour $PM_{2.5}$ National AAQS. This action suspends federal State Implementation Plan planning requirements for the Bay Area. The Air Basin will continue to be designated nonattainment for the National 24-hour $PM_{2.5}$ standard until such time as BAAQMD elects to submit a redesignation request and a maintenance plan to EPA and EPA approves the proposed redesignation.
Source: California Air Resources Board, June 2014, Area Designations: Activities and Maps, http://www.arb.ca.gov/desig/adm/adm.htm.

headquarters for a large information technology company. Criteria air pollutants generated by existing land uses in the Plan Area were modeled with California Division Estimator Model (CalEEMod) 2013.2.2 based on trip generation provided by W-Trans, and are shown in Table 4.2-5. In addition, emissions generated by permitted sources were compiled by BAAQMD and are included for informational purposes.

Sensitive Receptors

Some land uses are considered more sensitive to air pollution than others due to the types of population groups or activities involved. Sensitive population groups include children, the elderly, the acutely ill, and the chronically ill, especially those with cardiorespiratory diseases. Residential areas are also considered sensitive receptors to air pollution because residents (including children and the elderly) tend to be at home for extended periods of time, resulting in sustained exposure to any pollutants present. Other sensitive receptors include retirement facilities, hospitals, and schools. Recreational land uses are considered moderately sensitive to air pollution. Although exposure periods are generally short, exercise places a high demand on respiratory functions, which can be impaired by air pollution. In addition, noticeable air pollution can detract from the enjoyment of recreational activities. Industrial, commercial, retail, and office areas are considered the least sensitive to air pollution. Exposure periods are relatively short and

TABLE 4.2-4 AMBIENT AIR QUALITY MONITORING SUMMARY

	Number of Days Thresholds Were Exceeded and Maximum Levels During Such Violations				
Pollutant/Standard	2009	2010	2011	2012	2013
Ozone (O_3)[a]					
State 1-Hour ≥ 0.09 ppm	3	2	0	0	0
State 8-hour ≥ 0.07 ppm	8	3	1	1	1
Federal 8-Hour > 0.075 ppm	4	2	0	0	0
Maximum 1-Hour Conc. (ppm)	0.102	0.109	0.091	0.085	0.087
Maximum 8-Hour Conc. (ppm)	0.082	0.087	0.075	0.073	0.075
Carbon Monoxide (CO)[b]					
State 8-Hour > 9.0 ppm	0	0	0	0	0
Federal 8-Hour ≥ 9.0 ppm	0	0	0	0	0
Maximum 8-Hour Conc. (ppm)	2.50	2.19	2.18	1.86	*
Nitrogen Dioxide (NO_2)[b]					
State 1-Hour ≥ 0.18 (ppm)	0	0	0	0	0
Maximum 1-Hour Conc. (ppb)	69.0	64.0	61.0	67.2	58.7
Coarse Particulates (PM_{10})[b]					
State 24-Hour > 50 µg/m^3	0	0	0	1	5
Federal 24-Hour > 150 µg/m^3	0	0	0	0	0
Maximum 24-Hour Conc. (µg/ m^3)	43.3	46.8	44.3	59.6	58.1
Fine Particulates ($PM_{2.5}$)[b]					
Federal 24-Hour > 35 µg/m^3	0	3	3	2	4
Maximum 24-Hour Conc. (µg/m^3)	35.0	41.5	50.5	38.4	57.7

Notes: ppm: parts per million; ppb: parts per billion; µg/m^3: or micrograms per cubic meter; * = insufficient data; NA = Not Available
a. Data from Los Gatos Monitoring Station.
b. Data from San Jose Jackson Street Monitoring Station.
Source: California Air Resources Board, 2014, Air Pollution Data Monitoring Cards (2009, 2010, 2011, 2012, and 2013), http://www.arb.ca.gov/adam/index.html, accessed August 18, 2014.

TABLE 4.2-5 CRITERIA AIR POLLUTANT EMISSIONS GENERATED BY EXISTING LAND USES WITHIN THE PLAN AREA

	Criteria Air Pollutants (Average Pounds/Day)			
Category[a]	ROG	NO_x	PM_{10}	$PM_{2.5}$
Area	38	<1	<1	<1
Energy	1	8	1	1
Mobile	67	143	81	23
Total	105	151	81	23
Tons per Year (tpy)	15 tpy	21 tpy	10 tpy	3 tpy
Permitted Sources[b]				
Permitted	1	2	<1	<1
Tons per Year (tpy)	0.2 tpy	0.4 tpy	<1 tpy	<1 tpy

a. CalEEMod 2013.2.2. Based on 2014 emission rates.
b. Kirk, Alison, Senior Environmental Planner, September 2014. Planning and Research Division, Air Quality Planning, Bay Area Air Quality Management District.
Sources: BAAQMD and CalEEMod 2013.2.

intermittent, as the majority of the workers tend to stay indoors most of the time. In addition, the working population is generally the healthiest segment of the public.

Sensitive land uses proximate to the Plan Area include the residential uses and the Capri Elementary School to the west of Winchester Boulevard. Other sensitive land uses include residential uses east of Highway 17.

4.2.2 STANDARDS OF SIGNIFICANCE

The proposed project would result in a significant air quality impact if it would result in any of the following:

1. Conflict with or obstruct implementation of the applicable air quality plan.
2. Violate any air quality standard or contribute substantially to an existing or projected air quality violation.
3. Result in a cumulatively considerable net increase of any criteria pollutant for which the project region is non-attainment under an applicable federal or state ambient air quality standard (including releasing emissions which exceed quantitative thresholds for ozone precursors).
4. Expose sensitive receptors to substantial pollutant concentrations.
5. Create objectionable odors affecting a substantial number of people.

4.2.2.1 BAAQMD SIGNIFICANCE CRITERIA

The BAAQMD CEQA Air Quality Guidelines were prepared to assist in the evaluation of air quality impacts of projects and plans proposed within the Bay Area. The guidelines recommend procedures for evaluating potential air impacts during the environmental review process, consistent with CEQA requirements, and recommend thresholds of significance, mitigation measures, and background air quality information. They also recommend assessment methodologies for air toxics, odors, and GHG emissions. In June 2010, the BAAQMDs Board of Directors adopted CEQA thresholds of significance and an update of the CEQA Guidelines. In May 2011, the updated BAAQMD CEQA Air Quality Guidelines were amended to include a risk and hazards threshold for new receptors and modified procedures for assessing impacts related to risk and hazard impacts.

On March 5, 2012, the Alameda County Superior Court found that the BAAQMD had failed to comply with CEQA when it adopted the thresholds of significance in the BAAQMD CEQA Air Quality Guidelines. The court did not judge the validity of the thresholds, but found that their adoption was a project under CEQA. The court issued a writ of mandate ordering the BAAQMD to set aside the thresholds and cease dissemination of them until the BAAQMD complied with CEQA.

Following the court's order, the BAAQMD released revised CEQA Air Quality Guidelines in May of 2012 that set aside the significance thresholds, but provide guidance on calculating air pollution emissions,

obtaining information regarding the health impacts of air pollutants, and identifying potential mitigation measures. The BAAQMD recognizes that lead agencies may rely on the previously recommended thresholds of significance in its 1999-adopted CEQA Guidelines. Because the Alameda County Superior Court did not address the merits of the science or evidence supporting BAAQMDs thresholds, the City finds, therefore, that despite the court ruling, and in light of the subsequent case history discussed below, the science and reasoning in the BAAQMD 2011 CEQA Air Quality Guidelines provide state-of-the-art guidance. For that reason, substantial evidence supports continued use of the BAAQMD 2011 CEQA Air Quality Guidelines.

On August 13, 2013, the First District Court of Appeal ordered the trial court to reverse the judgment and upheld the BAAQMDs CEQA Guidelines (*California Building Industry Association vs. Bay Area Air Quality Management District*, Case No. A135335 and A136212 [Court of Appeal, First District, August 13, 2013]). In addition to the City's independent determination that use of the BAAQMDs CEQA Guidelines is supported by substantial evidence, the appellate court found the guidelines to be valid for use in the CEQA environmental review process. On November 26, 2013, the California Supreme Court granted review on the issue of whether the TAC thresholds are consistent with CEQA—specifically, whether CEQA requires analysis of exposing project residents or users to existing environmental hazards.

Though current project applicants and local agencies are uncertain how the outcome of this case will affect evaluation of TACs in CEQA documents, local agencies still have a duty to evaluate impacts related to air quality. In addition, CEQA grants local agencies broad discretion to develop their own thresholds of significance or to rely on thresholds previously adopted or recommended by other public agencies or experts, so long as they are supported by substantial evidence. Accordingly, the City of Campbell is using the BAAQMDs 2011 thresholds to evaluate the potential effects of implementation of the proposed Plan on air quality.

AQMP Consistency

Under its plan-level review criteria, BAAQMD requires a consistency evaluation of a plan with its current air quality plan control measures. The current AQMP is the 2010 Bay Area Clean Air Plan. BAAQMD considers project consistency with the AQMP in accordance with the following:

- Does the project support the primary goals of the AQMP?
- Does the project include applicable control measures from the AQMP?
- Does the project disrupt or hinder implementation of any AQMP control measures?
- A comparison that the project VMT or vehicle trip increase is less than or equal to the projected population increase.

Local CO Hotspots

Congested intersections have the potential to create elevated concentrations of CO, referred to as CO hotspots. The significance criteria for CO hotspots are based on the California AAQS for CO, which are 9.0

ppm (8-hour average) and 20.0 ppm (1-hour average). BAAQMD does not require a quantitative evaluation of CO hotspots under plan-level review.[26] Also, with the turnover of older vehicles, introduction of cleaner fuels, and implementation of control technology, the Air Basin is in attainment of the California and National AAQS, and CO concentrations in the Air Basin have steadily declined. Because CO concentrations have improved, the BAAQMD does not require a CO hotspot analysis for project-level analyses if the following criteria are met:

- The project is consistent with an applicable congestion management program established by the County Congestion Management Agency for designated roads or highways, the regional transportation plan, and local congestion management agency plans.
- The project would not increase traffic volumes at affected intersections to more than 44,000 vehicles per hour.
- The project traffic would not increase traffic volumes at affected intersection to more than 24,000 vehicles per hour where vertical and/or horizontal mixing is substantially limited (e.g., tunnel, parking garage, bridge underpass, natural or urban street canyon, below-grade roadway).[27]

Community Risk and Hazards

The BAAQMDs significance thresholds for local community risk and hazard impacts apply to both the siting of a new source and the siting of a new receptor.

Local community risk and hazard impacts are associated with TACs and $PM_{2.5}$ because emissions of these pollutants can have significant health impacts at the local level. Significant health impacts may occur when a project generates:

- An excess cancer risk level of more than 10 in 1 million, or a non-cancer (i.e. chronic or acute) hazard index greater than 1.0; or
- An incremental increase of greater than 0.3 micrograms per cubic meter ($\mu g/m^3$) annual average $PM_{2.5}$.[28]

For assessing community risk and hazards, sources within a 1,000-foot radius of a project site are considered. Sources are defined as freeways, high-volume roadways (with volume of 10,000 vehicles or more per day or 1,000 trucks per day), and permitted sources.[29] For a plan-level analysis, BAAQMD requires the following:

[26] Congested intersections have the potential to create CO hotspots.

[27] Bay Area Air Quality Management District (BAAQMD), 2011 Revised. *California Environmental Quality Act Air Quality Guidelines*.

[28] Bay Area Air Quality Management District (BAAQMD), 2010 (Revised 2011), *California Environmental Quality Act Air Quality Guidelines*.

[29] Bay Area Air Quality Management District (BAAQMD), 2010 (Revised 2011). *California Environmental Quality Act Air Quality Guidelines*.

- Overlay zones around existing and planned sources of TACs,
- Overlay zones of at least 500 feet from all freeways and high volume roads.

For a plan-level analysis, a project must also identify goals, policies, and objectives to minimize potential impacts and create overlay zones for sources of TACs and receptors.[30]

Odors

BAAQMDs thresholds for odors are qualitative based on BAAQMDs Regulation 7, Odorous Substances. This rule places general limitations on odorous substances and specific emission limitations on certain odorous compounds. In addition, odors are also regulated under BAAQMD Regulation 1, Rule 1-301, Public Nuisance, which states that no person shall discharge from any source whatsoever such quantities of air contaminants or other material which cause injury, detriment, nuisance or annoyance to any considerable number of persons or the public; or which endangers the comfort, repose, health or safety of any such persons or the public; or which causes, or has a natural tendency to cause, injury or damage to business or property. Under BAAQMDs Rule 1-301, a facility that receives three or more violation notices within a 30-day period can be declared a public nuisance. BAAQMD has established odor screening thresholds for land uses that have the potential to generate substantial odor complaints, including wastewater treatment plants, landfills or transfer stations, composting facilities, confined animal facilities, food manufacturing, and chemical plants.[31] For a plan-level analysis, BAAQMD requires:

- Potential existing and planned location of odors sources to be identified.
- Policies to reduce odors.

4.2.3 ENVIRONMENTAL IMPACT DISCUSSION

Methodology

Criteria air pollutant emissions from operation of the proposed Plan were calculated using the CalEEMod, Version 2013.2.2. Transportation emissions are based on trip generation provided by W-Trans.

This section analyzes potential project-specific and cumulative impacts to air quality.

AIR-1	**Implementation of the proposed Plan would not conflict with or obstruct implementation of the applicable air quality plan.**

[30] Bay Area Air Quality Management District (BAAQMD), 2010 (Revised 2011). *California Environmental Quality Act Air Quality Guidelines*.

[31] Bay Area Air Quality Management District (BAAQMD), 2010 (Revised 2011). *California Environmental Quality Act Air Quality Guidelines*.

As described in Section 4.2.2.2, BAAQMD requires a consistency evaluation of a plan with its current AQMP measures. The current AQMP is the 2010 Bay Area Clean Air Plan. BAAQMD considers project consistency with the AQMP in accordance with the following:

- Does the project support the primary goals of the AQMP?
- Does the project include applicable control measures from the AQMP?
- Does the project disrupt or hinder implementation of any AQMP control measures?
- A comparison that the project VMT or vehicle trip increase is less than or equal to the projected population increase.

2010 Bay Area Clean Air Plan Goals

The primary goals of the 2010 Bay Area Clean Air Plan are to attain the State and federal AAQS, reduce population exposure and protect public health in the Bay Area, and reduce GHG emissions and protect the climate.

Attain Air Quality Standards

BAAQMDs 2010 Bay Area Clean Air Plan strategy is based on regional population and employment projections in the Bay Area compiled by ABAG. These demographic projections are incorporated into MTC and ABAG Plan Bay Area, which is the Bay Area's Regional Transportation Plan (RTP)/Sustainable Community Strategy (SCS). Plan Bay Area was adopted jointly by ABAG and MTC on July 18, 2013.[32] Demographic trends incorporated into Plan Bay Area determine VMT in the Bay Area, which BAAQMD uses to forecast future air quality trends. The SFBAAB is currently designated a nonattainment area for O_3, $PM_{2.5}$, and PM_{10} (State AAQS only).

Growth under the proposed Plan could occur incrementally throughout the proposed Plan's 2040 buildout horizon.. The anticipated growth from the proposed Plan is within the population and employment projections identified by ABAG for the City of Campbell, as discussed further in Section 4.12, *Population and Housing*, of this Draft EIR. Based on ABAG's 2013 projections, ABAG anticipates that Campbell's population would grow to 47,800 by 2040, an increase of 8,652 from the 2010 population of 39,148. The 726 new residents that could result from future development under the proposed Plan represent less than 9 percent of the total expected population growth for the city, and thus would not exceed ABAGs expected level. Similarly, ABAG projects Campbell's total jobs to increase to approximately 35,170, an increase of 7,850 from their anticipated 2010 jobs count of 27,320. The 7,394 new jobs that could result from implementation of the proposed Plan represent approximately 95 percent of the total expected employment growth for the city, and thus would not exceed ABAGs expected level. As identified in Section 4.12, the proposed Plan would not exceed the anticipated regional population and employment forecasts. If

[32] It should be noted that Bay Area Citizens filed a lawsuit against MTC and ABAG for the adoption of *Plan Bay Area*.

population and employment projections of the proposed Plan are consistent with the population and employment projections identified by ABAG, then emissions forecasts modeled by BAAQMD will consider the additional growth and associated emissions from the proposed Plan. Consequently, emissions resulting from implementation of the proposed Plan are included in BAAQMDs projections, and future development allowed by the Plan would not hinder BAAQMDs ability to attain the California or National AAQS. Accordingly, impacts would be less than significant.

Reduce Population Exposure and Protect Public Health

As identified in the discussion of community risk and hazards (see Impact AIR-4 below), new sensitive land uses (e.g., residential, day care centers) could be near major sources of TACs. Stationary sources within 1,000 feet of the Plan Area include four auto body repair and refinishing facilities, three gas stations, one dry cleaner, and 12 industrial uses. High-volume roadways with over 10,000 vehicles per day include Highway 17, Hacienda Avenue, and Winchester Boulevard. Adherence to BAAQMD regulations would ensure that new sources of TACs do not expose populations to significant health risk; however, siting of land uses near major sources of air pollution is outside the control of BAAQMD as BAAQMD has no jurisdiction over municipal land use decisions. Future projects within 1,000 feet of major sources of TACs would be required to ensure that they could achieve BAAQMDs performance standards (greater or equal to 10 in 1 million [10E-06] cancer risk, greater or equal to 0.3 $\mu g/m^3$ $PM_{2.5}$, or a non-cancer hazard index greater or equal to 1.0). Implementation of Mitigation Measure AIR-4, as described below, requires a site-specific health risk assessment to achieve the BAAQMD performance standards to reduce community risk and hazards to ensure these impacts are less than significant.

Reduce GHG Emissions and Protect the Climate

The GHG emissions impacts of the proposed Plan are discussed in Section 4.8, *Greenhouse Gas Emissions*, of this Draft EIR. As described in that section, design guidelines and implementation actions are incorporated into the proposed Plan with the goal of reducing VMT and associated GHG emissions. Future development allowed by the proposed Plan would be required to adhere to Statewide measures that have been adopted to achieve the GHG reduction targets of Assembly Bill 32. In addition, the proposed Plan is consistent with regional strategies for infill development identified by the MTC/ABAG in the Plan Bay Area. Consequently, the proposed Plan is consistent with the goal of the 2010 Bay Area Clean Air Plan to reduce GHG emissions and protect the climate, and the impact would be less than significant.

2010 Bay Area Clean Air Plan Control Measures

Table 4.2-6 identifies the control measures included in the 2010 Bay Area Clean Air Plan.

TABLE 4.2-6 CONTROL MEASURES FROM THE 2010 BAY AREA CLEAN AIR PLAN

Type	Measure Number / Title	Consistency
Stationary and Area Sources Control Measures	▪ SSM 1 – Metal Melting Facilities ▪ SSM 2 – Digital Printing ▪ SSM 3 – Livestock Waste ▪ SSM 4 – Natural Gas Processing and Distribution ▪ SSM 5 – Vacuum Trucks ▪ SSM 6 – General Particulate Matter Weight Rate Limitations ▪ SSM 7 – Open Burning ▪ SSM 8 – Coke Calcining ▪ SSM 9 – Cement Kilns ▪ SSM 10 – Refinery Boilers and Heaters ▪ SSM 11 – Residential Fan Type Furnaces ▪ SSM 12 – Space Heating ▪ SSM 13 – Dryers, Ovens, Kilns ▪ SSM 14 – Glass Furnaces ▪ SSM 15 – Greenhouse Gases in Permitting Energy Efficiency ▪ SSM 16 – Revise Regulation 2, Rule 2: New Source Review ▪ SSM 17 – Revise Regulation 2, Rule 5 New Source Review for Air Toxics ▪ SSM 18 – Revise Air Toxics "Hot Spot" Program	Stationary and area sources are regulated directly by BAAQMD. To implement the stationary and area source control measures, BAAQMD adopts/revises rules or regulations to implement the control measures and reduce emissions from stationary and area sources. Because BAAQMD is the implementing agency, new and existing sources of stationary and area sources within the Plan Area would be required to comply with these control measures in the 2010 Bay Area Clean Air Plan.
Mobile Source Control Measures	▪ MSM A-1 – Promote Clean, Fuel Efficient Light & Medium-Duty Vehicles ▪ MSM A-2 – Zero Emission Vehicle and Plug-in Hybrids ▪ MSM A-3 – Green Fleets (Light Medium & Heavy-Duty Vehicles) ▪ MSM A-4 – Replacement or Repair of High Emitting Vehicles ▪ MSM B-1 – HDV Fleet Modernization ▪ MSM B-2 – Low NOx Retrofits for In-Use Engines ▪ MSM B-3 – Efficient Drive Trains ▪ MSM C-1 – Construction and Farming Equipment ▪ MSM C-2 – Lawn & Garden Equipment ▪ MSM C-3 – Recreational Vessels	Mobile source control measures would reduce emissions by accelerating the replacement of older, dirtier vehicles and equipment through programs such as the BAAQMDs Vehicle Buy-Back and Smoking Vehicle Programs, and by promoting advanced technology vehicles that reduce emissions. The implementation of these measures relies heavily on incentive programs, such as the Carl Moyer Program and the Transportation Fund for Clean Air, to achieve voluntary emission reductions in advance of or in addition to CARB requirements. CARB has new regulations that require the replacement or retrofit of on-road trucks, construction equipment, and other specific, diesel-powered equipment. The proposed Plan would not hinder the ability of BAAQMD to implement these regional programs.

TABLE 4.2-6 CONTROL MEASURES FROM THE 2010 BAY AREA CLEAN AIR PLAN

Type	Measure Number / Title	Consistency
Transportation Control Measures	▪ TCM A-1 – Improve Local and Area-wide Bus Service ▪ TCM A-2 – Improve Local and Regional Rail Service ▪ TCM B-1 – Implement Freeway Performance Initiative ▪ TCM B-2 – Improve Transit Efficiency and Use ▪ TCM B-3 – Bay Area Express Land Network ▪ TCM B-4 – Goods Movement Improvements and Emission Reduction Strategies ▪ TCM C-1 – Support Voluntary Employer-Based Trip Reduction Program ▪ TCM C-2 – Implement Safe Routes to Schools and Safe Routes to Transit ▪ TCM C-3 – Promote Rideshare Service and Incentives ▪ TCM C-4 – Conduct Public Outreach and Education ▪ TCM C-5 – Promote Smart Driving/Speed Moderation ▪ TCM D-1 – Improve Bicycle Access and Facilities ▪ TCM D-2 – Improve Pedestrian Access and Facilities ▪ TCM D-3 – Support Local Land Use Strategies ▪ TCM E-1 – Value Pricing Strategies ▪ TCM E-2 – Parking Pricing and Management ▪ TCM E-3 – Implement Transportation Pricing Reform	Transportation control measures (TCM) are strategies to reduce vehicle trips, vehicle use, VMT, vehicle idling, and traffic congestion for the purpose of reducing motor vehicle emissions. Although most of the TCMs are implemented at the regional level—that is, by MTC or Caltrans—the 2010 Bay Area Clean Air Plan relies on local communities to assist with implementation of some measures. The proposed Plan would enhance existing roadways with sidewalks and pedestrian amenities, create new pedestrian, bicycle, and vehicle facilities to improve connectivity. In addition, the proposed Plan would create a clear, safe and direct pathway to the proposed VTA light rail station and integrate it into the larger pedestrian network.
Land Use and Local Impact Control Measures	▪ LUM 1 – Goods Movement ▪ LUM 2 – Indirect Source Review ▪ LUM 3 – Enhanced CEQA Program ▪ LUM 4 – Land Use Guidelines ▪ LUM 5 – Reduce Risk in Impacted Communities ▪ LUM 6 – Enhanced Air Quality Monitoring	The 2010 Bay Area Clean Air Plan also has land use measures to reduce air quality emissions and/or air quality exposure in the SFBAAB. One of the key principals of the proposed Plan is to encourage the efficient use of land through sustainable development patterns, a mixture of uses, and development intensities that support transit and walking. The Mixed-Use Corridor PDA in the City of Campbell was included in Plan Bay Area to encourage residential and employment growth and/or downtown center attractions combined with transit connectivity. VTAs proposed light rail would serve as focal points to increase the live-work-play balance within walking distance of a transit route that connects these types of land uses together.
Energy and Climate Control Measures	▪ ECM 1 – Energy Efficiency ▪ ECM 2 – Renewable Energy ▪ ECM 3 – Urban Heat Island Mitigation ▪ ECM 4 – Tree Planting	The 2010 Bay Area Clean Air Plan also includes measures to reduce energy use, water use, and waste generation. The Development Standards of the Dell Avenue proposed Plan require that tree and plant specifies be water efficient and meet the City's Water Efficient Landscape Ordinance (WELO) standards. In addition, per the Development Standards, for every eight surface parking stalls, one shade tree shall be provided in the paved area.

TABLE 4.2-6 CONTROL MEASURES FROM THE 2010 BAY AREA CLEAN AIR PLAN

Type	Measure Number / Title	Consistency
		Projects would also be required to comply with the California Green Building Standards Code and the current Building and Energy Efficiency Standards of Title 24 for energy efficiency.
Further Study Control Measures	▪ FSM 1 – Adhesives and Sealants ▪ FSM 2 – Reactivity in Coating and Solvents ▪ FSM 3 – Solvent Cleaning and Degreasing Operations ▪ FSM 4 – Emissions from Cooling Towers ▪ FSM 5 – Equipment Leaks ▪ FSM 6 – Wastewater from Coke Cutting ▪ FSM 7 – SO_2 from Refinery Processes ▪ FSM 8 – Reduce Emission from LPG, Propane, Butane, and other Pressurized Gases ▪ FSM 9 – Greenhouse Gas Mitigation in BACT and TBACT Determinations ▪ FSM 10 Further Reductions from Commercial Cooking Equipment ▪ FSM 11 – Magnet Source Rule ▪ FSM 12 – Wood Smoke ▪ FSM 13 – Energy Efficiency and Renewable Energy ▪ FSM 14 – Winery Fermentation ▪ FSM 15 – Composting Operations ▪ FSM 16 – Vanishing Oils and Rust Inhibitors ▪ FSM 17 – Ferry System Expansion ▪ FSM 18 – Greenhouse Gas Fee	The majority of the further study control measures apply to sources regulated directly by BAAQMD. Because BAAQMD is the implementing agency, new and existing sources of stationary and area sources in the Plan Area would be required to comply with these additional further study control measures in the 2010 Bay Area Clean Air Plan.

Source: Bay Area Air Quality Management District, 2011 Revised, *California Environmental Quality Act Air Quality Guidelines*.

Include Applicable Control Measures from the AQMP

One of the key principals of the proposed Plan is to encourage the efficient use of land through sustainable development patterns, a mixture of uses, and development intensities that support transit and walking. The proposed Plan would enhance existing roadways with sidewalks and pedestrian amenities and create new pedestrian, bicycle, and vehicle facilities to improve connectivity. In addition, the proposed Plan would create a clear, safe, and direct pathway to the proposed VTA light rail station and integrate it into the larger pedestrian network. The Plan Area would also include mixed use on the west side of Winchester Boulevard. As shown in Table 4.2-5, implementation of the proposed Plan would be consistent with the 2010 Bay Area Clean Air Plan, and the impacts due to inconsistency would be *less than significant*.

Disrupt or Hinder Implementation of any AQMP Control Measures

As identified in Table 4.2-6, the proposed Plan would not hinder BAAQMD from implementing the control measures in the 2010 Bay Area Clean Air Plan. Impacts are *less than significant*.

Regional Growth Projections for VMT and Population and Employment

Future development allowed by the proposed Plan would result in additional sources of criteria air pollutants. Growth accommodated within the Plan Area could occur throughout the 2040 buildout horizon. As a result, BAAQMDs approach to evaluating impacts from criteria air pollutants generated by a plan's long-term growth is done by comparing population and employment estimates to the VMT estimates. This is because BAAQMDs AQMP plans for growth in the SFBAAB are based on regional population and employment projections identified by ABAG and growth in VMT identified by VTA. Changes in regional, community-wide emissions in the Plan Area could affect the ability of BAAQMD to achieve the air quality goals in the AQMP. Consequently, air quality impacts for a plan-level analysis are based on consistency with the regional growth projections.

VMT estimates based on trip generation data provided by W-Trans and activity-based trip characteristics in CalEEMod Version 2013.2.2 were calculated for the proposed Plan. Table 4.2-7 compares the projected increase in service population with the projected increases in total VMT and per capita VMT.

Generally, land uses that reflect a more balanced jobs-housing ratio result in lower per capita VMT. As shown in this table, the proposed Plan would result in a 6 percent decrease in VMT per capita from existing conditions. Daily VMT in the Plan Area would increase at a lower rate (194 percent) than would the service population (213 percent) when compared to existing conditions. BAAQMDs AQMP requires that the VMT increase be less than or equal to the projected population increase from the proposed Plan (e.g., generate the same or less VMT per capita). In other words, BAAQMD requires that a proposed Plan be designed to ensure the same or lower VMT per capita compared to what is on the ground. Even though the proposed Plan would result in an increase in service population, the total VMT does not increase at the same rate, but rather a lower rate. As shown in Table 4.2-7, implementation of the proposed Plan would result in lower VMT per capita. Consequently, impacts would be *less than significant*.

Significance Before Mitigation: Less than significant.

TABLE 4.2-7 COMPARISON OF THE CHANGE IN SERVICE POPULATION AND VMT IN THE PLAN AREA

Category	Existing	Project	Change	Percent Change
Population	3,807	11,201	7,394	7260%
Employment	10	736	726	194%
Total Service Population (SP)	3,817	11,937	8,120	213%
VMT per Day	27,208,307	80,044,979	52,836,672	194%
VMT per SP per Day	19.6	18.4	-1.2	-6%

Notes: VMT is based on the CalEEMod Version 2013.2.2 and trip generation provided by W-Trans.

AIR-2 Implementation of the proposed Plan would violate an air quality standard or contribute substantially to an existing or projected air quality violation.

BAAQMD has identified thresholds of significance for criteria pollutant emissions and criteria air pollutant precursors, including ROG, NO, $PM_{10,}$ and $PM_{2.5}$. Development projects below the significance thresholds are not expected to generate sufficient criteria pollutant emissions to violate any air quality standard or contribute substantially to an existing or projected air quality violation. According to BAAQMDs CEQA Guidelines, long-range plans, such as the proposed Plan, present unique challenges for assessing impacts. Due to the SFBAABs nonattainment status for ozone and PM and the cumulative impacts of growth on air quality, these plans almost always have significant, unavoidable adverse air quality impacts.

Operational Emissions

An inventory of criteria air pollutants was generated for the proposed Plan since enough information regarding the buildout of the proposed Plan is available to identify the magnitude of emissions from buildout of the proposed Plan. Table 4.2-8 identifies the emissions associated with buildout of the proposed Plan.

One of the primary goals of the proposed Plan is to encourage the efficient use of land through sustainable development patterns, a mixture of uses, and development intensities that support transit and walking. The proposed Plan would also create clear, safe, and direct pathways to the proposed VTA Vasona light rail station, and integrate them into the larger pedestrian network. Connections from new private development and public streets to Los Gatos Creek Park and the planned VTA light rail station would impact the way that employees and residents move throughout the area. Roads would be safely shared between cars, bicyclists, and pedestrians. Publicly accessible pathways would be provided through new development in a cohesive

pedestrian and bicycle system. Sidewalk widening on Winchester Boulevard along the west side of the street would extend the pedestrian realm and provide a safer and more comfortable environment for pedestrians, bus shelters, and other features. New sidewalks are also envisioned on Hacienda Avenue, Dell Avenue, Vandell Way, Division Street, and the north side of Knowles Drive. Employee housing would provide options for employees to live close to their office. New development and public improvements are also encouraged to incorporate green design, including appliances requiring limited water and energy usage and building design that takes advantage of solar access and incorporates reused materials where possible.

However, as shown in Table 4.2-8, buildout of the proposed Plan would generate a substantial increase in criteria air pollutant emissions that exceeds the BAAQMD regional significance thresholds (ROG, NO_x, and PM_{10}). Criteria air pollutant emissions would be generated from on-site area sources (e.g., landscaping fuel, consumer products), vehicle trips generated by implementation of the proposed Plan, and energy use (e.g., natural gas used for cooking and heating). This is considered a *significant* impact because emissions from the proposed Plan would exceed BAAQMD's significance thresholds.

Construction Emissions

BAAQMDs plan-level guidelines do not require an evaluation of construction emissions for plan-level projects. There is no proposed development under the proposed Plan at this time. Future development proposals under the proposed Plan would be subject to separate environmental review pursuant to CEQA in order to identify and mitigate potential air quality impacts. Because the details regarding future construction activities are not known at this time—including phasing of future individual projects, construction duration and phasing, and preliminary construction equipment—construction emissions are evaluated qualitatively in accordance with BAAQMDs plan-level guidance. However, an estimate of the potential magnitude in construction-related criteria air pollutant emissions is provided based on CalEEMod defaults and a 5-year development timeline as shown in Table 4.2-9. Subsequent environmental review of development projects would also be required to assess potential impacts under BAAQMDs project-level thresholds based on site-specific construction phasing and buildout characteristics.

Construction emissions associated with individual development projects under the proposed Plan would increase criteria air pollutants and TACs. BAAQMD has developed project-level thresholds for construction activities. Subsequent environmental review of future development projects would be required to assess potential impacts under BAAQMDs project-level thresholds. Construction emissions from buildout of future projects in the Plan Area would primarily be 1) exhaust emissions from off-road diesel-powered construction equipment; 2) dust generated by demolition, grading, earthmoving, and other construction activities; 3) exhaust emissions from on-road vehicles; and 4) off-gas emissions of ROGs from application of asphalt, paints, and coatings.

Existing federal, State, and local regulations, and policies and strategies of the proposed Plan described throughout this section protect local and regional air quality. Continued compliance with these regulations would reduce construction-related impacts. However, fugitive dust (PM_{10} and $PM_{2.5}$) levels downwind of

TABLE 4.2-8 CRITERIA AIR POLLUTANT EMISSIONS FORECAST FOR THE PROPOSED PLAN

	Criteria Air Pollutants (Average Pounds/Day)			
Category	ROG	NO_x	PM_{10}	$PM_{2.5}$
Existing				
Area	38	<1	<1	<1
Energy	1	8	1	1
Mobile	28	49	80	22
Total	66	57	81	23
Total Tons per Year (tpy)	11	8	10	3
Proposed Plan				
Area	116	<1	1	1
Energy	2	14	1	1
Mobile	77	137	224	62
Total	195	151	226	64
Change from Existing Land Uses	129	94	146	41
BAAQMD Average Daily Project-Level Threshold	54	54	82	54
Exceeds Average Daily Threshold	Yes	Yes	Yes	No
Total Tons per Year (tpy)	32	22	30	9
Change from 2013 Land Uses	21	14	20	6
BAAQMD Annual Project-Level Threshold	10 tpy	10 tpy	15 tpy	10 tpy
Exceeds Annual Threshold	Yes	Yes	Yes	No

Note: Emissions may not total to 100 percent due to rounding.
Source: CalEEMod 2013.2.2 Based on 2035 emission rates.

TABLE 4.2-9 ESTIMATE OF CONSTRUCTION EMISSIONS ASSOCIATED WITH THE PROPOSED PLAN

	Criteria Air Pollutants (average pounds/day)			
Category	ROG	NO_x	Exhaust PM_{10}	Exhaust $PM_{2.5}$
Average Daily Construction Emissions – All Phases	44	100	3	3
BAAQMD Average Daily Project-Level Threshold	54	54	82	54
Exceeds Average Daily Threshold	No	Yes	No	No

Note: Emissions may not total to 100 percent due to rounding.
Source: CalEEMod 2013.2.2. Construction assumptions were based on CalEEMod defaults, which are based on construction surveys conducted by South Coast Air Quality Management District of construction equipment and phasing for comparable projects.

actively disturbed areas during construction or overlapping construction activities could violate air quality standards or contribute substantially to an existing or projected air quality violation and expose sensitive receptors to elevated concentrations of pollutants during construction activities. Consequently, impacts are *significant*.

Significance Before Mitigation: Significant.

AIR-3	**Implementation of the proposed Plan would result in a cumulatively considerable net increase of any criteria pollutant for which the project region is in nonattainment under an applicable federal or State ambient air quality standard (including releasing emissions that exceed quantitative thresholds for ozone precursors).**

This section analyzes potential impacts related to air quality that could occur from the buildout associated with the proposed Plan in combination with the regional growth in the air basin. The SFBAAB is currently designated a nonattainment area for California and National O_3, California and National $PM_{2.5}$, and California PM_{10} AAQS. At a plan level, air quality impacts are measured by the potential for a project to exceed BAAQMDs significance criteria and contribute to the State and federal nonattainment designations in the SFBAAB. Any project that produces a significant regional air quality impact in an area that is in nonattainment adds to the cumulative impact. The proposed Plan's contribution to cumulative air quality impacts is identified under the discussions in Impacts AIR-1 and AIR-2. The analyses in these sections identify whether the proposed Plan would conflict with the 2010 Bay Area Clean Air Plan (Impact AIR-1) or generate a substantial increase in criteria air pollutants (Impact AIR-2). Although the proposed Plan would not conflict with the 2010 Bay Area Clean Air Plan, it would generate a substantial increase in criteria air pollutant emissions from construction and operational activities. Consequently, cumulative regional air quality impacts are also *significant*.

Significance Before Mitigation: Significant.

AIR-4	**Implementation of the proposed Plan would expose sensitive receptors to substantial concentrations of air pollution.**

CO Hotspots

Areas of vehicle congestion have the potential to create pockets of CO, called hotspots. These pockets have the potential to exceed the State 1-hour standard of 20 parts per million (ppm) or the 8-hour standard of 9.0 ppm. Because CO is produced in the greatest quantities from vehicle combustion and does not readily disperse into the atmosphere, adherence to AAQS is typically demonstrated through an analysis of localized CO concentrations. Hotspots are typically produced at intersections, where traffic congestion is highest because vehicles queue for longer periods and are subject to reduced speeds.

One of the key principals of the proposed Plan is to encourage the efficient use of land through sustainable development patterns, a mixture of uses, and development intensities that support transit and walking. The proposed Plan would enhance existing roadways with sidewalks and pedestrian amenities, and create new pedestrian, bicycle, and vehicle facilities to improve connectivity. In addition, the proposed Plan would create a clear, safe, and direct pathway to the proposed VTA light rail station and integrate it into the larger pedestrian network. The proposed Plan would also create mixed-use on the west side of Winchester Boulevard. These objectives would ensure consistency with VTAs Congestion Management Program. In addition, the SFBAAB has been designated as achieving attainment under both the National and California AAQS for CO. Under existing and future vehicle emission rates, a project would have to increase traffic volumes at a single intersection by more than 44,000 vehicles per hour—or 24,000 vehicles per hour where vertical and/or horizontal mixing is substantially limited—in order to generate a significant CO impact.[33] Based on the traffic analysis conducted as part of this environmental analysis, described in Chapter 4.13, Transportation and Traffic, the proposed Plan would not increase traffic volumes at affected intersections by more than 44,000 vehicles per hour or 24,000 vehicles per hour where vertical and/or horizontal mixing is substantially limited. Trips associated with the proposed Plan would not exceed the screening criteria of the BAAQMD. Therefore, the proposed Plan would not have the potential to substantially increase CO hotspots at intersections in the Plan Area and vicinity. Localized air quality impacts related to mobile-source emissions would therefore be *less than significant*.

Toxic Air Contaminants

The proposed Plan would not create new major sources of TACs, that are more commonly associated with industrial manufacturing or warehousing. Non-residential (e.g., research and development and commercial and retail) land uses may generate small quantities of TACs (e.g., emergency generators, dry cleaners, and gasoline dispensing facilities). However, these small-quantity generators would require review by BAAQMD for permitted sources of air toxics, which would ensure health risks are below the BAAQMD thresholds.

However, the proposed Plan would introduce new sensitive land uses near existing sources of TACs. Regulation of land uses falls outside CARB jurisdiction (see Figure 4.2-2); however, CARB developed and approved the *Air Quality and Land Use Handbook: A Community Health Perspective* (2005) to provide guidance regarding the siting of sensitive land uses in the vicinity of freeways, distribution centers, rail yards, ports, refineries, chrome-plating facilities, dry cleaners, and gasoline-dispensing facilities. This guidance document was developed to assess compatibility and associated health risks when placing sensitive receptors near existing pollution sources.

CARBs recommendations on the siting of new sensitive land uses were based on a compilation of recent studies that evaluated data on the adverse health effects ensuing from proximity to air pollution sources. The key observation in these studies is that proximity to air pollution sources substantially increases both exposure and the potential for adverse health effects. There are three carcinogenic TACs that constitute the

[33] Bay Area Air Quality Management District (BAAQMD), 2011 (Revised). *CEQA Air Quality Guidelines*.

majority of the known health risks from motor vehicle traffic: DPM from trucks, and benzene and 1,3-butadiene from passenger vehicles. Table 4.2-10 shows a summary of CARB recommendations for siting new sensitive land uses in the vicinity of air-pollutant sources. CARBs recommendations presented in Table 4.2-10 are based on data that show that localized air pollution exposures can be reduced by as much as 80 percent by following CARB minimum distance separations.

Figure 4.2-2 identifies stationary sources of TACs mapped by BAAQMD within 1,000 feet of the Plan Area, as well as a 500-foot screening area around high-volume roadways, as follows:

- Stationary sources within 1,000 feet of the Plan Area were identified using BAAQMDs Stationary Source Screening Analysis Tool. There are approximately 20 potential stationary sources in or near the Plan Area—four auto body repair and refinishing facilities, three gas stations, one dry cleaner, and 12 industrial uses.[34]
- High-volume roadways with over 10,000 vehicles per day were also mapped based on the traffic projections from the traffic analysis prepared by W-Trans.[35] High volume roadways in the Plan Area and within 1,000 feet of the Plan Area that carry 10,000 vehicles per day or more include:
  - **Freeway:** Highway 17.
  - **High Volume Roadways:** Hacienda Avenue and Winchester Boulevard.

Because these are screening distances, refined analysis of the effects from many of the high volume roadways would likely show much lower potential TAC exposure and smaller buffer zones. In compliance with CEQA, a refined analysis or site-specific health risk assessment would be conducted for all new sensitive sources that are sited within these areas to determine the actual health impact.

Future projects within 1,000 feet of major sources of TACs would need to ensure that they could achieve BAAQMDs performance standards (greater or equal to 10 in 1 million [10E-06] cancer risk, greater or equal to 0.3 $\mu g/m^3$ $PM_{2.5}$, or a non-cancer hazard index greater or equal to 1.0). Consequently, mitigation is needed to ensure that existing sources of emissions do not pose a health risk to sensitive receptors at new projects within the Plan Area. Therefore, impacts are *significant*.

Significance Before Mitigation: Significant.

AIR-5	**Implementation of the proposed Plan would not create or expose a substantial number of people to objectionable odors.**

Sources of objectionable odors may occur within the city. BAAQMDs Regulation 7, Odorous Substances, places general limitations on odorous substances and specific emission limitations on certain odorous

[34] Based on information provided by BAAQMD, The Cabinet Shoppe, Inc., and M & M Auto House are no longer in operation.
[35] W-Trans, 2014. *Dell Avenue Area Plan Traffic Analysis Results*.

TABLE 4.2-10 CARB RECOMMENDATIONS FOR SITING NEW SENSITIVE LAND USES

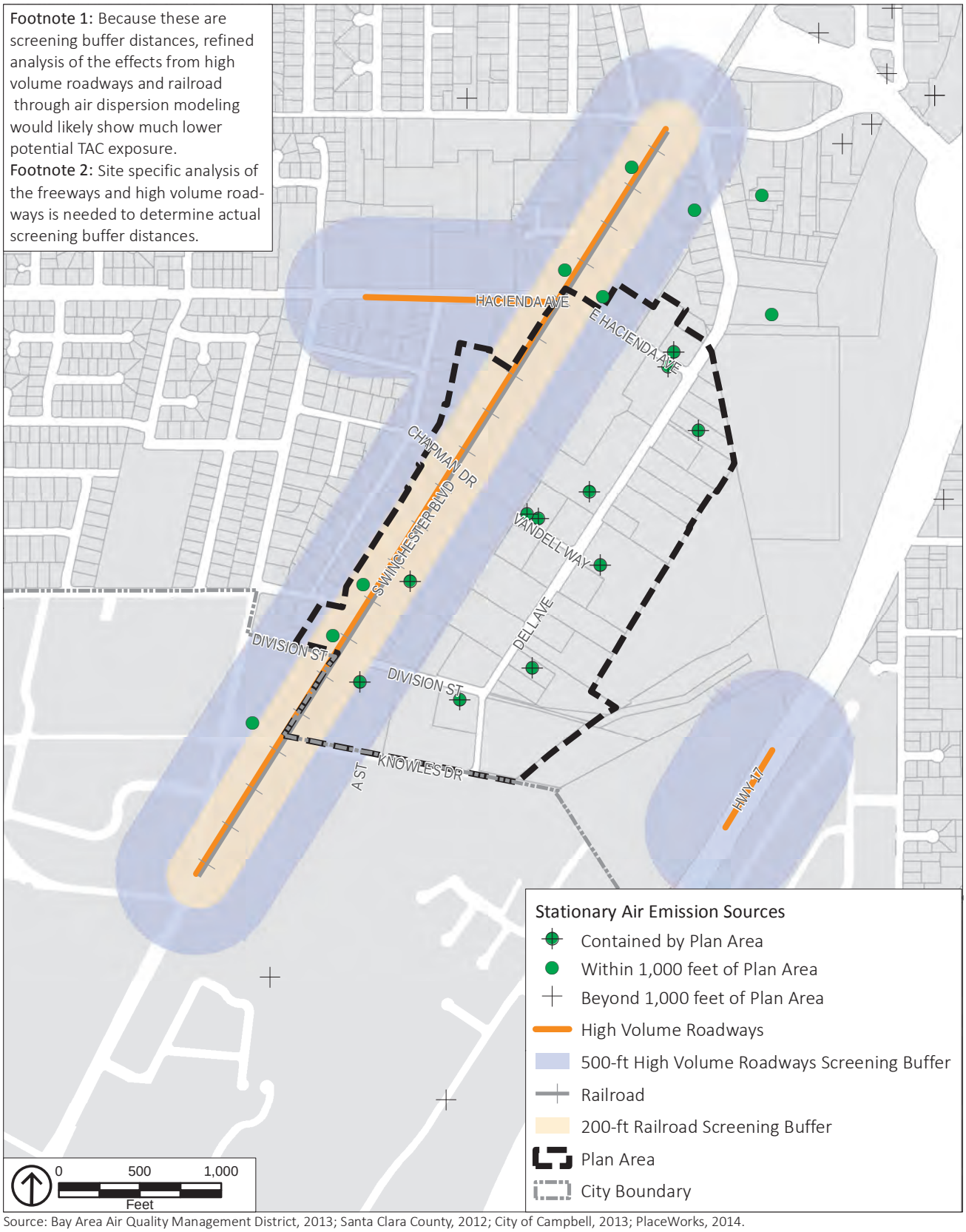
Source/Category	Advisory Recommendations
Freeways and High-Traffic Roads	Avoid siting new sensitive land uses within 500 feet of a freeway, urban roads with 100,000 vehicles per day, or rural roads with 50,000 vehicles per day.
Distribution Centers	Avoid siting new sensitive land uses within 1,000 feet of a distribution center (that accommodates more than 100 trucks per day, more than 40 trucks with operating transport refrigeration units [TRUs] per day, or where TRU unit operations exceed 300 hours per week). Take into account the configuration of existing distribution centers and avoid locating residences and other sensitive land uses near entry and exit points.
Rail Yards	Avoid siting new sensitive land uses within 1,000 feet of a major service and maintenance rail yard. Within 1 mile of a rail yard, consider possible siting limitations and mitigation approaches.
Ports	Avoid siting of new sensitive land uses immediately downwind of ports in the most heavily impacted zones. Consult local air districts or CARB on the status of pending analyses of health risks.
Refineries	Avoid siting new sensitive land uses immediately downwind of petroleum refineries. Consult with local air districts and other local agencies to determine an appropriate separation.
Chrome Platers	Avoid siting new sensitive land uses within 1,000 feet of a chrome plater.
Dry Cleaners Using Perchloroethylene	Avoid siting new sensitive land uses within 300 feet of any dry cleaning operation. For operations with two or more machines, provide 500 feet. For operations with three or more machines, consult with the local air district. Do not site new sensitive land uses in the same building with perchloroethylene dry cleaning operations.
Gasoline Dispensing Facilities	Avoid siting new sensitive land uses within 300 feet of a large gas station (defined as a facility with a throughput of 3.6 million gallons per year or greater). A 50-foot separation is recommended for typical gas dispensing facilities.

Source: California Air Resources Board (CARB), May 2005, *Air Quality and Land Use Handbook: A Community Health Perspective*.

compounds. In addition, odors are regulated under BAAQMD Regulation 1, Rule 1-301, Public Nuisance, which states that "no person shall discharge from any source whatsoever such quantities of air contaminants or other material which cause injury, detriment, nuisance or annoyance to any considerable number of persons or the public; or which endangers the comfort, repose, health or safety of any such persons or the public, or which causes, or has a natural tendency to cause, injury or damage to business or property." Under BAAQMDs Rule 1-301, a facility that receives three or more violation notices within a 30-day period can be declared a public nuisance.

There are two types of odor impacts: 1) siting sensitive receptors near nuisance odors, and 2) siting new sources of nuisance odors near sensitive receptors. Table 4.2-11 identifies screening distances from potential sources of objectionable odors in the SFBAAB. Odors from these types of land uses are regulated under BAAQMD Regulation 7, Odorous Substances.[36]

[36] While restaurants can generate odors, these sources are not identified by BAAQMD as nuisance odors since they typically do not generate significant odors that affect a substantial number of people. Larger restaurants that employ five or more people are subject to BAAQMD Regulation 7, Odorous Substances.



Source: Bay Area Air Quality Management District, 2013; Santa Clara County, 2012; City of Campbell, 2013; PlaceWorks, 2014.

Figure 4.2-2

Sources of Toxic Air Contaminants Proximate to the Dell Avenue Area Plan

Siting Receptors in Proximity to Odor Sources

Auto-repair uses within the Plan Area may generate odors from painting/coating operations. In addition, the Santa Clara Valley Water District's (SCVWDs) percolation ponds are proximate to the Plan Area. According to the SCVWD, percolation ponds may produce odors when SCVWD periodically drains the ponds.[37] BAAQMD was contacted to identify if any sources of odor within the city have received a confirmed odor complaint within the past year in order to evaluate whether a more detailed evaluation of a particular source within the Plan Area is necessary. A confirmed complaint means that the BAAQMD inspector was able to establish that a particular operation or combination of operations is the source of the odors by detecting the odors and tracing it to the source.[38] Based on data compiled by BAAQMD, there have been no confirmed odor complaints within the City of Campbell in the last year.[39] Therefore, no existing sources within the Plan Area are currently considered to generate nuisance odors. Buildout of the proposed Plan would result in conversion of the auto-repair facilities west of Winchester Boulevard to residential uses, which would further reduce the potential of odor complaints from painting/coating operations. Furthermore, BAAQMD Regulation 7, Odorous Substances, requires abatement of any nuisance generating an odor complaint. Therefore, because existing sources of odors are required to comply with BAAQMD Regulation 7, impacts to siting of new sensitive land uses would be *less than significant*.

Siting New Odor Sources

Implementation of the proposed Plan would not involve land uses that generate substantial odors such as from composting, green waste, and recycling operations; food processing; chemical manufacturing; and painting/coating operations. Minor odors may be generated from restaurants within the Plan Area; however, these uses do not typically generate substantial odors. BAAQMD requires operators of commercial charbroiler cooking operations to adhere to BAAQMD Regulation 6, Rule 2, Commercial Cooking Equipment. These types of facilities are required to install a catalytic oxidizer to reduce emissions. Furthermore, BAAQMD Regulation 7, Odorous Substances, requires abatement of any nuisance generating an odor complaint. Consequently, compliance with BAAQMD Regulation 7 would ensure that odor impacts are minimized and are *less than significant*.

Significance Before Mitigation: Less than significant

[37] Haggerty, Colleen, Associate Civil Engineer, Santa Clara Valley Water District, Community Projects Review Unit. Personal communication with City of Campbell, August 14, 2014.

[38] An unconfirmed complaint means that either the odor itself or the source of the odor could not be determined. An unconfirmed complaint is not considered indicative of an actual odor impact by BAAQMD. Bay Area Air Quality Management District (BAAQMD), 2010 (Revised 2011). *California Environmental Quality Act Air Quality Guidelines*.

[39] Reed, Rochelle, 2014. Bay Area Air Quality Management District, Public Records Section. Public Records Request – City of Campbell 2013.

TABLE 4.2-11 BAAQMD ODOR SCREENING DISTANCES

Land Use/Type of Operation	Screening Distance
Wastewater Treatment Plan	2 miles
Wastewater Pumping Facilities	1 mile
Sanitary Landfill	2 miles
Transfer Station	1 mile
Composting Facility	1 mile
Petroleum Refinery	2 miles
Asphalt Batch Plan	2 miles
Chemical Manufacturing	2 miles
Fiberglass Manufacturing	1 mile
Painting/Coating Operations	1 mile
Rendering Plant	2 miles
Coffee Roaster	1 mile
Food Processing Facility	1 mile
Confined Animal Facility/Feed Lot/ Dairy	1 mile
Green Waste and Recycling Operations	1 mile
Metal Smelting Plants	2 miles

Source: Bay Area Air Quality Management District (BAAQMD), 2011, *California Environmental Quality Act Air Quality Guidelines*, Table 3-3, Odor Screening Distances, and associated Appendix D of these Guidelines.

4.2.4 CUMULATIVE IMPACTS

AIR-6 Implementation of the proposed Plan would cumulatively contribute to air quality impacts in the San Francisco Bay Area Air Basin.

A project that exceeds the BAAQMD's significance criteria in the context of emissions from all other development projected within the entire SFBAAB would cumulatively contribute to impacts. As described under AIR-3, regional air quality impacts were identified as significant; therefore, in combination with past, present, and reasonably foreseeable projects, the proposed Plan would result in a significant cumulative

impact with respect to air quality, even with implementation of applicable regulations as well as Mitigation Measures described in Section 4.2.5 below. Therefore, the impact would be *significant*.

Significance Before Mitigation: Significant

4.2.5 SUMMARY OF SIGNIFICANT IMPACTS AND MITIGATION MEASURES

The proposed Plan would result in the following significant impacts to air quality.

AIR-2	**Implementation of the proposed Plan would violate an air quality standard or contribute substantially to an existing or projected air quality violation.**

Operational Emissions

Mitigation Measure AIR-2a: Applicant-provided appliances shall be Energy Star appliances (e.g., dishwashers, refrigerators, clothes washers, and dryers). Installation of Energy Star appliances shall be verified by the City of Campbell Building Division during plan check.

Mitigation Measure AIR-2b: Applicants, or their designee, for large non-residential development projects (e.g., employers with 50 employees at work site) shall establish an employee trip commute reduction program (CTR), in conformance with the Bay Area Air Quality Management District's Commuter Benefits Program (California Government Code Section 65081). The program shall offer one of the following commuter benefit options, or what is available through similar benefits at the time a development is proposed:

- Pre-tax benefit: Allow employees to exclude their transit or vanpooling expenses from taxable income, up to $130 per month.
- Employer-provided subsidy: Provide a subsidy to reduce or cover employees' monthly transit or vanpool costs, up to $75 per month.
- Employer-provided transit: Provide a free or low-cost transit service for employees, such as a bus, shuttle, or vanpool service.
- Alternative commuter benefit: Provide an alternative commuter benefit that is as effective in reducing single-occupancy commute trips as the options above.

The employer shall also provide information about other commute options and connect commuters for carpooling, ridesharing, and other activities. The CTR program shall identify alternative modes of transportation to the project site, including transit schedules, bike and pedestrian routes, and carpool/vanpool availability. Information regarding these programs shall be readily available to employees and clients and shall be posted in a highly visible location and/or made available online. The

project applicant shall consider the following additional incentives for commuters as part of the CTR program:

- Preferential carpool parking.
- Flexible work schedules for carpools.
- Telecommute and/or flexible work hour programs.
- Car-sharing program (e.g., Zipcar).
- Bicycle end-trip facilities, including bike parking, showers, and lockers.

The CTR program shall be prepared to the satisfaction of the Planning Division Manager prior to occupancy permits.

Significance After Mitigation: Significant and unavoidable.

Future development under the proposed Plan would result in a substantial long-term increase in criteria air pollutants over the 2040 buildout horizon or longer time frame. Criteria air pollutant emissions would be generated from on-site area sources (e.g., fuel used for landscaping equipment, consumer products), vehicle trips generated by the project, and energy use (e.g., natural gas used for cooking and heating). Mitigation measures identified above would minimize emissions to the extent feasible; however, there are no additional measures available to mitigate this impact due to the level of growth forecast in the proposed Plan. Operational emissions from future development would be determined during project-level CEQA review. The total criteria air pollutant emissions from operation of future development projects under the proposed Plan would be substantial and would contribute to increases in concentrations of air pollutants, which could contribute to ongoing violations of air quality standards. The identification of this Plan-level impact does not preclude the finding of less-than-significant impacts for subsequent projects that comply with BAAQMD screening criteria or meet applicable thresholds of significance. However, due to the programmatic nature of the proposed Plan, no additional mitigating policies are available, and the impact is considered to be *significant and unavoidable.*

Construction Emissions

Mitigation Measure AIR-2c: As part of the City's development approval process, the City shall require applicants for future development projects to comply with the current Bay Area Air Quality Management District's basic control measures for fugitive dust control, including:

- Water all active construction areas at least twice daily, or as often as needed to control dust emissions. Watering should be sufficient to prevent airborne dust from leaving the site. Increased watering frequency may be necessary whenever wind speeds exceed 15 miles per hour. Reclaimed water should be used whenever possible.
- Pave, apply water twice daily or as often as necessary to control dust, or apply (non-toxic) soil stabilizers on all unpaved access roads, parking areas, and staging areas at construction sites.

- Cover all trucks hauling soil, sand, and other loose materials or require all trucks to maintain at least 2 feet of freeboard (i.e. the minimum required space between the top of the load and the top of the trailer).
- Sweep daily (with water sweepers using reclaimed water if possible) or as often as needed all paved access roads, parking areas and staging areas at the construction site to control dust.
- Sweep public streets daily (with water sweepers using reclaimed water if possible) in the vicinity of the project site, or as often as needed, to keep streets free of visible soil material.
- Hydroseed or apply non-toxic soil stabilizers to inactive construction areas.
- Enclose, cover, water twice daily, or apply non-toxic soil binders to exposed stockpiles (dirt, sand, etc.).
- Limit vehicle traffic speeds on unpaved roads to 15 mph.
- Replant vegetation in disturbed areas as quickly as possible.

Significance After Mitigation: Significant and unavoidable.

While Mitigation Measure AIR-2c would require adherence to the current Bay Area Air Quality Management District's basic control measures for reducing fugitive dust and reduce fugitive emissions to less-than-significant levels, applicants for future development in the Plan Area could generate construction exhaust emissions in excess of the BAAQMD significance thresholds. An analysis of emissions generated from the construction of specific future projects under the proposed Plan would be required to evaluate emissions compared to BAAQMDs project-level significance thresholds during individual environmental review. The identification of this program-level impact does not preclude the finding of less-than-significant impacts for subsequent projects that comply with BAAQMD screening criteria or meet applicable thresholds of significance. However, due to the programmatic nature of the proposed Plan, no additional mitigation measures are available and the impact is considered *significant and unavoidable*.

AIR-3	**Implementation of the proposed Plan would result in a cumulatively considerable net increase of any criteria pollutant for which the project region is in nonattainment under an applicable federal or State ambient air quality standard (including releasing emissions that exceed quantitative thresholds for ozone precursors).**

Mitigation Measure AIR-3: Implement Mitigation Measures AIR-2a through AIR-2c.

Significance After Mitigation: Significant and unavoidable.

Criteria air pollutant emissions generated by land uses allowed by the proposed Plan would exceed the BAAQMD thresholds, as described above under Impact AIR-2. Air quality impacts identified in the

discussions of Impacts AIR-1 and AIR-2 constitute the proposed Plan's contribution to cumulative air quality impacts in the SFBAAB. Mitigation measures identified above to reduce Plan-related emissions would reduce impacts to the extent feasible. Due to the programmatic nature of the proposed Plan, no additional mitigation measures are available. Air pollutant emissions associated with the proposed Plan would result in a cumulatively considerable contribution to air quality impacts, and the Plan's impacts would be *significant and unavoidable*.

AIR-4	**Implementation of the proposed Plan would expose sensitive receptors to substantial concentrations of air pollution.**

Toxic Air Contaminants

Mitigation Measure AIR-4: Applicants of residential and other sensitive land use projects (e.g., hospitals, nursing homes, and day care centers) within 1,000 feet of a major sources of TACs (e.g., warehouses, industrial areas, freeways, and roadways with traffic volumes over 10,000 vehicle per day), as measured from the property line of the project to the property line of the source/edge of the nearest travel lane, shall submit a health risk assessment (HRA) to the City of Campbell prior to future discretionary project approval. The HRA shall be prepared in accordance with policies and procedures of the State Office of Environmental Health Hazard Assessment (OEHHA) and the Bay Area Air Quality Management District. The latest OEHHA guidelines shall be used for the analysis, including age sensitivity factors, breathing rates, and body weights appropriate for children age 0 to 16 years. If the HRA shows that the incremental cancer risk exceeds ten in one million (10E-06), $PM_{2.5}$ concentrations exceed 0.3 $\mu g/m^3$, or the appropriate non-cancer hazard index exceeds 1.0, the applicant will be required to identify and demonstrate that mitigation measures are capable of reducing potential cancer and non-cancer risks to an acceptable level (i.e., below ten in one million or a hazard index of 1.0), including appropriate enforcement mechanisms. Measures to reduce risk may include but are not limited to:

- Air intakes located away from high volume roadways and/or truck loading zones.
- Heating, ventilation, and air conditioning systems of the buildings provided with appropriately sized Maximum Efficiency Rating Value (MERV) filters.

Mitigation measures identified in the HRA shall be identified as mitigation measures in the environmental document and/or incorporated into the site development plan as a component of the proposed Plan. The air intake design and MERV filter requirements shall be noted and/or reflected on all building plans submitted to the City and shall be verified by the City's Planning Division.

Significance After Mitigation: Less than significant.

Placement of new sensitive receptors near major sources of TACs and $PM_{2.5}$ could expose people to substantial pollutant concentrations. Mitigation Measure AIR-4 would ensure that placement of sensitive receptors near major sources of air pollution would achieve the incremental risk thresholds established by BAAQMD, and impacts would be *less than significant*.

AIR-6	**Implementation of the proposed Plan would cumulatively contribute to air quality impacts in the San Francisco Bay Area Air Basin.**

Mitigation Measure AIR-6: Implement Mitigation Measures AIR-2a through AIR-2e.

Significance After Mitigation: Significant and unavoidable.

Criteria air pollutant emissions generated by land uses allowed by the proposed Plan would exceed the BAAQMD thresholds, as described above under Impact AIR-2. Air quality impacts identified in the discussions of Impacts AIR-1 and AIR-2 constitute the proposed Plan's contribution to cumulative air quality impacts in the SFBAAB. Mitigation measures identified above to reduce Plan-related emissions would reduce impacts to the extent feasible. At this time site plans are not available for individual projects that would be implemented as a result of the Dell Avenue Area Plan. Therefore, site-specific features that may be unique to a particular land use within the Dell Avenue Specific Plan are speculative and site-specific mitigation to reduce future project transportation and energy emissions cannot be formulated at this time. Likewise, construction timeframes and equipment for individual, site-specific projects are also not available. Due to the programmatic nature of the proposed Plan, no additional mitigation measures are available. Subsequent environmental review by the City of Campbell would ensure that air quality impacts are minimized based on site-specific/project-specific characteristics of the development proposal. Air pollutant emissions associated with the proposed Plan would result in a cumulatively considerable contribution to air quality impacts, and the Plan's impacts would be *significant and unavoidable*.

4.3 BIOLOGICAL RESOURCES

This chapter describes the regulatory framework and existing conditions in the Plan Area related to biological resources, and the potential impacts from implementation of the Dell Avenue Area Plan (proposed Plan) on biological resources.

4.3.1 ENVIRONMENTAL SETTING

4.3.1.1 REGULATORY FRAMEWORK

This section describes the federal, State, and local regulations that provide for the protection and management of sensitive biological resources.

Federal Regulations

The federal laws that regulate the treatment of biological resources include the Endangered Species Act, the Clean Water Act, and the Migratory Bird Treaty Act. The following sections outline the relevant principles of each.

Federal Endangered Species Act

The US Fish and Wildlife Service (USFWS) and National Oceanic and Atmospheric Administration, National Marine Fisheries Service (NOAA Fisheries) is responsible for implementation of the Federal Endangered Species Act (FESA) (16 United States Code [USC] Section 1531 *et seq.*). The Act protects fish and wildlife species that are listed as threatened or endangered, and their habitats. "Endangered" species, subspecies, or distinct population segments are those that are in danger of extinction through all or a significant portion of their range, and "threatened" species, subspecies, or distinct population segments are likely to become endangered in the near future.

If a listed species or its habitat is found to be affected by a project, then according to Section 7 of the FESA, all federal agencies are required to consult with USFWS and NOAA Fisheries. The purpose of consultation with USFWS and NOAA Fisheries is to ensure that the federal agencies' actions do not jeopardize the continued existence of a listed species, or destroy or adversely modify critical habitat for listed species.

Section 9 of the FESA prohibits the take of any fish or wildlife species listed as endangered, including the destruction of habitat that prevents the species' recovery. "Take" is defined as an action or attempt to hunt, harm, harass, pursue, shoot, wound, capture, kill, trap, or collect a species. Section 9 prohibitions also apply to threatened species unless a special rule has been defined with regard to taking at the time of listing.

Under Section 9 of the FESA, the take prohibition applies only to wildlife and fish species. However, Section 9 does prohibit the unlawful removal and reduction to possession, or malicious damage or destruction, of any endangered plant from federal land. Section 9 prohibits acts to remove, cut, dig up, damage, or destroy

an endangered plant species in non-federal areas in knowing violation of any State law or in the course of criminal trespass. Section 9 does not provide any protection for candidate species and species that are proposed or under petition for listing.

Federal Clean Water Act

The Federal Clean Water Act is administered by the US Environmental Protection Agency (US EPA) and the US Army Corps of Engineers (USACE). The USACE is responsible for regulating the discharge of fill material into waters of the United States, including lakes, rivers, streams, and their tributaries, as well as wetlands. Waters of the United States are defined in the Code of Federal Regulations (CFR) as waters susceptible to use in commerce, including interstate waters and wetlands, all other waters (intrastate waterbodies, including wetlands), and their tributaries (33 CFR 328.3). Wetlands are defined for regulatory purposes as areas "inundated or saturated by surface or ground water at a frequency and duration sufficient to support, and that under normal circumstances support a prevalence of vegetation typically adapted for life in saturated soil conditions."

The discharge of dredged or fill material into waters of the US is subject to permitting under Section 404 (Discharges of Dredge or Fill Material). Section 401 (Certification) specifies additional requirements for permit review, particularly at the State level. Project proponents must obtain a permit from the USACE for all discharges of dredged or fill material into waters of the United States, including wetlands, before proceeding with a proposed action. USACE permits must be certified by the State Water Resources Control Board, discussed below, in order to be valid. Thus, certification from the Board should be requested at the same time an application is filed with the USACE.

Certification from the California Regional Water Quality Control Board is also required when a proposed activity may result in discharge into navigable waters, pursuant to Section 401 of the Clean Water Act and the US EPA 404(b)(1) Guidelines.

Migratory Bird Treaty Act

The Migratory Bird Treaty Act (MTBA) (16 USC 703 et seq.) governs the taking, killing, possession, transportation, and importation of migratory birds, their eggs, parts, and nests. Moreover, the MBTA prohibits the take, possession, import, exports, transport, selling, purchase, barter, or offering for sale, purchase or barter, any migratory bird, their eggs, parts, nests, except as authorized under a valid permit (50 CFR 21.11).

State Regulations

The most relevant State laws regulating biological resources are the California Endangered Species Act, California Fish and Game Code, California Native Plant Protection Act, and Porter-Cologne Water Quality Control Act, each of which is described below.

California Endangered Species Act

The California Endangered Species Act (CESA) (California Fish and Game Code Section 2050 *et seq.*) establishes State policy to conserve, protect, restore, and enhance threatened or endangered species and their habitats. The CESA mandates that State agencies should not approve projects that jeopardize the continued existence of threatened or endangered species if reasonable and prudent alternatives are available that would avoid jeopardy. For projects that would affect a species that is on the federal and State lists, compliance with the FESA satisfies the CESA if the California Department of Fish and Wildlife (CDFW) determines that the federal incidental take authorization is consistent with the CESA under California Fish and Game Code Section 2080.1. For projects that would result in the taking of a species that is only State listed, the project proponent must apply for a take permit under Section 2081(b).

California Fish and Game Code

Under the California Fish and Game Code, the CDFW provides protection from take for a variety of species. The CDFW also protects streams, water bodies, and riparian corridors through the Streambed Alteration Agreement process under Section 1601 to 1606 of the California Fish and Game Code. The California Fish and Game Code stipulates that it is "unlawful to substantially divert or obstruct the natural flow or substantially change the bed, channel or bank of any river, stream or lake" without notifying the Department, incorporating necessary mitigation, and obtaining a Streambed Alteration Agreement. CDFWs jurisdiction extends to the top of banks and often includes the outer edge of riparian vegetation canopy cover.

California Fish and Game Code Sections 1600 through 1616 regulate development to avoid and mitigate impacts or modification to rivers, streams, or lakes. Modification is defined as diverting or obstructing the natural flow of, or substantially changing or using any material from, the bed, channel, or bank of, any river, stream, or lake.

California Fish and Game Code Section 3503.5 prohibits take, possession, or destruction of any raptor (bird of prey species in the orders Falconiformes and Strigiformes), including their nests or eggs. Violations of this law include destruction of active raptor nests as a result of tree removal and disturbance to nesting pairs by nearby human activity that causes nest abandonment and reproductive failure.

California Native Plant Protection Act

The California Native Plant Protection Act of 1977 prohibits importation of rare and endangered plants into California, take of rare and endangered plants, and sale of rare and endangered plants. The CESA defers to the California Native Plant Protection Act, which ensures that State-listed plant species are protected when State agencies are involved in projects subject to the California Environmental Quality Act (CEQA). In this case, plants listed as rare under the California Native Plant Protection Act are not protected under the CESA, but rather under CEQA.

The California Native Plant Society (CNPS) is a non-governmental conservation organization that has developed a list of plants of special concern in California. The following explains the designations for each plant species:[1]

- List 1A – Considered to be extinct
- List 1B – Considered rare, threatened, or endangered in California and elsewhere
- List 2 – Considered rare, threatened, or endangered in California, but is more common elsewhere
- List 3 – CNPS lacks necessary information to determine if it should be assigned to a list
- List 4 – Limited distribution in California

Porter-Cologne Water Quality Control Act

The Porter-Cologne Water Quality Control Act authorizes the Regional Water Quality Control Board (RWQCB) to regulate the discharge of waste that could affect the quality of the State's waters. The term "Waters of the State" is defined by the Porter-Cologne Act as "any surface water or groundwater, including saline waters, within the boundaries of the State." Projects that do not require a federal permit may still require review and approval by the RWQCB. The RWQCB focuses on ensuring that projects do not adversely affect the "beneficial uses" associated with waters of the State. In most cases, the RWQCB requires the integration of water quality control measures into projects that will require discharge into waters of the State. For most construction projects, the RWQCB requires the use of construction and post-construction Best Management Practices (BMPs).

Regional Regulations

Habitat Conservation Plan

The Santa Clara Valley Habitat Plan (SCVHP) was prepared by Santa Clara County and a number of participating local agencies (Local Partners) with the intent of providing a framework to protect, enhance, and restore natural resources in specific areas of the county, while improving and streamlining the environmental permitting process for impacts on threatened and endangered species. Participating entities include: the County of Santa Clara, City of San Jose, City of Morgan Hill, City of Gilroy, Santa Clara Valley Water District, and Santa Clara Valley Transportation Authority. The City of Campbell is not a participating Local Partner, but the Santa Clara Valley Water District's (SCVWDs) facilities within the city limits, including percolation ponds, the Los Gatos County Park, and Los Gatos Creek and Trails, are part of the SCVHPs study area. Within the Plan Area, the SCVWDs desilting ponds, located between Dell Avenue and the SCVWD percolation ponds, are under the SCVHPs jurisdiction, as shown in Figure 3-2 of Chapter 3, Project Description, of the Draft EIR.[2]

[1] California Native Plant Society, 2014. *The California Native Plant Society Ranking System,* http://www.cnps.org/cnps/rareplants/ranking.php, accessed December 10, 2014.

[2] Santa Clara Valley Habitat Agency Geobrowser, http://www.hcpmaps.com/habitat/, accessed on August 8, 2014.

Santa Clara Valley Habitat Plan

SCVHP was prepared by Santa Clara County and a number of participating local agencies (Local Partners) with the intent of providing a framework to protect, enhance, and restore natural resources in specific areas of the county, while improving and streamlining the environmental permitting process for impacts on threatened and endangered species. Participating entities include the County of Santa Clara, City of San Jose, City of Morgan Hill, City of Gilroy, Santa Clara Valley Water District, and Santa Clara Valley Transportation Authority.[3] In addition to restoring natural resources in specific areas in Santa Clara County, the SCVHP evaluates impacts to natural resources and provides comprehensive mitigation requirements that are effective for at-risk species and their supporting habitats. Further, the SCVHP includes conservation measure to protect 18 species that were identified as listed or that could become listed within the SCVHP study area. Species were selected based on their potential to be affected by covered activities, likelihood of occurrence within the study area, the adequacy of data for the species, and the species' current or foreseeable listing status.[4] Species covered under the SCVHP include: Bay checkerspot butterfly, California tiger salamander, California red-legged frog, foothill yellow-legged frog, western pond turtle, western burrowing owl, Least Bell's Vireo, tricolored blackbird, San Joaquin kit fox, Tiburon Indian paintbrush, Coyote ceanothus, Mount Hamilton thistle, Santa Clara Valley dudleya, fragrant fritillary, Loma Prieta hoita, smooth lessingia, Metcalf Canyon jewelflower, and most beautiful jewelflower.

The City of Campbell is not a participating Local Partner, but the Santa Clara Valley Water District's (SCVWDs) facilities within the city limits, including the percolation ponds, the Los Gatos County Park, and Los Gatos Creek and Trails, are part of the SCVHPs study area. Within the Plan Area, the SCVWDs desilting ponds located between Dell Avenue and the percolation ponds, are under the SCVWDs jurisdiction, as shown in Figure 3-2 of the Project Description.

Santa Clara Valley Water Resources Protection Collaborative Guidelines and Standards for Land Use near Streams

On October 24, 2006, the SCVWD adopted the Water Resources Protection Ordinance (Ordinance 06-1).[5] Beginning on February 28, 2007, this ordinance established the policy through which the SCVWD issues permits for modifications, entry, use, or access to SCVWD facilities or easements. This Ordinance was adopted following the creation of the Guidelines and Standards for Land Use near Streams: A Manual of Tools, Standards, and Procedures to Protect Streams and Streamside Resource in Santa Clara County (Guidelines and Standards) by the Santa Clara Valley Water Resources Protection Collaborative (Collaborative). The Collaborative includes the SCVWD and representatives from the County of Santa Clara, the 15 cities within the county, the Guadalupe-Coyote Resource Conservation District, the San

[3] Santa Clara Valley Habitat Conservation Plan, 2012, Figure 1-1.

[4] Santa Clara Valley Habitat Plan, 2012, page ES-3.

[5] Santa Clara Valley Water District, 2006. Water Resource Protection Ordinance 06-1, http://www.valleywater.org/uploadedFiles/Programs/BusinessInformationPermits/Permits/Ordinance071213%281%29.pdf, accessed August 27, 2014.

Francisco Bay Regional Water Quality Control Board, and representatives of various community interests.[6] The Collaborative members share the water and watershed resources protection goals of flood management, drinking water quality and adequate quantity, surface and groundwater quality and quantity, and habitat protection and enhancement throughout the county. In 2008, the City of Campbell adopted the Guidelines and Standards for Land Use near Streams per the City's resolution No. 10952.

A property that is adjacent to a stream or located within 50 feet of the top of the bank is considered a Streamside Protection Area and is subject to the Guidelines and Standards. In the southeastern corner of the Plan Area, the properties abutting the Los Gatos Creek fall into the Streamside Protection Area.

Land use activities that are exempt from the Guidelines and Standards include:

- Less than 3 cubic yards of earthwork.
- Interior building construction and alterations.
- Erection of storage buildings not greater than 120 square feet.
- Replacement of sewer or water laterals.
- Re-roofing.
- Wood fences 6 feet and height or less.
- Exterior decks less or equal to 30 inches above grade (decks or pathways should not overhang or extend beyond the creek bank).

All other land use activities are subject to guidelines and standards described in Chapter 3 of the Guidelines and Standards. Chapter 3 addresses the following issues: riparian corridor protection, bank stability/streambed conditions, encroachments on the top of a bank, erosion prevention and repair, grading, outfalls, pump stations and site drainage, channelization, utility encroachments, trail construction, septic systems, trash control and removal, protection of water quality, groundwater protection, and flood protection. In particular, *Guideline I.G., Land Uses Next to Riparian Corridors/Streams*, requires avoiding loading docks, trash enclosures, chemical storage areas, stationary noise producing mechanical equipment, new paved areas, active recreational areas, agricultural growing areas, and grazing activities within riparian corridors. *Guideline I.H., Light*, requires avoiding bright colors and glossy or glare-producing building finishes on structures facing the stream or riparian areas and keeping direct lighting away from riparian corridor and maximize distance of lighting from riparian corridor. Chapter 4 of the Guidelines and Standards provides vegetation guidelines to protect native riparian plants, including establishing a buffer area between development and the border of the riparian zone where feasible.

[6] Santa Clara Valley Water Resources Protection Collaborative, 2007. Guidelines and Standards for Land Use Near Streams: A Manual of Tools, Standards, and Procedures to Protect Streams and Streamside Resource in Santa Clara County.

Local Regulations

City of Campbell General Plan

The City of Campbell outlines various goals and policies in its General Plan relevant to biological resources in the Plan Area. Many of these goals and implementation measures appear in the Open Space, Parks, and Recreation Element, as well as the Conservation and Natural Resources Element. These relevant goals and policies are listed in Table 4.3-1.

TABLE 4.3-1 CITY OF CAMPBELL GENERAL PLAN GOALS, POLICIES, AND STRATEGIES PERTAINING TO BIOLOGICAL RESOURCES

Goal/Policy/ Strategy Number	Goal/Policy/Strategy Text
Open Space, Parks, and Public Facilities Element	
Goal OSP-9	*Properly functioning storm drainage system.*
Policy OSP-9.1	Drainage Facilities. Ensure that drainage facilities convey storm runoff without polluting local watercourses.
Conservation and Natural Resources Element	
Goal CNR-3	*Protect and maintain animal and plant species and supporting habitats within Campbell.*
Policy CNR-3.1	Riparian Corridor Preservation. Preserve the aesthetic and habitat value of riparian corridors.
Goal CNR-4	*Healthy, attractive, and well-maintained trees in the City.*
Policy CNR-4.1	Plant additional trees to maintain and enhance the City's suburban forest.

Source: City of Campbell General Plan, 2001.

City of Campbell Municipal Code

Watercourses

The City of Campbell Municipal Code contains all ordinances for the City relevant to biological resources. Chapter 14.02 of Campbell's Municipal Code defines a "watercourse" as natural waterways and definite channels and depressions in the earth that carry water, even though such waterways may only carry water during rains and storms and may not carry stormwater during all times and seasons. Watercourses include facilities owned and operated by the Santa Clara Valley Water District.[7] The Municipal Code outlines various acts that aim to protect watercourses, and require the acquisition of a permit; unless a written permit has first been obtained from the City or designated agent, no person shall commit the following acts:

[7] City of Campbell, *Campbell California Code of Ordinances,* accessed July 28, 2014.

- Discharge into or connect any pipe or channel to a watercourse;
- Modify the natural flow of water in a watercourse;
- Carry out development within a setback designed in whole or in part to protect a watercourse;
- Deposit in, plant in, or remove any material from a watercourse, including its banks, except as required for necessary maintenance;
- Construct, alter, enlarge, connect to, change or remove any structure in a watercourse; or
- Place any loose or unconsolidated material along the side of or within a watercourse or so close to a side as to cause a diversion of the flow, or to cause a probability of such material being carried away by stormwater passing through such watercourse.

Tree Protection

The City also recognizes the aesthetic, environmental, and economic significance of its tree population in the Municipal Code. Chapter 21.32 establishes policies and standards to protect and manage trees on private property to ensure that development is compatible with and enhances the small town quality and character of Campbell.[8] For purposes of the ordinance, a tree is defined as a woody or perennial plant characterized by having a main stem or trunk or a multi-stemmed trunk system with a more or less definitely formed crown, and is usually over ten feet high at maturity.[9] The following types of trees are classified as protected trees and shall not be removed from private property without a tree removal permit:

- Heritage trees designated in compliance with Municipal Code section 21.32.130 (Heritage tree designations); and
- Any tree shown on an approved landscaping plan or required to be planted or retained as a condition of approval of a development application, building permit, or tree removal permit;
- Any tree or multi-trunk tree on a commercial, industrial, multi-family residential, or undeveloped single-family residential property in any zoning district, with at least one trunk measuring 12 inches or greater in diameter (thirty-eight inches or greater in circumference), measured 4 feet above the adjacent grade; or
- Any tree or multi-trunk tree on a developed single-family residential property, with at least one trunk measuring 12 inches or greater (38 inches or greater in circumference) of the following species: Oak (*Quercus*), Redwood (*Sequoia*), Cedar (*Cedrus*), or Ash (*Fraxinus*).

[8] City of Campbell, *Campbell California Code of Ordinances*, accessed July 28, 2014.
[9] City of Campbell, *Campbell California Code of Ordinances,* accessed July 28, 2014.

4.3.1.2 EXISTING CONDITIONS

The City of Campbell is bounded by the City of San Jose to the north, east, and west, and by the City of Los Gatos to the south. The Plan Area is located in a highly urbanized area in the southeast corner of the City of Campbell. As a result, the natural biological habitat has been substantially altered over the last century. Although native vegetation was altered long ago for agricultural purposes, the city provides habitat for species commonly associated with suburban areas. In general, environmental habitat areas in the City of Campbell can be found in either urbanized portions of the city, or along the city's creek system and percolations ponds.

Plant Communities

Urbanized Campbell

Ornamental landscaping has been planted throughout the city, including the Plan Area. Most species used in landscaping are non-native ornamentals, consisting of a wide variety of tree, shrub, groundcover, and turf species. In general, the city has seen a significant loss of native wildlife habitat due to replacement of natural communities, fragmentation of remaining open space areas, and intensive human disturbance. Nevertheless, trees and shrubs used for landscaping provide nest sites and cover for wildlife adapted to urbanized areas.

Creeks and Percolation Ponds

The City of Campbell is bisected by two creeks that meander in a north-south direction: the Los Gatos Creek and the San Tomas Aquino Creek. San Tomas Aquino Creek is located approximately 2 miles west of the Plan Area. Los Gatos Creek is located just west of Highway 17; a portion of the creek runs just outside of the Plan Area. Los Gatos Creek not only provides habitat for biological resources, but is important for wildlife movement in general. Los Gatos Creek supports some native vegetation typically associated with riparian corridors, including Sycamore trees (*Platanus recmosa*), willow (*Salix* spp.), and other ornamental trees and shrubs. Grasses include but are not limited to wild oats (*Avena* spp.), rigput brome (*Bromus diandrus),* and fescue (*Vulpia* spp.).[10]

The eastern edge of the Plan Area, west of the percolation ponds, includes an engineered channel, but it is unlikely that rare plants would occur here. However, the drainage may be considered waters of the US and State under Sections 401 and 404 of the CWA and may be considered a stream under Section 1600 of the CDFW code.

In addition, several percolation ponds located adjacent to the Plan Area are maintained by the SCVWD and recharge the regional groundwater basin. In general, the Plan Area has only limited wildlife habitat values due to the replacement of natural communities, fragmentation of remaining open space areas, and intensive

[10] City of Campbell, 2001. *Campbell General Plan Environmental Impact Report, July 2001*, page 134.

human disturbance. Nevertheless, trees and shrubs along the engineered channel and near the percolation ponds provide possible nesting substrate for birds and cover for wildlife adapted to developed areas.

Wildlife Species

In general, the Plan Area has only limited wildlife habitat values due to the replacement of natural communities, fragmentation of remaining open space areas, and intensive human disturbance. Nevertheless, trees and shrubs used for landscaping provide possible nesting substrate for birds and cover for wildlife adapted to developed areas. Typical native bird species include: mourning dove, scrub jay, northern mockingbird, American robin, northern flicker, brown towhee, and American kestrel. Introduced species include: rock dove, European starling, house finch, and house sparrow. Urban areas also provide habitat for several species of native mammals, such as the California ground squirrel, raccoon, and striped skunk, as well as the introduced eastern fox squirrel. Introduced pest species, such as the Norway rat, house mouse, and opossum could also occur in the Plan Area.

Wildlife species associated with the engineered channel and percolation ponds just outside of the Plan Area include the Pacific tree frog (*Hyla regilla)*, bullfrog *(Rana catesbeiana)*, and western toad (*Bufo boreas).* Birds found along these waterways include mallard *(Anas platyrhynchos),* American coot *(Fulica Americana),* and belted kingfisher (*Ceryle alcyon)*.[11]

Habitat Connectivity

The spatial arrangement of habitat and barriers affects the location, movement patterns, foraging dynamics, and persistence of plant and animal species.[12] The extent of urbanization limits opportunities for movement and dispersal of native wildlife and plant species through the city. Common urban features such as roadways, rail lines, fencing, buildings, and hardscape represent barriers to wildlife movement and dispersal. In general, riparian corridors provide the best opportunity for plant and animal migration throughout the city. However, there are no such riparian corridors within or adjoining the Plan Area.

Special Status Species and Communities

Special-status plants include those listed as "Endangered," "Threatened," or "Candidate for Listing" by the CDFW or USFWS; those included in the California Rare Plant Rank; or those considered special status in local or regional plans, policies, or regulations. Special-status animals include those listed as "Endangered," "Threatened," or "Candidate for Listing" by the CDFW or USFWS; those designated as "Watch List," "Species of Special Concern," or "Fully Protected" by the CDFW; or those considered "Birds of Conservation Concern" by the USFWS.

[11] City of Campbell, 2001. *Campbell General Plan Environmental Impact Report, July 2001*, page 134.

[12] Malcolm L. Hunter, 1999. *Maintaining Biodiversity in Forest Ecosystems.* Cambridge University Press, books.google.com, accessed July 28, 2012.

The California Natural Diversity Database (CNDDB) compiles inventories of known occurrences of rare plants and animals for a variety of purposes, including to provide data to government agencies and to assist in environmental review, such as that required by CEQA.[13] In general, the highly urbanized character of the Plan Area, coupled with the predominance of hardscape surfaces and ornamental plantings, offers limited potential for habitat that supports special-status species; however, a search of the CNDDB, together with other relevant information, indicates that some occurrences of plant and animal species with special status have been recorded or are suspected to occur within a 5-mile radius of the Plan Area, as shown in Figure 4.3-1.

Plant Species

Based on review of the CNDDB, as shown on Table 4.3-2, 13 special-status plant species are known to occur within a 5-mile radius of the Plan Area: Congdon's tarplant (*Centromadia parryi* ssp.*congdonii*), Indian Valley bush-mallow (*Malacothamnus aboriginum*), Loma prieta hoita (*Hoita strobilina*), San Francisco collinsia (*Collinsia multicolor*), Santa Clara dudleya (*Dudleya setchellii*), Santa Clara Red Ribbons (*Clarkia concinna ssp. automixa*), arcuate bush-mallow (*Malacothamnus arcuatus*), hairless popcornflower (*Plagiobothrys glaber*), most beautiful jewelflower (*Streptanthus albidus* ssp. *paramoenus*), robust spineflower (*Chorizanthe robusta* var. *robusta)*, saline clover (*Trifolium hydrophilum)*, smooth lessingia (*Lessingia micradenia* var. *glabrata*), and woodland woollythreads (*Monolopia gracilens*). The General Plan EIR lists the following four special-status plant species as occurring in the City of Campbell: alkai milkvetch (*Astragalus tener* var. *tener),* Congdon's tarplant (*Centromadia parryi* ssp. Congdonni), Contra Costa goldfields (*Lasthenia conjugens)*, and fragrant fritillary (*Fritillaria lilacea*). Of these four plant species, Congdon's Tarplant is the only species found within a 5-mile radius of the Plan Area. Table 4.3-2 provides information on the name, status, and known habitat of these special-status plant species. Due to the severe degradation of habitat for special-status plant species, it is unlikely that the species listed above could occur in the Plan Area.

Animal Species

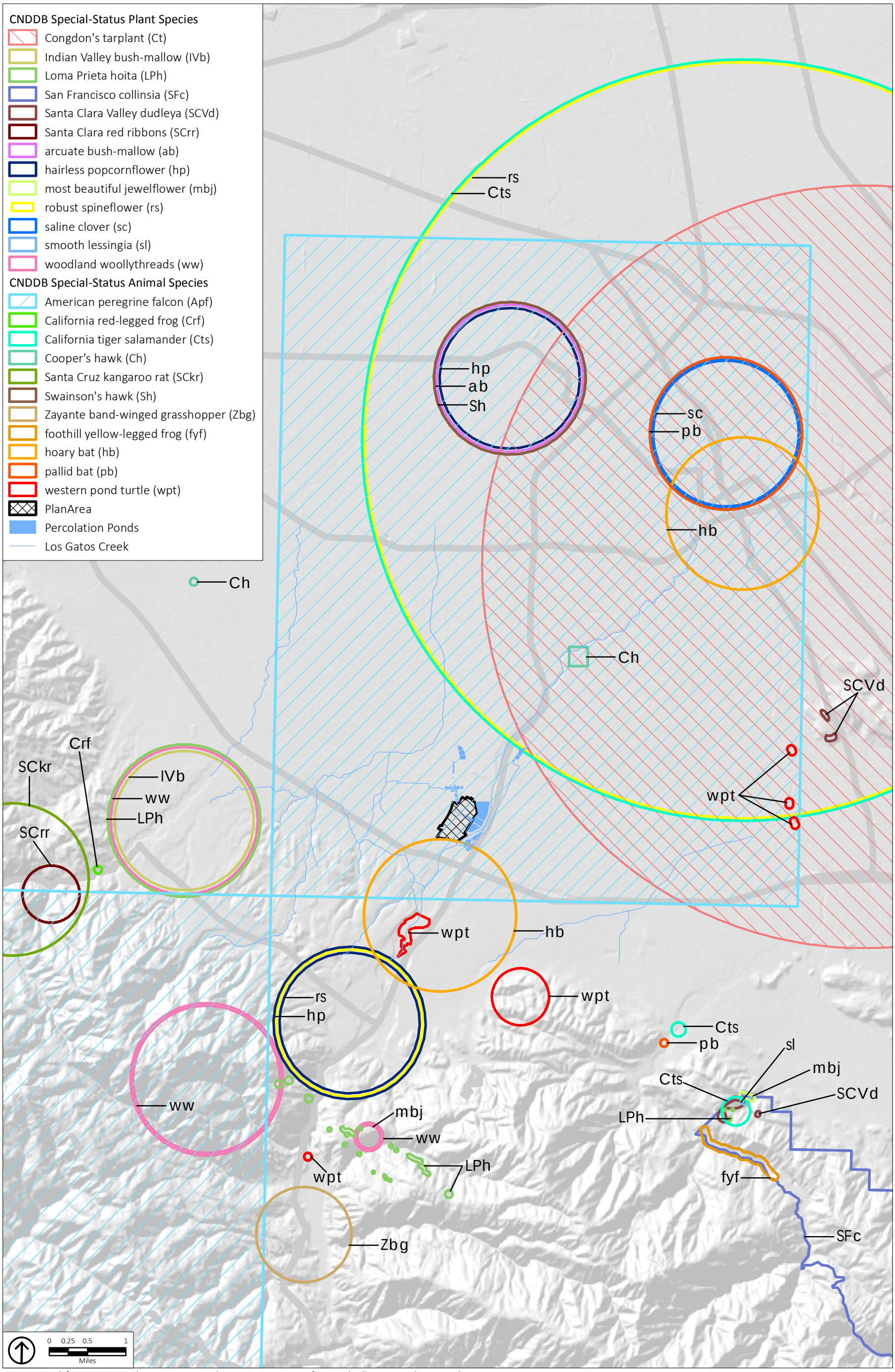
Based on a review of the CNDDB and as shown on Table 4.3-3, 11 special-status animal species are known to occur within a 5-mile radius of the Plan Area including: American peregrine falcon (*Falco peregrinus anatum*), California red-legged frog (*Rana draytonii*), California tiger salamander (*Ambystoma californiense*), Cooper's hawk (*Accipiter cooperi*), Santa Cruz kangaroo rat (*Dipodomys venustus venustus*), Swainson's hawk (*Buteo swainsoni*), Zayante band-winged grasshopper (*Trimerotropis infantilis*), foothill yellow-legged frog (*Rana boylii*), hoary bat (*Lasiurus cinereus*), pallid bat (*Antrozous pallidus*), and western pond turtle (*Emys marmorata*). Based on a records search of the CNDDB, five special-status wildlife species are potentially present in, or in the vicinity of, Los Gatos Creek: central California coho salmon (*Oncorhynchus kisutch*), central California coast steelhead (*O. mykisss irideus*), California red-legged frog (*Rana aurora*), western pond

[13] California Department of Fish and Wildlife, *California Natural Diversity Database*, http://www.dfg.ca.gov/biogeodata/cnddb/, accessed on July 29, 2014.

TABLE 4.3-2 SPECIAL-STATUS PLANT SPECIES KNOWN OR SUSPECTED TO OCCUR IN PLAN VICINITY

Species	Status State/Federal/ CNPS	Preferred Habitat
Congdons tarplant *Centramadia parryi* ssp. *congonii*	--/--/1B.1	Grassland. Elevation 3.2- 736 feet. Blooms June –November.
Indian Valley Bush Mallow *Malacothamnus Aboriginum*	--/--/1B.2	Montane Chapparal and lower Montane Coniferous Forest. Grow in minor rocky outcrops within relatively diverse chaparral flora.
Loma Prieta Hoita *Hoita Strobilina*	--/--/1B.1	Openings in chapparal or oak woodland, serpentine, or related Franciscan-formation substrata, and descending in gravelly creekbed draining from mountains into Santa Clara Valley. Blooms: May – October.
San Francisco Collinsia *Collinsia Multicolor*	--/--/1B.2	Shaded understory of coast live oak woodland or mixed forest in sheltered, canyon bottom settings. Blooms: March – May.
Santa Clara Dudleya *Dudleya Setchellii*	--/FE/1B.1	Limited to rocky outcrops within serpentine grasslands and oak woodlands between 300-900 feet in Greater Coyote Valley of Santa Clara County.
Santa Clara Red Ribbons *Clarkia concinna ssp. automixa*	--/--/4.3	Low-elevation mountains of the northern part of the state. Blooms: May-June.
Arcuate Bush Mallow *Malacothamnus arcuatus*	--/--/1B.2	Chapparal. Blooms: April – July.
Hairless Popcornflower *Plagyiobothrys glaber*	--/--/1A	Meadows and seeps with alkaline soils, coastal salt marshes and swamps.
Most Beautiful Jewelflower *Streptanthus albidus* ssp. *paramoenus*	--/--/1B.2	Grasslands dominated by native perennial grasses or in non-native grassland with relatively low cover between 360 to 3,280 feet.
Robust Spineflower *Chorizanthe robusta var. robusta*	--/FE/1B.1	Restricted to sandy soils along the coast and near-coastal areas in Santa Cruz County.
Saline Clover *Trifolium hydrophilum*	--/--/1B.2	Marshes and Swamps; valley and foothill grassland (mesic, alkaline); vernal pools. 0-300m Blooms: April – June.
Smooth Lessingia *Lessingia micradenia var. glabrata*	--/--/1B.2	Chaparral and Cismontane woodland. Blooms: July – November.
Woodland Woollythreads *Monolopia gracilens*	--/--/1B.2	Broadleafed upland forest, chaparral openings, cismontane woodland, and valley and foothill grassland with serpentine soils. 325-3940 feet. Blooms: March – May.

Status Explanations:
Designations
FE Listed as endangered by the federal government.
ST Listed as threatened under the California Endangered Species Act
CNPS Designations
List 1 CNPS Plant of highest priority.
List 1A CNPS Plants presumed extinct in California.
List 1B CNPS Plants rare and endangered in California and elsewhere.
R (Rarity)
1. Rare, but found in sufficient numbers and distributed widely enough that the potential or extinction or extirpation is low at this time.
2. Occurrence confined to several populations or to one extended population.
3. Occurrence limited to one or a few highly restricted populations, or present in such low numbers that it is seldom reported.
Source: California Natural Diversity Database, 2014.



Source: California Natural Diversity Database, 2008; City of Campbell, 2014; PlaceWorks, 2014.

Figure 4.3-1
Special-Status Plant and Animal Species

TABLE 4.3-3 SPECIAL-STATUS ANIMAL SPECIES KNOWN OR SUSPECTED TO OCCUR IN PLAN VICINITY

Species	Status State/Federal/ SRANK	Preferred Habitat
American Peregrine Falcon *Falco peregrinus anatum*	FPS/--/--	Nests in a depression or ledge near wetlands, lakes, rivers, or other water; on cliffs banks, dunes, mounds; also on manmade structures.
California Red-Legged Frog *Rana draytonii*	--/FT/S2S3	Lowlands and foothills in or near relatively permanent sources of deep water for breeding; nonbreeding frogs may be found in uplands within 300 feet of breeding ponds or at other wet/moist areas. Prefers but does not require dense shoreline vegetation.
California Tiger Salamander *Ambystoma californiense*	ST/FT/S2S3	Inhabits low-elevation grassland and oak savanna habitats. Breeds in winter and spring vernal pools and ponds and spends summer and fall in underground burrows in upland around pools.
Cooper's Hawk *Accipiter cooperi*	--/--/S3	Habitats near cliffs and almost always nest near water. Utilize open habitats for foraging. Non-breeding Falcons may also occur in open areas without cliffs. Artificial habitats may include towers, bridges, and buildings.
Santa Cruz Kangaroo Rat *Dipodomys venustus venustus*	--/--/S1	Habitats can only be found in Santa Cruz Sandhills.
Swainson's Hawk *Buteo swainsoni*	ST/--/S2	Open Grassland and agricultural landscapes.
Zayante Band-Winged Grasshopper *Trimerotropis infantilis*	FE/--/S1	Found exclusively in the Zayante Sandhills ecosystem.
Foothill Yellow Legged Frog *Rana boylii*	--/--/S2S3	Require shallow, flowing water in small to moderate-sized streams with at least some Cobble sized substrate.
Hoary Bat *Lasiurus cinereus*	--/--/S4	Prefers open habitats or habitat mosaics, with access to trees for cover and open areas or habitat edges for feeding. Roosts in dense foliage of medium to large trees. Feeds primarily on moths. Requires water.
Pallid Bat	--/--/S3	Prefers open, rocky habitats that can be very dry, but are near a water source. They do sometimes roost near humans but are sensitive to being disturbed.
Western Pond Turtle *Clemmys marmorata*	--/--/S3	Aquatic turtle of permanent or nearly permanent ponds, marshes, and irrigation ditches. Needs basking sites suitable upland for egg-laying, such as sandy banks or grassy, open fields on unshaded, south-facing slopes.

Status Explanations:
FE = Listed as endangered under the federal Endangered Species Act.
FT = Listed as threatened under the federal Endangered Species Act.
FPS = Listed as fully protected by CDFW
ST = Listed as threatened under the California Endangered Species Act.
CSC = Considered a California Special Concern species by CDFW.

SRANK = State Rank reflects (rarity and endangerment) of an element within the State of California. Ranks may be combined to indicate a range.
S1 Less than 6 Element Occurrences (EO) OR less than 1,000 individuals OR less than 2000 acres
S1.1 Very threatened
S1.2 Threatened
S1.3 No current threats known
S2 6 - 20 EOs OR 1,000 - 3,000 individuals OR 2,000 - 10,000 acres
S2.1 Very Threatened
S2.2 Threatened
S2.3 No current threats known
S3 21 - 100 EOs OR 3,000 - 10,000 individuals OR 10,000 - 50,000 acres
S3.1 Very Threatened
S3.2 Threatened

S3.3 No current threats known
S4 Apparently secure within California; this rank is clearly lower than S3 but factors exist to cause some concern; i.e., there is some threat, or somewhat narrow habitat. NO THREAT RANK
S5 Demonstrably secure to ineradicable in California. NO THREAT RANK
SH All sites as historical; the element has not been seen for at least 20 years, but suitable habitat still exists.
SX All sites are extirpated; this element is extinct in the wild.

turtle (*Clemmys marmorata*), Coopers hawk (*Accipter cooperi*), and burrowing owl (*Athene cunicularia*). However, the California red-legged frog is considered to be extinct within the floor of Santa Clara Valley.[14]

The City of Campbell lies within an area designated as Central California Coast Evolutionary Significant Unit (ESU) for the steelhead (*Oncorhynchus mykiss*). California coast steelhead were considered threatened in this ESU by the National Marine Fisheries Service (NMFS) on August 18, 1997.[15] The steelhead trout (*Oncorhynchus mykiss*) is a species of salmonoid that is native to fresh-water tributaries in California. The steelhead is an anadromous form of the coastal rainbow trout and typically migrates to marine waters after spending two years in fresh water. Steelhead typically spawn in deeper pools or pockets of tributaries that tend to persist through the dry season. Historically, streams within the Santa Clara Valley, including Los Gatos and San Tomas Aquino Creeks, have supported and may still support small runs of steelhead.

Suitable Habitat

In general, suitable habitat for special-status species is absent in the Plan Area due to the extent of past disturbance or lack of essential habitat characteristics. No special-status plant or animal species have been recently reported from within the actual limits of Plan Area where future development would be allowed by the proposed Plan. The Plan Area has already been improved with structures and paving, is heavily landscaped with non-native cover, and has been highly disturbed by human activities, limiting the likely presence of special-status plant or animal species.

There is a possibility that birds could nest in trees and other landscaping in the Plan Area. The nests of most bird species are protected under the MBTA when in active use and there is a remote possibility that one or more raptor species protected under the MBTA and CDFW Code could nest within the Plan Area, particularly if located near creek corridors or percolation ponds. These include the American Peregrine Falcon (*Falco peregrinus anatum*) and Cooper's hawk (*Accipiter cooperi*), which have reported CNDDB occurrences within the Plan Area vicinity (see Figure 4.3-1), together with more common raptors such as red-tailed hawk, great horned owl, and American kestrel, all of which are protected by the MBTA and CDFW Code when their nests are in active use.

[14] City of Campbell, 2001. *Campbell General Plan Environmental Impact Report, 2001*, page 135.
[15] City of Campbell, 2001. *Campbell General Plan Environmental Impact Report, 2001*, page 135.

4.3.2 STANDARDS OF SIGNIFICANCE

The proposed Plan would result in a significant impact to biological resources if it would result in any of the following:

1. Have a substantial adverse effect, either directly, or through habitat modifications, on any species identified as a candidate, sensitive, or special status species in local or regional plans, policies, or regulations, or by the California Department of Fish and Wildlife or US Fish and Wildlife Service.
2. Have a substantial or adverse effect on any riparian habitat or other sensitive natural community identified in local or regional plans, policies, or regulations, or by the California Department of Fish and Wildlife or US Fish and Wildlife Service.
3. Have a substantial or adverse effect on federally protected wetlands as defined by Section 404 of the Clean Water Act (including, but not limited to, marsh, vernal pool, coastal, etc.) through direct removal, filling, hydrological interruption, or other means.
4. Interfere substantially with the movement of any native resident or migratory fish or wildlife species or with established native resident or migratory wildlife corridors, or impede the use of native wildlife nursery sites.
5. Conflict with any local policies or ordinances protecting biological resources, such as a tree preservation policy or ordinance.
6. Conflict with the provisions of an adopted Habitat Conservation Plan, Natural Community Conservation Plan, or other approved local, regional, or state habitat conservation plan.

4.3.3 ENVIRONMENTAL IMPACT DISCUSSION

This section analyzes potential project-specific and cumulative impacts to biological resources.

BIO-1	**The proposed Plan would have a substantial adverse effect, either directly, or through habitat modifications, on any species identified as a candidate, sensitive, or special status species in local or regional plans, policies, or regulations, or by the California Department of Fish and Wildlife or US Fish and Wildlife Service.**

Development and land use activities allowed by the proposed Plan would occur in urbanized areas where special-status species are generally not expected to occur. The potential for occurrence of special-status species in developed areas is generally very remote in comparison to undeveloped lands with natural habitat that contain essential habitat characteristics for the range of species known to inhabit the City of Campbell.

However, some special-status bird species, such as Cooper's hawk, could utilize the remaining riparian corridors and heavily wooded areas for nesting, dispersal and other functions when they pass through

urbanized areas. More common birds protected under the MBTA may nest in trees and other landscaping in the Plan Area. Additionally, it is possible, albeit unlikely, that other special-status species could be present in the Plan Area. Therefore, since development permitted under the proposed Plan would have the potential to negatively impact nesting birds (and potentially other special status species) through alterations to their habitat, in the absence of adequate mitigation, a *significant* impact would result.

Significance Before Mitigation: Significant.

BIO-2	**The proposed Plan would have a substantial or adverse effect on a riparian habitat or other sensitive natural community identified in local or regional plans, policies, or regulations, or by the California Department of Fish and Wildlife or US Fish and Wildlife Service.**

Impacts to riparian habitats and sensitive natural communities include indirect impacts that may occur. An indirect impact is a physical change in the environment, which is not immediately related to, but is caused by a project. For example, if development results in reducing the sizes of remaining habitats, the values and functions of that habitat would be reduced and indirect impacts would occur.

As discussed above, sensitive biological communities in the vicinity of the Plan Area are primarily riparian habitats. Even though no riparian habitats are located within the Plan Area, indirect impacts may occur as a result of future development of the proposed Plan, specifically the construction of two small pedestrian crossings conceptually shown in the proposed Plan to cross the engineered channel outside of the Plan Area. The proposed pedestrian crossings would be located immediately outside of the eastern boundary of the Plan Area. While the proposed Plan does not require the construction of these crossings, they are suggested to improve connections from Dell Avenue to the waterfront. Construction of these crossings could disturb potential riparian habitat located along the engineered channel.

Section 1600 et seq. of the California Fish and Game Code prohibits alterations of any stream or lake, including some intermittent and seasonal channels and many artificial or altered channels, without a written agreement from the CDFW. The CDFW jurisdiction generally extends beyond that of the USACE and is applied to some alterations, including vegetation removal, which do not involve fill or excavation. Permitted streambed alterations are generally limited to the period from May 15 through October 15, and mitigation is required for actions with the potential to degrade or remove wetland, riparian, or aquatic habitat or degrade water quality.

Consistency with the following current General Plan policies and strategies would minimize impacts to riparian habitat:

- Policy CNR-3.1: Riparian Corridor Preservation. Preserve the aesthetic and habitat value of riparian corridors.

- Strategy CNR-3.1a: Development Near Riparian Corridors. Cooperate with State, federal, and local agencies to ensure that development does not cause significant adverse impacts to existing riparian corridors.
- Strategy CNR-3.1b: Santa Clara Valley Water District Activities. Work with Santa Clara Valley Water District to restrict future fencing, piping and channelization of creeks when flood control and public safety can be achieved through measures that preserve the natural environment and habitat of riparian corridors.
- Strategy-3.1c: Native Species Planting. Encourage the Santa Clara Valley Water District and County Parks Department to plant and maintain native trees and plants and replace invasive, non-native species with native ones along creek corridors.

While compliance with federal, State, and local regulations described in Section 4.3.1.1 of this chapter would reduce potential impacts to sensitive natural communities that could result from future development under the proposed Plan, the potential loss of riparian habitat is considered a *significant* impact.

Significance Before Mitigation: Significant.

BIO-3	**The proposed Plan would have a substantial or adverse effect on federally protected wetlands as defined by Section 404 of the Clean Water Act (including but not limited to, marsh, vernal pool, coastal, etc.) through direct removal, filling, hydrological interruption, or other means.**

Development and land use activities allowed by the proposed Plan would occur in urbanized areas where jurisdictional waters are absent, with the exception of the proposed pedestrian crossings over the engineered channel. Direct impacts to wetlands and jurisdictional waters could occur if the proposed pedestrian crossings, described above, are constructed in the channel using culverted crossings.

Indirect impacts to wetlands and jurisdictional waters include: 1) an increase in the potential for sedimentation due to construction grading and ground disturbance, 2) an increase in the potential for erosion due to increased runoff volumes generated by impervious surfaces, and 3) an increase in the potential for water quality degradation due to increased levels in non-point pollutants. However, indirect impacts could be largely avoided through effective implementation of BMPs during construction and compliance with water quality controls. The indirect water quality-related issues are discussed further in Chapter 4.8, Hydrology and Water Quality. As discussed in Impact HYDRO-1, water quality impacts would be less than significant. In addition, consistency with the following General Plan policy and strategy would reduce potential impacts:

- Policy OSP-9.1: Drainage Facilities. Ensure that drainage facilities convey storm runoff without polluting local watercourses.

- Strategy-9.1d: New Construction. Require new construction to utilize site preparation, grading, and foundation designs that provide erosion control to prevent sedimentation and contamination of streams.

Although consistency with applicable policies and implementation of stormwater BMPs would avoid indirect impacts from development allowed by the proposed Plan, the proposed pedestrian crossings over the engineered channels could impact wetlands and other jurisdictional waters, which is considered a *significant impact*.

Significance Before Mitigation: Significant.

BIO-4	**The proposed Plan would not interfere substantially with the movement of any native, resident, or migratory wildlife corridors, or impede the use of native wildlife nursery sites.**

Development and land use activities allowed by the proposed Plan would occur in urbanized areas where sensitive wildlife resources and important wildlife movement corridors are no longer present because of existing development. Wildlife species common to urban and suburban habitat could be displaced where existing structures are demolished and landscaping is removed as part of future development, but these species are relatively abundant, and adapted to human disturbance. In addition, future development allowed by the Plan would include setbacks and landscaping that would replace landscaping that has been removed. Proposed development standards for the Plan Area would require at least 5 percent of the site area to be publicly accessible open space for the DAAP-West District and 10 percent of the site to be publicly accessible open space for the DAAP-Waterfront and DAAP-Central Districts. If a Core Tech development project reaches the proposed allowable Height Bonus, the project must also include a park or open space amenity greater than 7,000 square feet. Also, all parking surface areas would be devoted to landscaping, with a focus on stormwater retention features, such as vegetative swales. With implementation of these development standards and requirements, it is probable that there would be a reduction in the amount of impervious surfaces and a resulting beneficial impact on water quality within the Plan Area as compared to existing conditions. Given the lack of wildlife movement in the Plan Area and future landscaping enhancements that would occur with development allowed by the proposed Plan, potential impacts on the movement of fish and wildlife, wildlife corridors, or wildlife nursery sites would be considered *less than significant*.

Significance Before Mitigation: Less than significant

BIO-5	**The proposed Plan would conflict with a local policy intended to protect biological resources.**

The Plan would have a significant impact if future development or infrastructure projects under the proposed Plan conflict with: applicable General Plan policies protecting biological resources; Chapter 14.02

of the Campbell Municipal Code, which specifies watercourse protection measures; or Chapter 21.32 of the Campbell Municipal Code, which establishes protection measures for heritage trees.

Due to the existing urbanized nature of the Plan Area and limited biological resources within it, the proposed Plan would not affect sensitive species and would generally conform to the relevant goals and policies of the City's General Plan. Table 4.3-4 provides an analysis of the proposed Plan's consistency with relevant General Plan Policies.

The proposed Plan would also be subject to Municipal Code Chapter 14.02 which aims to protect watercourses. The proposed Plan would be prohibited from the following:

- Discharging into or connecting any pipe or channel to a watercourse. As discussed in Section 4.8 of this DEIR, Hydrology and Water Quality, the proposed Plan is subject to the National Pollutant Discharge Elimination System (NPDES) Construction Permit requirements for implementation of individual Stormwater Pollution Prevention Plans, which outline erosion control, sediment control, wind erosion control, tracking control, non-stormwater management and waste management, and materials pollution control BMPs.
- Modifying the natural flow of water in a watercourse. The proposed Plan does not include any provisions that would modify the natural flow of water in a watercourse.
- Carrying out development within a setback designed in whole or in part to protect a watercourse. The proposed Plan a requires a 20-foot setback from property lines abutting the waterfront as well as a height restriction of 20 feet for structures located between 20 feet and 60 feet of a waterfront-facing parcel line.
- Depositing in, planting in, or removing any material from a watercourse, including its banks, except as required for necessary maintenance. The proposed Plan would comply with this provision.
- Constructing, altering, enlarging, connecting to, changing, or removing any structure in a watercourse. The proposed Plan does not include provisions to alter any structure in a watercourse.
- Placing any loose or unconsolidated material along the side of or within a watercourse or so close to a side as to cause a diversion of the flow, or to cause a probability of such material being carried away by stormwater passing through such watercourse. The proposed Plan would comply with this provision.

In addition, future development allowed by the proposed Plan may involve the removal of existing trees in the Plan Area. The removal of on-site trees, as well as the removal and planting of street trees, would be regulated by Chapter 21.32 of the City's Municipal Code. As discussed, Chapter 21.32 establishes policies and standards to protect and manage trees on private property to ensure that development is compatible with and enhances the small town quality and character of Campbell.[16] The Municipal Code protects

[16] City of Campbell, *Campbell California Code of Ordinances*, accessed July 28, 2014.

TABLE 4.3-4 CITY OF CAMPBELL GENERAL PLAN POLICIES PERTAINING TO BIOLOGICAL RESOURCES – CONSISTENCY TABLE

Goal/Policy/ Strategy Number	Goal/Policy/Strategy Text	Analysis of Consistency with Proposed Plan
Open Space, Parks, and Public Facilities Element		
Policy OSP-9.1	Drainage Facilities. Ensure that drainage facilities convey stormwater runoff without polluting local watercourses.	One of the Objectives of the proposed Plan calls for the incorporation of green design and environmentally friendly features in new public and private development to reduce stormwater runoff into existing streams and preserve existing infrastructure. Reducing overall stormwater runoff to existing streams would reduce pollution levels in local watercourses, assuming that the concentration of pollution in runoff remains consistent with existing conditions. In addition to the goal stated in the proposed Plan's Objectives, development permitted under the proposed Plan would continue to be subject to Chapter 14.02, Stormwater Pollution Control, of the Campbell Municipal Code. This chapter restricts all discharges into the municipal storm drain system or watercourses other than stormwater. Additionally, the chapter states that prohibited discharges are declared to constitute a public nuisance. Therefore, since development permitted under the proposed Plan would continue to be subject to Chapter 14.02 of the Campbell Municipal Code, the Plan would be consistent with this Policy of the Campbell General Plan.
Conservation and Natural Resources Element		
Policy CNR-3.1	Riparian Corridor Preservation. Preserve the aesthetic and habitat value of riparian corridors.	As shown above in the impact discussion for threshold BIO-2, a significant impact is anticipated as a result of the potential loss of riparian habitat. Therefore, without adequate mitigation, the proposed Plan would be inconsistent with this Policy and a significant impact would result.
Policy CNR-4.1	Plant additional trees to maintain and enhance the City's suburban forest.	Development permitted under the proposed Plan would continue to be subject to Chapter 21.32, Tree Protection Regulations, of the Campbell Municipal Code. According to section 21.32.010, the purpose of this chapter of the Campbell Municipal Code is to ensure that development is compatible with and enhances Campbell's small town quality and character. The chapter accomplishes this by regulating the removal and replacement of trees. Since development permitted under the proposed Plan would continue to be subject to Chapter 21.32 of the Campbell Municipal Code, the Plan would be consistent with this Policy of the Campbell General Plan.

Source: City of Campbell General Plan, 2001.

heritage trees, trees approved on an approved landscaping plan, a tree measuring 12 inches or greater in diameter, on a commercial, industrial, multi-family residential or undeveloped single-family residential property, or any Oak (*Quercus*), Redwood (*Sequoia*), Cedar (*Cedrus*), or Ash (*Fraxinus*) tree or multi-trunk tree with at least one trunk measuring 12 inches or greater on a developed single-family property.

Development and land use activities allowed by the proposed Plan would occur in urbanized areas where sensitive biological and wetland resources are generally considered to be absent. However, as shown above in Table 4.3-4, the proposed Plan would be in conflict with Policy CNR-3.1 of the Campbell General Plan. Therefore, without adequate mitigation, a *significant impact* would result.

Significance Before Mitigation: Significant.

BIO-6	**The proposed Plan would not conflict with the provisions of an adopted Habitat Conservation Plan, Natural Community Conservation Plan, or other local, regional, or state habitat conservation plan.**

As described above, the SCVHP study area encompasses a small portion of the Plan Area; the SCVWD's desilting ponds. The proposed Plan, however, would not allow new buildings or structures on the lot containing the SCVWD desilting ponds. In addition, the SCVWD would continue to maintain the desilting ponds in accordance with the provisions of the SCVHP. Therefore, implementation of the proposed Plan would not result in a significant impact to the desilting ponds.

As discussed above, two conceptual pedestrian crossings are shown in the proposed Plan. These bridges are located outside of the Plan Area, adjacent to the SCVWDs desilting ponds and partially within the SCVHP study area.[17] The proposed Plan does not require construction of these proposed pedestrian crossings and are only shown conceptually. The pedestrian crossings, if constructed, would be built partially within the SCVHP study area and would thereby be subject to the SCVHP's permit process, mitigation requirements, and fee payment. Such construction projects would also be subject to separate, independent CEQA review in part to ensure their consistency with the SCVHP. Therefore, implementation of the proposed Plan would not conflict with the SCVHP and associated impact would be *less than significant*.

Significance Before Mitigation: Less than significant.

4.3.4 CUMULATIVE IMPACTS

BIO-7	**Implementation of the proposed Plan, in combination with past, present and reasonably foreseeable projects, would not result in significant cumulative impacts with respect to biological resources.**

As discussed in Chapter 4.0, Environmental Evaluation, of this Draft EIR, this EIR takes into account growth projected by the proposed Plan within the Campbell city boundary and Sphere of Influence (SOI), in combination with impacts from projected growth in the rest of Santa Clara County and the surrounding

[17] See Figure 2-3 on page 24 of the proposed Plan.

region, as forecast by the Association of Bay Area of Governments (ABAG). The geographic scope of the cumulative analysis for biological resources considers the surrounding incorporated and unincorporated lands, and the region, including the County Courthouse, Albright, and North 40 projects in the Town of Los Gatos which would generate 869,000 square feet of commercial and 269,000 square feet of retail development along with 150 hotel rooms, 73 single-family homes, and 336 multi-family units. Cumulative impacts would occur if development or infrastructure projects allowed by the proposed Plan, together with other cumulative projects, would substantially and adversely affect a special-status species, a riparian habitat, or a federally protected wetland; substantially interfere with the movement of native resident fish or wildlife species, disturb wildlife corridors, or impede the use of native wildlife nursery sites; or conflict with local policies protecting biological resources or with an adopted habitat conservation plan.

Due to the urbanized nature of the Plan Area and limited biological resources within it, the proposed Plan would not have any biological resource impacts that would be cumulatively considerable. The Plan Area is extensively disturbed by urban uses. Any potential tree removal would be done in compliance with the City's Tree Protection Ordinance. Furthermore, impacts of the proposed Plan on migratory birds would be short-term from construction-associated redevelopment activities and the general nature of areas used by migratory birds would not be significantly changed (e.g. changing from an undeveloped to developed site). In addition, compliance with Mitigation Measure BIO-1 would ensure that no sensitive species are disturbed. Although the conceptual pedestrian crossings have the potential to disturb riparian and wetland habitat within a habitat conservation plan, these potential impacts can be mitigated by Mitigation Measures BIO-2, BIO-3, and BIO-5. Given the short-term nature of the proposed Plan's impact and its ability to be mitigated by Mitigation Measures BIO-1, BIO-2, BIO-3, and BIO-5, the proposed Plan would not contribute to a significant cumulative impact.

The potential impacts of proposed development on biological resources tend to be site-specific, and the overall cumulative effect would be dependent on the degree to which significant vegetation and wildlife resources are protected on a particular site. This includes preservation of well-developed native vegetation (native grasslands, oak woodlands, riparian woodland, etc.), populations of special-status plant or animal species, and wetland features (including freshwater seeps and tributary drainages). Further environmental review of specific cumulative development projects should serve to ensure that important biological resources are identified, protected, and properly managed, and to prevent any significant adverse development-related impacts, including development for the remaining undeveloped lands in the Plan Area and surrounding incorporated and unincorporated lands.

New development in the region, in conjunction with the proposed Plan, could result in further conversion of existing natural habitats to urban and suburban conditions, limiting the existing habitat values of the surrounding area. This could include further loss of wetlands and sensitive natural communities, reduction in essential habitat for special-status species, removal of mature native trees and other important wildlife habitat features, and obstruction of important wildlife movement corridors. Additional development may also contribute to degradation of the aquatic habitat in the creeks throughout the region, including the Plan Area.

Grading associated with construction activities generally increases erosion and sedimentation, and urban pollutants from new development would reduce water quality. However, most of the parcels within Plan Area are already developed and occur within urbanized areas, thus avoiding or diminishing effects on biological resources. With implementation of the Mitigation Measures BIO-1, BIO-2, BIO-3, and BIO-5 identified below, the proposed Plan would not make a significant contribution to cumulative impacts to biological resources. Therefore, the proposed Plan would result in a *less-than-significant* cumulative impact on biological resources.

Significance Before Mitigation: Less than significant.

4.3.5 SUMMARY OF SIGNIFICANT IMPACTS AND MITIGATION MEASURES

BIO-1	**Implementation of the proposed Plan would have a substantial adverse effect, either directly or through habitat modifications, on a plant or animal population, or essential habitat, defined as a candidate, sensitive or special-status species.**

The following measure addresses the potential for impacts to special status species, especially the possible loss or abandonment of nests of birds protected under the federal MBTA and CDFG Code, and would reduce potential impacts to *less-than-significant* levels:

> **Mitigation Measure BIO-1:** Prior to site preparation or construction on parcels containing mature trees and/or vegetated areas, a qualified biologist shall evaluate the need for and/or potentially conduct a survey. In the event that special-status species are found to be present on-site, a qualified biologist will make recommendations to reduce or avoid impacts to the special-species, as feasible, and these recommendations will be incorporated into project construction and/or operation. In particular, nests of raptors and other birds shall be protected when in active use, as required by the federal Migratory Bird Treaty Act and the California Department of Fish and Wildlife (CDFW) Code. If construction activities and any required tree removal occur during the breeding season (February 1 and August 31), a qualified biologist shall be required to conduct surveys prior to tree removal or construction activities. Preconstruction surveys are not required for tree removal or construction activities outside the nesting period. If construction would occur during the nesting season (February 1 to August 31), preconstruction surveys shall be conducted no more than 14 days prior to the start of tree removal or construction. Preconstruction surveys shall be repeated at 14-day intervals until construction has been initiated in the area after which surveys can be stopped. Locations of active nests containing viable eggs or young birds shall be documented and protective measures implemented under the direction of the qualified biologist until the nests no longer contain eggs or young birds. Protective measures shall include establishment of clearly delineated exclusion zones (i.e., demarcated by identifiable fencing, such as orange construction fencing or equivalent) around each nest location as determined by a

qualified biologist, taking into account the species of birds nesting, their tolerance for disturbance and proximity to existing development. In general, exclusion zones shall be a minimum of 300 feet for raptors and 75 feet for passerines and other birds. The active nest within an exclusion zone shall be monitored on a weekly basis throughout the nesting season to identify signs of disturbance and confirm nesting status. The radius of an exclusion zone may be increased by the qualified biologist if project activities are determined to be adversely affecting the nesting birds. Exclusion zones may be reduced by the qualified biologist only in consultation with CDFW. The protection measures shall remain in effect until the young have left the nest and are foraging independently or the nest is no longer active.

Significance After Mitigation: Less than significant.

BIO-2	**The proposed Plan would have a substantial or adverse effect on a riparian habitat or other sensitive natural community identified in local or regional plans, policies, or regulations, or by the California Department of Fish and Wildlife or US Fish and Wildlife Service.**

The following measure is recommended to address possible direct and indirect impacts on riparian habitats protected by the CDFW and USFW, and would reduce potential impacts to *less than significant* levels:

Mitigation Measure BIO-2: Minimize, avoid, and compensate for impacts to riparian habitat by avoiding individual riparian trees during construction. If avoidance is not feasible obtain a 1602 Streambed Alteration Agreement from the CDFW for impacts to riparian habitat. In addition, mitigation for impacted riparian habitat will be needed and can be accomplished by planting three native riparian trees for every one removed.

To reduce indirect impacts to riparian habitat, the City shall require the use of BMPs to protect preserved waters of the US/State and to ensure that water quality standards are not compromised. These practices can include installing orange construction fencing buffers, straw waddles to keep fill from entering preserved/avoided riparian habitats and other waters, and other protective measures; and requiring a biological monitor be onsite during project construction to monitor the integrity of any preserved wetlands and other waters during mass grading or filling of the project site.

Significance After Mitigation: Less than significant.

BIO-3	**The proposed Plan would not have a substantial or adverse effect on federally protected wetlands as defined by Section 404 of the Clean Water Act (including but not limited to, marsh, vernal pool, coastal, etc.) through direct removal, filling, hydrological interruption, or other means.**

The following measure is recommended to address possible adverse effects on federally protected wetlands as defined by Section 404 of the Clean Water Act, and would reduce potential impacts to *less than significant* levels:

Mitigation Measure BIO-3: To avoid impacts to wetlands and Waters of the US, a jurisdictional wetland delineation should be conducted and verified by the USACE. If the engineered channel is determined to be a Waters of the US, a free spanning pedestrian crossing should be used to span the engineered channel. If this is infeasible and a culvert bridge is required that results in fill impacts to Waters of the US, a Section 404 permit should be obtained from the USACE. To comply with the USACE "No Net Loss" policy, mitigation should be conducted to compensate for impacts to Waters of the US. This shall include conducting creek restoration activities in the engineered channel or along the adjacent Los Gatos Creek to provide a functional uplift in wetland functions and values.

Significance After Mitigation: Less than significant.

BIO-5	**The proposed Plan would potentially have a substantial or adverse effect on the habitat value of riparian corridors and would therefore be in conflict with Policy CNR-3.1 of the Campbell General Plan.**

The following measure would address possible adverse effects on the habitat value of riparian corridors potentially affected by the proposed Plan which would result in a conflict between the proposed Plan and Policy CNR-3.1 of the Campbell General Plan. Implementation of the following Mitigation Measure would eliminate the conflict between the proposed Plan and General Plan Policy CNR-3.1.

Mitigation Measure BIO-5: Implement Mitigation Measure BIO-2.

Significance After Mitigation: Less than significant.

4.4 CULTURAL RESOURCES

This chapter describes existing cultural resources in the City of Campbell and evaluates the potential environmental consequences on cultural resources from future development that could occur by adopting and implementing the proposed Plan. Cultural resources include historically and architecturally significant resources, as well as archaeological and paleontological resources.

4.4.1 ENVIRONMENTAL SETTING

4.4.1.1 REGULATORY FRAMEWORK

This section summarizes the existing federal, State, and local policies and regulations that apply to cultural resources and the potential impacts from the implementation of the Dell Avenue Area Plan (proposed Plan) on cultural resources.

Federal Regulations

National Historic Preservation Act

The National Register of Historic Places (National Register) established by the National Historic Preservation Act (NHPA) of 1966, as amended, recognizes properties that are significant at local, State, and national levels. Officially, designated historical resources include districts, sites, buildings, structures, and objects.

Properties that are eligible for listing in the National Register are afforded the same protection given to properties that are listed in the National Register.

For a property to be eligible for listing in the National Register, it must be significant in American history, architecture, archaeology, engineering, or culture, and must retain integrity in terms of location, design, setting, materials, workmanship, feeling, and association. Resources less than 50 years in age, unless of exceptional importance, are not eligible for the National Register. Though a listing in the National Register does not prohibit demolition or alteration of a property, California Environmental Quality Act (CEQA) requires the evaluation of project effects on properties that are listed in the National Register.

American Indian Religious Freedom Act and Native American Graves and Repatriation Act

The American Indian Religious Freedom Act recognizes that Native American religious practices, sacred sites, and sacred objects have not been properly protected under other statutes. It establishes as national policy that traditional practices and beliefs, sites (including right of access), and the use of sacred objects shall be protected and preserved. Additionally, Native American remains are protected by the Native American Graves and Repatriation Act of 1990.

Paleontological Resources Preservation Act

The federal Paleontological Resources Preservation Act of 2002 codifies the generally accepted practice of limited vertebrate fossil collection and limited collection of other rare and scientifically significant fossils by qualified researchers. Researchers must obtain a permit from the appropriate State or federal agency and agree to donate any materials recovered to recognized public institutions, where they will remain accessible to the public and to other researchers.

State Regulations

California Environmental Quality Act

Public Resources Code Section 21083.2 provides for protection of unique archaeological resources. Preservation of unique archaeological sites is the preferred treatment (21083.2[b]); however, if sites are not be preserved in place, mitigation measures shall be required as provided in 21083.2(c).

Public Resources Code Section 21084.1 addresses the issue of historical resources, which includes prehistoric Native American resources, historical-era archaeological deposits, buildings, structures, objects, and districts. Historical resources are defined as resources that are listed in or determined to be eligible for listing in the California Register of Historical Resources. The Registry also includes resources included in a local register of historical resources or otherwise determined to be historically significant under Public Resources Code Section 5024.1.

Section 15064.5 of the CEQA Guidelines states that a project that may cause a substantial adverse change in the significance of a historical resource is a project that may have a significant effect on the environment. The CEQA Guidelines define four ways that a property can qualify as a historical resource for purposes of CEQA compliance:

- The resource is listed in or determined eligible for listing in the California Register of Historical Resources, as determined by the State Historical Resources Commission.
- The resource is included in a local register of historical resources, as defined in Section 5020.1(k) of the Public Resources Code, or identified as significant in a historical resource survey meeting the requirements of Section 5024.1(g) of the Public Resources Code, unless the preponderance of evidence demonstrates that it is not historically or culturally significant.
- The lead agency determines the resource to be significant in the architectural, engineering, scientific, economic, agricultural, educational, social, political, military, or cultural annals of California, as supported by substantial evidence in light of the whole record.
- The lead agency determines that the resource may be a historical resource as defined in Public Resources Code Sections 5020.1(j) or 5024.1 (CEQA Guidelines Section 15064.5) which means, in part, that it may be eligible for the California Register.

In addition, Public Resources Code Section 21083.2 and Sections 15064.5(c), 15064(f), and 15126.4(b) of the CEQA Guidelines specify lead agency responsibilities to determine whether a project may have a significant effect on unique archaeological resources. If it can be demonstrated that a project will damage a unique archaeological resource, the lead agency may require reasonable efforts for the resources to be preserved in place or left in an undisturbed state. Preservation in place is the preferred approach to mitigation. The Public Resources Code also details required mitigation if unique archaeological resources are not preserved in place.

Sections 15064.5(d) and (e) of the CEQA Guidelines specify procedures to be used in the event of discovery of Native American human remains on non-federal land. Section 15064.5(d) addresses procedures when an Initial Study identifies the existence or probable likelihood of Native American human remains within a project area. Section 15064.5(e) provides guidance for accidental discovery of any human remains after a project is under way. These provisions protect such remains from disturbance, vandalism, and inadvertent destruction, as well as establish procedures to be implemented if Native American skeletal remains are discovered during construction of a project. The provisions also establish the Native American Heritage Commission (NAHC) as the authority to identify the Most Likely Descendant (MLD) and mediate any disputes regarding disposition of such remains.

California Register of Historic Resources

The California Register of Historic Places (California Register) establishes a list of properties to be protected from substantial adverse change (Public Resources Code Section 5024.1). The office of Historic Preservation (OHP) advocates that all historical resources over 45 years old be recorded for inclusion in the OHP filing system, although the use of professional judgment is recommended in determining whether a resource warrants documentation.[1] A historical resource may be listed in the California Register if it meets any of the following criteria.

- It is associated with events that have made a significant contribution to the broad patterns of local or regional history, or the cultural heritage of California or the United States.
- It is associated with the lives of persons important to local, California, or national history.
- It embodies the distinctive characteristics of a type, period, region, or method of construction; represents the work of a master; or possesses high artistic value.
- It has yielded, or may be likely to yield, information important in the pre-history or history of the local area, California, or the nation.

In addition to meeting one or more of the four criteria listed above, a property must possess "integrity," defined as the ability to convey its significance. Seven elements are considered key in considering a property's integrity: location, design, setting, materials, workmanship, feeling, and association.

[1] Office of Historic Preservation, 1995. *Instructions for Recording Historical Resources,* March, page 2.

The California Register includes properties that are listed or have been formally determined eligible for listing in the National Register, State Historical Landmarks, and eligible Points of Historical Interest. Other resources that may be eligible for the California Register, and which require nomination and approval for listing by the State Historic Resources Commission, include:

- Resources contributing to the significance of a local historic district;
- Individual historical resources;
- Historic resources identified in historic surveys conducted in accordance with OHP procedures;
- Historic resources or districts designated under a local ordinance consistent with the procedures of the State Historic Resources Commission; and
- Local landmarks or historic properties designated under local ordinance.

Additionally, for a resource to be eligible for the California Register of Historic Resources, it must retain sufficient integrity to be recognizable as a historical resource and to convey its significance.

Health and Safety Code Sections 7052 and 7050.5

Section 7052 of the Health and Safety Code states that the disinterment of remains known to be human, without authority of law, is a felony. Section 7050.5 requires that construction or excavation be stopped in the vicinity of discovered human remains until the county coroner can determine whether the remains are those of a Native American. If determined to be Native American, the coroner must contact the NAHC.

California Historical Building Code

Part 8 of Title 24, the California Historical Building Code (CHBC), defined in Sections 18950 to 18961 of Division 13, Part 2.7 of Health and Safety Code, provides regulations and standards for the rehabilitation, preservation, restoration (including related reconstruction) or relocation of historical buildings, structures, and properties deemed by any level of government as having importance to the history, architecture, or culture of an area.

California State Senate Bill 18

Senate Bill (SB) 18, which went into effect January 1, 2005, set forth requirements for local governments (cities and counties) to consult with Native American tribes to aid in the protection of traditional tribal cultural places through local land use planning.[2] The intent of SB 18 is to provide California Native American tribes an opportunity to participate in local land use decisions at an early stage of planning for the purpose of protecting, or mitigating impacts to cultural places. The purpose of involving tribes at these early

[2] SB 18 amends Government Sections (GC) 65040.2, 65092, 65351 and 65560, while adding GC sections 65352.3, 65352.4 and 65562.5.

planning stages is to allow consideration of cultural places in the context of broad local land use policy prior to individual site-specific, project-level land use designations are made by a local government.

Public Resources Code Section 5097

Public Resources Code Section 5097 specifies the procedures to be followed in the event of the unexpected discovery of human remains on non-federal public lands. The disposition of Native American burials fall within the jurisdiction of the NAHC, which prohibits willfully damaging any historical, archaeological, or vertebrate paleontological site or feature on public lands.

Local Regulations

City of Campbell General Plan

The City of Campbell's General Plan, adopted in November 2001, contains goals and policies related to the protection of cultural resources in its Cultural and Natural Resource Element. These policies require records review for development projects recognizing the potential for discovery of archaeological resources, and call for preservation and restoration of historically significant structures and sites, as shown in Table 4.4-1.

TABLE 4.4-1 CITY OF CAMPBELL GENERAL PLAN GOALS, POLICIES, AND STRATEGIES PERTAINING TO CULTURAL RESOURCES

Goal/Policy/ Strategy Number	Goal/Policy/Strategy Text
Cultural and Natural Resource Element	
Goal CNR-1	*A high level of community participation in historic preservation efforts to build a strong sense of community identity.*
Policy CNR-1.1	Ensure that the City and its citizens preserve historic resources as much as possible.
Strategy CNR-1.1a	Maintain and update an inventory of historic resources for use in evaluating development proposals and determining if sites or buildings are of local, State, or federal significance.
Strategy CNR-1.1b	In accordance with CEQA and State Public Resources Code, require the discontinuation of all work in the immediate vicinity and the preparation of a resource mitigation plan and monitoring program by a licensed archaeologist if archaeological resources are found on any sites within the City.
Goal CNR-2	*Enhanced pride in the City's heritage.*
Policy CNR-2.1	Historic and Cultural Activities: Support historic and cultural activities and opportunities in the community.

Source: City of Campbell General Plan, 2001.

Campbell Municipal Code

Section 21.33 of Campbell's Municipal Code outlines its historic preservation policy, which establishes procedures for the designation of historical resources within the City. It also establishes procedures for the

designation, modification, alteration, demolition, or removal of landmark sites. The City of Campbell's historic preservation policy evaluates potential historic resources, which it defines as a building, structure, site, object, landscape, sign, district, or contributing member to a district that is significant in American history, architecture, engineering, archaeology, or culture and is designated under city, State, or national significance criteria. Criteria for designation as a historic resource are found within Campbell's Municipal Code Section 21.33.040 and generally include factors such as a relationship to historic eras, persons, notable historic events, and buildings that represent a rare architectural style or are associated with a notable artist, architect, or craftsman. Section 21.14.020, Historic Overlay/Combining Districts ("H" Overlay District), intends to identify, protect, and preserve the historic and/or cultural resources of the city and provides a means to preserve and enhance structures, properties, or areas of architectural, engineering, and historic significance. The "H" Overlay District must be used in accordance with the policies and principles of the General Plan, as well as the criteria of the historic preservation policy as specified above.

Historic Design Guidelines for Residential Buildings

The City of Campbell's Historic Design Guidelines for Residential Buildings apply to projects that propose to change or alter the exterior appearance of any building or structure located within a designated Historic District, designated landmark, or property listed on the City's Historic Resources Inventory List. The guidelines outline several principles for an owner or developer to follow in order to preserve or maintain their property. These not only include information on how to preserve and maintain the historic character of the property, but also offer compatible design features and examples of distinctive construction techniques and elements that characterize existing historic structures.

4.4.1.2 EXISTING CONDITIONS

This section provides an overview of the history of Campbell and resources of cultural significance that may be affected by implementation of the proposed Plan. Archeological evidence indicates that humans began to settle in the Campbell area at least 12,000 years ago. Prehistoric occupation of California is broken into three broad periods: the Paleoindian period (10,000 – 6,000 B.C.), the Archaic period (6,000 B.C. – A.D. 500), and the Emergent period (A.D. 500 – 1800). Early occupants depended mainly on big game and minimally processed plant foods for survival. Later, as trade networks became increasingly complex, and an economy based on clam disk bead money became more prevalent, inhabitants' social status became recognizably linked to wealth.

Linguistic evidence shows that descendants of the native groups who inhabited the area between the Carquinez Straight and the Monterey area were known as the Ohlone, and were often referred to by the name of their linguistic group, Costanoan. The Ohlone occupied a large territory in the South Bay, including the Plan Area. This ethnographic group settled in large permanent groupings of households, forming large villages and tribal territories known as 'tribelets.' The Ohlone lived in domed structures built of woven tule, ferns, and grass, and were often constructed near bayshores and valleys providing access to waterways, increasing their ability to distribute trade goods, as well as access plant and animal life. The customary way

of living of the Ohlone people disappeared by about 1810 due to disruption by introduced diseases, a declining birth rate and the impact of the California mission system established by the Spanish in the area, in 1777.[3]

The Plan Area lies within the Santa Clara Valley, which is comprised of recent alluvial deposits dating back to between 5,000 and 7,000 years ago, and consists of unconsolidated silts, sands, and gravels, which are known to contain archeological materials.[4]

Paleontological Resources

Archaeological resources may be considered to be either "unique archeological resources" or "historical resources" as defined by CEQA and described previously. CEQA Section 21083.2 defines a "unique archeological resource" as an archeological artifact, object, or site which can be clearly demonstrated that, without merely adding to the current body of knowledge, there is a high probability that it:

- Contains information needed to answer important scientific research questions, and there is a demonstrable public interest in that information;
- Has a special and particular quality, such as being the oldest of its type or the best available example of its type; and or
- Is directly associated with a scientifically recognized important prehistoric or historic event or person.

Paleontological resources, or fossils, are any evidence of past plant and animal life. Paleontological resources do not include human remains or artifacts. Fossil remains such as bones, teeth, shells, and wood are found in geologic formations. Paleontological resources are limited, non-renewable, sensitive scientific and educational resources. The potential for fossil remains at a location can be predicted based on whether previous fossil finds have been made in the vicinity, and based on the age of the geologic formations. Fossils are nonrenewable paleontological resources that are afforded protection by federal, State, and local environmental laws and regulations (Paleontological Resources Preservation Act). Accordingly, the potential of a particular area to produce a valuable paleontological resource is largely dependent on the geologic age and origin of the underlying rocks.

Late Pleistocene sediments expected to be found in the region have the potential to contain Ranch La Brean fossils, such as the remains of gastropods and pelecypods, giant ground sloth, mastodon, bison, and saber-tooth cats.[5]

[3] City of San Jose, 2011. *Envision San Jose 2040 General Plan Draft Program EIR,* page 673.
[4] Helley, E.J., K.R. La Joie, W.E. Spangle, and M.L. Blair, 1979. *Flatland Deposits of the San Francisco Bay Region.*
[5] Helley, E.J., K.R. La Joie, W.E. Spangle, and M.L. Blair, 1979. *Flatland Deposits of the San Francisco Bay Region.*

Archaeological Resources

The Santa Clara Valley, possibly including the Campbell area, was most likely settled by native Californians between 12,000 and 6,000 years ago. Penutian peoples migrated into central California around 4,500 years ago and were firmly settled around San Francisco Bay by 1,500 years ago. The descendants of the native groups who lived between the Carquinez Strait and the Monterey area are the Ohlone, although they are often referred to by the name of their linguistic group, Costanoan. Approximately 40 Ohlone tribelets were documented ethnographically. An Ohlone household was made up of about 15 individuals, with households grouping together to form villages, which in turn combined to form tribelets.

Intensive Hispanic exploration and settlement of the Bay Area began in the late eighteenth century and Ohlone culture was radically transformed when European settlers moved into northern California. These settlers established the mission system and exposed the Ohlone to diseases to which they had no immunity. Mission San Francisco was founded in 1776, and drew Ohlone from the entire Bay Area. Following the secularization of the missions in 1834, native people in the Bay Area moved to ranchos, where they worked as manual laborers.

According to the Campbell General Plan EIR certified in July 2001, a records search indicated that only one prehistoric archeological site has been recorded in the city. However, few archeological studies have been conducted within the City limits. This lack of information may account for the area's apparent lack of prehistoric activity. Furthermore, modern development and urbanization may have resulted in the burial of cultural or prehistoric resources.[6] Therefore, it is possible that undiscovered paleontological resources could be found in the Plan Area.

Although there have been few archaeological sites recorded in the City of Campbell, this is likely because there have been few archaeological studies completed within the City and not because there is a lack of prehistoric resources.[7]

Historical Resources

The National Register includes buildings that are at least 50 years old, unless deemed to be of exceptional importance. The California State Office of Historic Preservation (OHP) includes on the California Register buildings, structures and objects that are 45 years or older. There are no local, State, or federally recognized historic properties within or near the Plan Area.[8,9] Most of Campbell's historic buildings are located in the downtown area or within the Historic Overlay District in the Alice Avenue area. Buildings within the Alice

[6] City of Campbell, 2001. *City of Campbell General Plan EIR*, page 146.

[7] City of Campbell, 2001. *City of Campbell General Plan EIR*, page 146.

[8] California State Office of Historic Preservation, California Historic Resources. http://ohp.parks.ca.gov/ListedResources/?view=county&criteria=43 accessed on August 27, 2014.

[9] National Parks Service US Department of the Interior, *National Register of Historic Places.* http://nrhp.focus.nps.gov/natreghome.do?searchtype=natreghome accessed on September 4, 2014.

Avenue area include landmark commercial buildings, Victorian homes, churches, schools, and civic buildings.[10] The City of Campbell maintains a listing of properties that are of historical significance known as the Historical Resources Inventory.

The Campbell Historic Preservation Board, City Council, and Planning Commission are responsible for adopting guidelines and reviewing land use and planning decisions with respect to properties that are of historical significance. They may suggest design guidelines or provide alternatives to project applicants to preserve or maintain their property.

According to the Historic Resources Inventory and the Historic Inventory Map, there are no architecturally distinctive buildings within the Plan Area (see Figure 4.4-1), and existing buildings are built to accommodate industrial, research and development, and office uses. Though many of the existing building with the Plan Area were built in the 1960s and 1970s and meet the age requirement for inclusion on the California Register, most buildings do not meet the other criteria to be listed in the California Register as stated above. Additionally, buildings and structures within the Plan Area do not meet the criteria set forth by the Campbell Municipal Code as stated above.

4.4.2 STANDARDS OF SIGNIFICANCE

The proposed Plan would result in a significant cultural resources impact if it would:

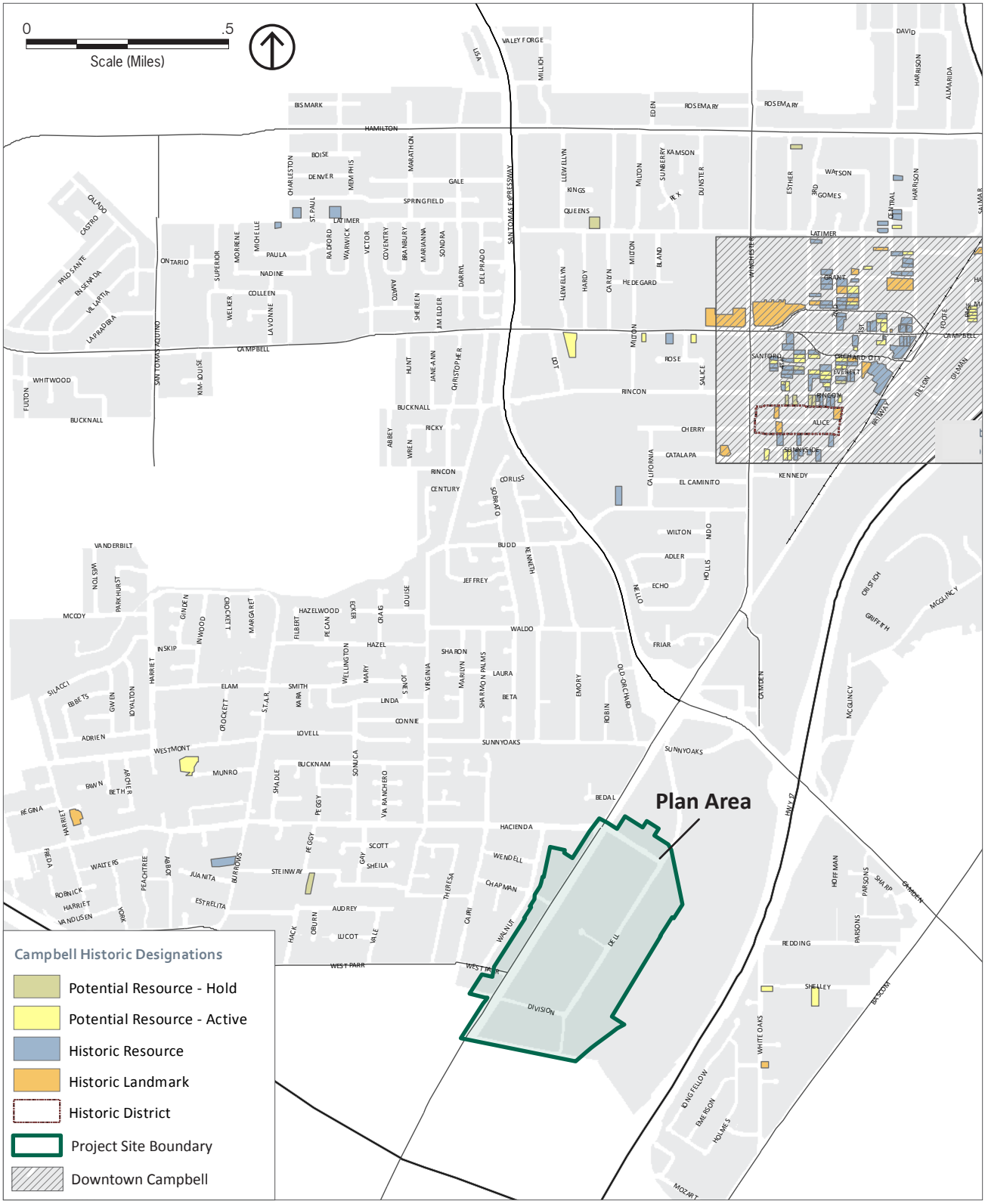
1. Cause a substantial adverse change in the significance of a historical resource as defined in Section 15064.5.
2. Cause a substantial adverse change in the significance of an archeological resource pursuant to Section 15064.5.
3. Directly or indirectly destroy a unique paleontological resource or site or unique geologic feature.
4. Disturb any human remains, including those interred outside of formal cemeteries.

4.4.3 ENVIRONMENTAL IMPACT DISCUSSION

This section analyzes potential project-specific and cumulative impacts cultural resources.

CULT-1	**The proposed Plan would not have the potential to cause a substantial adverse change in the significance of a historical resource as defined in Section 15064.5.**

[10] California State Office of Historic Preservation, *California Historic Resources*. http://ohp.parks.ca.gov/ListedResources/?view=county&criteria=43 accessed on August 27, 2014.



Source: City of Campbell, County of Santa Clara.

Figure 4.4-1
Historic Resource Inventory Map

Pursuant to CEQA, a historical resource is a resource listed in or eligible for listing in the California Register, a resource included in a local register of historical resources, a resource determined to be significant by the Lead Agency, or a resource determined by the Lead Agency to be a historical resource as defined in the Public Resources Code. The types of cultural resources that meet the definition of historical resources under Public Resources Code Section 21084.146[11] generally consist of districts, sites, buildings, structures, and objects that are significant for their traditional, cultural, and/or historical associations. Under CEQA, both prehistoric and historic-period archaeological sites may qualify based on historical associations.[12] As such, the two main historical resources that are subject to impact, and that may be impacted by development allowed under the proposed Plan, are historical archaeological deposits and historical architectural resources.

The proposed Plan would have a significant impact on historic resources if it would adversely affect a historical resource, including any building, structure, feature, object, or site of historic, aesthetic, cultural, or educational importance.

The federal, State, and City historic registers do not indicate that any historically or architecturally significant buildings are designated within the Plan Area. The nearest historic structure, as listed in the California Register of Historic Places, is the Ainsley House located at 300 Grant Street, 2 miles from the Plan Area. Furthermore, no known historic resources have been recorded or identified in the General Plan EIR or on the City's list of historic landmarks, districts, and historic properties in the Plan Area. Additionally, the current architecture does not reflect any particular historical, creative, cultural, or design feature or distinction identified in any of the criteria required by the California Register. However, should an unidentified historic resource exist within the Plan Area, compliance with the NHPA of 1966, California Register of Historical Resources, 2013 California Historical Building Code, Campbell General Plan, and Campbell Municipal Code, as described above in Section 4.4.1.1, Regulatory Framework, would ensure future development would not be detrimental or injurious to listed or eligible historic resources in the vicinity of individual development projects. Taken together, this suite of local, State, and national regulations would reduce potential impacts to a *less-than-significant* level.

Significance Before Mitigation: Less than significant.

CULT-2	**The proposed Plan would have the potential to cause a substantial adverse change in the significance of an archeological resource pursuant to Section 15064.5.**

[11] The California Environmental Quality Act (CEQA) Statute is contained in Sections 21000 et. seq. of the Public Resource Code (PRC).

[12] California Code of Regulations (CCR), Title 14, Chapter 3, Section 15064.5(c), Determining the Significance of Impacts on Historical and Unique Archaeological Resources.

The proposed Plan would have a significant environmental impact if it would disturb or adversely affect an archaeological resource, including any object or site of pre-historic of historic archaeological importance.

As discussed in Section 4.4.1.2, the native Californians settled the Santa Clara Valley, which encompasses the Plan Area, approximately 12,000 to 6,000 years ago. Therefore, it is possible that archaeological deposits exist in the Plan Area. In addition, it is possible that unrecorded Native American prehistoric archaeological sites exist in the Plan Area, including those that are buried under soils, since there have been very few archaeological studies within the city.[13] However, no prehistoric resources including ethnographic villages or camps have been discovered or recorded to date.

Archaeological deposits that meet the definition of unique archaeological resources under Public Resources Code Section 21083.2(g) could be damaged or destroyed by ground-disturbing construction activities (e.g., site preparation, grading, excavation, and trenching for utilities) associated with development allowed under the proposed Plan. Should this occur, the ability of the deposits to convey their significance, either as containing information in prehistory or history, or as possessing traditional or cultural significance to Native American or other descendant communities, would be materially impaired. In addition to the potential presence of unrecorded Native American archaeological sites, it is possible that other significant archaeological deposits exist in the Plan Area.

Several existing local, State, and federal regulations would help to ensure that development and redevelopment activities allowed under the proposed Plan do not cause a substantial adverse change to cultural resources. The City of Campbell General Plan includes a goal, policy, and strategy that would address impacts to historical and pre-contact archaeological deposits. Conservation and Natural Resources (CNR) Element Goal CNR-1 and its associated policy and strategies would provide for the identification of archaeological deposits prior to actions that may disturb such deposits and provides for the protection of such deposits. CNR Element Strategy CNR-1.1b requires that in the event of uncovering an archaeological resource, all work in the immediate vicinity of the Plan Area be discontinued and that a licensed archaeologist prepares a resource mitigation plan and monitoring program. The proposed Plan would not directly result in physical construction that could impact archeological resources. However, future projects allowed under the Plan could disturb subsurface materials that have not yet been identified during site planning, preparation, and/or construction activities. This would be a *significant* impact before mitigation.

Significance Before Mitigation: Significant.

CULT-3	**The proposed Plan would have the potential to directly or indirectly destroy a unique paleontological resource, site, or geologic feature.**

The proposed Plan would have a substantial effect on the environment if it would directly or indirectly destroy a unique paleontological resource, site, or geologic feature.

[13] City of Campbell, 2001. *City of Campbell General Plan EIR*, page 146.

Although no known paleontological resources have been recorded within the Plan Area, there could be fossils of potential scientific significance and other unique geologic features that are not recorded. It is possible that ground-disturbing construction associated with development under the proposed Plan could reach significant depths below the ground surface. Should this occur, damage to, or destruction of, paleontological resources or unique geologic features could result.

The CNR Element Strategy CNR-1.1b discusses the actions to be taken if archaeological resources are discovered; however, it does not clarify any policies related to the protection of unknown paleontological resources. As such, ground-disturbing activities associated with development under the proposed Plan would have the potential to uncover and adversely affect unknown resources. This would be a *significant* impact before mitigation.

Significance Before Mitigation: Significant.

CULT-4	**The proposed Plan would not have the potential to disturb human remains, including those interred outside of formal cemeteries.**

The proposed Plan would substantially disturb human remains if it would not comply with federal, State, and local regulations that outline the human remain response procedures.

Human remains associated with pre-contact archaeological deposits may exist in the Plan Area, as sometimes previously unrecorded human remains are encountered during development projects. The proposed Plan would allow new construction, and the associated ground-disturbing activities would have the potential to impact human remains. Descendant communities may ascribe religious or cultural significance to such remains, and may view their disturbance as an immitigable impact. However, any human remains encountered during ground-disturbing activities associated with future development under implementation of any of the four scenarios under consideration for the proposed Plan would be subject to federal, State, and local regulations, such as the California Health and Safety Code Section 7050.5, Public Resources Code Section 5097.98, and the California Code of Regulations Section 15064.5(e) (CEQA), which state the mandated procedures of conduct following the discovery of human remains. According to the provisions in CEQA, if human remains are encountered at the site, all work in the immediate vicinity of the discovery shall cease and necessary steps to ensure the integrity of the immediate area shall be taken. The Santa Clara County Coroner shall be notified immediately. The Coroner shall then determine whether the remains are Native American. If the Coroner determines the remains are Native American, the Coroner shall notify the NAHC within 24 hours, who will in turn, notify the person the NAHC identifies as the MLD of any human remains. Further actions shall be determined, in part, by the desires of the MLD. The MLD has 48 hours to make recommendations regarding the disposition of the remains following notification from the NAHC of the discovery. If the MLD does not make recommendations within 48 hours, the owner shall, with appropriate dignity, reinter the remains in an area of the property secure from further disturbance. Alternatively, if the owner does not accept the MLD's recommendations, the owner or the descendent may request mediation by the NAHC.

Therefore, compliance with the mandatory regulatory procedures described above, potential impacts related to the potential discovery or disturbance of any human remains accidently unearthed during construction activities as a result of implementation of the proposed Plan would be *less than significant*.

Significance Before Mitigation: Less than significant.

4.4.4 CUMULATIVE IMPACTS

CULT-5	**The proposed Plan, in combination with past, present, and reasonably foreseeable projects, would result in less than significant cumulative impacts with respect to cultural resources.**

The development of the individual projects under the proposed Plan, combined the cumulative projects identified in Chapter 4.0, which include the County Courthouse, Albright, and North 40 development projects in Los Gatos, could potentially result in cumulative impacts associated with cultural resources if these projects, collectively, would exceed the identified thresholds listed under CULT-1 through CULT-4. Future projects in Campbell and the surrounding area could result in the loss of historical resources. There is also the possibility of encountering buried archaeological and paleontological deposits and human remains throughout Campbell and the surrounding vicinity. Impacts to those resources would need to be assessed on a case-by-case basis. Implementation of Mitigation Measures CULT-2 and CULT-3, shown below, would ensure that implementation of the proposed Plan would not be cumulatively considerable. As a result, the proposed Plan would not substantially contribute to a significant cumulative impact on such resources. Additionally, it is anticipated that other projects would similarly be required to comply with all applicable existing regulations, procedures, and policies that are intended to address cultural resources impacts. Therefore, implementation of the proposed Plan would not result in a cumulative impact to cultural resources, and cumulative cultural resources impacts would be *less than significant*.

Significance Before Mitigation: Less than significant.

4.4.5 SUMMARY OF SIGNIFICANT IMPACTS AND MITIGATION MEASURES

CULT-2	**The proposed Plan would have the potential to cause a substantial adverse change in the significance of an archaeological resource as defined in Section 15064.5.**

Mitigation Measure CULT-2: If a potentially significant subsurface cultural resource is encountered during ground-disturbing activities, all construction activities within a 100-foot radius of the find shall cease until a qualified archeologist determines whether the resource requires further study. All

developers in the Plan Area shall include a standard inadvertent discovery clause in every construction contract to inform contractors of this requirement. Any previously undiscovered resources found during construction activities shall be recorded on appropriate Department of Parks and Recreation (DPR) forms and evaluated for significance, in terms of CEQA criteria, by a qualified archeologist. If the resource is determined significant under CEQA, the qualified archaeologist shall prepare and implement a research design and archaeological data recovery plan that will capture those categories of data for which the site is significant. The archaeologist shall also perform appropriate technical analyses; prepare a comprehensive report complete with methods, results, and recommendations; and provide for the permanent curation of the recovered resources. The report shall be submitted to the City of Campbell, NWIC, and State Historic Preservation Office (SHPO), if required.

Significance After Mitigation: Less than significant.

CULT-3	**The proposed Plan would have the potential to directly or indirectly destroy a unique paleontological resource, site, or geologic feature.**

Mitigation CULT-3: If paleontological resources are encountered during grading or excavation, all construction activities within a 50-foot radius shall stop, the City shall be notified, and a qualified paleontologist shall inspect the findings within 24 hours of discovery. The paleontologist shall document the discovery, as needed, in accordance with the Society of Vertebrate Paleontology standards, evaluate the resource, and assess the significance of the find under the criteria set forth in CEQA Guidelines Section 15064.5. The paleontologist shall notify the appropriate agencies to determine procedures that would be followed before construction is allowed to resume at the location of the find. If in consultation with the paleontologist, the project proponent determines that avoidance is not feasible, the paleontologist shall prepare an excavation plan for mitigating the effect of the project on the qualities that make the resource important. Possible mitigation under CEQA emphasizes preservation-in-place measures, including planning construction to avoid paleontological sites, incorporating sites into parks and other open spaces, covering sites with stable soil, and deeding the site into a permanent conservation easement. The project proponent shall submit the excavation plan to the City for review and approval and the project proponent shall implement the approved excavation plan.

Significance After Mitigation: Less than significant

4.5 GEOLOGY, SOILS, AND SEISMICITY

This chapter describes potential impacts associated with the implementation of the Dell Avenue Area Plan (proposed Plan) that are related to geology, soils, and seismicity. Additionally, this chapter describes the environmental setting of the Plan Area, including the regulatory framework, existing conditions, and policies and mitigation measures that would prevent or reduce significant impacts.

4.5.1 ENVIRONMENTAL SETTING

The State of California as well as the City of Campbell have enacted laws and developed regulations that pertain to geology, soils, and seismicity. There are no federal laws or regulations related to geology, soils, and seismicity that are applicable to the proposed Plan. The following laws and regulations are relevant to the California Environmental Quality Act (CEQA) review process for the proposed Plan.

4.5.1.1 REGULATORY FRAMEWORK

State Regulations

Alquist-Priolo Earthquake Fault Zoning Act

The Alquist-Priolo Earthquake Fault Zoning Act was passed in 1972 to mitigate the hazard of surface fault rupture to structures used for human occupancy.[1] The main purpose of the Act is to prevent the construction of buildings used for human occupancy on top of the traces of active faults. It was passed into law in the wake of the February 1971 M_w 6.5 San Fernando (Sylmar) Earthquake that resulted in over 500 million dollars in property damage and 65 deaths.[2] Although the Act addresses the hazards associated with surface fault rupture, it does not address other earthquake-related hazards, such as seismically induced ground shaking, liquefaction, or landslides.

The Act requires the State Geologist to establish regulatory zones (formerly known as Special Studies Zones, now known as Earthquake Fault Zones) around the surface traces of mapped active faults, and to publish appropriate maps that depict these zones.[3] The maps are made publicly available and distributed to all affected cities, counties, and State agencies for their use in planning and controlling new or renewed construction. In general, the law prohibits construction within 50 feet of an active fault trace.

[1] Originally titled the *Alquist-Priolo Special Studies Zones Act* until renamed in 1993, Public Resources Code Division 2, Ch. 7.5, Sect. 2621.

[2] Southern California Earthquake Data Center, 2014, http://www.data.scec.org/significant/sanfernando1971.html, accessed on August 20, 2014.

[3] California Geological Survey, Alquist-Priolo Earthquake Fault Zones, 2014, http://www.conservation.ca.gov/cgs/rghm/ap/Pages/index.aspx, accessed on August 20, 2014.

Seismic Hazards Mapping Act

The Seismic Hazards Mapping Act, which was passed by the California legislature in 1990, addresses earthquake hazards related to liquefaction and seismically induced landslides. Under the Act, seismic hazard zones are mapped by the State Geologist in order to assist local governments in land use planning. The Act states, "It is necessary to identify and map seismic hazard zones in order for cities and counties to adequately prepare the safety element of their general plans and to encourage land use management policies and regulations to reduce and mitigate those hazards to protect public health and safety."[4] Section 2697(a) of the Act states that "cities and counties shall require, prior to the approval of a project located in a seismic hazard zone, a geotechnical report defining and delineating any seismic hazard."[5]

California Building Code

The California Building Code (CBC), known as the California Building Standards Code, is included in Title 24 of the California Code of Regulations. The CBC incorporates the International Building Code, a model building code adopted across the United States. Current State law requires every local agency enforcing building regulations, such as cities and counties, to adopt the provisions of the CBC within 180 days of its publication. The publication date of the CBC is established by the California Building Standards Commission. The most recent building standard adopted by the legislature and used throughout the state is the 2013 version of the CBC, which took effect on January 1, 2014. The CBC, as adopted by local cities or counties, is often modified with more restrictive amendments that are based on local geographic, topographic, or climatic conditions. The CBC codes provides minimum standards to protect property and public safety by regulating the design and construction of excavations, foundations, building frames, retaining walls, and other building elements to mitigate the effects of seismic shaking and adverse soil conditions.[6] It also regulates grading activities, including drainage and erosion control.

Local Regulations

City of Campbell General Plan

The City of Campbell General Plan, which was adopted on November 6, 2001, includes goals, policies, and strategies that are intended to reduce the risks associated with geology, soils, and seismic hazards. Table 4.5-1 lists these goals, policies, and strategies.

[4] California Public Resources Code, Division 2, Chapter 7.8, Section 2691(c).
[5] California Public Resources Code, Division 2, Chapter 7.8, Section 2697(a).
[6] California Building Standards Commission, http://www.bsc.ca.gov/codes.aspx, accessed on August 20, 2014.

TABLE 4.5-1 CITY OF CAMPBELL GENERAL PLAN GOALS, POLICIES, AND STRATEGIES PERTAINING TO GEOLOGY, SOILS, AND SEISMICITY

Goal/Policy/ Strategy Number	Goal/Policy/Strategy Text
Health and Safety Element	
Goal HS-1	*A feeling of safety in the community.*
Policy HS-1.4	Critical Facilities: Ensure that critical facilities keep pace with technological improvements and demand.
Strategy HS-1.4c	Proper Siting of Emergency Response Facilities: Ensure that siting of critical emergency response facilities such as hospitals, fire stations, police offices and substations, dispatch centers and other emergency service facilities and utilities have minimal exposure to flooding, seismic and geologic hazards, fires and explosions.
Goal HS-3	*Minimize impacts from natural and human-induced hazards.*
Policy HS-3.1	Construction-related Risk Reduction: Reduce construction related risks.
Strategy HS-3.1a	Building and Fire Code Requirements: Require all new construction, including public facilities, to be built according to the most recent Building and Fire Codes.
Policy HS-3.2	Seismic Risk Reduction: Minimize the potential damage to buildings, humans and property from geologic and seismic hazards, including ground shaking, liquefaction and fault rupture.
Strategy HS-3.1b	Non-conforming Structures: Identify structures not conforming with current earthquake, fire or flood standards and require compliance through programs such as structural rehabilitation, occupancy reduction and demolition or reconstruction.
Strategy HS-3.2a	Building Code Compliance: Require new development, remodels and redevelopment to comply with Uniform Building Code and California Building Code provisions regarding engineering and geotechnical analysis in order to minimize risk to the safety of occupants due to geologic and seismic hazards.
Strategy HS-3.2b	Excavation, Grading and Filling Requirements: Review and update City requirements for excavation, grading and filling to ensure they incorporate current and best available practices, standards and technology.
Strategy HS-3.2c	Abatement of Dangerous Buildings: Implement a Uniform Building Code section regarding abatement of dangerous buildings to address older buildings that may be at risk from geologic and seismic hazards.
Strategy HS-3.2d	Retrofitting Structures: Explore and pursue funding sources to assist in retrofitting non-earthquake-safe structures, such as non-reinforced masonry buildings.
Strategy HS-3.2e	Earthquake Risk and Preparedness Information: Distribute materials informing the public of earthquake risks and ways to reduce them and support information programs that address earthquake preparedness.
Strategy HS-3.2f	Compliance with Seismic Hazards Mapping Act: Require projects within Seismic Hazard Zones to comply with the provisions of the Seismic Hazards Map Act.
Strategy HS-3.2g	Recognition of Seismic and Geologic Hazards in the Zoning Code: Revise the Zoning Code to recognize and address geologic and seismic hazards, including criteria for approval of a project within Seismic Hazard Zones, guidelines for Campbell General Plan HS-26 evaluating seismic hazards and recommending mitigation measures and content of the geotechnical report.
Strategy HS-3.2h	Posting of Potential Hazards Associated with Unreinforced Masonry Buildings. Require that all URM structures within the City be posted with signs informing the public of the potential hazards associated with occupancy of these buildings. Property owners are responsible for implementing and maintaining such signage.

TABLE 4.5-1 CITY OF CAMPBELL GENERAL PLAN GOALS, POLICIES, AND STRATEGIES PERTAINING TO GEOLOGY, SOILS, AND SEISMICITY

Goal/Policy/ Strategy Number	Goal/Policy/Strategy Text
Conservation and Natural Resource Element	
Goal CNR-3	*Protect and maintain animal and plant species and supporting habitats within Campbell.*
Policy CNR-3.1	Riparian Corridor Preservation: Preserve the aesthetic and habitat value of riparian corridors.
Strategy CNR-3.1f	Grading Ordinance: Develop and implement a Grading Ordinance that requires the use of erosion and sediment control measures and minimizes grading and vegetation removal near creeks to ensure that the creeks are protected from reduction in bank stability, erosion, downstream sedimentation and flooding.

Source: City of Campbell General Plan, 2001.

Municipal Code

The City of Campbell Municipal Code contains all adopted ordinances for the city. The Municipal Code is organized by Title, Chapter, and Section. The current Municipal Code is codified through Ordinance No. 2179, which was passed on June 2, 2014.

The City of Campbell has adopted the 2013 CBC, by reference, as the basis for the City's Building Code. The provisions of the Building Code are set forth in Title 18, Chapter 18.04 of the Campbell Municipal Code.[7] A number of additional building-related requirements were appended to the CBC as it was adopted, several of which are relevant to geology, soils, and seismicity. For example, Chapter 18.04.030(c) of the Municipal Code prohibits most uses of structural plain concrete in structures assigned to Seismic Design Category C, D, E, or F. Additionally, Chapter 18.04.030(e) includes more stringent requirements for the minimum amount of longitudinal reinforcing in concrete building foundations located in Seismic Design Categories D_0, D_1, and D_2.

Chapter 20.80.020 of the Municipal Code contains provisions that govern construction-related excavation and grading, and the approval of development or subdivision maps are to be conditioned on compliance with the requirements for grading and erosion control, including the prevention of sedimentation or damage to off-site property. Chapter 21.18.130 of the Municipal Code includes standards for geologic hazard reviews and reports where site development in areas with potential seismic and/or geologic hazards is contemplated. The standards include, but are not limited to required credentials for the report preparers and the use of the geotechnical report conclusions and recommendations as review standards.

[7] City of Campbell Municipal Code, https://library.municode.com/index.aspx?clientId=16242, accessed on August 24, 2014.

4.5.1.2 EXISTING CONDITIONS

This section includes a discussion of the existing geologic, soil, and seismic conditions in the City of Campbell.

Geology

The City of Campbell lies near the west-central edge of the Santa Clara Valley, a broad, alluvial plain of generally low topographic relief that slopes gently towards San Francisco Bay to the north. The Santa Clara Valley is located within the Coast Ranges geomorphic province of California. This province is characterized by northwest-trending ridges and valleys, underlain by strongly deformed sedimentary and metamorphic rocks of the Franciscan Complex. Major strike-slip faults help define the valley margins, such as the San Andreas Fault to the southwest and the Hayward and Calaveras Faults to the east.

The Santa Clara Valley consists of a large structural basin containing alluvial deposits that were deposited as a series of coalescing alluvial fans. The fans were formed by streams that drain the Diablo Range to the east and the Santa Cruz Mountains to the west. The Plan Area is located near the west-central margin of the valley, where the alluvium abuts the east flank of the Santa Cruz Mountains.

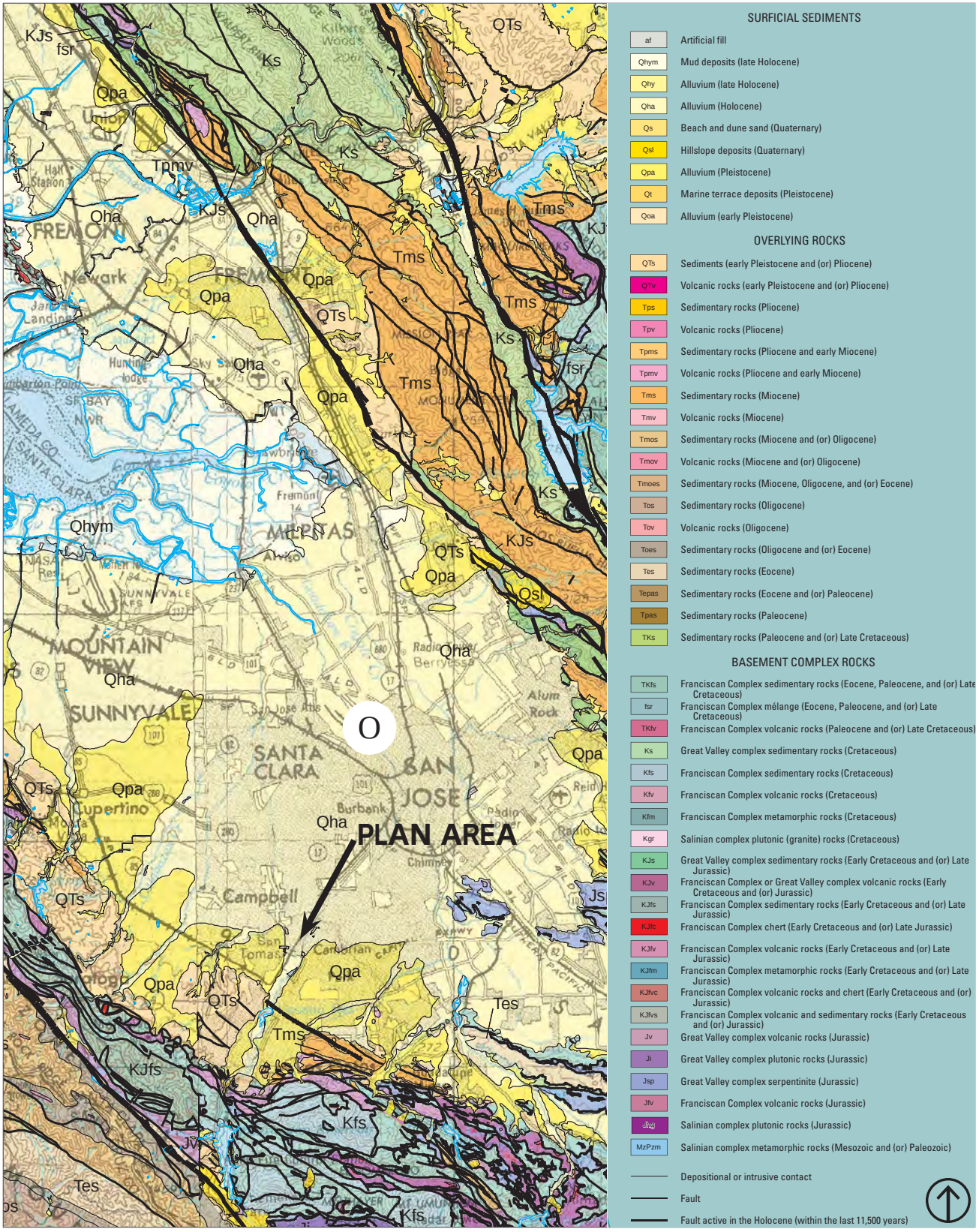
The general pattern of surficial geology is typified by progressively older sediments as one traverses the City of Campbell from the northeast to the southwest, as summarized below (refer to Figure 4.5-1):[8]

- Holocene alluvial fan deposits that are typically comprised of gravelly sand grading upward to sandy or silty clay;
- Pleistocene alluvial fan deposits generally composed of gravelly to clayey sand; and
- Lower Pleistocene to Upper Pliocene fluvial deposits of the Santa Clara Formation that generally consist of poorly sorted, poorly consolidated boulder and gravel conglomerate with beds of poorly sorted sandstone, siltstone, and clay.[9] The depositional environmental for the Santa Clara Formation has been interpreted as non-marine environments that were produced by late Cenozoic tectonism and uplift of the nearby Coast Ranges.

The Plan Area lies at the head of an alluvial fan, where Los Gatos Creek emerges from the foothills. In addition to the alluvium described above, less extensive alluvial terrace deposits locally flank the creek, where they are frequently composed of poorly sorted gravels and cobbles set in a sandy matrix.

[8] US Geological Survey, 1994, Preliminary Quaternary Geologic Maps of Santa Clara Valley, Santa Clara, Alameda, and San Mateo Counties, California: A Digital Database, Open-File Report 94-231, by E.J. Helley, R.W. Graymer, G.A. Phelps, P.K. Showalter, and C.M. Wentworth.

[9] US Geological Survey, 2002, Subsurface and Petroleum Geology of the Southwestern Santa Clara Valley ("Silicon Valley"), California, Professional Paper 1663, by Richard G. Stanley, Robert C. Jachens, Paul G. Lillis, Robert J. McLaughlin, Keith A. Kvenvolden, Frances D. Hostettler, Kristin A. McDougall, and Leslie B. Magoon.



Source: US Geology Survey, 2006, Geologic Map of the San Francisco Bay Region.

Figure 4.5-1
Geologic Map, Campbell, California

Soils

Web-accessible soil mapping data compiled by the United States Department of Agriculture's (USDA) Natural Resources Conservation Service (formerly, the Soil Conservation Survey) was used to identify the major soil types within the Plan Area (see Figure 4.5-2).[10] The predominant soil types include soils of the Urban Land-Flaskan complex, with lesser areas of Urban Land-Elder and Urban Land-Landelspark complexes. All of the above soils are generally formed on slopes of 0 to 2 percent.

The soils of the dominant Urban Land-Flaskan complex are typically formed on alluvial fans, where they are chiefly composed of sandy loam, sandy clay loam, and gravelly loam. According to the USDA, these soils are deep and well drained, and are typified by low runoff and low corrosivity with respect to concrete and steel.

Soils in the vicinity of the City of Campbell are known to be expansive in places.[11] A number of widely used treatments are available to mitigate expansive soils, including soil grouting, recompaction, and replacement with a non-expansive material. The CBC requires that each construction location be evaluated to determine the most appropriate treatment for expansive soils. Local-area construction contractors and soil testing firms are well acquainted with the procedures used to identify and mitigate expansive soils.

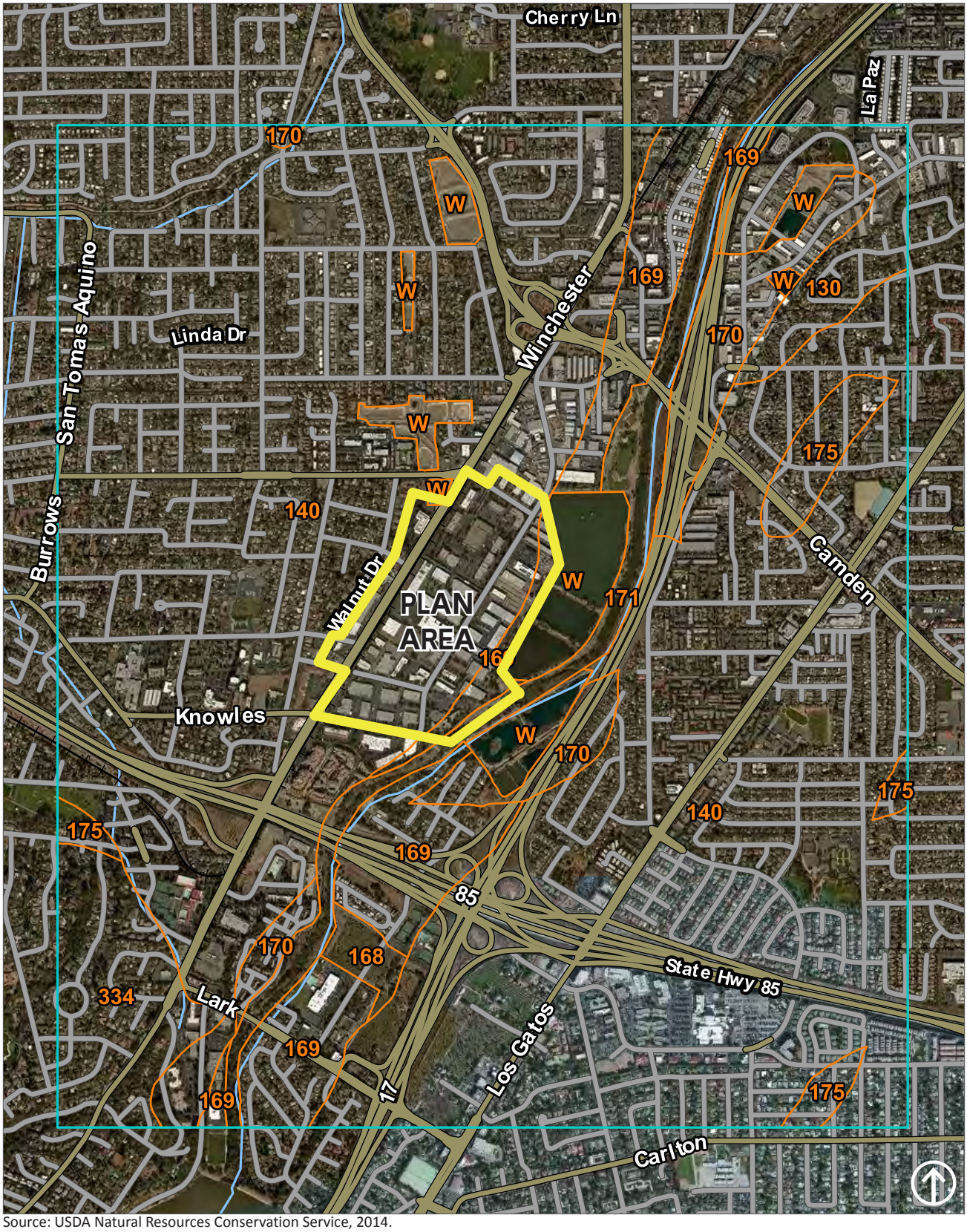
Regional Faulting, Seismicity, and Related Seismic Hazards

The earth's crust includes tectonic plates that locally collide with or slide past one another along plate boundaries. California is particularly susceptible to such plate movements, notably the largely horizontal or "strike-slip" movement of the Pacific Plate as it impinges on and slides past the west margin of the North American Plate. In general, earthquakes occur when the accumulated stress along a plate boundary or fault is suddenly released, resulting in seismic slippage. The amount (i.e., distance) of slippage can vary widely, ranging in scale from a few millimeters or centimeters, to tens of feet.

The performance of man-made structures during a major seismic event varies widely due to a number of factors: location with respect to active fault traces or areas prone to liquefaction or seismically-induced landslides; the type of building construction (i.e., wood frame, unreinforced masonry, non-ductile concrete frame); the proximity, magnitude, and intensity of the seismic event itself; and many other factors. In general, evidence from past earthquakes shows that wood frame structures tend to perform well, especially when their foundations are properly designed and anchored. Older, unreinforced masonry structures, on the other hand, do not perform as well, especially if they have not undergone appropriate seismic retrofitting. Applicable building code requirements, such as those found in the CBC, include seismic requirements that are designed to ensure the satisfactory performance of building materials under prescribed seismic conditions.

[10] US Department of Agriculture Natural Resources Conservation Service, 2014. Web Soil Service, http://websoilsurvey.sc.egov.usda.gov/app/HomePage.htm, accessed on August 26, 2014.

[11] Cornerstone Earth Group, 2010, Current Conditions, Geology, Soil and Seismic Hazards, San Jose General Plan Update.



Source: USDA Natural Resources Conservation Service, 2014.

130	Urban land-Still complex	171	Elder fine sandy loam
140	Urban land-Flaskan complex	175	Urbanland-Botella complex
169	Urbanland-Elder complex	178	Elder fine sandy loam
170	Urbanland-Landelspark complex	W	Water

Figure 4.5-2
Soil Types

The Plan Area, like nearly all of the San Francisco Bay Area, is vulnerable to seismic activity due to the presence of active earthquake faults in the region. The closest and most prominent active fault is the San Andreas Fault, the closest approach of which lies approximately 5.6 miles southwest of the Plan Area. Other active earthquake faults in the Santa Clara Valley region include the Hayward Fault and Calaveras Fault, which lie roughly 11 to 17 miles to the northeast, respectively, and the San Gregorio Fault, which passes as close as 21 miles southwest of the Plan Area (see Figure 4.5-3). Based on the maps published by the California Geological Survey, no Alquist-Priolo Earthquake Fault Zones have been mapped in the Plan Area or in the immediate vicinity.

Subsequent to the October 17, 1989 Loma Prieta earthquake, mapping by the U.S. Geological Survey documented seismic-related ground deformation along the northeastern flank of the Santa Cruz Mountains in the hills directly southwest of the Plan Area.[12] The deformation, which was reportedly manifest in the Pliocene and Pleistocene Santa Clara Formation and overlying Quaternary deposits, generally coincided with the location and orientation of the Berrocal, Monte Vista, Cascade, and Shannon Faults. These faults are part of a series of northwest-trending, southwest-dipping reverse faults that border the Santa Cruz Mountains range front and traverse the communities of Los Gatos, Saratoga, Cupertino, and Los Altos Hills. None of these faults are known to cross the Plan Area; based on U.S. Geological Survey (USGS) mapping, the closest of these is the Cascade Fault, whose inferred location passes roughly 0.4-mile southwest of the Plan Area.[13]

In the general vicinity of the Plan Area, none of the aforementioned faults has been mapped by the California Geological Survey as an "active" fault (sensu stricto). According to the California Geological Survey (CGS, formerly the Division of Mines and Geology), conclusive evidence of Holocene displacement, such that the faults would meet current criteria of being "sufficiently active" for zoning under the Alquist-Priolo Act, has not been documented.[14] Such mapping criteria notwithstanding, the fault zones reportedly exhibit geomorphic evidence of faulting (i.e., lineament patterns, offset drainages, sag ponds, and faceted ridge spurs) and a November 1973 M_w 4.7 to 4.9 earthquake near the community of Los Gatos was tentatively linked to movement on the Sargent-Berrocal Fault.[15]

Ground Shaking

The severity of seismic ground shaking depends on a number of variables, such as earthquake magnitude, hypocenter proximity, local geology (including the properties of unconsolidated sediments), groundwater

[12] US Geological Survey, 1994, Geomorphic Investigations of Deformation Along the Northeastern Margin of the Santa Cruz Mountains, by Christopher S. Hitchcock, Keith I. Kelson and Stephen C. Thompson, Open File Report 94-187.

[13] California Department of Water Resources, 1975, Evaluation of Ground Water Resources - South San Francisco Bay; Volume III Northern Santa Clara County Area.

[14] California Division of Mines and Geology, 1980, Fault Evaluation Report FER-98, dated June 26, 1980.

[15] US Geological Survey, 1975, Geologic Map of the Sargent-Berrocal Fault Zone between Los Gatos and Los Altos Hills, Santa Clara County, California, by Dennis Sorg and Robert McLaughlin, Map MF-643.

conditions, and topographic setting. In general, ground-shaking hazards are most pronounced in areas that are underlain by loosely consolidated soil/sediment.

When earthquake faults within the Bay Area's nine-county area were considered, the USGS estimated that the probability of a M_W 6.7 or greater earthquake prior to year 2036 is 63 percent, or roughly a two-thirds probability over this timeframe.[16] Individually, the forecasted probability for a given earthquake fault to produce a M_W 6.7 or greater seismic event by the year 2036 is as follows: 31 percent for the Hayward Fault, 21 percent for the San Andreas Fault, 7 percent for the Calaveras Fault, and 6 percent for the San Gregorio Fault, as shown in Figure 4.5-4. Earthquakes of this magnitude can create ground accelerations severe enough to cause major damage to structures and foundations not designed to resist the forces generated by earthquakes. Underground utility lines are also susceptible where they lack sufficient flexibility to accommodate the seismic ground motion. In the event of an earthquake of this magnitude, the seismic forecasts presented on the Association of Bay Area Governments' website (developed by a cooperative working group that included the USGS and the CGS) suggest that most parts of Plan Area are expected to experience "strong" shaking (i.e., Modified Mercalli Intensity [MMI] VII).

The April 1906 earthquake on the San Andreas Fault, estimated between M_W 7.7 and 8.3, was the largest seismic event in recent history that affected the City of Campbell. Roughly 25 years ago, the M_W 6.9 Loma Prieta earthquake of October 1989 on the San Andreas Fault caused significant damage throughout the San Francisco Bay Area, although no deaths were reported in Santa Clara County. The epicenter of the Loma Prieta event was located roughly 13.5 miles south of the Plan Area. Most recently, the August 24, 2014 M_W 6.0 Napa earthquake, located near the City of Napa roughly 65 miles north of the Plan Area, underscores the regional seismic hazards in the San Francisco Bay Area.[17] This earthquake represents the largest regional seismic event since Loma Prieta, and it may have resulted in the destruction of more than 70 structures and one billion dollars in total damage.

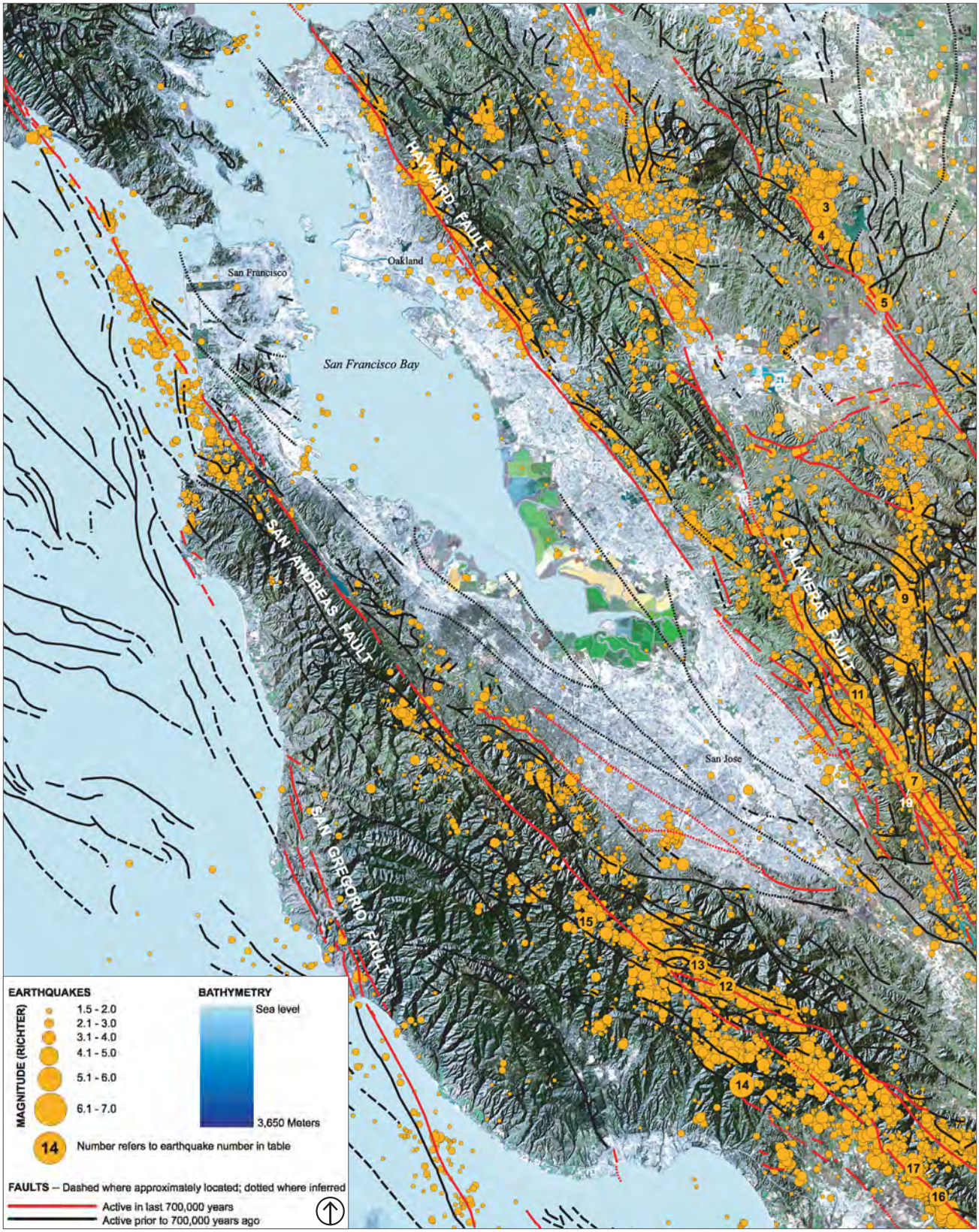
Landslides

Landslides are gravity-driven movements of earth materials that can include rock, soil, unconsolidated sediment, or combinations of such materials. The rate of landslide movement can vary considerably; some move rapidly, as in a soil or rock avalanche, while other landslides creep or move slowly for extended periods of time. The susceptibility of a given area to landslides depends on many variables, although the general characteristics that influence landslide hazards are widely acknowledged. Some of the more important factors that can impact the likelihood of landslides are listed below:

Slope Material: Loose, unconsolidated soil and weakly indurated or highly fractured bedrock are more prone to landslides.

[16] US Geological Survey, 2014, 2008 Bay Area Earthquake Probabilities, http://earthquake.usgs.gov/regional/nca/ucerf/, accessed on August 25, 2014.

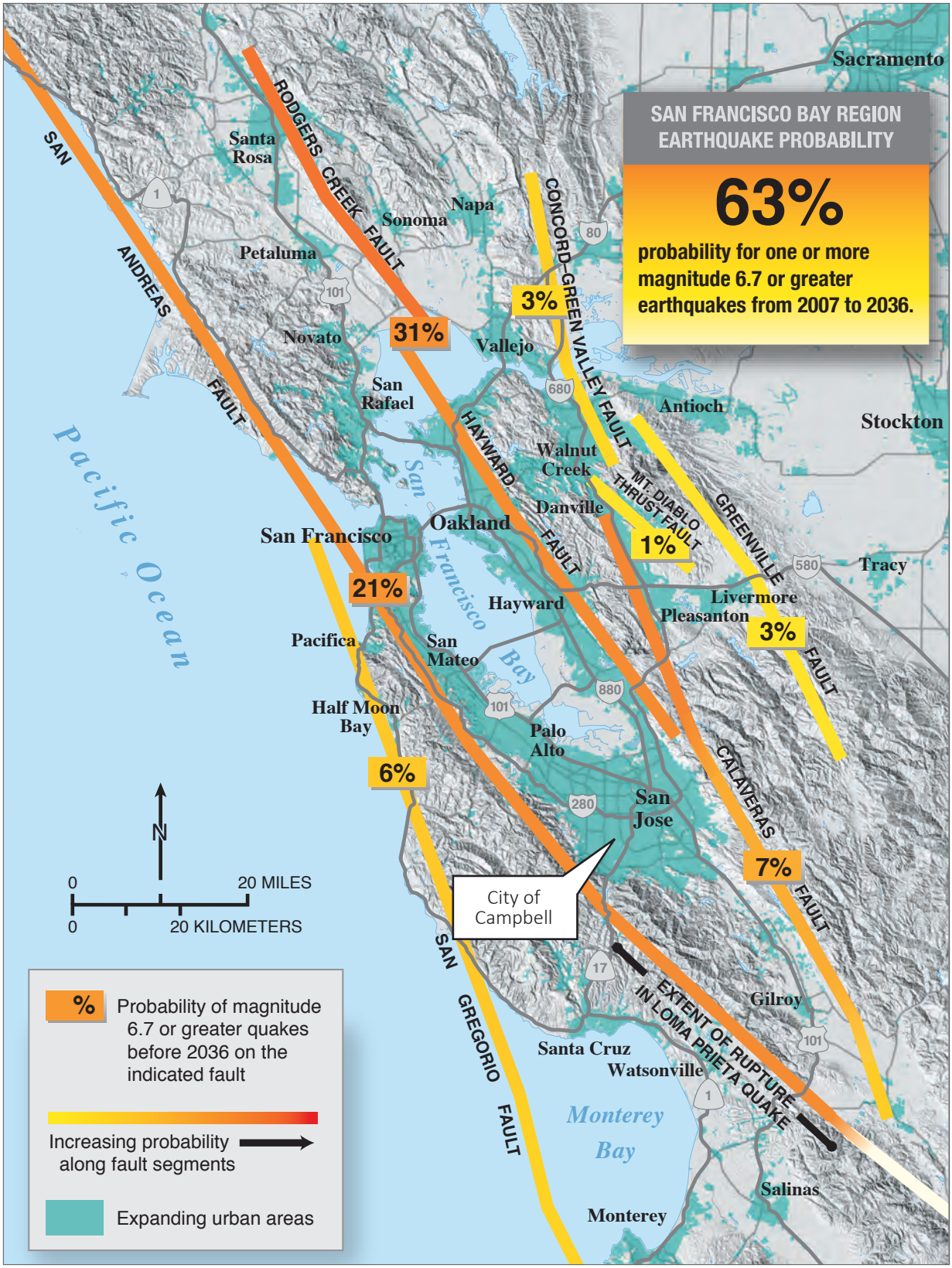
[17] US Geological Survey, 2014, Earthquake Hazards Program, http://earthquake.usgs.gov/earthquakes/eventpage/nc72282711#summary, accessed on August 26, 2014.



Source: US Geological Survey, 2004; Earthquakes and Faults in the San Francisco Bay Area (1970-2003); Scientific Investigations Map 2848.

Figure 4.5-3

Earthquakes and Faults in the San Francisco Bay Area



Source: US Geological Survey, 2008 Bay Area Earthquake Probabilities, 2014.

Figure 4.5-4
Bay Area Earthquake Probabilities

- **Slope Steepness:** Most landslides occur on moderate to steep slopes.
- **Structural Geometry:** The orientation of planar elements in soil or bedrock (e.g., bedding, foliation, joints, etc.) and the geometric relationship of these elements to the ground surface can affect landslide probability.
- **Moisture:** Increased moisture, as it may be present in subsurface soil or bedrock pores, or bedrock fractures, can increase the likelihood of a landslide due to decreased internal friction and increased weight of the earth materials.
- **Vegetation:** Well-established vegetation, and associated root structure, help promote slope stability.
- **Eroded Slopes or Man-made Cuts:** Proximity to eroded faces in soil or bedrock, as well as proximity to cut (i.e., excavated) slope faces can increase landslide potential.
- **Seismic Shaking:** Strong seismic shaking can trigger landslides in otherwise stable slopes or loosen the slope materials such that they are more prone to landslides in the future.

Due to the prevailing gentle topography and lack of steep slopes, earthquake-induced landslides are unlikely to occur within the Plan Area. This is consistent with the maps prepared by the California Geological Survey, which do not show any seismically induced landslide hazard zones in the Plan Area.[18]

Liquefaction

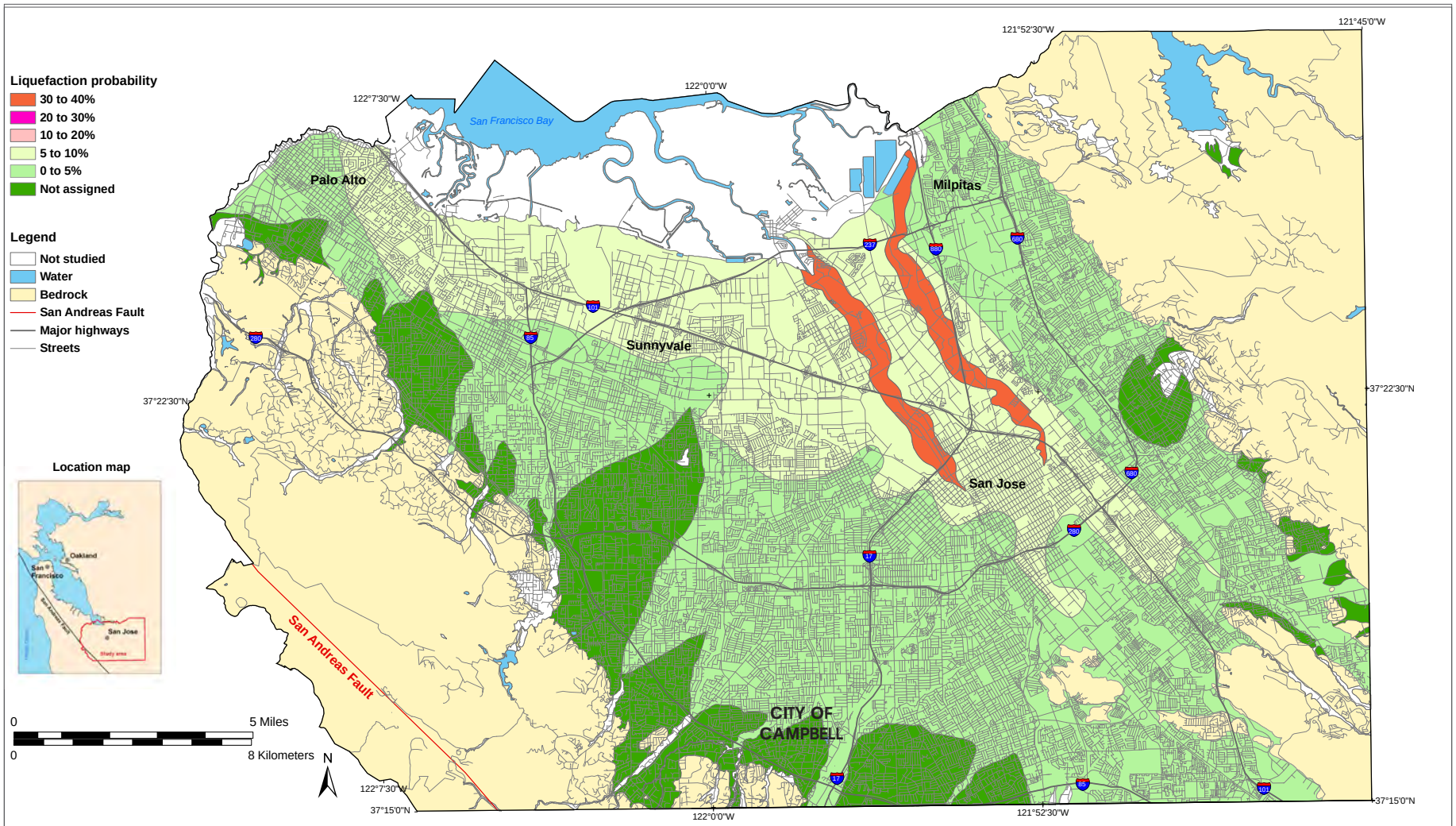
Liquefaction generally occurs in areas where moist, fine-grained, cohesionless sediment or fill materials are subjected to strong, seismically induced ground shaking. Under certain circumstances, the ground shaking can temporarily transform an otherwise solid, granular material to a fluid state. Liquefaction is a serious hazard because buildings in areas that experience liquefaction may subside and suffer major structural damage. Liquefaction is most often triggered by seismic shaking, but it can also be caused by improper grading, landslides, or other factors. In dry soils, seismic shaking may cause soil to consolidate rather than flow, a process known as densification.

Assuming a M_W 7.8 earthquake on the San Andreas Fault, the USGS estimated that the liquefaction potential ranges from 0 to 5 percent throughout the City of Campbell as shown on Figure 4.5-5.[19] In addition to the USGS evaluation, the CGS has studied and mapped liquefaction potential in the San Jose West 7.5-minute topographic quadrangle, a map area that includes the Plan Area.[20] Based on that map and the accompanying report, most of the Plan Area lies in a designated liquefaction hazard zone that is associated with the alluvium that flanks Los Gatos Creek. In reporting their findings, the CGS stated that "localities most

[18] California Geological Survey, 2002. Seismic Hazards Zone, San Jose West Quadrangle, Official Map, released February 7, 2002, Scale 1:24,000.

[19] US Geological Survey, Open File Report 2008-1270, 2008.

[20] California Department of Conservation, Division of Mines and Geology, 2002, Seismic Hazard Zone Report for the San Jose West 7.5-Minute Quadrangle, Santa Clara County, California, Seismic Hazard Zone Report 058.



This map shows the likelihood of liquefaction in Northern Santa Clara County during a magnitude 7.8 earthquake on the northernmost segments of the San Andreas Fault. This earthquake is similar to the 1906 San Francisco earthquake. At each location, the map predicts the approximate probability that shallow wet sands will liquefy and cause surface manifestations of liquefaction such as sand boils and ground cracking. Liquefaction is a phenomenon that is caused by earthquake shaking. Wet sand can become liquid-like when strongly shaken. The liquefied sand may flow and the ground may move and crack, causing damage to surface structures and underground utilities.The map depicts the hazard at a regional scale and should not be used for site-specific design and consideration. Subsurface conditions can vary abruptly and borings are required to address the hazard at a given location. The map assumes the historically shallowest water table conditions and does not reflect current ground-water conditions. If the current water table is deeper, the probability of liquefaction is reduced. The map includes the communities of San Jose, Campbell, Cupertino, Los Altos, Los Gatos, Milpitas, Mountain View, Palo Alto, Santa Clara, Saratoga, and Sunnyvale.

Source: US Geological Survey, 2008; Bay Area Earthquake Probabilities, 2014.

Figure 4.5-5

Liquefaction Probability for M7.8 San Andreas Fault Earthquake Scenario, Santa Clara County, California

susceptible to liquefaction-induced damage are underlain by loose, water-saturated, granular sediment within 40 feet of the ground surface" and that these geological and hydrogeological conditions are relatively common throughout the San Francisco Bay area.

The CGS report also commented on historical liquefaction phenomena in the Santa Clara Valley that were associated with major seismic events in the twentieth century. In the aftermath of the 1906 San Francisco earthquake, water, and mud reportedly erupted from artesian water wells in the Willow Park area of San Jose, roughly 8.5 miles north-northeast of the Plan Area. More recently, during the 1989 Loma Prieta earthquake, areas near the southeast corner of the San Jose airport reportedly experienced liquefaction. Features suggestive of liquefaction were documented along the banks of the Guadalupe River and along the airport frontage road.

Unstable Geologic Units

Expansive soils can change dramatically in volume depending on moisture content. When wet, these soils can expand; conversely, when dry, they can contract or shrink. Sources of moisture that can trigger this shrink-swell phenomenon include seasonal rainfall, landscape irrigation, utility leakage, and/or perched groundwater. Expansive soil can develop wide cracks in the dry season, and changes in soil volume have the potential to damage concrete slabs, foundations, and pavement. Special building/structure design or soil treatment are often needed in areas with expansive soils.

Expansive soils are typically very fine-grained with a high to very high percentage of clay, typically montmorillonite, smectite, or bentonite clay. Two types of soil tests are used to identify expansive soils. The first is referred to as a linear extensibility test, which measures the change in length of an unconfined clod as the moisture content is decreased from a moist to dry state. The volume change is reported as a percent change for the entire sample. In the linear extensibility test, shrink-swell potential is considered low if the soil has a linear extensibility of less than 3 percent; moderate, if 3 to 6 percent; high, if 6 to 9 percent; and very high, if more than 9 percent.[21] A linear extensibility of 3 percent or greater indicates that shrinking and swelling has the potential to cause damage to buildings, roads, and other structures. Previous USDA soil surveys notwithstanding, the shrink-swell potential at a given project within the Plan Area may be highly site-specific, requiring careful geotechnical investigation prior to project design and construction. In general, alluvial fan sediments become increasingly finer grained with greater distance from the source area (i.e., the Santa Cruz Mountains). As a consequence, expansive soils are more likely to be encountered in the relatively flat portions of Santa Clara Valley northeast of the Plan Area, where clayey silts and silty clays may be more prevalent.

[21] Army Corps of Engineers Field Manual TM 5-818-7, 1985, Foundations In Expansive Soils, http://armypubs.army.mil/eng/DR_pubs/DR_a/pdf/tm5_818_7.pdf, accessed on August 27, 2014.

4.5.2 STANDARDS OF SIGNIFICANCE

The proposed Plan would have a significant impact with regard to geology, soils, and/or seismicity if it would:

1. Expose people or structures to potential substantial adverse effects, including the risk of loss, injury, or death involving:
   - Surface rupture along a known active fault, including those faults identified on recent Alquist-Priolo Earthquake Fault Zoning Maps issued by the State Geologist, or active faults identified through other means (i.e., site-specific geotechnical studies, etc.).
   - Strong seismic ground shaking.
   - Seismic-related ground failure, including liquefaction.
   - Landslides.
2. Result in substantial soil erosion or the loss of topsoil.
3. Be located on a geologic unit or soil that is unstable, or that would become unstable as a result of the proposed Plan, and potentially result in on- or off-site landsliding, lateral spreading, subsidence, liquefaction, or collapse.
4. Be located on expansive soil, as defined in Section 1803.5.3 of the California Building Code, creating substantial risks to life or property.
5. Have soils incapable of adequately supporting the use of septic tanks or alternative wastewater disposal systems where sewers are not available for the disposal of wastewater.

4.5.3 ENVIRONMENTAL IMPACT DISCUSSION

This section analyzes potential impacts to geology, soils, and seismicity.

GEO-1	**Implementation of the proposed Plan would not expose people or structures to potential substantial adverse effects, including the risk of loss, injury, or death involving: surface rupture along a known active fault; strong seismic ground shaking; seismic-related ground failure, including liquefaction; and landslides.**

To date, no Alquist-Priolo Earthquake Fault Zones haves been mapped within the Plan Area. Protections afforded by the Alquist-Priolo Act, as well as the CBC and City Municipal Code ordinances that require detailed geotechnical reports in areas of suspected geological hazards, would help ensure that the potential for ground rupture is carefully evaluated when development in the Plan Area is proposed. Together, these safeguards would help control the construction of new residential buildings in proximity to the mapped traces of active faults. Nevertheless, in the event of a large, M_W 6.7 or greater, seismic event on the nearby San Andreas Fault, the Plan Area could experience "very strong" ground shaking. Based on published studies

and maps of the Plan Area, the potential for seismically induced liquefaction appears to be significant. State-mapped hazard zones for seismic-induced liquefaction include nearly all of the Plan Area.

Existing Municipal Code ordinances, such as Chapter 21.18.130, empower the City to require detailed soils and/or geotechnical reports where geological hazards, such as areas prone to seismically induced liquefaction, are likely to be present. Detailed soils/geotechnical investigations typically include quantitative evaluations of liquefaction hazards, as well as recommendations for foundation design and/or ground improvement. Implementation of such recommendations would help ensure that seismically induced liquefaction hazards would be adequately mitigated for future development in the Plan Area.

In addition to the safeguards discussed above, future development in the Plan Area would be subject to the following policies and strategies in the Health and Safety Element of the City's General Plan:

- Policy HS-3.2: Seismic Risk Reduction: Minimize the potential damage to buildings, humans, and property from geologic and seismic hazards, including ground shaking, liquefaction, and fault rupture.
- Strategy HS-3.1b: Non-conforming Structures: Identify structures not conforming with current earthquake, fire or flood standards and require compliance through programs such as structural rehabilitation, occupancy reduction and demolition or reconstruction.
- Strategy HS-3.2a: Building Code Compliance: Require new development, remodels and redevelopment to comply with Uniform Building Code and California Building Code provisions regarding engineering and geotechnical analysis in order to minimize risk to the safety of occupants due to geologic and seismic hazards.
- Strategy HS-3.2b: Excavation, Grading and Filling Requirements: Review and update City requirements for excavation, grading and filling to ensure they incorporate current and best available practices, standards and technology.
- Strategy HS-3.2c: Abatement of Dangerous Buildings: Implement a Uniform Building Code section regarding abatement of dangerous buildings to address older buildings that may be at risk from geologic and seismic hazards.
- Strategy HS-3.2d: Retrofitting Structures: Explore and pursue funding sources to assist in retrofitting non-earthquake-safe structures, such as non-reinforced masonry buildings.
- Strategy HS-3.2e: Earthquake Risk and Preparedness Information: Distribute materials informing the public of earthquake risks and ways to reduce them and support information programs that address earthquake preparedness.
- Strategy HS-3.2f: Compliance with Seismic Hazards Mapping Act: Require projects within Seismic Hazard Zones to comply with the provisions of the Seismic Hazards Map Act.
- Strategy HS-3.2g: Recognition of Seismic and Geologic Hazards in the Zoning Code: Revise the Zoning Code to recognize and address geologic and seismic hazards, including criteria for approval of a project

within Seismic Hazard Zones, guidelines for Campbell General Plan HS-26 evaluating seismic hazards and recommending mitigation measures and content of the geotechnical report.

- Strategy HS-3.2h: Posting of Potential Hazards Associated with Unreinforced Masonry Buildings. Require that all URM structures within the City be posted with signs informing the public of the potential hazards associated with occupancy of these buildings. Property owners are responsible for implementing and maintaining such signage.

Adherence to CBC requirements and applicable City regulations, procedures, and policies would help ensure that potential geological hazards, such as surface rupture along active faults, strong seismic shaking, and seismically induced liquefaction, are carefully evaluated when development in the Plan Area is considered. Such evaluations can mitigate these geological hazards through refined building and foundation design, ground improvement, and modified building siting. As a result, the impacts are judged *less than significant*.

Significance Before Mitigation: Less than significant.

GEO-2	**Implementation of the proposed Plan would not result in substantial soil erosion or the loss of topsoil.**

Substantial soil erosion or loss of topsoil during construction could undermine structures and minor slopes, and this could be a concern during development of the Plan Area. However, compliance with existing regulatory requirements, such as mandatory implementation of grading erosion control measures specified in the CBC and the City of Campbell's Municipal Code, would reduce impacts from erosion and the loss of topsoil. Examples of these control measures are Best Management Practices (BMPs) such as hydroseeding or short-term biodegradable erosion control blankets; vegetated swales, silt fences, or other forms of protection at storm drain inlets; post-construction inspection of drainage structures for accumulated sediment; and post-construction clearing of debris and sediment from these structures. Chapter 20.80.020 of the Municipal Code contains requirements for grading and erosion control that are broadly applicable to development projects where rezoning, building permit, use permit, variance, or special zoning area approvals are required.

In addition to the safeguards discussed above, consistency with the following policies and strategies in the Conservation and Natural Resource Element of the City's General Plan would minimize impacts pertaining to substantial soil erosion or the loss of topsoil:

- Policy CNR-3.1: Riparian Corridor Preservation: Preserve the aesthetic and habitat value of riparian corridors.
- Strategy CNR-3.1f: Grading Ordinance: Develop and implement a Grading Ordinance that requires the use of erosion and sediment control measures and minimizes grading and vegetation removal near

creeks to ensure that the creeks are protected from reduction in bank stability, erosion, downstream sedimentation, and flooding.

Adherence to the aforementioned regulatory requirements and consistency with relevant General Plan policies and strategies would ensure that impacts associated with substantial erosion and loss of topsoil during the development allowed by the proposed Plan would be *less than significant*.

Significance Before Mitigation: Less than significant.

GEO-3	**Implementation of the proposed Plan would not result in a significant impact related to development on unstable geologic units and soils or result in on- or off-site landslide, lateral spreading, subsidence, liquefaction, or collapse.**

Unstable geologic units could be present within the Plan Area. The potential impacts of such unstable materials could include subsidence where artificial fill material may be poorly engineered and highly compressible. As previously noted, development sites in the Plan Area may be at greater risk for seismically induced liquefaction, as are most areas that flank Los Gatos Creek. Compliance with Municipal Code requirements, which can require site-specific soils and/or geotechnical studies for land development or construction in areas of potential geologic instability, would reduce the potential impacts associated with future development to a *less-than-significant* level.

Significance Before Mitigation: Less than significant.

GEO-4	**Implementation of the proposed Plan would not create substantial risks to life or property as a result of its location on expansive soil, as defined in Section 1803.5.3 of the California Building Code, creating substantial risks to life or property.**

As previously discussed, the available information does not specifically show that expansive soils are present in the Plan Area. Nevertheless, future development would be subject to the CBC regulations and provisions, as adopted in Chapter 18.04 of the City of Campbell's Municipal Code and enforced by the City during plan review prior to building permit issuance. The CBC contains specific requirements for seismic safety, excavation, foundations, retaining walls, and site demolition, and it also regulates grading activities, including drainage and erosion control. Similarly, existing City ordinances governing site development, such as Chapter 21.18.130, contain standards for the content, scope, and application of geologic hazard/geotechnical investigations where geological hazards, including expansive soils, may be present.

In addition, City of Campbell General Plan policies and strategies under the Health and Safety Element require formal seismic and geologic evaluations of new development proposals that lie within identified

hazard zones. Examples include Strategy HS-3.2a (Building Code Compliance) and Strategy HS-3.2g (Recognition of Seismic and Geologic Hazards in the Zoning Code). Compliance with existing regulations and adherence to relevant General Plan policies and strategies would ensure that the potential future development impacts as a result of development allowed by the proposed Plan would be *less than significant*.

Significance Before Mitigation: Less than significant.

GEO-5	**Implementation of the proposed Plan would not result in impacts associated with the use of septic tanks or alternative wastewater disposal systems where sewers are not available for the disposal of wastewater.**

Construction allowed by the proposed Plan would not require the use of septic tanks or alternative wastewater disposal systems. Wastewater would be discharged into the existing public sanitary sewer system in the Plan Area, which is serviced by the West Valley Sanitation District (WVSD). WVSD sewers capture and convey wastewater to the Sunnyvale Water Pollution Control Plant, where the wastewater is treated and recycled. As discussed in Section 4.14.2.1 of this DEIR, adequate system capacity is ensured through implementation and periodic auditing of WVSD's Sewer System Management Plan (SSMP), as well as sewer-related capital improvement program (CIP) projects and studies. In light of the above, there would be *no impact* from the proposed Plan's implementation and associated development at sites where soils may not be capable of supporting the use of septic tanks or alternative wastewater disposal systems.

Significance Before Mitigation: No impact.

4.5.4 CUMULATIVE IMPACTS

GEO-6	**Implementation of the proposed Plan, in combination with past, present, and reasonably foreseeable projects, would result in less than significant cumulative impacts with respect to geology and soils.**

As discussed elsewhere in Chapter 4.0 of this DEIR, the cumulative projects considered for this analysis includes the County Courthouse, Albright, and North 40 projects in the Town of Los Gatos which would generate 869,000 square feet of commercial and 269,000 square feet of retail development along with 150 hotel rooms, 73 single-family homes, and 336 multi-family units.. Potential cumulative geological impacts could arise from a combination of implementation of the proposed Plan and associated development, together with past and future development in the adjacent Town of Los Gatos.

Considering the fact that no active earthquake faults have been mapped by the State of California within the Plan Area, the risk of primary fault rupture to occupied buildings is considered to be low. Furthermore, new development allowed by the proposed Plan would be subject to CBC and Municipal Code requirements. Compliance with these requirements would, to the maximum extent practicable, reduce cumulative,

development-related impacts that relate to seismic shaking, seismically induced landslides and liquefaction, and expansive soils. Similarly, compliance with General Plan policies and strategies, as well as the City's Ordinances pertaining to construction-related excavation and grading (i.e., Municipal Code Chapter 20.80.020), would minimize the cumulative impacts associated with soil erosion and loss of topsoil to the maximum extent practicable.

The proposed Plan would not result in a significant impact with respect to geology, soils, and seismicity and would not significantly contribute to cumulative impacts in this regard. Therefore, the cumulative impacts associated with implementation of the proposed Plan, together with anticipated growth in the immediate vicinity of the Plan Area, would result in a *less-than-significant* cumulative impact with respect to geology, soils, and seismicity.

Significance Before Mitigation: Less than significant.

4.5.5 SUMMARY OF SIGNIFICANT IMPACTS AND MITIGATION MEASURES

The proposed Plan would not result in any significant impacts with respect to geology, soils, or seismicity. Therefore, no mitigation measures are required.

4.6 GREENHOUSE GAS EMISSIONS

This chapter evaluates the potential for the Dell Avenue Area Plan (proposed Plan) to cumulatively contribute to greenhouse gas (GHG) emissions impacts. Because no single project is large enough individually to result in a measurable increase in global concentrations of GHG emissions, global warming impacts of a project are considered on a cumulative basis. This chapter is based on the methodology recommended by the Bay Area Air Quality Management District (BAAQMD) for project-level review. GHG emissions modeling is included in Appendix B, Air Quality and Greenhouse Gas Modeling, of this Draft EIR.

4.6.1 ENVIRONMENTAL SETTING

Scientists have concluded that human activities are contributing to global climate change by adding large amounts of heat-trapping gases, known as GHGs, to the atmosphere. The primary source of these GHGs is fossil fuel use. The Intergovernmental Panel on Climate Change (IPCC) has identified four major GHGs—water vapor, carbon dioxide (CO_2), methane (CH_4), and ozone (O_3)—that are the likely cause of an increase in global average temperatures observed in the 20th and 21st centuries. Other GHGs identified by the IPCC that contribute to global warming to a lesser extent are nitrous oxide (N_2O), sulfur hexafluoride (SF_6), hydrofluorocarbons, perfluorocarbons, and chlorofluorocarbons.[1,2,3] The major GHGs are briefly described below.

- **Carbon dioxide (CO_2)** enters the atmosphere through the burning of fossil fuels (e.g., oil, natural gas, and coal), solid waste, trees and wood products, and respiration, and also as a result of other chemical reactions (e.g., manufacture of cement). Carbon dioxide is removed from the atmosphere (i.e., sequestered) when it is absorbed by plants as part of the biological carbon cycle.
- **Methane (CH_4)** is emitted during the production and transport of coal, natural gas, and oil. Methane emissions also result from livestock and other agricultural practices and from the decay of organic waste in landfills and water treatment facilities.
- **Nitrous oxide (N_2O)** is emitted during agricultural and industrial activities as well as during the combustion of fossil fuels and solid waste.

[1] Water vapor (H_2O) is the strongest GHG and the most variable in its phases (vapor, cloud droplets, ice crystals). However, water vapor is not considered a pollutant, but part of the feedback loop rather than a primary cause of change.

[2] Black carbon contributes to climate change both directly, by absorbing sunlight, and indirectly, by depositing on snow (making it melt faster) and by interacting with clouds and affecting cloud formation. Black carbon is the most strongly light-absorbing component of particulate matter (PM) emitted from burning fuels such as coal, diesel, and biomass. Reducing black carbon emissions globally can have immediate economic, climate, and public health benefits. According to the California Air Resources Board, California has been an international leader in reducing emissions of black carbon, with close to 95 percent control expected by 2020 due to existing programs that target reducing PM from diesel engines and burning activities. However, State and national GHG inventories do not yet include black carbon due to ongoing work resolving the precise global warming potential of black carbon. Guidance for CEQA documents does not yet include black carbon.

[3] Intergovernmental Panel on Climate Change, 2001. *Third Assessment Report: Climate Change 2001,* New York: Cambridge University Press.

- **Fluorinated gases** are synthetic, strong GHGs that are emitted from a variety of industrial processes. Fluorinated gases are sometimes used as substitutes for ozone-depleting substances. These gases are typically emitted in smaller quantities, but because they are potent GHGs, they are sometimes referred to as high global-warming-potential (GWP) gases. Fluorinated gases include the following:
- **Chlorofluorocarbons (CFCs)** are GHGs covered under the 1987 Montreal Protocol and used for refrigeration, air conditioning, packaging, insulation, solvents, or aerosol propellants. Since they are not destroyed in the lower atmosphere (i.e., troposphere), CFCs drift into the upper atmosphere where, given suitable conditions, they break down the ozone layer. These gases are therefore being replaced by other compounds that are GHGs covered under the Kyoto Protocol.
- **Perfluorocarbons (PFCs)** are a group of human-made chemicals composed of carbon and fluorine only. These chemicals (predominantly perfluoromethane [CF_4] and perfluoroethane [C_2F_6]) were introduced as alternatives, along with HFCs, to ozone-depleting substances. In addition, PFCs are emitted as by-products of industrial processes and are used in manufacturing. PFCs do not harm the stratospheric ozone layer, but they have a high GWP.
- **Sulfur Hexafluoride (SF_6)** is a colorless gas that is soluble in alcohol and ether, and slightly soluble in water. SF_6 is a strong GHG used primarily in electrical transmission and distribution systems as an insulator.
- **Hydrochlorofluorocarbons (HCFCs)** contain hydrogen, fluorine, chlorine, and carbon atoms. Although they are ozone-depleting substances, they are less potent than CFCs. They have been introduced as temporary replacements for CFCs.
- **Hydrofluorocarbons (HFCs)** contain only hydrogen, fluorine, and carbon atoms. They were introduced as alternatives to ozone-depleting substances to serve many industrial, commercial, and personal needs. HFCs are emitted as by-products of industrial processes and are also used in manufacturing. They do not significantly deplete the stratospheric ozone layer, but they are strong GHGs.[4,5]

The GWP of GHGs are dependent on the lifetime, or persistence, of the gas molecule in the atmosphere. Some GHGs have a stronger greenhouse effect than others. As noted above, they are referred to as high GWP gases. The GWP of GHG emissions are shown in Table 4.6-1. The GWP is used to convert GHGs to CO_2-equivalence (CO_2e) to show the relative potential that different GHGs have to retain infrared radiation in the atmosphere and contribute to the greenhouse effect. For example, under IPCCs Second Assessment

[4] United States Environmental Protection Agency, 2012. Greenhouse Gas Emissions, http://www.epa.gov/climatechange/ghgemissions/gases.html.

[5] Intergovernmental Panel on Climate Change, 2001. *Third Assessment Report: Climate Change 2001,* New York: Cambridge University Press.

TABLE 4.6-1 GHG EMISSIONS AND THEIR RELATIVE GLOBAL WARMING POTENTIAL COMPARED TO CO_2

GHGs	Atmospheric Lifetime (Years)	Second Assessment Report Global Warming Potential Relative to CO_2[a]	Fourth Assessment Report Global Warming Potential Relative to CO_2[a]
Carbon Dioxide (CO_2)	50 to 200	1	1
Methane (CH_4)[b]	12 (±3)	21	25
Nitrous Oxide (N_2O)	120	310	298
Hydrofluorocarbons:			
HFC-23	264	11,700	14,800
HFC-32	5.6	650	675
HFC-125	32.6	2,800	3,500
HFC-134a	14.6	1,300	1,430
HFC-143a	48.3	3,800	4,470
HFC-152a	1.5	140	124
HFC-227ea	36.5	2,900	3,220
HFC-236fa	209	6,300	9,810
HFC-4310mee	17.1	1,300	1,030
Perfluoromethane: CF_4	50,000	6,500	7,390
Perfluoroethane: C_2F_6	10,000	9,200	12,200
Perfluorobutane: C_4F_{10}	2,600	7,000	8,860
Perfluoro-2-methylpentane: C_6F_{14}	3,200	7,400	9,300
Sulfur Hexafluoride (SF_6)	3,200	23,900	22,800

Notes: The GWP shown in this table is based on the IPCCs Second and Fourth Assessment Reports. The IPCC has published updated GWP values in its Fifth Assessment Report (2013) that reflect new information on atmospheric lifetimes of GHGs and an improved calculation of the radiative forcing of CO_2 (radiative forcing is the difference of energy from sunlight received by the earth and radiated back into space). However, GWP values identified in the Second Assessment Report are still used by BAAQMD to maintain consistency in GHG emissions modeling. In addition, the 2008 Scoping Plan and BAAQMDs emission inventory used to develop the efficiency metric in their CEQA Guidelines were based on the GWP values in the Second Assessment Report.
a. Based on 100-Year Time Horizon of the GWP of the air pollutant relative to CO_2.
b. The methane GWP includes direct effects and indirect effects due to the production of tropospheric ozone and stratospheric water vapor. The indirect effect due to the production of CO_2 is not included.
Source: Intergovernmental Panel on Climate Change, 2007. *Fourth Assessment Report: Climate Change 2007*, New York, Cambridge University Press.

Report GWP value for CH_4, which is 21, a project that generates 10 metric tons (MT) of CH_4 would be equivalent to 210 MT of CO_2.[6]

California GHG Sources and Relative Contribution

California is the tenth largest GHG emitter in the world and the second largest emitter of GHG in the United States, surpassed only by Texas; however, California also has over 12 million more people than the state of Texas.[7,8] Because of more stringent air emission regulations, in 2001 California ranked fourth lowest in carbon emissions per capita and fifth lowest among states in CO_2 emissions from fossil fuel consumption per unit of Gross State Product (total economic output of goods and services).[9]

The California Air Resources Board (CARB) last update to the statewide GHG emissions inventory that used the Second Assessment Report GWPs was conducted in 2012 for year 2009 emissions.[10,11] In 2009, California produced 457 million metric tons (MMT) of CO_2e GHG emissions. In 2009, California produced 457 $MMTCO_2e$ GHG emissions. California's transportation sector is the single largest generator of GHG emissions, producing 37.9 percent of the State's total emissions. Electricity consumption is the second largest source, producing 22.7 percent. Industrial activities are California's third largest source of GHG emissions at 17.8 percent.[12,13]

In 2013, the statewide GHG emissions inventory was updated for 2000 to 2012 emissions using the GWPs in IPCCs Fourth Assessment Report. Based on these GWPs, California produced 459 $MMTCO_2e$ GHG emissions in 2012. California's transportation sector remains the single largest generator of GHG emissions, producing 36.5 percent of the State's total emissions. Electricity consumption made up 20.7 percent, and

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[6] CO_2-equivalence is used to show the relative potential that different GHGs have to retain infrared radiation in the atmosphere and contribute to the greenhouse effect. The global warming potential of a GHG is also dependent on the lifetime, or persistence, of the gas molecule in the atmosphere.

[7] California Energy Commission, 2005. Climate Change Emissions Estimates from Bemis, Gerry and Jennifer Allen, *Inventory of California Greenhouse Gas Emissions and Sinks: 1990 to 2002 Update,* California Energy Commission Staff Paper CEC-600-2005-025, Sacramento, California.

[8] United States Energy Information Administration, 2011. Rankings: Total Carbon Dioxide Emissions 2011, http://www.eia.gov/state/rankings/?sid=US&CFID=16614878&CFTOKEN=c9e715a2d7eea2be-87707F06-237D-DA68-2480975A3D95A7AF&jsessionid=8430fb08420360b6652d711d4e77303802c2#/series/226, accessed August 2014.

[9] California Energy Commission, 2006. *Inventory of California Greenhouse Gas Emissions and Sinks 1990 to 2004,* Report CEC-600-2006-013-SF.

[10] Methodology for determining the statewide GHG inventory is not the same as the methodology used to determine statewide GHG emissions under Assembly Bill 32 (2006).

[11] As noted in Table 4.5-1, BAAQMD uses the GWP values from IPCCs Second Assessment Report that was published in 2001. The IPCC has published updated GWP values in subsequent Assessment Reports, but BAAQMD relies on the Second Assessment Report GWPs in order to maintain consistency in GHG emissions modeling. Therefore, the GHG analysis in this section relies on the GWP values from the Second Assessment Report, and therefore reports the latest California emissions that use these same GWP values.

[12] CO_2-equivalence is used to show the relative potential that different GHGs have to retain infrared radiation in the atmosphere and contribute to the greenhouse effect. The global warming potential of a GHG is also dependent on the lifetime, or persistence, of the gas molecule in the atmosphere.

[13] California Air Resources Board, 2012. *California Greenhouse Gas Inventory for 2000–2009: By Category as Defined by the Scoping Plan*.

industrial activities produced 19.4 percent. Other major sectors of GHG emissions include commercial and residential, recycling and waste, high global warming potential GHGs, agriculture, and forestry.[14]

Human Influence on Climate Change

For approximately 1,000 years before the Industrial Revolution, the amount of GHGs in the atmosphere remained relatively constant. During the 20th century, however, scientists observed a rapid change in the climate and climate change pollutants that is attributable to human activities. The amount of CO_2 has increased by more than 35 percent since preindustrial times and has increased at an average rate of 1.4 parts per million (ppm) per year since 1960, mainly due to combustion of fossil fuels and deforestation.[15] These recent changes in climate change pollutants far exceed the extremes of the ice ages, and the global mean temperature is rising at a rate that cannot be explained by natural causes alone.[16] Human activities are directly altering the chemical composition of the atmosphere through the buildup of climate change pollutants.[17]

Projections of climate change depend heavily on future human activity. Therefore, climate models are based on different emission scenarios that account for historical trends in emissions, as well as, observations on the climate record that assess the human influence of the trend and projections for extreme weather events. Climate-change scenarios are affected by varying degrees of uncertainty, including uncertainty regarding the magnitude of the direction of the trends for:

- Warmer and fewer cold days and nights over most land areas;
- Warmer and more frequent hot days and nights over most land areas;
- An increase in frequency of warm spells and heat waves over most land areas;
- An increase in frequency of heavy precipitation events (or proportion of total rainfall from heavy falls) over most areas; areas affected by drought increase;
- An increase in intense tropical cyclone activity increases;
- Increased incidence of extreme high sea level (excludes tsunamis)

IPCCs "2007 IPCC Fourth Assessment Report" projects that the global mean temperature increase from 1990 to 2100 under different climate-change scenarios will range from 1.4 to 5.8 degrees Celsius (°C) (2.5 to 10.4 degrees Fahrenheit (°F). In the past, gradual changes in the Earth's temperature changed the distribution of species, availability of water, etc. However, human activities are accelerating this process so

[14] California Air Resources Board, March 24, 2014. *California Greenhouse Gas Inventory for 2000–2012: By Category as Defined by the Scoping Plan.*

[15] Intergovernmental Panel on Climate Change, 2007. *Fourth Assessment Report: Climate Change 2007*, New York: Cambridge University Press.

[16] At the end of the last ice age, the concentration of CO_2 increased by around 100 ppm (parts per million) over about 8,000 years, or approximately 1.25 ppm per century. Since the start of the industrial revolution, the rate of increase has accelerated markedly. The rate of CO_2 accumulation currently stands at around 150 ppm/century—more than 200 times faster than the background rate for the past 15,000 years.

[17] California Climate Action Team, March 2006. *Climate Action Team Report to Governor Schwarzenegger and the Legislature.*

that environmental impacts associated with climate change no longer occur in a geologic time frame but within a human lifetime.[18]

Potential Climate Change Impacts for California

Like the variability in the projections of the expected increase in global surface temperatures, the environmental consequences of gradual changes in the Earth's temperature are hard to predict. In California and western North America, observations of the climate have shown: (1) a trend toward warmer winter and spring temperatures, (2) a smaller fraction of precipitation falling as snow, (3) a decrease in the amount of spring snow accumulation in the lower and middle elevation mountain zones, (4) a shift in the timing of snowmelt of 5 to 30 days earlier in the spring, and (5) a similar shift (5 to 30 days earlier) in the timing of spring flower blooms.[19] According to the California Climate Action Team—a committee of State agency secretaries and the heads of agency, boards, and departments, led by the Secretary of the California Environmental Protection Agency—even if actions could be taken to immediately curtail climate change emissions, the potency of emissions that have already built up, their long atmospheric lifetimes (see Table 4.6-1), and the inertia of the Earth's climate system could produce as much as 0.6 °C (1.1°F) of additional warming. Consequently, some impacts from climate change are now considered unavoidable. Global climate change risks to California are shown in Table 4.6-2 and include public health impacts, water resources impacts, agricultural impacts, coastal sea level impacts, forest and biological resource impacts, and energy impacts. Specific climate change impacts that could affect the City of Campbell include health impacts from deterioration of air quality, water resources impacts from a reduction in water supply, and increased energy demand.

4.6.1.2 REGULATORY FRAMEWORK

This section describes the federal, State, and local regulations applicable to GHG emissions.

Federal Regulations

The US Environmental Protection Agency (EPA) announced on December 7, 2009, that GHG emissions threaten the public health and welfare of the American people and that GHG emissions from on-road vehicles contribute to that threat. The EPAs final findings respond to the 2007 U.S. Supreme Court decision that GHG emissions fit within the Clean Air Act definition of air pollutants. The findings did not in and of themselves impose any emission reduction requirements, but allowed the EPA to finalize the GHG

[18] Intergovernmental Panel on Climate Change, 2007. *Fourth Assessment Report: Climate Change 2007,* New York: Cambridge University Press.

[19] California Climate Action Team, 2006. *Climate Action Team Report to Governor Schwarzenegger and the Legislature.*

TABLE 4.6-2 SUMMARY OF CLIMATE CHANGE RISKS TO CALIFORNIA

Impact Category	Potential Risk
Public Health Impacts	Poor air quality made worse More severe heat
Water Resources Impacts	Decreasing Sierra Nevada snow pack Challenges in securing adequate water supply Potential reduction in hydropower Loss of winter recreation
Agricultural Impacts	Increasing temperature Increasing threats from pests and pathogens Expanded ranges of agricultural weeds Declining productivity Irregular blooms and harvests
Coastal Sea Level Impacts	Accelerated sea level rise Increasing coastal floods Worsened impacts on infrastructure
Forest and Biological Resource Impacts	Increased risk and severity of wildfires Lengthening of the wildfire season Movement of forest areas Conversion of forest to grassland Declining forest productivity Increasing threats from pest and pathogens Shifting vegetation and species distribution Altered timing of migration and mating habits Loss of sensitive or slow-moving species
Energy Demand Impacts	Potential reduction in hydropower Increased energy demand

Sources: California Energy Commission, 2006, *Our Changing Climate: Assessing the Risks to California, 2006 Biennial Report,* California Climate Change Center, CEC-500-2006-077; California Energy Commission, 2008, *The Future Is Now: An Update on Climate Change Science, Impacts, and Response Options for California,* CEC-500-2008-0077.

standards proposed in 2009 for new light-duty vehicles as part of the joint rulemaking with the Department of Transportation.[20]

The EPAs endangerment finding covers emissions of six key GHGs—CO_2, CH_4, N_2O, hydrofluorocarbons, perfluorocarbons, and SF_6—that have been the subject of scrutiny and intense analysis for decades by scientists in the United States and around the world. The first three are applicable to the proposed Plan because they constitute the majority of GHG emissions from the onsite land uses, and per BAAQMD guidance are the GHG emissions that should be evaluated as part of a GHG emissions inventory.

[20] United States Environmental Protection Agency (EPA), 2009. *Greenhouse Gases Threaten Public Health and the Environment.* "Science overwhelmingly shows GHG concentrations at unprecedented levels due to human activity," http://yosemite.epa.gov/opa/admpress.nsf/0/08D11A451131BCA585257685005BF252.

U.S. Mandatory Report Rule for GHGs (2009)

In response to the endangerment finding, the EPA issued the Mandatory Reporting of GHG Rule that requires substantial emitters of GHG emissions (e.g., large stationary sources) to report GHG emissions data. Facilities that emit 25,000 $MTCO_2e$ or more per year are required to submit an annual report.

Update to Corporate Average Fuel Economy Standards (2010/2012)

The current Corporate Average Fuel Economy (CAFE) standards (for model years 2011 to 2016) incorporate stricter fuel economy requirements promulgated by the federal government and California into one uniform standard. Additionally, automakers are required to cut GHG emissions in new vehicles by roughly 25 percent by 2016 (resulting in a fleet average of 35.5 miles per gallon [mpg] by 2016). Rulemaking to adopt these new standards was completed in 2010. California agreed to allow automakers who show compliance with the national program to also be considered to be in compliance with State requirements. The federal government issued new standards in 2012 for model years 2017–2025, which will require a fleet average of 54.5 mpg in 2025.

EPA Regulation of Stationary Sources under the Clean Air Act (Ongoing)

Pursuant to its authority under the Clean Air Act (CAA), the EPA has been developing regulations for new stationary sources such as power plants, refineries, and other large sources of emissions. Pursuant to the President's 2013 Climate Action Plan, the EPA will be directed to also develop regulations for existing stationary sources.

State Regulations

Current State guidance and goals for reducing GHG emissions are generally embodied in Executive Order S-03-05, Assembly Bill (AB) 32, and Senate Bill (SB) 375.

Executive Order S-03-05

Executive Order S-3-05, signed June 1, 2005, set the following GHG reduction targets for the State:

- Reduce statewide GHG emissions to 2000 levels by 2010.
- Reduce statewide GHG emissions to 1990 levels by 2020.
- Reduce statewide GHG emissions to 80 percent below 1990 levels by 2050.

Assembly Bill 32, the Global Warming Solutions Act (2006)

Current State of California guidance and goals for reductions in GHG emissions are generally embodied in AB 32, the Global Warming Solutions Act. AB 32 was passed by the California State legislature on August 31, 2006, to place the State on a course toward reducing its contribution of GHG emissions. AB 32 follows the 2020 tier of emissions reduction targets established in Executive Order S-3-05.

CARB 2008 Scoping Plan

The final Scoping Plan was adopted by CARB on December 11, 2008. AB 32 directed CARB to adopt discrete early action measures to reduce GHG emissions and outline additional reduction measures to meet the 2020 target. In order to effectively implement the emissions cap, AB 32 directed CARB to establish a mandatory reporting system to track and monitor GHG emissions levels for large stationary sources that generate more than 25,000 $MTCO_2e$ per year, prepare a plan demonstrating how the 2020 deadline can be met, and develop appropriate regulations and programs to implement the proposed Plan by 2012.

The 2008 Scoping Plan estimated that GHG emissions in California are anticipated to be approximately 596 $MMTCO_2e$ in 2020 if no steps are taken to reduce GHG emissions (i.e., the business as usual [BAU] scenario). In December 2007, CARB approved a 2020 emissions limit of 427 $MMTCO_2e$ (471 million tons) for the State. The 2020 target requires a total emissions reduction of 169 $MMTCO_2e$, from the BAU scenario, or a 28.5 percent for the year 2020 (i.e. 28.5 percent of 596 $MMTCO_2e$).[21,22]

Since release of the 2008 Scoping Plan, CARB has updated the Statewide GHG emissions inventory to reflect GHG emissions in light of the economic downturn and of measures not previously considered in the 2008 Scoping Plan baseline inventory. The updated forecast predicts BAU emissions to be 545 $MMTCO_2e$ by 2020. The revised BAU 2020 forecast shows that the State would have to reduce GHG emissions by 21.7 percent from BAU in order to achieve 1990 levels, compared to the 28.5 percent reduction that was estimated in the 2008 Scoping Plan. The new inventory also identifies that if the updated 2020 forecast includes the reductions assumed from implementation of the Pavley standards (26 $MMTCO_2e$ of reductions) and the 33 percent renewable portfolio standard (RPS) (12 $MMTCO_2e$ of reductions), the forecast would be 507 $MMTCO_2e$ in 2020, in which case an estimated 80 $MMTCO_2e$ of additional reductions would be necessary to achieve the statewide emissions GHG reduction target of AB 32, or a 15.7 percent reduction compared to adjusted BAU forecast (i.e., 15.7 percent of 507 $MMTCO_2e$).[23]

Key elements of CARBs GHG reduction plan that may be applicable to the proposed Plan include:

- Expanding and strengthening existing energy efficiency programs as well as building and appliance standards (adopted and cycle updates in progress).
- Achieving a mix of the State's energy generation in which 33 percent is from renewable sources (anticipated by 2020).

[21] California Air Resources Board, 2008. *Climate Change Scoping Plan: A Framework for Change.*

[22] CARB defines BAU in its Scoping Plan as emissions levels that would occur if California continued to grow and add new GHG emissions but did not adopt any measures to reduce emissions. Projections for each emission-generating sector were compiled and used to estimate emissions for 2020 based on 2002–2004 emissions intensities. Under CARBs definition of BAU, new growth is assumed to have the same carbon intensities as was typical from 2002 through 2004.

[23] California Air Resources Board, 2012. *Status of Scoping Plan Recommended Measures,* http://www.arb.ca.gov/cc/scopingplan/status_of_scoping_plan_measures.pdf.

- A California cap-and-trade program that links with other Western Climate Initiative partner programs to create a regional market system for large stationary sources (adopted 2011).
- Establishing targets for transportation-related GHG emissions for regions throughout California, and pursuing policies and incentives to achieve those targets (several Sustainable Communities Strategies have been adopted).
- Adopting and implementing measures pursuant to State laws and policies, including California's clean car standards (amendments to the Pavley Standards adopted 2009; Advanced Clean Car standard adopted 2012), goods movement measures, and the Low Carbon Fuel Standard (LCFS) (adopted 2009).[24]
- Creating target fees, including a public goods charge on water use, fees on high GWP gases, and a fee to fund the administrative costs of the State's long-term commitment to AB 32 implementation (in progress).

Table 4.6-3 shows the anticipated reductions from regulations and programs outlined in the 2008 Scoping Plan. Although local government operations were not accounted for in achieving the 2020 emissions reduction, CARB estimates that land use changes implemented by local governments that integrate jobs, housing, and services result in a reduction of 5 $MMTCO_2e$, which is approximately 3 percent of the 2020 GHG emissions reduction goal. In recognition of the critical role local governments play in the successful implementation of AB 32, the 2008 Scoping Plan cited a GHG reduction goal for local governments that is 15 percent of current levels (2005–2008) by 2020 to ensure that municipal and community-wide emissions match the State's reduction target.[25] Measures that local governments take to support shifts in land use patterns are anticipated to emphasize compact, low-impact growth over development in greenfields, resulting in fewer VMT.[26]

2014 Update to the Scoping Plan

CARB recently completed a 5-year update to the 2008 Scoping Plan, as required by AB 32. The final Update to the Scoping Plan was released in May 2014, and CARB adopted it at the May 22, 2014, board hearing. The Update to the Scoping Plan defines CARBs climate change priorities for the next 5 years and lays the

[24] On December 29, 2011, the U.S. District Court for the Eastern District of California issued several rulings in the federal lawsuits challenging the LCFS. One of the court's rulings preliminarily enjoined the CARB from enforcing the regulation during the pendency of the litigation. In January 2012, CARB appealed the decision and on April 23, 2012, the Ninth Circuit Court granted CARBs motion for a stay of the injunction while it continued to consider CARBs appeal of the lower court's decision. On July 15, 2013, the State of California Court of Appeals held that the LCFS would remain in effect and that CARB can continue to implement and enforce the 2013 regulatory standards while it corrects certain aspects of the procedures by which the LCFS was adopted. Accordingly, CARB is continuing to implement and enforce the LCFS while addressing the court's concerns.

[25] The Scoping Plan references a goal for local governments to reduce community GHG emissions by 15 percent from current (interpreted as 2008) levels by 2020, but it does not rely on local GHG reduction targets established by local governments to meet the State's GHG reduction target of AB 32.

[26] California Air Resources Board, 2008. *Climate Change Scoping Plan, a Framework for Change.*

TABLE 4.6-3 SCOPING PLAN GHG REDUCTION MEASURES AND REDUCTIONS TOWARD 2020 TARGET

Recommended Reduction Measures	Reductions Counted Toward 2020 Target of 169 MMT CO_2e	Percentage of Statewide 2020 Target
Cap and Trade Program and Associated Measures		
California Light-Duty Vehicle GHG Standards	31.7	19%
Energy Efficiency	26.3	16%
Renewable Portfolio Standard (33 percent by 2020)	21.3	13%
Low Carbon Fuel Standard	15	9%
Regional Transportation-Related GHG Targets[a]	5	3%
Vehicle Efficiency Measures	4.5	3%
Goods Movement	3.7	2%
Million Solar Roofs	2.1	1%
Medium/Heavy Duty Vehicles	1.4	1%
High Speed Rail	1.0	1%
Industrial Measures	0.3	0%
Additional Reduction Necessary to Achieve Cap	34.4	20%
Total Cap and Trade Program Reductions	*146.7*	*87%*
Uncapped Sources/Sectors Measures		
High Global Warming Potential Gas Measures	20.2	12%
Sustainable Forests	5	3%
Industrial Measures (for sources not covered under cap and trade program)	1.1	1%
Recycling and Waste (landfill methane capture)	1	1%
Total Uncapped Sources/Sectors Reductions	*27.3*	*16%*
Total Reductions Counted toward 2020 Target	*174*	*100%*
Other Recommended Measures – Not Counted toward 2020 Target		
State Government Operations	1.0 to 2.0	1%
Local Government Operations[b]	To Be Determined	NA
Green Buildings	26	15%
Recycling and Waste	9	5%
Water Sector Measures	4.8	3%

TABLE 4.6-3 SCOPING PLAN GHG REDUCTION MEASURES AND REDUCTIONS TOWARD 2020 TARGET

Recommended Reduction Measures	Reductions Counted Toward 2020 Target of 169 MMT CO_2e	Percentage of Statewide 2020 Target
Methane Capture at Large Dairies	1	1%
Total Other Recommended Measures – Not Counted toward 2020 Target	*42.8*	*NA*

Notes: The percentages in the right-hand column add up to more than 100 percent because the emissions reduction goal is 169 MMTCO2e and the Scoping Plan identifies 174 $MTCO_2e$ of emissions reductions strategies.
$MMTCO_2e$: million metric tons of CO_2e
a. Reductions represent an estimate of what may be achieved from local land use changes. It is not the SB 375 regional target.
b. According to the Measure Documentation Supplement to the Scoping Plan, local government actions and targets are anticipated to reduce vehicle miles by approximately 2 percent through land use planning, resulting in a potential GHG reduction of 2 $MMTCO_2e$ (or approximately 1.2 percent of the GHG reduction target). However, these reductions were not included in the Scoping Plan reductions to achieve the 2020 target.
Source: California Air Resources Board, 2008, *Climate Change Scoping Plan: A Framework for Change.*

groundwork to reach post-2020 goals in Executive Orders S-3-05 and B-16-2012. The update includes the latest scientific findings related to climate change and its impacts, including short-lived climate pollutants. The GHG target identified in the 2008 Scoping Plan is based on IPCCs GWPs identified in the Second and Third Assessment Reports (see Table 4.6-1). IPCCs Fourth and Fifth Assessment Reports identified more recent GWP values based on the latest available science. CARB recalculated the 1990 GHG emission levels with the updated GWPs in the Fourth Assessment Report, and the 427 $MMTCO_2e$ 1990 emissions level and 2020 GHG emissions limit, established in response to AB 32, is slightly higher, at 431 $MMTCO_2e$.[27]

The update highlights California's progress toward meeting the near-term 2020 GHG emission reduction goals defined in the original 2008 Scoping Plan. As identified in the Update to the Scoping Plan, California is on track to meeting the goals of AB 32. However, the Update to the Scoping Plan also addresses the State's longer-term GHG goals within a post-2020 element. The post-2020 element provides a high-level view of a long-term strategy for meeting the 2050 GHG goals, including a recommendation for the State to adopt a mid-term target. According to the Update to the Scoping Plan, local government reduction targets should chart a reduction trajectory that is consistent with, or exceeds, the trajectory created by Statewide goals.[28]

According to the Update to the Scoping Plan, reducing emissions to 80 percent below 1990 levels will require a fundamental shift to efficient, clean energy in every sector of the economy. Progressing toward California's 2050 climate targets will require significant acceleration of GHG reduction rates. Emissions

[27] California Air Resources Board (CARB), May 15, 2014. *Proposed First Update to the Climate Change Scoping Plan: Building on the Framework,* http://www.arb.ca.gov/cc/scopingplan/2013_update/draft_proposed_first_update.pdf.

[28] California Air Resources Board (CARB), May 15, 2014. *Proposed First Update to the Climate Change Scoping Plan: Building on the Framework,* http://www.arb.ca.gov/cc/scopingplan/2013_update/draft_proposed_first_update.pdf.

from 2020 to 2050 will have to decline several times faster than the rate needed to reach the 2020 emissions limit.[29]

Senate Bill 375

In 2008, SB 375, the Sustainable Communities and Climate Protection Act, was adopted to connect the GHG emissions reductions targets established in the 2008 Scoping Plan for the transportation sector to local land use decisions that affect travel behavior. Its intent is to reduce GHG emissions from light-duty trucks and automobiles (it excludes emissions associated with goods movement) by aligning regional long-range transportation plans, investments, and housing allocations with local land use planning to reduce VMT and vehicle trips. Specifically, SB 375 required CARB to establish GHG emissions reduction targets for each of the 18 metropolitan planning organizations (MPOs). The Metropolitan Transportation Commission (MTC) is the MPO for the nine-county San Francisco Bay Area region. MTCs targets are a 7 percent per capita reduction in GHG emissions from light-duty trucks and passenger vehicles from 2005 by 2020, and a 15 percent per capita reduction from 2005 levels by 2035.[30]

Plan Bay Area: Strategy for a Sustainable Region

Plan Bay Area is the Bay Area's Regional Transportation Plan (RTP)/Sustainable Community Strategy (SCS). Plan Bay Area was adopted jointly by the Association of Bay Area Governments (ABAG) and MTC July 18, 2013.[31] The SCS lays out a development scenario for the region, which, when integrated with the transportation network and other transportation measures and policies, would reduce GHG emissions from transportation (excluding goods movement) beyond the per capita reduction targets identified by CARB. According to Plan Bay Area, the proposed Plan meets a 16 percent per capita reduction of GHG emissions by 2035 and a 10 percent per capita reduction by 2020 from 2005 conditions.

As part of the implementing framework for Plan Bay Area, local governments have identified Priority Development Areas (PDAs) to focus growth. PDAs are transit-oriented infill development opportunity areas within existing communities. Overall, well over two-thirds of all regional growth in the Bay Area by 2040 is allocated within PDAs. PDAs are expected to accommodate 80 percent (or over 525,570 units) of new housing and 66 percent (or 744,230) of new jobs in the region.[32] Portions of the Plan Area along Winchester Boulevard are within the Santa Clara Valley Transportation Authority (VTA) City Cores, Corridors and Station Area, Mixed-Use Corridor PDA.[33]

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[29] California Air Resources Board (CARB), 2014. *Proposed First Update to the Climate Change Scoping Plan: Building on the Framework,* http://www.arb.ca.gov/cc/scopingplan/2013_update/draft_proposed_first_update.pdf.

[30] California Air Resources Board, 2010. *Staff Report, Proposed Regional Greenhouse Gas Emission Reduction Targets for Automobiles and Light Trucks Pursuant to Senate Bill 375.*

[31] It should be noted that Bay Area Citizens filed a lawsuit on MTC and ABAG adoption of *Plan Bay Area*.

[32] Metropolitan Transportation Commission (MTC) and Association of Bay Area Governments (ABAG), 2013. *Plan Bay Area: Strategy for a Sustainable Region*.

[33] Metropolitan Transportation Commission (MTC) and Association of Bay Area Governments (ABAG), 2013. *Plan Bay Area,* http://geocommons.com/maps/141979, accessed September 2014.

Assembly Bill 1493

California vehicle GHG emission standards were enacted under AB 1493 (Pavley I). Pavley I is a clean-car standard that reduces GHG emissions from new passenger vehicles (light-duty auto to medium-duty vehicles) from 2009 through 2016 and is anticipated to reduce GHG emissions from new passenger vehicles by 30 percent during the same time. California implements the Pavley I standards through a waiver granted to California by the EPA. In 2012, the EPA issued a Final Rulemaking that sets even more stringent fuel economy and GHG emissions standards for model year 2017 through 2025 light-duty vehicles (see also the discussion on the update to the CAFE standards under *Federal Laws*, above). In January 2012, CARB approved the Advanced Clean Cars program (formerly known as Pavley II) for model years 2017 through 2025. The program combines the control of smog, soot, and global warming gases and requirements for greater numbers of zero-emission vehicles into a single package of standards. Under California's Advanced Clean Car program, by 2025, new automobiles will emit 34 percent fewer global warming gases and 75 percent fewer smog-forming emissions.[34]

Executive Order S-01-07

On January 18, 2007, the State set a new low carbon fuel standard (LCFS) for transportation fuels sold within the State. Executive Order S-01-07 sets a declining standard for GHG emissions measured in carbon dioxide equivalent gram per unit of fuel energy sold in California. The LCFS requires a reduction of 2.5 percent in the carbon intensity of California's transportation fuels by 2015 and a reduction of at least 10 percent by 2020. The standard applies to refiners, blenders, producers, and importers of transportation fuels, and would use market-based mechanisms to allow these providers to choose how they reduce emissions during the "fuel cycle," using the most economically feasible methods.

Executive Order B-16-2012

On March 23, 2012, the State directed CARB, the California Energy Commission (CEC), the Public Utilities Commission, and other relevant agencies to work with the Plug-in Electric Vehicle Collaborative and the California Fuel Cell Partnership to establish benchmarks to accommodate zero-emissions vehicles in major metropolitan areas, including infrastructure to support them (e.g., electric vehicle charging stations). The executive order also directs the number of zero-emission vehicles in California's State vehicle fleet to increase through the normal course of fleet replacement so that at least 10 percent of fleet purchases of light-duty vehicles are zero emission by 2015 and at least 25 percent are by 2020. The executive order also establishes a target for the transportation sector of reducing GHG emissions to 80 percent below 1990 levels by 2050.

[34] See also the discussion on the update to the CAFE standards under Federal Laws, above. In January 2012, CARB approved the Advanced Clean Cars program (formerly known as Pavley II) for model years 2017 through 2025. The program combines the control of smog, soot and global warming gases and requirements for greater numbers of zero-emission vehicles into a single package of standards. Under California's Advanced Clean Car program, by 2025, new automobiles will emit 34 percent fewer global warming gases and 75 percent fewer smog-forming emissions.

Senate Bills 1078 and 107, and Executive Order S-14-08

A major component of California's Renewable Energy Program is the renewable portfolio standard (RPS) established under SB 1078 (Sher)[35] and SB 107 (Simitian)[36]. Under the RPS, certain retail sellers of electricity were required to increase the amount of renewable energy each year by at least 1 percent in order to reach at least 20 percent by December 30, 2010. CARB has now approved an even higher goal of 33 percent by 2020. In 2011, the State legislature adopted this higher standard in SBX1-2. Executive Order S-14-08 was signed in November 2008 and expands the State's Renewable Energy Standard to 33 percent renewable power by 2020. Renewable sources of electricity include wind, small hydropower, solar, geothermal, biomass, and biogas. The increase in renewable sources for electricity production will decrease indirect GHG emissions from development projects because electricity production from renewable sources is generally considered carbon neutral.

California Building Code

Energy conservation standards for new residential and non-residential buildings were adopted by the California Energy Resources Conservation and Development Commission (now the CEC) in June 1977 and most recently revised in 2013 (Title 24, Part 6, of the California Code of Regulations [CCR]). Title 24 requires the design of building shells and building components to conserve energy. The standards are updated periodically to allow for consideration and possible incorporation of new energy efficiency technologies and methods. The most current Building and Energy Efficiency Standards went into effect on July 1, 2014. Buildings that are constructed in accordance with the 2013 Building and Energy Efficiency Standards are 25 percent (residential) to 30 percent (non-residential) more energy efficient than those constructed under the prior 2008 standards as a result of better windows, insulation, lighting, ventilation systems, and other features that reduce energy consumption in homes and businesses.

On July 17, 2008, the California Building Standards Commission adopted the nation's first green building standards. The California Green Building Standards Code (Part 11, Title 24, known as "CALGreen") was adopted as part of the California Building Standards Code (Title 24, CCR). CALGreen established planning and design standards for sustainable site development, energy efficiency (in excess of the California Energy Code requirements), water conservation, material conservation, and indoor air contaminants.[37] The mandatory provisions of the California Green Building Code Standards became effective January 1, 2011, and were updated most recently in 2013.

[35] Official California Legislative Information, http://www.leginfo.ca.gov/pub/01-02/bill/sen/sb_1051-1100/sb_1078_bill_20020912_chaptered.html, accessed on September 24, 2014.

[36] Official California Legislative Information , http://www.leginfo.ca.gov/pub/05-06/bill/sen/sb_0101-0150/sb_107_bill_20060926_chaptered.html, accessed on September 24, 2014.

[37] The green building standards became mandatory in the 2010 edition of the code.

2006 Appliance Efficiency Regulations

The 2006 Appliance Efficiency Regulations (Title 20, CCR Sections 1601 through 1608) were adopted by the CEC on October 11, 2006, and approved by the California Office of Administrative Law on December 14, 2006. The regulations include standards for both federally regulated appliances and non-federally regulated appliances. Though these regulations are now often viewed as "business as usual," they exceed the standards imposed by all other states, and they reduce GHG emissions by reducing energy demand.

Local Regulations

Table 4.6-4 shows the relevant Campbell General Plan policies related to GHG emissions.[38]

4.6.1.3 EXISTING CONDITIONS

Existing Emissions

Existing land uses in the Plan Area are generally of a non-manufacturing, light industrial–related and office-related nature (e.g., automobile services, printers, machine shops, building materials, medical and contracting offices, research & development, informational technology, and bio-technology) and service commercial (fitness centers, catering, and indoor farming). The Plan Area is a built-out environment. There are few, if any, vacant parcels or buildings. The west side of Winchester Boulevard consists mostly of auto-oriented service uses, with a few single-family residential parcels. A large parcel near the northern end of the Plan Area is the corporate headquarters for a large information technology company. GHG emissions generated by existing land uses in the Plan Area were modeled with CalEEMod 2013.2.2 based on trip generation provided by W-Trans, and are shown in Table 4.6-5. In addition, emissions generated by permitted sources were compiled by BAAQMD and are included for informational purposes.

4.6.2 STANDARDS OF SIGNIFICANCE

The proposed Plan would result in a significant GHG emissions impacts if it would:

1. Generate GHG emissions, either directly or indirectly, that may have a significant effect on the environment.
2. Conflict with an applicable plan, policy, or regulation adopted for the purpose of reducing the emissions of GHGs.

[38] City of Campbell, 2011. *City of Campbell General Plan.* http://www.ci.campbell.ca.us/DocumentCenter/View/2052.

TABLE 4.6-4 CITY OF CAMPBELL GENERAL PLAN GOALS, POLICIES, AND STRATEGIES PERTAINING TO GREENHOUSE GAS EMISSIONS

Goal/Policy/ Strategy Number	Goal/Policy/Strategy Text
Conservation and Natural Resource Element	
Policy CNR-11.1	Air Quality Impacts: Reduce adverse air quality impacts of City operations.
Policy CNR-11.2	Effects of Development on Air Quality: Use the City's development review process and the California Environmental Quality Act to evaluate and mitigate the local and cumulative effects of new development on air quality.
Policy CNR-11.3	Air Quality Improvement Programs: Support regional, State and federal programs to improve air quality.
Policy CNR-12.1	Energy Consumption: Reduce City government energy consumption.
Policy CNR-12.2	Advanced Energy Technology and Building Materials: Facilitate the use of advanced energy technology and building materials to create energy-efficient residences and buildings.
Policy CNR-12.3	Landscaping Requirements: Continue to enforce landscaping requirements that facilitate energy efficient use or conservation.
Policy CNR-4.1	Tree Planting: Plant additional trees to maintain and enhance the City's suburban forest.
Policy CNR-6.1	Water Conservation: Encourage residents and businesses to conserve water.
Policy CNR-7.1	Water Recycling: Take part in and promote water recycling efforts.
Policy CNR-9.1	Source Reduction and Recycling Efforts: Participate in source reduction and recycling efforts.
Land Use and Transportation Element	
Policy LUT-1.2	Regional Land Use and Transportation Planning: Promote integrated and coordinated regional land use and transportation planning.
Policy LUT-1.5	Land Use Planning and the Regional Transportation System: Support land use planning that complements the regional transportation system.
Policy LUT-2.1	Alternative Transportation: Encourage the use of alternative transportation such as ridesharing, public transit, walking, and bicycling to reduce reliance on automobile use.
Policy LUT-2.4	Jobs and Housing Balance: Maintain Campbell's balance of jobs and housing units to encourage residents to work in Campbell, and to limit the impact on the regional transportation system.
Policy LUT-9.1	Land Use Pattern: Establish a compatible land use pattern citywide.
Policy LUT-9.3	Design and Planning Compatibility: Promote high quality, creative design and site planning that is compatible with surrounding development, public spaces and natural resources.
Policy LUT-11.1	Physically Connected Transportation Infrastructure: Strive to achieve physically connected transportation infrastructure.
Policy LUT-11.2	Services Within Walking Distance: Encourage neighborhood services within walking distance of residential uses.

TABLE 4.6-5 GHG EMISSIONS GENERATED BY EXISTING LAND USES WITHIN THE PLAN AREA

	Existing GHG Emissions	
Category	$MTCO_2e$/Year	Percent of Total
Operational Emissions[c]		
Area	<1	<1%
Energy	7,628	37%
On-Road Mobile Sources	11,623	56%
Waste	352	2%
Water/Wastewater	1,071	5%
Total with Waste	**20,674**	100%
Total Without Waste[a]	20,323	—
Service Population (SP)[b]	3,817	—
$MTCO_2e$/SP	5.3	—
Permitted[d]		
BAAQMD Permitted Sources	26	—

Note: Emissions may not total to 100 percent due to rounding. Because existing energy use is unavailable for the Plan Area, and to be conservative, assumes buildings achieve average of 2008 Building and Energy Efficiency Standards). Assumes existing units do not have fireplaces.
a. BAAQMD did not include solid waste emissions when developing the per capita significance thresholds. Therefore, total GHG emissions with and without the Waste Generation sector are included. If these emissions are included in the analysis for the proposed Plan, proposed Plan per capita emissions would be 4.0 $MTCO_2e$/SP/yr.
b. Service population (SP) is based on 10 residents and 3,807 employees (existing) CalEEMod 2013.2.2. Based on year 2020 emission rates.
c. Source: CalEEMod 2013.2.2 Based on 2014 emission rates for existing uses and trip generation provided by W-Trans.
d. Source: Kirk, Alison, Senior Environmental Planner, Planning and Research Division, Air Quality Planning, Bay Area Air Quality Management District, September 2014.

4.6.2.1 BAAQMD PROJECT-LEVEL SIGNIFICANCE CRITERIA

The BAAQMD CEQA Air Quality Guidelines were prepared to assist in the evaluation of air quality impacts of projects and plans proposed within the Bay Area. The guidelines provide recommended procedures for evaluating potential air impacts during the environmental review process, consistent with CEQA requirements, and include recommended thresholds of significance, mitigation measures, and background air quality information. They also include recommended assessment methodologies for air toxics, odors, and GHG emissions. In June 2010, the BAAQMDs Board of Directors adopted CEQA thresholds of significance and an update of the CEQA Guidelines. In May 2011, the updated BAAQMD CEQA Air Quality Guidelines were amended to include a risk and hazards threshold for new receptors and modified procedures for assessing impacts related to risk and hazard impacts.

On March 5, 2012, the Alameda County Superior Court issued a judgment finding that the BAAQMD had failed to comply with CEQA when it adopted the thresholds of significance in the BAAQMD CEQA Air Quality Guidelines. The court did not determine whether the thresholds of significance were valid on their merits, but found that the adoption of the thresholds was a project under CEQA. The court issued a writ of mandate ordering the BAAQMD to set aside the thresholds and cease dissemination of them until the BAAQMD complied with CEQA.

Following the court's order, the BAAQMD released revised CEQA Air Quality Guidelines in May of 2012 that include guidance on calculating air pollution emissions, obtaining information regarding the health impacts of air pollutants, and identifying potential mitigation measures, which set aside the significance thresholds. The BAAQMD recognizes that lead agencies may rely on the previously recommended Thresholds of Significance in its CEQA Guidelines adopted in 1999. The Alameda County Superior Court, in ordering BAAQMD to set aside the thresholds, did not address the merits of the science or evidence supporting the thresholds. The City finds, therefore, that despite the Superior Court's ruling, and in light of the subsequent case history discussed below, the science and reasoning in the BAAQMD 2011 CEQA Air Quality Guidelines provide the latest state-of-the-art guidance available. For that reason, substantial evidence supports continued use of the BAAQMD 2011 CEQA Air Quality Guidelines.

On August 13, 2013, the First District Court of Appeal ordered the trial court to reverse the judgment and upheld the BAAQMDs CEQA Guidelines.[39] In addition to the City's independent determination that use of the BAAQMDs CEQA Guidelines is supported by substantial evidence, they have been found to be valid guidelines for use in the CEQA environmental review process.

In addition, CEQA grants local agencies broad discretion to develop their own thresholds of significance, or to rely on thresholds previously adopted or recommended by other public agencies or experts so long as they are supported by substantial evidence. Accordingly, the City of Campbell is using the BAAQMD 2011 thresholds to evaluate project impacts in order to protectively evaluate the potential effects of the project on GHG emissions.

Greenhouse Gas Emissions

In the absence of an applicable qualified GHG reduction strategy, BAAQMD has identified screening criteria and significance criteria for development projects that would be applicable for the proposed Plan. If a project exceeds the Guidelines' GHG screening-level sizes, the project would be required to conduct a full GHG analysis using the following BAAQMD significance criteria:

- 1,100 MT of CO_2e per year; or
- 4.6 MT of CO_2e per SP.

[39] *California Building Industry Association versus Bay Area Air Quality Management District*, Case No. A135335 and A136212 (Court of Appeal, First District, August 13, 2013).

Land use development projects include residential, commercial, industrial, and public land use facilities. Direct sources of emissions may include on-site combustion of energy, such as natural gas used for heating and cooking, emissions from industrial processes (not applicable for most land use development projects), and fuel combustion from mobile sources. Indirect emissions are emissions produced off-site from energy production, water conveyance due to a project's energy use and water consumption, and non-biogenic emissions from waste disposal. Biogenic CO_2 emissions are not included in the quantification of a project's GHG emissions, because biogenic CO_2 is derived from living biomass (e.g., organic matter present in wood, paper, vegetable oils, animal fat, food, animal, and yard waste) as opposed to fossil fuels. Although GHG emissions from waste generation are included in the GHG inventory for the proposed Plan, the efficiency threshold of 4.6 $MTCO_2e$ per service population identified above does not include the waste sector, and therefore it is not considered in the evaluation.

BAAQMD does not have thresholds of significance for construction-related GHG emissions, but requires quantification and disclosure of construction-related GHG emissions. However, GHG emissions from construction activities are short term and therefore not assumed to significantly contribute to cumulative GHG emissions impacts of the proposed Plan

4.6.3 ENVIRONMENTAL IMPACT DISCUSSION

4.6.3.1 METHODOLOGY

GHG emissions from construction and operation of the proposed Plan were calculated using the California Emissions Estimator Model (CalEEMod), Version 2013.2.2. Transportation emissions are based on trip generation provided by W-Trans.

This section analyzes potential project-specific and cumulative impacts to GHG emissions.

GHG-1	**Implementation of the proposed Plan would not generate GHG emissions, either directly or indirectly, that may have a significant effect on the environment.**

A project does not generate enough GHG emissions on its own to influence global climate change; therefore, the GHG chapter measures a project's contribution to the cumulative environmental impact.

Development of the proposed Plan would contribute to global climate change through direct and indirect emissions of GHG from transportation sources, energy (natural gas and purchased energy), water use and wastewater generation, and solid waste generation. Construction emissions (total and amortized over a 30-year duration) are provided for informational purposes. The GHG emissions associated with the proposed Plan are shown in Table 4.6-6 and compared to existing emissions within the Plan Area.

BAAQMD does not have thresholds of significance for construction-related GHG emissions. GHG emissions from future construction activities within the Plan Area are one-time, short-term emissions, and therefore, not assumed to significantly contribute to long-term cumulative GHG emissions impacts of the proposed Plan. Therefore, construction emissions associated with the proposed Plan are *less than significant*.

As shown in Table 4.6-6, the net increase of GHG emissions generated by the operational phase of the proposed Plan would exceed BAAQMDs bright-line significance criteria of 1,100 $MTCO_2e$; therefore, GHG emissions impacts are evaluated based on the proposed Plan efficiency. As identified in Table 4.6-5, the proposed Plan would not exceed the BAAQMD performance criteria of 4.6 $MTCO_2e$/SP. Furthermore, the proposed Plan would result in an improved efficiency compared to existing conditions. Consequently, GHG emissions impacts of the proposed Plan would be *less than significant*.

Significance Before Mitigation: Less than significant.

GHG-2	**Implementation of the proposed Plan would not conflict with an applicable plan, policy, or regulation adopted for the purpose of reducing the emissions of greenhouse gases.**

The following plans have been adopted by CARB and MTC/ABAG and are applicable for the proposed Plan:

California Air Resource Board Scoping Plan

In accordance with AB 32, CARB developed the Scoping Plan to outline the State's strategy to achieve 1990-level emissions by year 2020. To estimate the reductions necessary, CARB projected statewide 2020 BAU GHG emissions (i.e., GHG emissions in the absence of statewide emission reduction measures). CARB identified that the State as a whole would be required to reduce GHG emissions by 28.5 percent from year 2020 BAU to achieve the targets of AB 32.[40] The revised BAU 2020 forecast shows that the State would have to reduce GHG emissions by 21.6 percent from BAU without implementation of the Pavley GHG emission standards for passenger vehicles and the 33 percent renewable portfolio standard (RPS) for electricity, or 15.7 percent from the adjusted baseline (i.e. with Pavley and 33 percent RPS).[41]

Statewide strategies to reduce GHG emissions include the LCFS; California Appliance Energy Efficiency regulations; California Building Standards (i.e., CALGreen and the 2008 Building and Energy Efficiency Standards); California Renewable Energy Portfolio standard (33 percent RPS); changes in the corporate average fuel economy standards (e.g., Pavley I and Pavley II); and other measures that would ensure the State is on target to achieve the GHG emissions reduction goals of AB 32. Statewide GHG emissions reduction

[40] California Air Resources Board (CARB), 2008. October. *Climate Change Proposed Scoping Plan, a Framework for Change.*

[41] California Air Resources Board (CARB), 2012. *Status of Scoping Plan Recommended Measures,* http://www.arb.ca.gov/cc/scopingplan/status_of_scoping_plan_measures.pdf.

TABLE 4.6-6 DELL AVENUE AREA PLAN GHG EMISSIONS FORECAST

	GHG Emissions ($MTCO_2e$/Year)		
Category	Existing	Proposed Plan	Change
Construction Emissions			
Total Construction Emissions[a]	NA	16,519	16,519
30-Year Amortized Construction	NA	551	551
Operational Emissions			
Area	<1	18	18
Energy	7,628	15,927	8,299
On-Road Mobile Sources	11,623	28,493	16,870
Waste	352	1,388	1,037
Water/Wastewater	1,071	1,430	359
Total with Waste	20,674	47,256	26,582
Total without Waste[b]	**20,323**	**45,868**	**25,545**
Service Population (SP)[c]	3,817	11,937	8,120
$MTCO_2e$/SP	**5.3**	**3.8**	**1.5**
BAAQMD Efficiency Threshold	4.6 $MTCO_2e$/SP	4.6 $MTCO_2e$/SP	—
Exceeds BAAQMD Efficiency Target?	**Yes**	**No**	**—**

Note: Emissions may not total to 100 percent due to rounding. Because existing energy use is unavailable for the Plan Area, and to be conservative, assumes buildings achieve average of 2008 Building and Energy Efficiency Standards). New buildings of the proposed Plan would be constructed to the 2013 Building & Energy Efficiency Standards (effective July 1, 2014). Assumes existing units do not have fireplaces. Assumes all fireplaces in the proposed Plan are gas-burning fireplaces in accordance with BAAQMD Regulation 6, Rule 3.

[a.] Construction emissions are an estimate only based on the development potential within the Dell Avenue Specific Plan. The construction assumptions do not include construction of water/sewer infrastructure, parking structures/subterranean parking garages because information on the size and need for soil excavation is not known at the time of this programmatic EIR and evaluation of such structures would be speculative.

[b.] BAAQMD did not include solid waste emissions when developing the per capita significance thresholds. Therefore, total GHG emissions with and without the Waste Generation sector are included. If these emissions are included in the analysis for the proposed Plan, proposed Plan per capita emissions would be 4.0 $MTCO_2e$/SP/yr.

[c.] Service population (SP) is based on 10 residents and 3,807 employees (existing) and 736 residents and 11,201 employees (Plan).

Source: CalEEMod 2013.2.2. Based on year 2020 emission rates for the proposed Plan and trip generation provided by W-Trans.

measures identified above would reduce the proposed Plan's GHG emissions.

New residential and non-residential construction associated with the proposed Plan are required to achieve the current building and energy efficiency standards, which are increasingly more energy efficient with each cycle update to the Title 24 energy standards. The current standards are the 2013 Building and Energy Efficiency Standards, which are 25 percent more energy efficient than the 2008 standards for residential buildings and 30 percent more energy efficient than the 2008 standards for non-residential buildings. The

new buildings would be required to be constructed in conformance with CALGreen, which requires high-efficiency water fixtures for indoor plumbing and water efficient irrigation systems. The Design Guidelines of the proposed Plan require that tree and plant species be water efficient and meet the City's Water Efficient Landscape Ordinance (WELO) standards. In addition, per the proposed Plan's Design Guidelines, for every eight surface parking stalls, one shade tree shall be provided in the paved area. These regulations identified above have been adopted by State agencies to implement AB 32 to reduce GHG emissions to 1990 level by 2020. New development within the proposed Plan area would implement these new regulations that have been adopted to reduce energy use, water use, and encourage alternative modes of transportation. Therefore, the proposed Plan would not conflict with the programs and regulations identified in CARB's Scoping Plan and impacts would be *less than significant*.

ABAG/MTC Plan Bay Area

To achieve the ABAG/MTC sustainable vision for the Bay Area, the Plan Bay Area land use concept plan for the region concentrates the majority of new population and employment growth in the region in PDAs. PDAs are transit-oriented, infill development opportunity areas within existing communities. Overall, well over two-thirds of all regional growth by 2040 is allocated within PDAs. PDAs are expected to accommodate 80 percent (or over 525,570 units) of new housing and 66 percent (or 744,230) of new jobs.

Portions of the Plan Area along Winchester Boulevard are within the VTA Mixed-Use Corridor PDA identified in Plan Bay Area.[42] One of the key principles of the proposed Plan is to encourage the efficient use of land through sustainable development patterns, a mixture of uses, and development intensities that support transit and walking. The Mixed-Use Corridor PDA in the City of Campbell was included in Plan Bay Area to encourage residential and employment growth and/or downtown center attractions combined with transit connectivity. VTA's proposed light rail would serve as a focal point to increase the live-work-play balance within walking distance of a transit route that connects these types of land uses.[43] The proposed Plan would enhance existing roadways with sidewalks and pedestrian amenities and create new pedestrian, bicycle, and vehicle facilities to improve connectivity. In addition, the proposed Plan would create a clear, safe, and direct pathway to the proposed VTA light rail station and integrate it into the larger pedestrian network. The proposed Plan would also create mixed-use development on the west side of Winchester Boulevard, which increases land use intensity and would have convenient access to the proposed light rail station to encourage residents and employees to take alternative modes of transportation. Therefore, the proposed Plan is consistent with the vision for this PDA and would not conflict with the land use concept plan in Plan Bay Area. Therefore, this impact would be *less than significant.*

As identified above, the proposed Plan would not conflict with the measures in the Scoping Plan or the land use concept plan in Play Bay Area. Therefore, the proposed Plan would not conflict with an applicable plan,

[42] Metropolitan Transportation Commission (MTC) and Association of Bay Area Governments (ABAG), 2013. *Plan Bay Area,* http://geocommons.com/maps/141979. Accessed September 2014.

[43] Metropolitan Transportation Commission (MTC) and Association of Bay Area Governments (ABAG), May 2012. *Visions for Priority Development Areas, Jobs-Housing Connection Strategy*. http://onebayarea.org/file10010.html

policy, or regulation adopted for the purpose of reducing GHG emissions and impacts would be *less than significant*.

Significance Before Mitigation: Less than significant.

4.6.4 CUMULATIVE IMPACTS

GHG-3	**Implementation of the proposed Plan, in combination with past, present, and reasonably foreseeable projects, would not result in significant cumulative impacts with respect to GHG emissions.**

As described above, GHG emissions related to the proposed Plan are not confined to a particular air basin but are dispersed worldwide. Therefore, the analysis of impacts in Section 4.6.3, Environmental Impact Discussion, above, also addresses cumulative impacts. A project that exceeds the BAAQMD's significance criteria in the context of emissions from all other development projected within the entire Air Basin would cumulative contribute to impacts. As identified in Impact GHG-1, Table 4.6-5 shows that the proposed Plan would not exceed BAAQMDs efficiency metric; and therefore, GHG emissions would not result in a significant impact. Furthermore, the proposed Plan would result in an improved efficiency compared to existing conditions. Impact GHG-2 identifies that the project would not conflict with an applicable plan, policy, or regulation adopted for the purpose of reducing GHG emissions and impacts. Consequently, GHG emissions impacts of the proposed Plan would be *less than significant*.

Significance Before Mitigation: Less than significant.

4.6.5 SUMMARY OF SIGNIFICANT IMPACTS AND MITIGATION MEASURES

The proposed Plan would not result in any significant project-specific or cumulative impacts to GHG emissions, and therefore no mitigation measures are required.

4.7 HAZARDS AND HAZARDOUS MATERIALS

This chapter describes the regulatory framework, existing conditions, and potentially significant impacts associated with the adoption and implementation of the Dell Avenue Area Plan (proposed Plan) related to hazardous materials, airport hazards, emergency response plans, and wildland fires.

4.7.1 ENVIRONMENTAL SETTING

4.7.1.1 REGULATORY FRAMEWORK

Hazardous materials refer generally to hazardous substances, hazardous waste, and other materials that exhibit corrosive, poisonous, flammable, and/or reactive properties and have the potential to harm human health and/or the environment. Hazardous materials are used in products (e.g., household cleaners, industrial solvents, paint, pesticides, etc.) and in the manufacturing of products (e.g., electronics, newspapers, plastic products, etc.). Hazardous materials can include petroleum, natural gas, synthetic gas, acutely toxic chemicals, and other toxic chemicals that are used in agriculture, commercial, and industrial uses; businesses; hospitals; and households. Accidental releases of hazardous materials have a variety of causes, including highway incidents, warehouse fires, train derailments, shipping accidents, and industrial incidents.

The term "hazardous materials" as used in this section includes all materials defined in the California Health and Safety Code (H&SC):

> A material that, because of its quantity, concentration, or physical or chemical characteristics, poses a significant present or potential hazard to human health and safety or to the environment if released into the workplace or the environment. "Hazardous materials" include, but are not limited to, hazardous substances, hazardous waste, and any material that a handler or the unified program agency has a reasonable basis for believing that it would be injurious to the health and safety of persons or harmful to the environment if released into the workplace or the environment.

The term includes chemicals regulated by the United States Department of Transportation (USDOT), the United States Environmental Protection Agency (USEPA), the California Department of Toxic Substances Control (DTSC), the California Governor's Office of Emergency Services (Cal OES), and other agencies as hazardous materials, wastes, or substances. "Hazardous waste" is any hazardous material that has been discarded, except those materials specifically excluded by regulation. Hazardous materials that have been intentionally disposed of or inadvertently released fall within the definition of "discarded" materials and can result in the creation of hazardous waste. Hazardous wastes are broadly characterized by their ignitability, toxicity, corrosivity, reactivity, radioactivity, or bioactivity. Federal and State hazardous waste definitions are similar, but contain enough distinctions that separate classifications are in place for federal Resource Conservation and Recovery Act (RCRA) hazardous wastes and State non-RCRA hazardous wastes. Hazardous wastes require special handling and disposal because of their potential to impact public health and

the environment. Some materials are designated "acutely" or "extremely" hazardous under relevant statutes and regulations.

Hazardous materials and wastes can pose a significant actual or potential hazard to human health and the environment when improperly treated, stored, transported, disposed of, or otherwise managed. Many federal, State, and local programs that regulate the use, storage, and transportation of hazardous materials and hazardous waste are in place to prevent these unwanted consequences. These regulatory programs are designed to reduce the danger that hazardous substances may pose to people and businesses under normal daily circumstances and as a result of emergencies and disasters.

Federal Agencies and Regulations

United States Environmental Protection Agency

The USEPA is the primary federal agency that regulates hazardous materials and waste. In general, the USEPA works to develop and enforce regulations that implement environmental laws enacted by Congress. The agency is responsible for researching and setting national standards for a variety of environmental programs and delegates to States and Native American tribes the responsibility for issuing permits and for monitoring and enforcing compliance. USEPA programs promote handling hazardous wastes safely, cleaning up contaminated land, and reducing waste volumes through such strategies as recycling. California falls under the jurisdiction of EPA Region 9. Under the authority of RCRA and in cooperation with State and tribal partners, the EPA Region 9 Waste Management and Superfund Divisions manage programs for site environmental assessment and cleanup, hazardous and solid waste management, and underground storage tanks.

United States Department of Transportation

The USDOT has the regulatory responsibility for the safe transportation of hazardous materials between states and to foreign countries. The USDOT regulations govern all means of transportation, except for those packages shipped by mail, which are covered by United States Postal Service regulations. The federal RCRA of 1976 imposes additional standards for the transport of hazardous wastes.

Occupational Safety and Health Administration

The Occupational Safety and Health Administration (OSHA) oversees the administration of the Occupational Safety and Health Act, which requires specific training for hazardous materials handlers, provision of information to employees who may be exposed to hazardous materials, and acquisition of material safety data sheets (MSDS) from materials manufacturers. The MSDS describe the risks, as well as proper handling and procedures, related to particular hazardous materials. Employee training must include response and remediation procedures for hazardous materials releases and exposures.

Resource Conservation and Recovery Act of 1976, as amended by the Hazardous and Solid Waste Amendments of 1984

Federal hazardous waste laws are generally promulgated under the RCRA, as amended by the Hazardous and Solid Waste Amendments of 1984. These laws provide for the "cradle to grave" regulation of hazardous wastes. Any business, institution, or other entity that generates hazardous waste is required to identify and track its hazardous waste from the point of generation until it is recycled, reused, or disposed. DTSC is responsible for implementing the RCRA program as well as California's own hazardous waste laws, which are collectively known as the Hazardous Waste Control Law. Under the Certified Unified Program Agency (CUPA) program, California Environmental Protection Agency (Cal EPA) has in turn delegated enforcement authority to the County of Santa Clara for State law regulating hazardous waste producers or generators in Campbell.

Comprehensive Environmental Response, Compensation, and Liability Act and the Superfund Amendments and Reauthorization Act of 1986

Congress enacted the Comprehensive Environmental Response, Compensation, and Liability Act (CERCLA), commonly known as Superfund, on December 11, 1980. CERCLA established prohibitions and requirements concerning closed and abandoned hazardous waste sites; provided for liability of persons responsible for releases of hazardous waste at these sites; and established a trust fund to provide for cleanup when no responsible party could be identified. The Superfund Amendments and Reauthorization Act (SARA) amended the CERCLA on October 17, 1986. SARA stressed the importance of permanent remedies and innovative treatment technologies in cleaning up hazardous waste sites; required Superfund actions to consider the standards and requirements found in other State and federal environmental laws and regulations; provided new enforcement authorities and settlement tools; increased State involvement in every phase of the Superfund program; increased the focus on human health problems posed by hazardous waste sites; encouraged greater citizen participation in making decisions on how sites should be cleaned up; and increased the size of the trust fund to $8.5 billion.

Emergency Planning Community Right-to-Know Act

The Emergency Planning Community Right-to-Know Act (EPCRA), also known as SARA Title III, was enacted in October 1986. This law requires any infrastructure at the State and local levels to plan for chemical emergencies. Reported information is then made publicly available so that interested parties may become informed about potentially dangerous chemicals in their community. EPCRA Sections 301 through 312 are administered by EPA's Office of Emergency Management. EPA's Office of Information Analysis and Access implements the EPCRA Section 313 program. In California, SARA Title III is implemented through California Accidental Release Program (CalARP). The State of California has delegated local oversight authority of the CalARP program to the County of Santa Clara.

Hazardous Materials Transportation Act

The USDOT regulates hazardous materials transportation under Title 49 of the Code of Federal Regulations (CFR). State agencies that have primary responsibility for enforcing federal and State regulations and responding to hazardous materials transportation emergencies are the California Highway Patrol (CHP) and the California Department of Transportation (Caltrans). The California State Fire Marshal's Office has oversight authority for hazardous materials liquid pipelines. The California Public Utilities Commission has oversight authority for natural gas pipelines in California. These agencies also govern permitting for hazardous materials transportation.

Federal Response Plan

The Federal Response Plan of 1999 is a signed agreement among 27 federal departments and agencies and other resource providers, including the American Red Cross, that: 1) provides the mechanism for coordinating delivery of federal assistance and resources to augment efforts of State and local governments overwhelmed by a major disaster or emergency; 2) supports implementation of the Robert T. Stafford Disaster Relief and Emergency Act, as well as individual agency statutory authorities; and 3) supplements other federal emergency operations plans developed to address specific hazards. The Federal Response Plan is implemented in anticipation of a significant event likely to result in a need for federal assistance or in response to an actual event requiring federal assistance under a Presidential declaration of a major disaster or emergency. The Federal Response Plan is part of the National response Framework, which was most recently updated on March 22, 2008.

The Stafford Act

The Robert T. Stafford Disaster Relief and Emergency Assistance Act (Stafford Act) of 1988 authorizes the federal government to provide assistance in emergencies and disasters when State and local capabilities are exceeded. The Stafford Act constitutes statutory authority for most federal disaster response activities especially as they pertain to the federal Emergency Management Agency (FEMA) and FEMA programs.

National Response Framework

The 2013 National Response Framework, published by the Department of Homeland Security, is a guide to how the nation responds to all types of disasters and emergencies. The Framework describes specific authorities and best practices for managing incidents that range from serious local to large-scale terrorist attacks or catastrophic natural disasters. In addition, the Framework describes the principles, roles, and responsibilities, and coordinating structures for responding to an incident, and further describes how response efforts integrate with those of the other mission areas.

Homeland Security Presidential Directive No. 5

Through the development of a National Incident Management System (NIMS), Presidential Directive 5 is intended to prevent, prepare for, respond to, and recover from terrorist attacks, major disasters, and other emergencies through a single, comprehensive approach to domestic incident management. The objective of the Directive is to ensure that all levels of government across the nation have the capability to work efficiently and effectively together, using a national approach.

Homeland Security Presidential Directive No. 8

Presidential Directive 8 establishes policies for strengthening national preparedness, including the National Preparedness Goal and Target Capabilities List. Directive 8 requires the preparation of an implementation plan that describes the departmental responsibilities and delivery timelines for the development of the national planning frameworks and associated interagency plans.

State Agencies and Regulations

California Environmental Protection Agency

One of the primary agencies that regulate hazardous materials is the California Environmental Protection Agency (CalEPA). The State, through CalEPA, is authorized by the USEPA to enforce and implement certain federal hazardous materials laws and regulations. The California DTSC, a department of the CalEPA, protects California and Californians from exposure to hazardous waste, primarily under the authority of the RCRA and the California Health and Safety Code.[1] The DTSC requirements include the need for written programs and response plans, such as Hazardous Materials Business Plans (HMBPs). The DTSC programs include dealing with aftermath clean-ups of improper hazardous waste management, evaluation of samples taken from sites, enforcement of regulations regarding use, storage, and disposal of hazardous materials, and encouragement of pollution prevention.

California Division of Occupational Safety and Health

Like OSHA at the federal level, the California Division of Occupational Safety and Health (CalOSHA) is the responsible State-level agency for ensuring workplace safety. The CalOSHA assumes primary responsibility for the adoption and enforcement of standards regarding workplace safety and safety practices. In the event that a site is contaminated, a Site Safety Plan must be crafted and implemented to protect the safety of workers. Site Safety Plans establish policies, practices, and procedures to prevent the exposure of workers and members of the public to hazardous materials originating from the contaminated site or building.

[1] Hazardous Substance Account, Chapter 6.5 (Section 25100 et seq.) and the Hazardous Waste Control Law, Chapter 6.8 (Section 25300 et seq.) of the Health and Safety Code.

California Building Code

The State of California provided a minimum standard for building design through the California Building Code (CBC), which is located in Part 2 of Title 24 of the California Code of Regulations (CCR). The CBC is based on the 1997 Uniform Building Code, but has been modified for California conditions. The CBC is updated every three years, and the current CBC went into effect in January 2014. It is generally adopted on a jurisdiction-by-jurisdiction basis, subject to further modification based on local conditions. Commercial and residential buildings are plan-checked by local city and county building officials for compliance with the typical fire safety requirements of the CBC, including the installation of sprinklers in all high-rise buildings; the establishment of fire resistance standards for fire doors, building materials, and particular types of construction; and the clearance of debris and vegetation within a prescribed distance from occupied structures in wildlife hazard areas.

California Fire Code

The California Fire Code (CFC) incorporates, by adoption, the International Fire Code of the International Code Council, with California amendments. This is the official Fire Code for the State and all political subdivisions. It is located in Part 9 of Title 24 of the California Code of Regulations (CCR). The CFC is revised and published approximately every three years by the California Building Standards Commission.

California Emergency Management Agency

The California Emergency Management Agency (CalEMA) was established as part of the Governor's Office on January 1, 2009—created by Assembly Bill 38 (Nava), which merged the duties, powers, purposes, and responsibilities of the former Governor's Office of Emergency Services with those of the Governor's Office of Homeland Security. The CalEMA is responsible for the coordination of overall State agency response to major disasters in support of local government. The agency is responsible for assuring the State's readiness to respond to and recover from all hazards—natural, manmade, emergencies, and disasters—and for assisting local governments in their emergency preparedness, response, recovery, and hazard mitigation efforts.

California Department of Forestry and Fire Protection

The California Department of Forestry and Fire Protection (CAL FIRE) has mapped fire threat potential throughout California.[2] The CAL FIRE ranks fire threat based on the availability of fuel and the likelihood of an area burning (based on topography, fire history, and climate). The rankings include no fire threat, moderate, high, and very high fire threat. Additionally, the CAL FIRE produced the *2010 Strategic Fire Plan*

[2] California Department of Forestry and Fire Protection (CAL FIRE), http://www.fire.ca.gov/fire_prevention/fire_prevention_wildland_zones_development.php, accessed August 15, 2014.

for California, which contains goals, objectives, and policies to prepare for and mitigate for the effects of fire on California's natural and built environments.[3]

California Department of Transportation and California Highway Patrol

Caltrans and the CHP are the two State agencies that have primary responsibility for enforcing federal and State regulations and responding to hazardous materials transportation emergencies. Caltrans manages more than 50,000 miles of California's highway and freeway lanes, provides intercity rail services, permits more than 400 public-use airports and special-use hospital heliports, and works with local agencies. Caltrans is also the first responder for hazardous material spills and releases that occur on those highway and freeway lanes and intercity rail services.

The CHP enforces hazardous materials and hazardous waste labeling and packing regulations designed to prevent leakage and spills of materials in transit and to provide detailed information to cleanup crews in the event of an accident. Vehicle and equipment inspection, shipment preparation, container identification, and shipping documentation are all part of the responsibility of the CHP, which conducts regular inspections of licensed transporters to assure regulatory compliance. In addition, the State of California regulates the transportation of hazardous waste originating or passing through the State.

Common carriers are licensed by the CHP, pursuant to the California Vehicle Code, Section 32000. This section requires licensing every motor (common) carrier who transports, for a fee, in excess of 500 pounds of hazardous materials at one time and every carrier, if not for hire, who carries more than 1,000 pounds of hazardous material of the type requiring placards. Common carriers conduct a large portion of the business in the delivery of hazardous materials.

California Health and Safety Code and Code of Regulations

California Health and Safety Code Chapter 6.95 and California Code of Regulations, Title 19, Section 2729 set out the minimum requirements for business emergency plans and chemical inventory reporting. These regulations require businesses to provide emergency response plans and procedures, training program information, and a hazardous material chemical inventory disclosing hazardous materials stored, used, or handled on-site. A business which uses hazardous materials or a mixture containing hazardous materials, must establish and implement a business plan if the hazardous material is handled in certain quantities.

California Education Code

The California Education Code (CEC) establishes the law for California public education. The CEC requires that the DTSC be involved in the environmental review process for the proposed acquisition and/or construction of school properties that will use State funding. The CEC requires that a Phase I Environmental

[3] California Department of Forestry and Fire Protection (CAL FIRE), 2010, *2010 Strategic Fire Plan for California,* http://cdfdata.fire.ca.gov/pub/fireplan/fpupload/fpppdf668.pdf, accessed on August 15, 2014.

Site Assessment be completed prior to acquiring a school site or engaging in a construction project. Depending on the outcome of the Phase I Environmental Site Assessment, a Preliminary Environmental Assessment and remediation may be required. The CEC also requires potential, future school sites that are proposed within 2 miles of an airport to be reviewed by the Caltrans Division of Aeronautics. If Caltrans does not support the proposed site, no State or local funds can be used to acquire the site or construct the school.

California State Aeronautics Act

The State Aeronautics Act is implemented by the Caltrans Division of Aeronautics. The purpose of this Act is to: 1) foster and promote safety in aeronautics; 2) ensure State laws and regulations relating to aeronautics are consistent with federal aeronautics laws and regulations; 3) assure that persons residing in the vicinity of airports are protected against intrusions by unreasonable levels of aircraft noise; and 4) develop informational programs to increase the understanding of current air transportation issues. The Caltrans Division of Aeronautics issues permits for and annually inspects hospital heliports and public-use airports, makes recommendations regarding proposed school sites within 2 miles of an airport runway, and authorizes helicopter landing sites at/near schools.

Federal and State Hazardous Materials-Specific Programs and Regulations

Asbestos-Containing Materials Regulations

Asbestos-containing materials (ACM) are materials that contain asbestos, a naturally occurring fibrous mineral that has been mined for its useful thermal properties and tensile strength. ACM is generally defined as either friable or non-friable. Friable ACM is defined as any material containing more than one percent asbestos. Friable ACM is more likely to produce airborne fibers than non-friable ACM, and can be crumpled, pulverized, or reduced to powder by hand pressure. Non-friable ACM is defined as any material containing one percent or less asbestos. Non-friable ACM cannot be crumpled, pulverized, or reduced to powder by hand pressure. When left intact and undisturbed, ACM does not pose a health risk to building occupants. Potential for human exposure occurs when ACM becomes damaged to the extent that asbestos fibers become airborne and are inhaled. Inhalation of asbestos airborne fibers can lead to various health problems, the most serious of which includes lung disease.

State-level agencies, in conjunction with the USEPA and OSHA, regulate removal, abatement, and transport procedures for ACMs. Releases of asbestos from industrial, demolition, or construction activities are prohibited by these regulations and medical evaluation and monitoring is required for employees performing activities that could expose them to asbestos. Additionally, the regulations include warnings that must be heeded and practices that must be followed to reduce the risk for asbestos emissions and exposure. Finally, federal, State, and local agencies must be notified prior to the onset of demolition or construction activities with the potential to release asbestos. Specifically, Bay Area Air Quality Management District (BAAQMD) Regulation 11, Rule 2, requires a written plan or notification of intent to demolish or renovate be provided to the District at least ten working days prior to commencement of demolition or renovation.

Lead-Based Paint

Lead-based paint (LBP), which can result in lead poisoning when consumed or inhaled, was widely used in the past to coat and decorate buildings. Lead poisoning can cause anemia and damage to the brain and nervous system, particularly in children. Like ACM, LBP generally does not pose a health risk to building occupants when left undisturbed; however, deterioration, damage, or disturbance will result in hazardous exposure. In 1978, the use of LBP was federally banned by the Consumer Product Safety Commission. Therefore, only buildings built before 1978 are presumed to contain LBP, as well as buildings built shortly thereafter, as the phase-out of LBP was gradual.

Polychlorinated Biphenyls

The USEPA prohibited the use of polychlorinated biphenyls (PCBs) in the majority of new electrical equipment starting in 1979, and initiated a phase-out for much of the existing PCB-containing equipment. The inclusion of PCBs in electrical equipment and the handling of those PCBs are regulated by the provisions of the Toxic Substances Control Act (TSCA), 15 United States Code Section 2601 et seq. Relevant regulations include labeling and periodic inspection requirements for certain types of PCB-containing equipment and outline highly specific safety procedures for their disposal. The State of California likewise regulates PCB-laden electrical equipment and materials contaminated above a certain threshold as hazardous waste; these regulations require that such materials be treated, transported, and disposed accordingly. At lower concentrations for non-liquids, regional water quality control boards may exercise discretion over the classification of such wastes.

CalOSHAs Lead in Construction Standard is contained in Title 8, Section 1532.1 of the California Code of Regulations. The regulations address all of the following areas: permissible exposure limits (PELs); exposure assessment; compliance methods; respiratory protection; protective clothing and equipment; housekeeping; medical surveillance; medical removal protection (MRP); employee information, training, and certification; signage; record keeping; monitoring; and agency notification.

Regional Agencies and Regulations

San Francisco Bay Regional Water Quality Control Board

The Porter-Cologne Water Quality Act[4] established the State Water Resources Control Board (SWRCB) and divided the State into nine regional basins, each under the jurisdiction of a Regional Water Quality Control Board (RWQCB). The San Francisco Bay Region (Region 2) RWQCB (San Francisco Bay RWQCB) regulates water quality in the Plan Area. The San Francisco Bay RWQCB has the authority to require groundwater investigations when the quality of groundwater or surface waters of the state is threatened, and to require remediation actions, if necessary.

[4] California Water Code Sections 13000 et seq.

Bay Area Air Quality Management District

The BAAQMD has primary responsibility for control of air pollution from sources other than motor vehicles and consumer products (which are the responsibility of CalEPA and the California Air Resources Board [CARB]). The BAAQMD is responsible for preparation of attainment plans for non-attainment criteria pollutants, control of stationary air pollutant sources, and issuance of permits for activities, including demolition and renovation activities affecting asbestos containing materials (District Regulation 11, Rule 2) and lead (District Regulation 11, Rule 1).

Santa Clara County Department of Environmental Health

A Certified Unified Program Agency (CUPA) is a local agency that has been certified by CalEPA to implement the local Unified Program. The CUPA can be a county, city, or joint powers authority. A participating agency is a local agency that has been designated by the local CUPA to administer one or more Unified Programs within their jurisdiction on behalf of the CUPA. A designated agency is a local agency that has not been certified by CalEPA to become a CUPA, but is the responsible local agency that would implement the six Unified Programs until they are certified. Currently, there are 83 CUPAs in California. The Santa Clara County Department of Environmental Health's Hazardous Materials Compliance Division (SCCHMCD) is the certified CUPA for the City of Campbell and consolidates, coordinates, and makes consistent the following existing programs:

- Aboveground Storage Tank SPCC Plan (California Health and Safety Code, Chapter 6.6.7)
- California Accidental Release Prevention (CalARP) Program
- Hazardous Waste Generator and Onsite Hazardous Waste Treatment (tiered permitting) Programs (California Health and Safety Code, Chapter 6.5)
- California Uniform Fire Code: Hazardous Materials Management Plans and Hazardous Material Inventory Statements

Santa Clara County Fire Department

The Santa Clara County Fire Department (SCCFD) administers the following programs within the City of Campbell through the Fire Prevention Bureau:

- California Fire Code (with local amendments)
- Hazardous Materials Storage Ordinance (Municipal Code)
- Toxic Gas Ordinance (Municipal Code)
- Storm Water Pollution Prevention (Municipal Code)

As a Participating Agency (PA) in CUPA, the Department also administers the following Hazardous Materials related state programs:

- Hazardous Materials Business Plan (California Health and Safety Code, Chapter 6.95)
- Underground Storage Tank (California Health and Safety Code, Chapter 6.7)

Santa Clara County Office of Emergency Services

The Santa Clara County Office of Emergency Services has adopted an Emergency Operations Plan (EOP),[5] which identifies emergency response programs related to hazardous waste incidents.

Local Agencies and Regulations

City of Campbell General Plan

The City of Campbell's General Plan was adopted by the Campbell City Council in November 2001. The Plan was updated in 2009 with adoption of the Housing Element Update. The Health and Safety Element identifies methods and resources for minimizing death, injury, property and environmental damage, and social disturbance resulting from natural and human-induced hazards. The Health and Safety Element also establishes goal, policies, and strategies, which are listed in Table 4.7-1, related to hazardous materials, hazardous wastes, and hazardous materials emergency response.

City of Campbell Municipal Code

Besides the General Plan, the City of Campbell Municipal Code is the primary tool that guides development in the city. The City's Municipal Code identifies land use categories, site development regulations, and other general provisions that ensure consistency between the General Plan and proposed development projects. The following chapters regulate emergency response and hazardous materials in Campbell:

- Chapter 2.28 – Emergency Services/Citizen Corps Council. The purpose of this chapter is to outline emergency response planning procedures and responsibilities in Campbell.
- Chapter 17.06 – Aboveground Hazardous Materials Storage. The purpose of this chapter is the protection of health, life, resources, and property through prevention and control of unauthorized discharge of hazardous materials from aboveground structures (e.g., tanks, pipelines, etc.).
- Chapter 17.07 – Requirements for Facilities Where Materials Which Are or Which May Become Toxic Gases are Found. This chapter applies to all new and existing facilities where regulated materials subject to this chapter are present in concentrations that exceed the level of concern as determined in accordance with this chapter.

[5] Santa Clara County, 2008. *Operational Area Emergency Operations Plan,* March.

TABLE 4.7-1 CITY OF CAMPBELL GENERAL PLAN GOALS, POLICIES, AND STRATEGIES PERTAINING TO HAZARDS AND HAZARDOUS MATERIALS

Goal/Policy/ Strategy Number	Goal/Policy/Strategy Text
Goal HS-1	*A feeling of safety in the community.*
Policy HS-1.1	Disaster Recovery: Adequately prepare for, respond to and recover from disasters.
Strategy HS-1.1a	Emergency-Planning Funding: Provide funding for fire and police services to ensure preparedness of response teams and implementation of emergency response plans.
Strategy HS-1.1b	Emergency Operations: Coordinate among City departments to ensure that emergency operations will comply with the Standardized Emergency Management System.
Strategy HS-1.1e	Geographic information System: Study the possibility of maintaining and updating a database for safety related information in a geographic information system (GIS) format that would provide mapping and parcel information for more efficient emergency response.
Strategy HS-1.1f	Adequate Access: Require adequate access for emergency vehicles, including minimum street width and vertical clearance. The Uniform Fire Code currently sets the minimum street width at 20 feet. Larger buildings may require a minimum width of 30 feet.
Policy HS-1.3	Risk Reduction: Coordinate with other agencies and the public to reduce the risks of disasters.
Strategy HS-1.3a	Inter-Agency Coordination: Coordinate emergency preparedness, response, recovery and mitigation activities with Santa Clara County, surrounding cities, service agencies, voluntary organizations and State and federal agencies.
Strategy HS-1.3b	Public Information Officer: Designate and train a City staff member designated as a Public Information Officer, whose duties will include meeting regularly with media liaisons and providing information during emergencies.
Strategy HS-1.3d	Information Sharing: Work with Santa Clara County and other government, academic and private organizations to obtain new data that can be used for emergency preparedness and response and share information with other nearby jurisdictions and private and public organizations.
Goal HS-2	*Adequate, efficient and high quality police, fire and emergency services.*
Policy HS-2.3	Fire and Emergency Medical Services: Ensure that fire and emergency medical services meet existing and future demand.
Strategy HS-2.3c	Hazardous Material Inspections: Coordinate with the County Fire Department to provide hazardous material inspections for businesses.
Strategy HS-2.3e	911 Dispatch Service Coordination: Coordinate 911 dispatch service with the County Fire Department to help speed fire and emergency response time.
Goal HS-7	*Minimal exposure to hazardous materials.*
Policy HS-7.1	Hazardous Materials Storage, Use and Transport: Ensure that storage, use and transport of hazardous materials are regulated properly.
Strategy HS-7.1a	Hazardous Materials: Require storage, use and transport of hazardous materials to comply with local, State and federal safety standards.
Strategy HS-7.1b	Hazardous Materials and Development Project Review: Review all proposed development projects that manufacture, use or transport hazardous materials for compliance with the County Hazardous Waste Management Plan
Strategy HS-7.1c	Storage and Processing of Hazardous Materials: Require new industries that store and process hazardous materials to provide a buffer zone along property boundaries sufficient to protect public safety and natural resources. The adequacy of the buffer zone shall be determined by the City in consultation with other agencies responsible for the management of hazardous materials.

TABLE 4.7-1 CITY OF CAMPBELL GENERAL PLAN GOALS, POLICIES, AND STRATEGIES PERTAINING TO HAZARDS AND HAZARDOUS MATERIALS

Goal/Policy/ Strategy Number	Goal/Policy/Strategy Text
Strategy HS-7.1d	Hazardous Materials Emergency Response Plan: Require any business that handles hazardous material to prepare an appropriate emergency response plan, including a transportation plan for using City streets to transport hazardous materials.
Strategy HS-7.1e	Inappropriate Sites: Identify sites that are inappropriate for hazardous materials storage and use.
Strategy HS-7.1f	Hazardous Materials Emergency Response: Work with other agencies to help ensure adequate response capability for hazardous materials emergencies.
Strategy HS-7.1g	Development Projects Involving Potential Historical Hazardous Materials Use: Require that applications for discretionary development projects that will involve a change in land use (i.e., from industrial to commercial or residential) provide detailed information regarding potential historical hazardous materials use, including soil and/or groundwater sampling results, if warranted.
Goal HS-8	*Safe and proper disposal of hazardous waste.*
Policy HS-8.1	Disposal of Hazardous Waste: Prevent unsafe or illegal disposal of hazardous waste.
Strategy HS-8.1a	Hazardous Waste Facilities Near Residences or Schools: Discourage the development of residences or schools near known hazardous waste disposal or handling facilities
Strategy HS-8.1b	Information About Hazardous Waste: Provide the public and industry with information needed to make informed decisions regarding the recycling, treatment, disposal and other management of hazardous wastes
Strategy HS-8.1c	County Hazardous Waste Plan and Element: Work with appropriate regional agencies to implement the County Hazardous Waste Management Plan and the City Household Hazardous Waste Element.
Strategy HS-8.1d	Development Projects Involving Hazardous Materials: Require that applications for discretionary development projects that will generate, use or store hazardous materials or provide detailed information regarding waste reduction, recycling and storage.

- Chapter 17.09 – Underground Hazardous Materials Storage. The purpose of this chapter is the protection of health, life, resources, and property through prevention and control of unauthorized discharges of hazardous materials from underground structures (e.g., tanks, sumps, pipelines, etc.).

City of Campbell Emergency Operations Plan

The City of Campbell Police Department is responsible for coordinating agency response to disasters or other large-scale emergencies in the City of Campbell with assistance from the Santa Clara County Office of Emergency Services and the Santa Clara County Fire Department. The Campbell Emergency Operations Plan (EOP)[6] establishes policy direction for emergency planning, mitigation, response, and recovery activities within the city. The Campbell EOP addresses interagency coordination, procedures to maintain communications during emergencies, and methods to assess the extent of damage and management of volunteers. The Campbell EOP uses the Standardized Emergency Management System as required by

[6] City of Campbell, *Emergency Operation Plan*, 2014.

California Government Code Section 8607(a) for managing responses to multi-agency and multi-jurisdiction emergencies in California, including those related to hazardous materials.

4.7.1.2 EXISTING CONDITIONS

This section describes existing conditions related to hazardous materials, airport hazards, and wildland fires within the Plan Area.

Hazardous Materials Sites

California Government Code Section 65962.5 requires the CalEPA to compile, maintain, and update specified lists of hazardous material release sites. The California Environmental Quality Act (CEQA) (California Public Resources Code Section 21092.6) requires the lead agency to consult the lists compiled pursuant to Government Code Section 65962.5 to determine whether a project and any alternatives are identified on any of the following lists:

- **EPA NPL**: The EPA's National Priorities List includes all sites under the USEPAs Superfund program, which was established to fund cleanup of contaminated sites that pose risk to human health and the environment.
- **EPA CERCLIS and Archived Sites:** The EPA's Comprehensive Environmental Response, Compensation, and Liability Information System includes a list of 15,000 sites nationally identified as hazardous sites. This would also involve a review for archived sites that have been removed from CERCLIS due to No Further Remedial Action Planned (NFRAP) status.
- **EPA RCRIS (RCRA Info):** The Resource Conservation and Recovery Act Information System (RCRIS or RCRA Info) is a national inventory system about hazardous waste handlers. Generators, transporters, handlers, and disposers of hazardous waste are required to provide information for this database.
- **DTSC Cortese List:** The DTSC maintains the Hazardous Waste and Substances Sites (Cortese) list as a planning document for use by the State and local agencies to comply with the CEQA requirements in providing information about the location of hazardous materials release sites. This list includes the Site Mitigation and Brownfields Reuse Program Database (CalSites).
- **DTSC HazNet:** The DTSC uses this database to track hazardous waste shipments.
- **SWRCB LUSTIS:** Through the Leaking Underground Storage Tank Information System, the SWRCB maintains an inventory of USTs and leaking USTs, which tracks unauthorized releases.

The required lists of hazardous material release sites are commonly referred to as the "Cortese List" after the legislator who authored the legislation. Because the statute was enacted more than 20 years ago, some of the provisions refer to agency activities that were conducted many years ago and are no longer being implemented and, in some cases, the information required in the Cortese List does not exist. Those requesting a copy of the Cortese Lists are now referred directly to the appropriate information resources

contained on internet websites hosted by the boards or departments referenced in the statute, including DTSCs online EnviroStor database and the SWRCBs online GeoTracker database. These two databases include hazardous material release sites, along with other categories of sites or facilities specific to each agency's jurisdiction.

A search of the EnviroStor database on August 16, 2014, revealed two listings within the Plan Area and one listing just south of the Plan Area on Winchester Boulevard, as presented in Table 4.7-2.

TABLE 4.7-2 ENVIROSTOR CLEANUP PROGRAM SITES FOR THE DAAP AREA

Project Name	Address	Type	Status
Ashland Chemical Company	1600 Dell Avenue	Tiered Permit	Inactive-Needs Evaluation
Silicon Genesis Corporation	590 Division Street	Tiered Permit	Inactive-Needs Evaluation
Maximum Medical	14300 Winchester Boulevard	Tiered Permit	Refer: Other Agency as of 5/16/2002

Source: California Department of Toxic Substances Control 2014. http://envirostor.dtsc.ca.gov/public.

All three are type-listed as "Tiered Permit," which refers to hazardous waste generating businesses that are permitted to treat eligible waste streams onsite. The two sites identified within the Plan Area (i.e., Ashland Chemical Company and Silicon Genesis Corporation) are both listed as "Inactive-Needs Evaluation," indicating that DTSC has determined a Preliminary Endangerment Assessment (PEA) or other evaluation is required to see if there has been a release of a hazardous substance that presents a risk to human health or the environment. The third site, Maximum Medical, located just outside of the Plan Area, is listed "Refer Other Agency," indicating that, based on limited information available to DTSC, it appears to be more appropriately addressed by another State or local environmental regulatory agency.

According to information available on the EnviroStor database, Maximum Medical was a medical glove manufacturing facility that operated from 1963 to 2000. The facility operated two units under Conditional Authorization, which allowed onsite treatment of non-RCRA and RCRA-exempt hazardous waste (i.e., less risky waste). Soil and groundwater investigations conducted at the site beginning in 1983 discovered contamination at the facility consisting of phthalates, nickel, copper, and benzene, toluene, ethylbenzene, and xylenes (BTEX). A significant dissolved phase groundwater plume of bis (2-ethylhexyl) phthalate (DEHP) was detected at the site, and in August 1986 the San Francisco Bay Region RWQCB issued a Waste Discharge Requirement (WDR) No. 86-100. Over 5 years of monitoring, data from nine monitoring wells demonstrated that the plume concentrations had decreased significantly, and the Water Board Order was rescinded in a letter from RWQCB dated January 1995.

Following closure of the glove manufacturing operation and purchase of the property by Sobrato Development Companies (Sobrato) in 2000, Maximum Medical contracted Levine Fricke (LFR) to conduct a shallow soil investigation in the former Water Treatment/Aboveground Tank Farm (WT/TF) area.

Approximately 1,120 cubic yards of soil with concentrations of DEHP (up to 5,200 mg/kg) were removed from the facility between December 2000 and February 2001.

In 2000, the property owner Sobrato contracted with PES Environmental Inc. (PES) to perform a subsurface investigation for the presence of DEHP in groundwater and soil at the WT/TF area. The resulting report (dated July 16, 2001) concluded that DEHP impacts in this area persisted at concentrations incompatible with potential future residential use of the property. PES requested that the RWQCB review and comment on the report and reevaluate the site status. On April 2, 2002, the RWQCB issued a response letter concluding that no additional investigation or restrictions are merited unless building demolition occurs and previously inaccessible areas near the WT/TF area are accessible for sampling. At such time, sampling undertaken and the results therefrom may reveal the need for further removal of impacted soil to reduce DEHP concentrations to levels deemed safe and compatible for future residential use of the property.

A search of the GeoTracker database on August 16, 2014, revealed three listings within the Plan Area, as presented in Table 4.7-3.

TABLE 4.7-3 GEOTRACKER SITES FOR THE PLAN AREA

Project Name	Address	Type	Status
Deluxe Corporation	1551 Dell Avenue	Cleanup Program Site	Completed – Case Closed as of 5/18/2005
Warner-Lambert Company	1587 Dell Avenue	Cleanup Program Site	Completed – Case Closed as of 5/25/1999
K&K Manufacturing	1500 Dell Avenue	Cleanup Program Site	Open – Site Assessment as of 9/16/1990

Source: State Water Resources Control Board, 2014. http://geotracker.waterboards.ca/gov.

All three GeoTracker sites are listed as "Cleanup Program Sites." The status of the Warner-Lambert Company site at 1587 Dell Avenue is "Completed – Case Closed," meaning the responsible party has satisfied all cleanup requirements and the site no longer presents a risk to human health or the environment. The status of Deluxe Corporation at 1551 Dell Avenue is the same, however, based on information available on the GeoTracker database, a deed restriction has been recorded with the County of Santa Clara, prohibiting the extraction of shallow groundwater on the subject site for any purpose. According to the RWQCB, this risk management measure needs to be implemented for an indefinite period of time to assure protection of human health and the environment.

The status of the third site at 1500 Dell Avenue is "Open – Site Assessment," as a result of former machine shop operations at the site. Previous soil and groundwater sampling was conducted during the decommissioning of a sub-slab wastewater drainage and clarifier system, in accordance with a closure plan approved by the SCCFD. Out of 33 soil samples collected, five contained residual TPH-d and –mo, exceeding Water Board Environmental Screening Levels (ESLs) for commercial/industrial uses. No TPH

impacts to groundwater were detected in either the monitoring well or other grab samples collected at the site. In addition, no volatile organic compounds were detected at concentrations exceeding residential or commercial/industrial ESLs.

RWQCB staff reviewed the data presented and concurred that the residual TPH is not a significant threat to groundwater, due in part to its low solubility and mobility. The RWQCB further concurred that the soil is likely beneath the foundation and any meaningful removal would require removal of the foundation. This being the case, the RWQCB agreed that the proposal to manage the impacted soil in-place is an appropriate remedial strategy until such time as the building is removed or the soil otherwise becomes accessible, allowing for further evaluation and possible removal of the impacted soil.

The search of the GeoTracker database also revealed that several sites with leaking underground storage tanks (LUSTs) were identified in the vicinity of the Plan Area. All were listed as "Completed-Case Closed," which means that the LUST is not expected to impact the properties on which it sits.

Existing or Proposed Schools

There are no existing or proposed schools within ¼-mile of the Plan Area. The nearest school is Campbell Middle School, located at 295 Cherry Lane, roughly 1 mile to the north. Carlton Avenue School, located at 2421 Carlton Avenue, is roughly the same distance to the southeast.

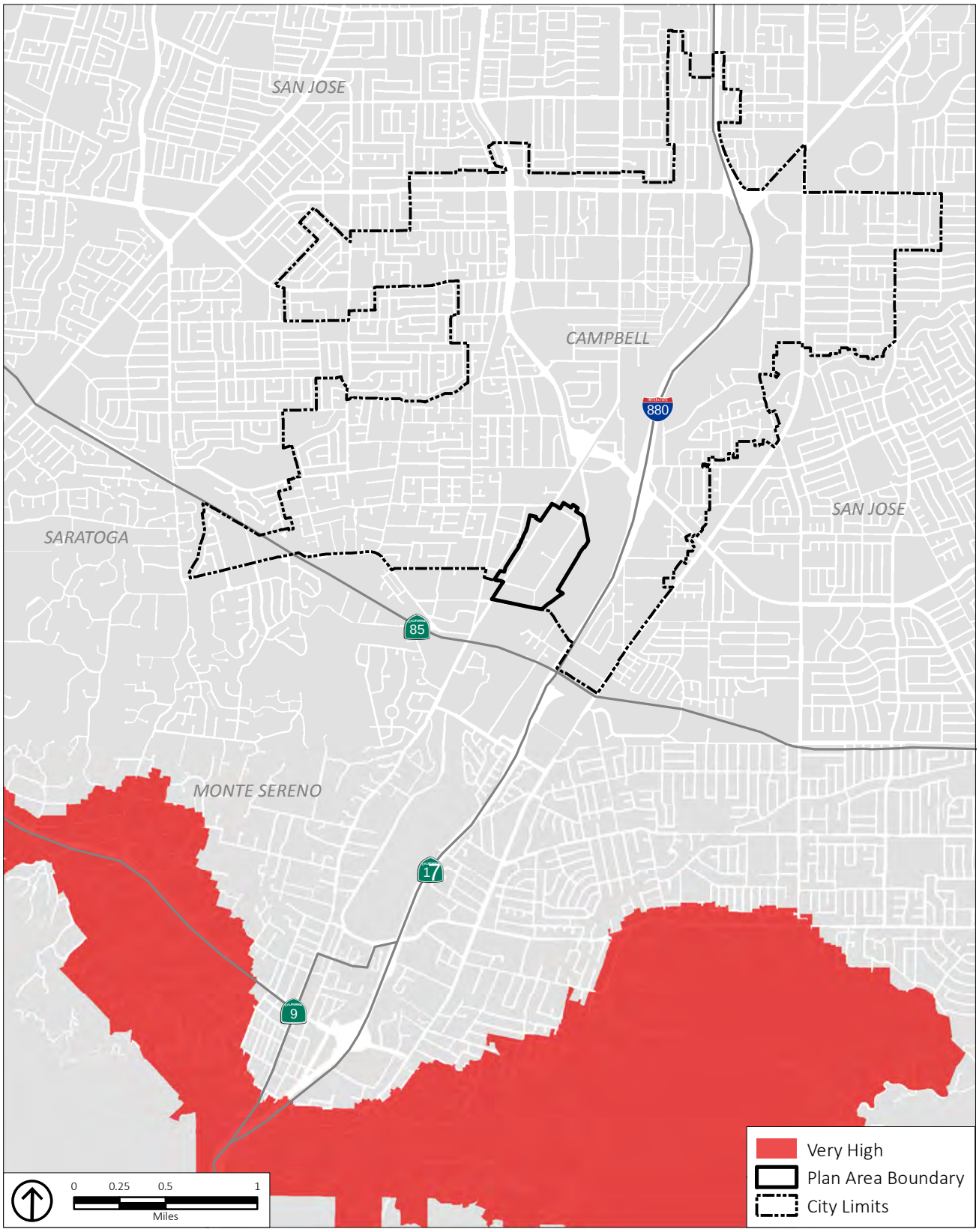
Airport Hazards

The City of Campbell, including the Plan Area, is not located within an airport land use plan area. The nearest public use airport or private airstrip is the Norman Mineta San Jose International Airport located roughly 9 miles north from the center of Campbell. There are no other public use airports within 2 miles of the Plan Area. Likewise, there are no private airstrips within or near the Plan Area.

Wildland Fire Hazard

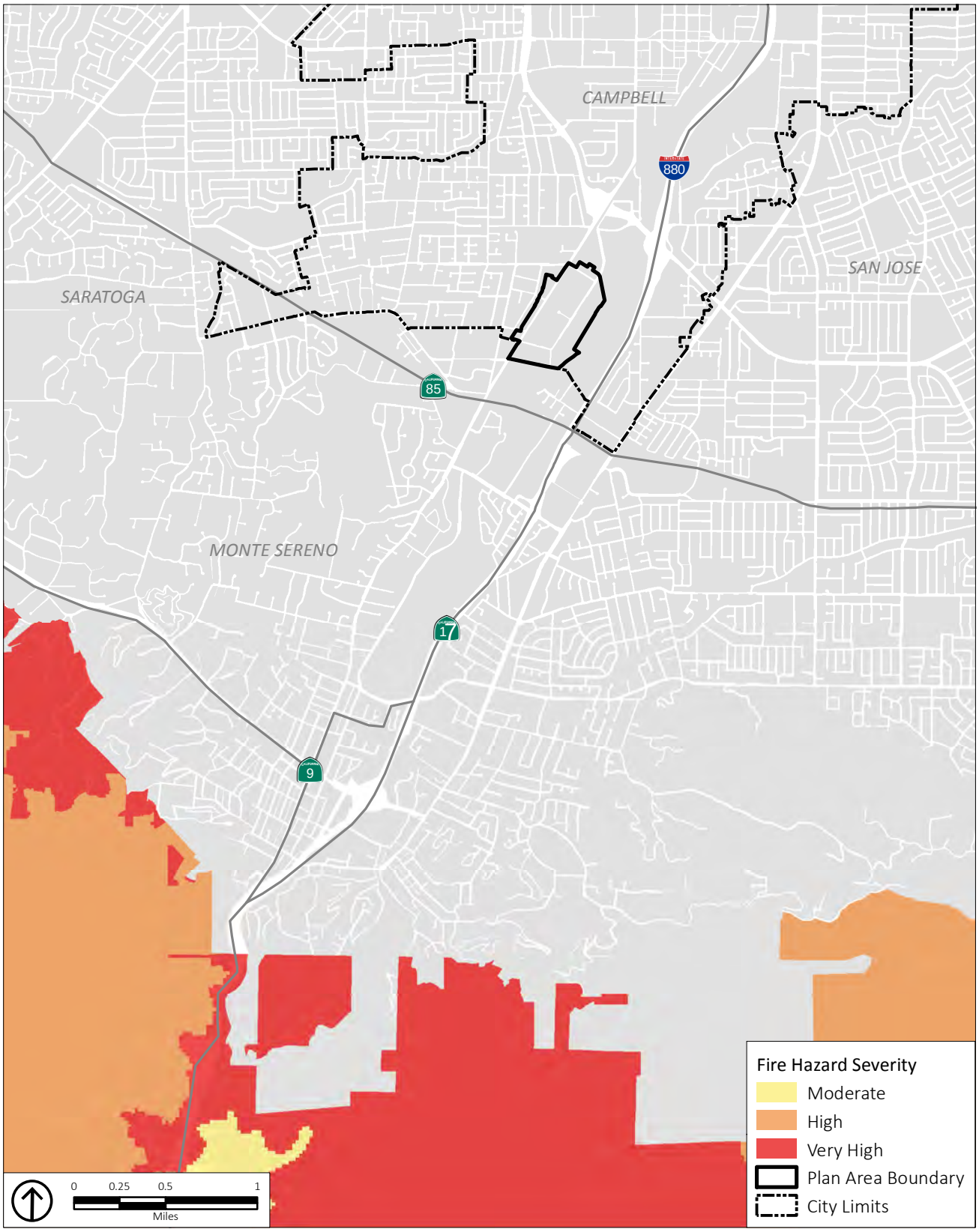
CAL FIRE evaluates fire hazard severity risks according to areas of responsibility (i.e., federal, State, and local). According to CAL FIRE, and as depicted on Figure 4.7-1, there are no very high fire hazard severity zones (VHFHSZ) within the Local Responsibility Area (LRA) for the City of Campbell, including the Plan Area. Also, as depicted on Figure 4.7-2, there are no moderate, high, and very high fire hazard severity zones in the State Responsibility Area (SRA) in the vicinity of the City of Campbell, including the Plan Area.[7]

[7] California Department of Forestry and Fire Protection (CDFFP), 2007. *Fire Hazards and Severity Zones in State Responsibility Areas,* http://frap.cdf.ca.gov/webdata/maps/alameda/fhszs_map.43.pdf, accessed August 20, 2014.



Source: CAL FIRE, 2007; PlaceWorks, 2014.

Figure 4.7-1
Very High Fire Hazard Severity Zones in Local Responsibility Areas



Source: CAL FIRE, 2007; PlaceWorks, 2014.

Figure 4.7-2
Fire Hazard Severity Zones in State Responsibility Areas

4.7.2 THRESHOLDS OF SIGNIFICANCE

The proposed Plan would have a significant impact regarding hazards and hazardous materials if it would:

Create a significant hazard to the public or the environment through the routine transport, use, or disposal of hazardous materials.

1. Create a significant hazard to the public or the environment through reasonably foreseeable upset and accident conditions involving the release of hazardous materials into the environment.
2. Emit hazardous emissions or handle hazardous or acutely hazardous materials, substances, or waste within ¼-mile of an existing or proposed school.
3. Be located on a site which is included on a list of hazardous materials sites compiled pursuant to Government Code Section 65962.5 and, as a result, create a significant hazard to the public or the environment.
4. Be located within an airport land use plan or, where such a plan has not been adopted, within 2 miles of a public airport or public use airport it results in a safety hazard for people residing or working in the project area.
5. Be within the vicinity of a private airstrip and result in a safety hazard for people residing or working in the project area.
6. Impair implementation of, or physically interfere with, an adopted emergency response plan or emergency evacuation plan.
7. Expose people or structures to a significant risk of loss, injury, or death involving wildland fires, including where wildlands are adjacent to urbanized areas or where residences are intermixed with wildlands.

4.7.2.1 THRESHOLDS NOT DISCUSSED FURTHER

With regard to Thresholds 3, 5, 6, and 8, as discussed previously in Section 4.7.1.2, Existing Conditions, the Plan Area is not located within ¼-mile of an existing or proposed school, is not within 2 miles of a public use airport, is not on or in the vicinity of a private airstrip, and is not within an area where wildland fires pose a significant risk of loss, injury, or death. Therefore, the proposed Plan would have *no impact* for these thresholds of significance and no further discussion of the proposed Plan's impacts related to these thresholds is warranted in this Draft EIR.

4.7.3 ENVIRONMENTAL IMPACT DISCUSSION

HAZ-1	**Implementation of the proposed Plan would not create a significant hazard to the public or the environment through the routine transport, use, or disposal of hazardous materials.**

The proposed Plan does not include changes to regulatory standards for handling, transport, storage, use, disposal, or disruption of hazardous materials. While commercially available hazardous materials (e.g., fuels, solvents, paints, and some consumer electronics) would be used for construction projects allowed by the proposed Plan and may generate small amounts of hazardous waste, the waste would be handled in accordance with applicable federal, State, and local laws, policies, and regulations, as described in Section 4.7.1.1, Regulatory Framework. The Plan Area currently contains, and the proposed Plan would allow, office, research and development/light industrial, retail and commercial, and residential land uses. It is, possible, therefore that future development could generate significant quantities of hazardous materials. However, the City of Campbell, SCCHMCD, and SCCFD coordinate the review of building permits to ensure that hazardous materials requirements are met prior to construction, including required separation between hazardous materials and sensitive land uses, and proper hazardous materials storage facilities. Any businesses that transport, generate, use, and/or dispose of hazardous materials within the Plan Area would also be subject to existing hazardous materials regulations, such as those implemented by the City of Campbell, SCCHMCD, and SCCFD. In addition, the General Plan contains policies and strategies that further ensure that new development would not create a significant hazard to the public or the environment through the routine transport, use, or disposal of hazardous materials. These strategies include:

- Strategy HS-7.1a: Hazardous Materials. Require storage, use and transport of hazardous materials to comply with local, State and federal safety standards.
- Strategy HS-7.1b: Hazardous Materials and Development Project Review. Review all proposed development projects that manufacture, use or transport hazardous materials for compliance with the County Hazardous Waste Management Plan
- Strategy HS-7.1c: Storage and Processing of Hazardous Materials. Require new industries that store and process hazardous materials to provide a buffer zone along property boundaries sufficient to protect public safety and natural resources. The adequacy of the buffer zone shall be determined by the City in consultation with other agencies responsible for the management of hazardous materials.
- Strategy HS-7.1e: Inappropriate Sites. Identify sites that are inappropriate for hazardous materials storage and use.
- Strategy HS-8.1a: Hazardous Waste Facilities Near Residences or Schools. Discourage the development of residences or schools near known hazardous waste disposal or handling facilities.

- Strategy HS-8.1c: County Hazardous Waste Plan and Element. Work with appropriate regional agencies to implement the County Hazardous Waste Management Plan and the City Household Hazardous Waste Element.
- Strategy HS-8.1d: Development Projects Involving Hazardous Materials. Require that applications for discretionary development projects that will generate, use or store hazardous materials or provide detailed information regarding waste reduction, recycling and storage.

Compliance with applicable federal, State, and local laws, and regulations regarding handling of these materials, and the General Plan policies listed above, would ensure the risks associated with release of hazardous materials into the environment from the routine transport, use, storage, or disposal of hazardous materials following construction would be *less than significant*.

Significance Before Mitigation: Less than significant.

HAZ-2	**Implementation of the proposed Plan would not create a significant hazard to the public or the environment through reasonably foreseeable upset and accident conditions involving the release of hazardous materials into the environment.**

The proposed Plan would allow new development, including office, research and development/light industrial, retail and services, and residential uses within the Plan Area. Demolition and/or renovation of existing structures could potentially result in the release of hazardous building materials (e.g., asbestos, lead paint, etc.) into the environment. Use of hazardous materials on newly developed properties after construction could potentially include cleaning solvents, fertilizers, pesticides, and other materials used in the regular maintenance and operation of the proposed uses. Compliance with existing laws, regulations, policies, and procedures would ensure future development allowed by the proposed Plan would not create a significant hazard to the public or the environment through reasonably foreseeable upset and accident conditions involving the release of hazardous materials into the environment. These include applicable federal, State, and local laws and regulations regarding handling of these materials described in Section 4.7.1.1, Regulatory Framework, of this chapter; the General Plan policies listed under Impact HAZ-1; and the Stormwater Pollution Prevention Plan and Best Management Practices required for the proposed Plan (see Chapter 4.8, Hydrology and Water Quality, for additional detail). Therefore, impacts would be *less than significant*.

Significance Before Mitigation: Less than significant.

HAZ-4	**Implementation of the proposed Plan would not create a significant hazard to the public or the environment by being located on a site, which is included on a list of hazardous materials sites compiled pursuance to Government Code Section 65962.5.**

As discussed previously in Section 4.7.1.2, Existing Conditions, and summarized in Tables 4.7-2 and 4.7-3, five sites within the Plan Area and one additional site in proximity to the Plan Area were identified on lists compiled pursuance to Government Code Section 65962.5. Two of the listed sites were closed, requiring no further action, two sites remain in need of evaluation, one site was referred to another agency and issued a "conditional" no further action status, and the sixth identified site remains open, requiring further assessment at such time the site structure is demolished. In addition, several sites with LUSTs were identified in the vicinity of the Plan Area. However, all identified LUST sites were listed as "case closed" and none is expected to have impacted properties within the Plan Area.

Based on available information contained variously in the EnviroStor and GeoTracker government databases, as also summarized in Section 4.7.1.2, one site remains "Open-Site Assessment," due to possible residual TPH in soil beneath existing building foundation, and two sites are listed as "Inactive-Needs Evaluation." All three sites remain under either RWQCB or DTSC oversight. In addition, the General Plan contains the following strategies to address future development of identified hazardous materials sites:

- Strategy HS-7.1b: Hazardous Materials and Development Project Review. Review all proposed development projects that manufacture, use or transport hazardous materials for compliance with the County Hazardous Waste Management Plan
- Strategy HS-7.1e: Inappropriate Sites. Identify sites that are inappropriate for hazardous materials storage and use.
- Strategy HS-71g: Development Projects Involving Potential Historical Hazardous Materials Use. Require that applications for discretionary development projects that will involve a change in land use (i.e., from industrial to commercial or residential) provide detailed information regarding potential historical hazardous materials use, including soil and/or groundwater sampling results, if warranted.
- Strategy HS-8.1d: Development Projects Involving Hazardous Materials. Require that applications for discretionary development projects that will generate, use or store hazardous materials or provide detailed information regarding waste reduction, recycling and storage.

Compliance with applicable federal, State, and local laws and regulations regarding hazardous material sites, as described in Section 4.7.1.1, Regulatory Framework, of this chapter, and the General Plan policies listed above, would ensure future development under the proposed Plan would not create a significant hazard to the public or the environment. Therefore, impacts would be *less than significant*.

Significance Before Mitigation: Less than significant.

HAZ-7	**Implementation of the proposed Plan would not impair implementation of, or physically interfere with, an adopted emergency response plan or emergency evacuation plan.**

As discussed in Section 4.7.1.1, the City of Campbell has prepared an EOP that identifies and allocates resources in response to emergencies, from preparation through recovery. The EOP identifies the City's emergency planning, organizational, and response policies and procedures and how they will be coordinated with emergency responses from other levels of government.

The Campbell General Plan identifies the following roadways as evacuation routes in the event of an emergency: Hamilton Avenue, Bascom Avenue, Winchester Boulevard (which runs through the Plan Area), Campbell Avenue, Highway 17, and the San Tomas Expressway.[8] The proposed Plan would guide future development and improvements in the Plan Area; however, the proposed Plan does not propose any physical components that would interfere with the ability to implement emergency response or evacuation.

In addition, individual development projects allowed by the proposed Plan would be required to comply with the provisions of the 2013 CFC and the 2013 CBC, which would ensure that building and life safety measures are incorporated into new development and facilitate implementation of emergency response plans.

In addition, the General Plan contains the following strategies that would further ensure that new development would not conflict with emergency operations in the Plan Area.

- Strategy HS-1.1b: Emergency Operations. Coordinate among City departments to ensure that emergency operations will comply with the Standardized Emergency Management System.
- Strategy HS-1.1f: Adequate Access. Require adequate access for emergency vehicles, including minimum street width and vertical clearance. The Uniform Fire Code currently sets the minimum street width at 20 feet. Larger buildings may require a minimum width of 30 feet.
- Strategy HS-1.3a: Inter-Agency Coordination. Coordinate emergency preparedness, response, recovery and mitigation activities with Santa Clara County, surrounding cities, service agencies, voluntary organizations and State and federal agencies.
- Strategy HS-1.3d: Information Sharing. Work with Santa Clara County and other government, academic and private organizations to obtain new data that can be used for emergency preparedness and response and share information with other nearby jurisdictions and private and public organizations.
- Strategy HS-7.1d: Hazardous Materials Emergency Response Plan. Require any business that handles hazardous material to prepare an appropriate emergency response plan, including a transportation plan for using City streets to transport hazardous materials.

[8] City of Campbell, 2001. *General Plan*, page HS-2.

- Strategy HS-7.1f: Hazardous Materials Emergency Response. Work with other agencies to help ensure adequate response capability for hazardous materials emergencies.

Development and improvements allowed by the proposed Plan would result in changes to current circulation by extending Vandall Way to Winchester Boulevard and enhancing sidewalk and bicycle infrastructure throughout the Plan Area. However, neither these components nor any other part of the implementation of the proposed Plan would impair implementation of, or physically interfere with an adopted emergency response plan or emergency evacuation plan. Future development plans will include fire and emergency access through all phases of construction and operation.

Compliance with applicable laws and regulations regarding emergency preparedness, and the General Plan policies listed above, would ensure future development under the proposed Plan would not interfere with an adopted emergency response plan or emergency evacuation plan and impacts would be *less than significant*.

Significance Before Mitigation: Less than significant.

4.7.4 CUMULATIVE IMPACT DISCUSSION

HAZ-9	**Implementation of the proposed Plan, in combination with past, present, and reasonably foreseeable projects, would result in less-than-significant cumulative impacts with respect to hazards and hazardous materials.**

This section analyzes potential impacts related to hazards and hazardous materials that could occur from a combination of implementation of the proposed Plan and associated future development with other past, present, and reasonably foreseeable projects in the near vicinity.

As discussed in Chapter 4.0, the cumulative projects considered for this analysis include the County Courthouse, Albright, and North 40 projects, which would generate 869,000 square feet of commercial and 269,000 square feet of retail development along with 150 hotel rooms, 73 single-family homes, and 336 multi-family units all within the Town of Los Gatos. Development of these cumulative projects would involve increased storage, use, and disposal of common cleaning substances, building maintenance products, paints, and solvents; however, these potentially hazardous materials would not be of a type or occur in sufficient quantities to pose a significant hazard to public health and safety or the environment. While cumulative development in the vicinity of the Plan Area would bring more residents into the area, compliance with existing federal, State, local regulations, and standards, and the General Plan policies listed in Section 4.7.1.1 of this chapter, would ensure that risks associated with the transport, storage, use, and disposal of hazardous materials and waste would be reduced to the maximum extent practicable.

As discussed previously, development of the proposed Plan would not result in significant impacts from the increased use of hazardous materials. The proposed Plan would not interfere with implementation of

emergency response plans. In addition, potential project-level impacts associated with hazards and hazardous materials would be further reduced through compliance with General Plan policies and strategies, other local, regional, State, and federal regulations. Consequently, implementation of the proposed Plan, in combination with past, present, and reasonably foreseeable projects in the Plan Area vicinity, would result in a *less-than-significant* cumulative impact.

Significance Before Mitigation: Less than significant.

4.7.5 SUMMARY OF SIGNIFICANT IMPACTS AND MITIGATION MEASURES

The proposed Plan would not result in any significant impacts related to hazards and hazardous materials. Therefore, no mitigation measures are required.

4.8 HYDROLOGY AND WATER QUALITY

This chapter describes the regulatory framework and existing conditions of the Plan Area and the potential impacts of the Dell Avenue Area Plan (proposed Plan) on hydrology and water quality.

4.8.1 ENVIRONMENTAL SETTING

4.8.1.1 REGULATORY FRAMEWORK

Federal Regulations

Clean Water Act

The Federal Water Pollution Control Act, also known as the Clean Water Act (CWA), is the primary statute governing water quality. The CWA establishes the basic structure for regulating the discharges of pollutants into the waters of the United States and gives the US Environmental Protection Agency (EPA) the authority to implement pollution control programs. The statute's goal is to regulate all discharges into the nation's waters and to restore, maintain, and preserve the integrity of those waters. The CWA sets water quality standards for all contaminants in surface waters and mandates permits for wastewater and stormwater discharges. The CWA also requires states to establish site-specific water quality standards for navigable bodies of water and regulates other activities that affect water quality, such as dredging and the filling of wetlands. The following CWA sections assist in ensuring water quality for the water of the United States:

- CWA Section 208 requires the use of best management practices (BMPs) to control the discharge of pollutants in stormwater during construction
- CWA Section 303(d) requires the creation of a list of impaired water bodies by states, territories, and authorized tribes; evaluation of lawful activities that may impact impaired water bodies, and preparation of plans to improve the quality of these water bodies. CWA Section 303(d) also establishes Total Maximum Daily Loads (TMDLs), which is the maximum amount of a pollutant that a water body can receive and still safely meet water quality standards
- CWA Section 404 authorizes the US Army Corps of Engineers to require permits that will discharge dredge or fill materials into waters in the US, including wetlands.

In California, the EPA has designated the State Water Resources Control Board (SWRCB) and its nine Regional Water Quality Control Boards (RWQCBs) with the authority to identify beneficial uses and adopt applicable water quality objectives.

Federal Emergency Management Agency

The Federal Emergency Management Agency (FEMA) administers the National Flood Insurance Program (NFIP), which provides subsidized flood insurance to communities that comply with FEMA regulations,

which limit development in flood plains.[1] FEMA also issues Flood Insurance Rate Maps (FIRMs) that identify which land areas are subject to flooding. These maps provide flood information and identify flood hazard zones in the community. The design standard for flood protection is established by FEMA, with the minimum level of flood protection for new development set as the 100-year flood event, also described as a flood that has a 1-in-100 chance of occurring in any given year.

National Pollutant Discharge Elimination System

The National Pollutant Discharge Elimination System (NPDES) permit program was established by the CWA to regulate municipal and industrial discharges to surface waters of the United States from their municipal separate storm sewer systems (MS4s). Under the NPDES Program, all facilities which discharge pollutants from any point source into waters of the United States are required to obtain an NPDES permit. Point source discharges include discharges from publicly owned treatment works (POTWs), discharges from industrial facilities, and discharges associated with urban runoff, such as stormwater. The NPDES permit programs in California are administered by the SWRCB and the nine RWQCBs.

State Regulations

Porter-Cologne Water Quality Act

The Porter-Cologne Water Quality Act (Water Code sections 13000 et seq.) is the basic water quality control law for California. Under this Act, the State Water Resources Control Board (SWRCB) has ultimate control over State water rights and water quality policy. The State is divided into nine regions related to water quality and quantity characteristics. The SWRCB, through its nine RWQCBs carries out the regulation, protection, and administration of water quality in each region. Each regional board is required to adopt a Water Quality Control Plan or Basin Plan that recognizes and reflects the regional differences in existing water quality, the beneficial uses of the region's ground and surface water, and local water quality conditions and problems.

State Water Resources Control Board

In California, the SWRCB has broad authority over water quality control issues for the State. The SWRCB is responsible for developing statewide water quality policy and exercises the powers delegated to the State by the federal government under the CWA.

Construction activities that disturb one or more acres of land that could impact hydrologic resources must comply with the requirements of the SWRCB Construction General Permit (2009-0009-DWQ) as amended by 2010-0014-DWQ. Under the terms of the permit, applicants must file Permit Registration Documents (PRDs) with the SWRCB prior to the start of construction. The PRDs include a Notice of

[1] Federal Emergency Management Agency's Library, *National Flood Insurance Program Description*, http://www.fema.gov/library/resultSearchTitle.do;jsessionid=DD174A565E1F55952F9B72CE7EC2818C.Worker2Library, accessed on May 1, 2014.

Intent (NOI), risk assessment, site map, Stormwater Pollution Prevention Plan (SWPPP), annual fee, and a signed certification statement. The PRDs are submitted electronically to the SWRCB via the Stormwater Multiple Application and Report Tracking System (SMARTS) website.

Applicants must also demonstrate conformance with applicable best management practices (BMPs) and prepare a SWPPP, containing a site map that shows the construction site perimeter, existing and proposed buildings, lots, roadways, stormwater collection, and discharge points, general topography both before and after construction, and drainage patterns across the project site. The SWPPP must list BMPs that would be implemented to prevent soil erosion and discharge of other construction-related pollutants that could contaminate nearby water resources. Additionally, the SWPPP must contain a visual monitoring program, a chemical monitoring program for nonvisible pollutants if there is a failure of the BMPs, and a sediment-monitoring plan if the site discharges directly to a water body listed on the 303(d) list for sediment. Some sites also require implementation of a Rain Event Action Plan (REAP). The updated Construction General Permit (2010-0014-DWQ), effective on September 2, 2012, also requires applicants to comply with post-construction runoff reduction requirements.

California Fish and Game Code

The California Department of Fish and Wildlife (CDFW) protects streams, water bodies, and riparian corridors through the streambed alteration agreement process under Section 1600 to 1616 of the California Fish and Game Code. The California Fish and Game Code establishes that "an entity may not substantially divert or obstruct the natural flow or substantially change the bed, channel or bank of any river, stream or lake, or deposit or dispose of debris, waste, or other material containing crumbled, flaked, or ground pavement where it may pass into any river stream, or lake" (Fish and Game Code Section 1602(a)) without notifying the CDFW, incorporating necessary mitigation and obtaining a streambed alteration agreement. The CDFWs jurisdiction extends to the top of banks and often includes the outer edge of riparian vegetation canopy cover.

Emergency Services Act

The Emergency Services Act, under California Government Code Section 8589.5(b), calls for public safety agencies whose jurisdiction contains populated areas below dams, to adopt emergency procedures for the evacuation and control of these areas in the event of a partial or total failure of the dam. The Governor's Office of Emergency Services (Cal OES), formerly the California Emergency Management Agency (CalEMA), is responsible for the coordination of overall State agency response to major disasters and assisting local governments in their emergency preparedness, response, recovery, and hazard mitigation efforts. In addition, the Cal OES Dam Safety Program provides assistance and guidance to local jurisdictions on emergency planning for dam failure events and is also the designated repository of dam failure inundation maps.

Division of Safety of Dams

Since 1929, the State of California has supervised all non-federal dams in California through the Dam Safety Program under the jurisdiction of the Department of Water Resources, Division of Safety of Dams (DSOD). The DSOD came into existence as a direct result of the failure of St. Francis Dam in southern California in 1928, causing the deaths of more than 450 people.

The DSOD engineers and engineering geologists review and approve plans and specifications for the design of dams and oversee their construction to ensure compliance with the approved plans and specifications. Reviews include site geology, seismic setting, site investigations, construction material evaluation, dam stability, hydrology, hydraulics, and structural review of appurtenant structures. In addition, the DSOD engineers inspect over 1,200 dams on a yearly schedule to ensure they are performing and being maintained in a safe manner.

Water Conservation Act

The Water Conservation Act of 2009, Senate Bill (SB) X7-7, requires a statewide 20 percent reduction in urban per capita water use by 2020. SB X7-7 requires that urban water retail suppliers determine baseline water use and set reduction targets according to specified standards, and requires that agricultural water suppliers prepare plans and implement efficient water management practices.

State Updated Model Landscape Ordinance

Under Assembly Bill (AB) 1881, the updated Model Landscape Ordinance requires cities and counties to adopt landscape water conservation ordinances by January 31, 2010 or to adopt a different ordinance that is at least as effective in conserving water as the updated Model Ordinance (MO). In accordance with AB 1881, Campbell adopted its Landscape Ordinance on January 1, 2010.

Regional Regulations

San Francisco Bay Regional Water Quality Control Board

Regional authority for planning, permitting, and enforcement is delegated to the nine RWQCBs. Each regional board is required to adopt a water quality control plan or basin plan that recognizes and reflects the regional differences in existing water quality, the beneficial uses of the region's ground and surface water, and local water quality conditions and problems. The Plan Area and City of Campbell are within the jurisdiction of the San Francisco Bay RWQCB (Region 2), which covers most of the Bay Area region, including Santa Clara County.

The San Francisco Bay RWQCB addresses region-wide water quality issues through the Water Quality Control Plan for San Francisco Bay Region (Basin Plan), which is updated every 3 years. The Basin Plan was

adopted in 1993 and updated most recently in December 2013.[2] The Basin Plan designates beneficial uses of the State waters within Region 2, describes the water quality that must be maintained to support such uses, and provides programs, projects, and other actions necessary to achieve the standards established in the Basin Plan.

Santa Clara Valley Water District

The Santa Clara Valley Water District (SCVWD) is a water resources agency responsible for balancing flood protection needs with the protection of natural watercourses and habitat in the Santa Clara Valley. The SCVWD serves 16 cities and 1.8 million residents, provides wholesale water supply, operates three water treatment plants, and provides flood protection along the creeks and rivers within the county. The Clean, Safe Creeks and Natural Flood Protection (CSC) Plan was approved by Santa Clara County voters in November 2000 to create a countywide special parcel tax to accomplish the following four goals:[3]

- 100-year flood protection for homes, schools, businesses, and transportation;
- Clean, safe water in Santa Clara County creeks and bays;
- Healthy creek and bay ecosystems; and
- Trails, parks, and open space along waterways.

In addition, the SCVWD has developed the Water Supply and Infrastructure Master Plan, which provides the strategy for meeting the County's future water demands to the year 2035 with a combination of reliable water supply sources and conservation programs. Groundwater in the Santa Clara Basin is managed by SCVWD through its 2012 Groundwater Management Plan.[4] The SCVWD also has developed an Urban Water Management Plan (UWMP) that provides information on water supply sources, historical water usage, water conservation programs, demand projections, water shortage contingencies, and water quality. The current SCVWD UWMP is dated 2010; however, the UWMP is required to be updated every 5 years.[5]

The SCVWD reviews plans for development projects near streams to ensure that the proposed storm drain systems and wastewater disposal systems will not adversely impact water quality in the streams. In addition, the SCVWD reviews projects for conformance to SCVWD flood control design criteria, stream maintenance and protection plans, and groundwater protection programs.

The SCVWD also implements the Well Ordinance Program (Ordinance 90-1), which regulates the construction, destruction, and maintenance of wells and other deep excavations. The purpose of this program is to prevent improperly constructed, maintained, or destroyed wells from acting as conduits that allow poor quality surface or subsurface waters to migrate into the drinking water aquifers. The Well

[2] California Environmental Protection Agency, San Francisco Bay Area Regional Water Quality Control Board, http://www.waterboards.ca.gov/rwqcb2/basin_planning.shtml, accessed on August 20, 2014.

[3] Santa Clara Valley Water District website, www.valleywater.org, accessed on August 20, 2014.

[4] Santa Clara Valley Water District, 2012, *2012 Groundwater Management Plan.*

[5] Santa Clara Valley Water District, 2010, *Urban Water Management Plan 2010.*

Ordinance Program is responsible for issuing permits and inspecting all well construction and destruction activities in Santa Clara County.

Santa Clara Valley Urban Runoff Pollution Prevention Program

The Santa Clara Valley Urban Runoff Pollution Prevention Program (SCVURPPP) is an association of 13 cities and towns in the Santa Clara Valley, together with the County of Santa Clara and the SCVWD. The RWQCB has conveyed responsibility for implementation of stormwater regulations to the member agencies of the SCVURPPP. The SCVURPPP incorporates regulatory, monitoring, and outreach measures aimed at improving the water quality of South San Francisco Bay and the streams of the Santa Clara Valley to reduce pollution in urban runoff to the "maximum extent practicable." The SCVURPPP maintains compliance with the NPDES Permit and promotes stormwater pollution prevention within that context. Participating agencies (including the City of Campbell) must meet the provisions of the Santa Clara County permit by ensuring that new development and redevelopment mitigate water quality impacts to stormwater runoff during both the construction and operation of projects.[6]

The SCVURPPP has successively implemented a series of comprehensive stormwater management plans for urban runoff management meeting RWQCB standards. When the NPDES permit was reissued in 2009, now known as the Municipal Regional Stormwater NPDES Permit (MRP), new design standards for runoff treatment control measures from new development and significant redevelopment were required. An amendment to the MRP was issued in 2011 (Order Number R2-2011-0083) and added Special Development Project Categories and Biotreatment Soil and Green Roof Specifications to the MRP. The current MRP also requires development of a Hydrograph Modification Management Plan (HMP) to manage increased peak runoff flows and volumes (hydromodification) and avoid erosion of stream channels and degradation of water quality caused by new and redevelopment projects. The MRP was issued to cover "surface runoff generated from various land uses in all the hydrologic sub basins in the basin which discharge into watercourses, which in turn flow into South San Francisco Bay." The latest program activities conducted by the SCVURPPP are described in the *FY2012-2013 Annual Report*.

Municipal Regional Stormwater NPDES Permit

As stated above, pursuant to Section 402 of the CWA and the Porter-Cologne Water Quality Control Act, municipal stormwater discharge in the City of Campbell is subject to the Waste Discharge Requirements (WDRs) of the MS4 Permit (Order Number R2-2009-0074) and NPDES Permit Number CAS612008, as amended by Order Number R2-2011-0083.

Provision C.3 of the MRP addresses post-construction stormwater requirements for new development and redevelopment projects that add and/or replace 10,000 square feet or more of impervious area. Provision C.3 of the MRP also mandates that new development projects that meet certain criteria: 1) incorporate site

[6] Santa Clara Valley Urban Runoff Pollution Prevention Program, 2013, *FY 2012-2103 Annual Report*.

design, source control, and stormwater treatment measures into the project design; 2) minimize the discharge of pollutants in stormwater runoff and non-stormwater discharge; and 3) prevent increases in runoff flows as compared to pre-development conditions. Low-impact development (LID) methods are the primary mechanisms for implementing such controls.

Effective December 1, 2011, new development projects must treat 100 percent of the calculated runoff (based on the sizing criteria described in the C.3 provisions of the MRP) with LID treatment measures that include harvesting and reuse, infiltration, evapotranspiration, or biotreatment/bioretention. In addition, projects that create and/or replace 10,000 square feet or more of impervious surface for Group 2 Tier A and B, which includes gas stations, loading docks, vehicle and equipment maintenance areas, and other outdoor areas, will also be required to provide LID treatment of stormwater runoff.

In order to comply with Provision C.3 of the MRP, project applicants within the Plan Area would be required to submit a Stormwater Management Plan (SWMP) with building plans, to be reviewed and approved by the City of Campbell's Public Works Department. The SWMP must be prepared under the direction of and certified by a licensed and qualified professional, which includes civil engineers, architects, or landscape architects.

Conditions of approval for development projects include the installation and maintenance of Best Management Practices (BMPs) for site design and stormwater treatment, which must be designed per approved numeric sizing criteria. General guidance on the selection and implementation of BMPs and Stormwater Pollution Prevention Plans can be found on the California Stormwater Quality Association and SCVURPPP websites.

Each development project mandated to implement stormwater treatment will also require a Certification of Engineered Stormwater Treatment for New and Redevelopment Projects. The Certification of Engineered Stormwater Treatment for New and Redevelopment Projects may be obtained at the City's Public Works Department. Owners of properties with treatment BMPs will also be required to certify on-going operation and maintenance by filing and recording a covenant submitted to the City.

Santa Clara Basin Watershed Management Initiative

The Watershed Management Initiative (WMI) was initiated in 1996 by the EPA, the SWRCB, and the San Francisco Bay RWQCB to address all sources of pollution that threaten the San Francisco Bay and to protect water quality throughout Santa Clara Basin watersheds. In the past, specific issues affecting watersheds had been addressed by separate regulatory actions, resulting in a "patchwork" approach. A major aim of the WMI is to coordinate existing regulatory activities on a basin-wide scale, ensuring that problems are addressed efficiently and cost-effectively.

The Santa Clara Basin WMI consists of 34 collaborative groups from regional and local public agencies; civic, environmental, resource conservation and agricultural groups; professional and trade organizations; business and industrial sectors; and the general public. The purpose of the WMI is "to develop and

implement a comprehensive watershed management program – one that recognizes that healthy watersheds mean addressing water quality problems and quality of life issues for the people, animals, and plants that live in the watershed."The WMI has continued to develop its foundation by producing a watershed assessment report (2003), a watershed action plan (2003), plastics pollution prevention summit (2011), impacts of homelessness on creeks (2011), and educational materials to reduce water usage by the general public.[7]

Water Resources Protection Collaborative

On October 24, 2006, the SCVWD adopted the Water Resources Protection Ordinance (Ordinance 06-1).[8] Beginning on February 28, 2007, this ordinance established the policy through which the SCVWD issues permits for modifications, entry, use, or access to SCVWD facilities or easements. This Ordinance was adopted following the creation of the *Guidelines and Standards for Land Use Near Streams: A Manual of Tools, Standards, and Procedures to Protect Streams and Streamside Resource in Santa Clara County* (Guidelines and Standards) by the Santa Clara Valley Water Resources Protection Collaborative (Collaborative). The Collaborative includes the SCVWD and representatives from the County of Santa Clara, the 15 cities within the county, the Guadalupe-Coyote Resource Conservation District, the San Francisco Bay RWQCB, and representatives of various community interests.[9] The Collaborative members share the water and watershed resources protection goals of flood management, drinking water quality and quantity, surface and groundwater quality and quantity, and habitat protection and enhancement throughout the county.

The City of Campbell adopted the Guidelines and Standards and integrated them into its zoning/development/review process, as codified in Chapter 14.02 (Watercourse Protection Requirements under Stormwater Pollution Control) of the Municipal Code. A property is considered to be subject to these guidelines if it contains or is adjacent to a stream, including all properties located within 50 feet of the top of the bank.

West Valley Clean Water Program

The West Valley Clean Water Program (WVCWP) was established in 1994 as a collaborative effort between the smaller West Valley communities (Campbell, Monte Sereno, Saratoga, and Los Gatos) to implement stormwater pollution control and management efforts. The WVCWPs goal is to reduce pollutants in storm drain discharges, comply with MRP regulations and requirements, and maximize the effectiveness of pollution prevention efforts. The SVCWP administers an Urban Runoff Management Plan to reduce stormwater pollution, which includes the following specific actions:

- Municipal controls such as storm drain stenciling, storm drain operation and maintenance (O&M), street sweeping, street/public facilities maintenance, and illegal discharge response.

[7] Santa Clara Basin Watershed Management Initiative, 2013, http://www.scbwmi.org, accessed on August 20, 2014.

[8] Santa Clara Valley Water District, 2006, Water Resource Protection Ordinance 06-1, http://www.valleywater.org/uploadedFiles/Programs/BusinessInformationPermits/Permits/Ordinance071213%281%29.pdf, accessed on August 20, 2014.

[9] Santa Clara Valley Water District, 2007, Water Resources Protection Collaboration, http://www.valleywater.org/index.htm, accessed on August 20, 2014.

- Construction and development measures including on-site inspections, grading and erosion controls, and educating developers.
- Commercial and industrial facility inspections to prevent wastes from discharging into the storm drain system.
- Public education activities to increase awareness and change behavior.

By agreement with the participating cities and towns, the West Valley Sanitation District collects an additional surcharge from residences and commercial properties to fund the WVCWP. The SVCWP complies with the requirements of the MRP for urban runoff pollution control.

Local Regulations

City of Campbell General Plan

The City of Campbell General Plan contains the goals, strategies, policies, and implementing actions that guide in the overall development of the city. The General Plan goals and policies relevant to hydrology and water quality are listed in Table 4.8-1.

City of Campbell Municipal Code

Besides the General Plan, the City of Campbell Municipal Code is the primary tool that guides development in the city. The City's Municipal Code identifies land use categories, site development regulations, and other general provisions that ensure consistency between the General Plan and proposed development projects. The following four chapters of the City of Campbell's Municipal Code contain directives pertaining to hydrology and water quality issues:

- Chapter 14.02 – Stormwater Pollution Control. The purpose of this chapter is to provide minimum requirements designed to control the discharge of pollutants into the City's municipal storm drain system and to assure that discharges from the City's storm drain system comply with applicable provisions of the Federal CWQ and the current NPDES Permit.
- Chapter 20.56 – Drainage and Sewer Facilities. Prior to filing a final map or parcel map, the project applicant must pay fees for defraying the costs of constructing planned drainage facilities.
- Chapter 20.80 - Environmental Impact and Grading and Erosion Control. Every parcel or tentative map filed with the City is conditional on compliance with requirements for grading and erosion control, including the prevention of sediment or damage to off-site property.
- Chapter 21.22 – Flood Damage Prevention. The purpose of this chapter is to minimize public and private losses due to flood conditions. A development permit must be obtained and reviewed by the Director of Public Works before new construction, substantial improvements, or development occurs within any area of a special flood hazard area (SFHA). The chapter also contains construction standards

TABLE 4.8-1 CITY OF CAMPBELL GENERAL PLAN GOALS, POLICIES, AND STRATEGIES PERTAINING TO HYDROLOGY AND WATER QUALITY

Goal/Policy/ Strategy Number	Goal/Policy/ Strategy Text
Open Space, Parks, and Public Facilities Element – Sewer, Storm Drainage, and Wastewater	
Goal OSP-9	*Properly functioning storm drainage system.*
Policy OSP-9.1	Drainage Facilities : Ensure that drainage facilities convey storm runoff without polluting local watercourses.
Strategy OSP-9.1a	Storm Drain Fees : Collect adequate fees to provide for maintenance of storm drainage facilities.
Strategy OSP-9.1b	Regional Storm Drainage Facilities : Cooperate with surrounding jurisdictions and Santa Clara County to provide adequate storm drainage facilities.
Strategy OSP-9.1c	Urban Runoff Management Plan: Implement *Urban Runoff Management Plan* standards and programs to ensure to the maximum extent practicable that receiving waters and ground water recharge basins are not polluted.
Strategy OSP-9.1d	New Construction: Require new construction to utilize site preparation, grading and foundation designs that provide erosion control to prevent sedimentation and contamination of streams.
Strategy OSP-9.1e	Post-Construction Pollution Control Measures: Require new construction projects to include post-construction pollution control measures in site designs to prevent pollution.
Policy OSP-9.2	NPDES: Comply with the federal Clean Water Act requirements for National Pollution Discharge Elimination System permits.
Strategy OSP-9.2a	Storm Water Management Plan: Work with the Santa Clara Valley Urban Runoff Pollution Prevention Program to implement the *Storm Water Management Plan.*
Strategy OSP-0.2b	West Valley Clean Water Program: Implement the Work Plan for the West Valley Cities, including implementing Campbell's *Storm Water Pollution Prevention Plan* and Best Management Practices.
Health and Safety Element – Flooding	
Goal HS-5	*Protection of lives and property from flood hazards.*
Policy HS-5.1	Flood Regulations: Enforce flood regulations during the development review process.
Strategy HS-5.1a	FEMA Requirements: Implement Federal Emergency Management Agency requirements regarding construction in Flood Hazard areas designated on the Flood Insurance Rate Maps.
Strategy HS-5.1b	Flood Hazards Review: Evaluate potential flood hazards prior to approval of development projects and require any necessary measures to ensure that proposed projects provide adequate protection from flood hazards.
Conservation and Natural Resources Element – Water Resources	
Goal CNR-5	*Promote high-quality drinking, surface, and ground water Citywide.*
Policy CNR-5.1	Water Quality Enhancement: Enhance the quality of surface and groundwater resources and prevent their contamination.
Strategy CNF-5.1a	Regional Water Quality Control Board: Comply with the Regional Water Quality Control Board's regulations and standards to maintain and improve water quality.
Strategy CNF-5.1b	San Jose Water Company Delivery Lines: Encourage the San Jose Water Company to repair and upgrade delivery lines as appropriate.
Strategy CNF-5.1c	Public Education: Educate and inform the public about the importance of a clean water supply and safe alternatives to toxics for home and garden use.

TABLE 4.8-1 CITY OF CAMPBELL GENERAL PLAN GOALS, POLICIES, AND STRATEGIES PERTAINING TO HYDROLOGY AND WATER QUALITY

Goal/Policy/ Strategy Number	Goal/Policy/ Strategy Text
Strategy CNF-5.1d	Sediment Removal from Creeks: Work with Santa Clara Valley Water District on sediment management for the creeks.
Strategy CNF-5.1e	Dumping into Waterways: Work with the Santa Clara Valley Water District to protect surface water quality by prohibiting the dumping of toxic chemical substances, debris and refuse in and near water ways and storm drains and adding signs with this information near these areas.
Strategy CNF-5.1f	Toxic Chemical Substances Use and Disposal: Work with other agencies to prepare and disseminate information about the potentially harmful effects of toxic chemical substances, including information about proper disposal and safe alternatives to home and garden use.
Strategy CNF-5.1g	Dry Wells: Encourage filling of dry wells.

Source: City of Campbell General Plan, 2001.

that must be implemented within the 100-year floodplain to protect buildings and improvements from flood damage.

- Chapter 21.26 – Landscaping Requirements. This chapter implements the California Water Conservation in Landscaping Act of 2006 by establishing new water-efficient landscaping and irrigation requirements.

City of Campbell Stormwater Regulations

In order to comply with Provision C.3 of the MRP, project applicants within the Plan Area would be required to submit a Stormwater Management Plan (SWMP) with building plans, to be reviewed and approved by the City of Campbell's Public Works Department. The SWMP must be prepared under the direction of and certified by a licensed and qualified professional, which includes civil engineers, architects, or landscape architects.

Conditions of approval for development projects include the installation and maintenance of Best Management Practices (BMPs) for site design and stormwater treatment, which must be designed per approved numeric sizing criteria.

Each development project mandated to implement stormwater treatment will also require a Certification of Engineered Stormwater Treatment for New and Redevelopment Projects. The Certification of Engineered Stormwater Treatment for New and Redevelopment Projects may be obtained at the City's Public Works Department. Owners of properties with treatment BMPs will also be required to certify on-going operation and maintenance by filing and recording a covenant submitted to the City.

In addition to implementing LID measures, the MRP also includes a provision to mitigate for hydromodification caused by increases in the volume and frequency of runoff discharges to creeks and streams. Generally, projects in highly developed urban areas are less likely to cause hydromodification.

Consequently, projects located in catchment/watersheds that are already more than 65 percent impervious are exempt from this requirement. Per the HMP (Hydromodification Plan) Applicability Map for the City of Campbell, developed by the SCVURPPP, the majority of the Plan Area is exempt from hydromodification mitigation requirements. However, there is a vacant area east of Dell Avenue in the central portion of the Plan Area and another area east of Dell Avenue and south of Division Road that would require hydromodification. For projects in these areas that create or replace one acre or more of impervious surfaces, flow controls are required so that post-project runoff does not exceed pre-project runoff rates and durations.

4.8.1.2 EXISTING CONDITIONS

Climate

Campbell is located in a Mediterranean-type climate zone, with almost all precipitation falling between the months of October and May. The average annual rainfall is approximately 23.27 inches.[10] Temperatures in Campbell tend to be fairly mild, with an average high of 85 degrees Fahrenheit in July and an average low of 39 degrees Fahrenheit in December and January. The hottest temperatures occur in July and August, with average maximum temperatures of 82 degrees Fahrenheit, and the coldest temperatures occur in December and January with average minimum temperatures of 42 degrees Fahrenheit.

Hydrology and Surface Drainage

Watersheds

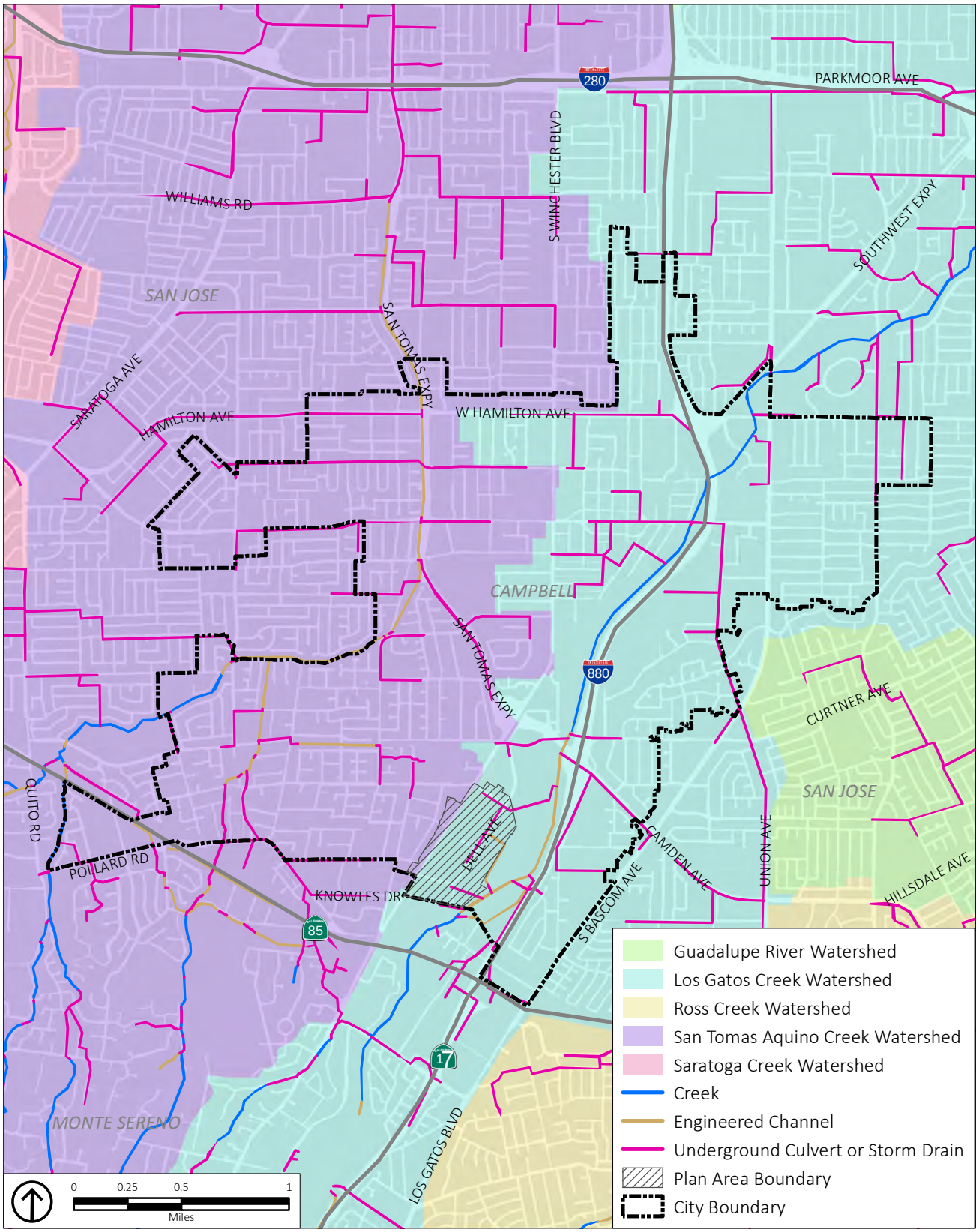
The Plan Area is within the Santa Clara Basin Hydrologic Planning Area and lies within two watersheds: Los Gatos Creek Watershed and San Tomas Aquino Creek Watershed.[11] The majority of the Plan Area is within Los Gatos Creek Watershed. A small portion of the Plan Area west of Winchester Boulevard is within San Tomas Aquino Creek Watershed. Figure 4.8-1 shows the Plan Area and the location of the watersheds.

Los Gatos Creek Watershed encompasses 55 square miles and originates in the eastern Santa Cruz Mountains at the summit of Loma Prieta and ends where Los Gatos Creek joins the Guadalupe River at Confluence Park in downtown San Jose. The watershed includes Lexington Reservoir and Vasona Reservoir and parts of the cities of Los Gatos, Campbell, Monte Sereno, and San Jose. Los Gatos Creek is the largest tributary of the Guadalupe River and half of the watershed lies in the mountains between Lexington Reservoir and the crest of the Santa Cruz Mountains.

San Tomas Aquino Creek Watershed covers 25 square miles and originates at El Sereno peak in the Santa Cruz Mountains. Tributaries include Wildcat Creek, Vasona Creek, Vasona Canal, Smith Creek, and Sobey

[10] Monthly Climate Summary, Cupertino, California, 2014, http://www.weather.com/weather/wxclimatology/monthly/graph/95008, accessed on August 20, 2014.

[11] Santa Clara Valley Water District, 2014, Watching our Watersheds (WOW) Interactive Map Layers, http://www.valleywater.org/wow.aspx, accessed on August 21, 2014.



Source: City of Cupertino, 2013; MIG, Inc, 2014; Santa Clara Valley Water District, 2012; PlaceWorks, 2014.

Figure 4.8-1
Watersheds

Creek, and the watershed includes portions of the cities of Saratoga, Santa Clara, Monte Sereno, and Campbell. The watershed ends with discharge of runoff via Guadalupe Slough into San Francisco Bay.

Creeks and Waterways

There are several water features within or adjacent to the Plan Area. Los Gatos Creek is adjacent to and east of the Plan Area. It runs 24 miles from the Santa Cruz Mountains through the Santa Clara Valley until its confluence with the Guadalupe River in downtown San Jose. It flows from Loma Prieta northwesterly to Lake Elsman, then northward into the Lexington Reservoir, through Los Gatos Canyon and through the town of Los Gatos and the Vasona Reservoir, and then northeasterly through Campbell and San Jose. The Los Gatos Creek Trail runs along the river from Lexington Reservoir to the Guadalupe River near downtown San Jose and is popular among local hikers and bicyclists.

Los Gatos Creek feeds the percolation ponds that are adjacent to and east of the Plan Area. The percolation ponds are part of the groundwater recharge system that is owned and operated by the SCWVD. The Plan Area is directly adjacent to the Camden Recharge System and Page Recharge System.[12] There also is one percolation pond within the boundaries of the Plan Area, it is located at Assessor Parcel Number (APN) 424-33-025 and is part of the Upper Page Distribution System. There is a piped and open channel system that conveys water westerly through the Plan Area and then northerly before crossing Winchester Boulevard and discharging runoff into the Page Recharge System at Hacienda Avenue. New development in areas where the SCWVD has easements or fee title properties for the recharge facilities would require an encroachment permit from the SCWVD, and new development in areas adjacent to the percolation ponds would require adherence to the Guidelines and Standards document,[13] including potential setbacks of 50 feet from Los Gatos Creek.

Storm Drain Facilities

The City of Campbell maintains a system of laterals and storm drain pipes that drain runoff into Los Gatos Creek and San Tomas Aquino Creek, which ultimately drain into San Francisco Bay. The storm drains in Campbell are designed to handle the 5-year storm event. The SCVWD provides regional storm drainage for Santa Clara Valley and maintains the creeks through which rainwater runoff is channeled into San Francisco Bay. The SCVWD also owns and maintains 85 acres of groundwater recharge facilities along Los Gatos Creek within the city that recharge the regional groundwater basin.

The Plan Area has an existing network of catch basins and storm drains. Some of the larger storm drains in the Plan Area are shown on Figure 4.8-1. All new projects are required to treat stormwater runoff before releasing the water into the storm drain system, as per the C.3 provisions of the MRP. As such, new

[12] Santa Clara Valley Water District, 2014. Comment letter for Notice of Preparation (NOP) for the Dell Avenue Area Plan from Colleen Hagerty, Associate Civil Engineer, Community Projects Review Unit to Mr. Paul Kermoyan, Community Development Director, City of Campbell.

[13] Santa Clara Valley Water Resources Protection Collaborative, 2006, *Guidelines & Standards for Land Use Near Streams: A Manual of Tools, Standards and procedures to Protect Streams and Streamside Resources in Santa Clara County*.

development in the Plan Area would be required to implement LID features and other mechanisms, such as site design and source control, to ensure compliance. The SCVWD also has prepared a Watershed Action Plan that states that Specific Area Plans are among the best planning tools for preserving and enhancing watersheds, due to their potential to plan for "design-in" drainage systems that mitigate impacts to streams.[14] In addition, the City collects fees from developers to defray the costs of constructing additional storm drain facilities. Development within the Plan Area most likely would not require significant expansion of the existing stormwater drainage infrastructure because the majority of the sites involve redevelopment of already developed properties that have an existing storm drainage system with adequate capacity to convey stormwater. Also, new development and redevelopment would be required to comply with the C.3 provisions of the MRP, which requires the installation of stormwater treatment measures that detain stormwater on-site for a certain period of time and treat primarily through settling and infiltration. This requirement typically results in lower stormwater flow rates and volumes as compared to existing conditions. Project applicants within the Plan Area would be required to submit a Stormwater Management Plan (SWMP) with building plans, which will be reviewed and approved by the City of Campbell's Public Works Department to ensure that stormwater flows from each site would not exceed the capacity of the existing storm drain system, including hydrology and hydraulic calculations.

Groundwater

The Plan Area lies within the Santa Clara Subbasin of the Santa Clara Valley Groundwater Basin, as shown on Figure 4.8-2.[15] The Santa Clara Subbasin extends from the southern edge of San Francisco Bay through the Coyote Valley, with the boundary located near Cochrane Road in Morgan Hill. The thickness of the aquifer materials ranges from about 150 feet near the Coyote Narrows to more than 1,500 feet in the interior of the subbasin. Groundwater movement generally follows surface water patterns flowing from the interior of the subbasin northerly toward San Francisco Bay.[16]

The water-bearing formations of the Santa Clara subbasin include non-marine deposits of unconsolidated to semi-consolidated gravel, sand, silt, and clay. The Santa Clara Subbasin is divided into confined and recharge areas. Within confined areas, laterally extensive low permeability clays and silts (confining units or aquitards) divide upper and lower aquifers. The SCVWD refers to these as the shallow and principal aquifers, with the latter defined as aquifer materials greater than 150 feet below ground surface (bgs).

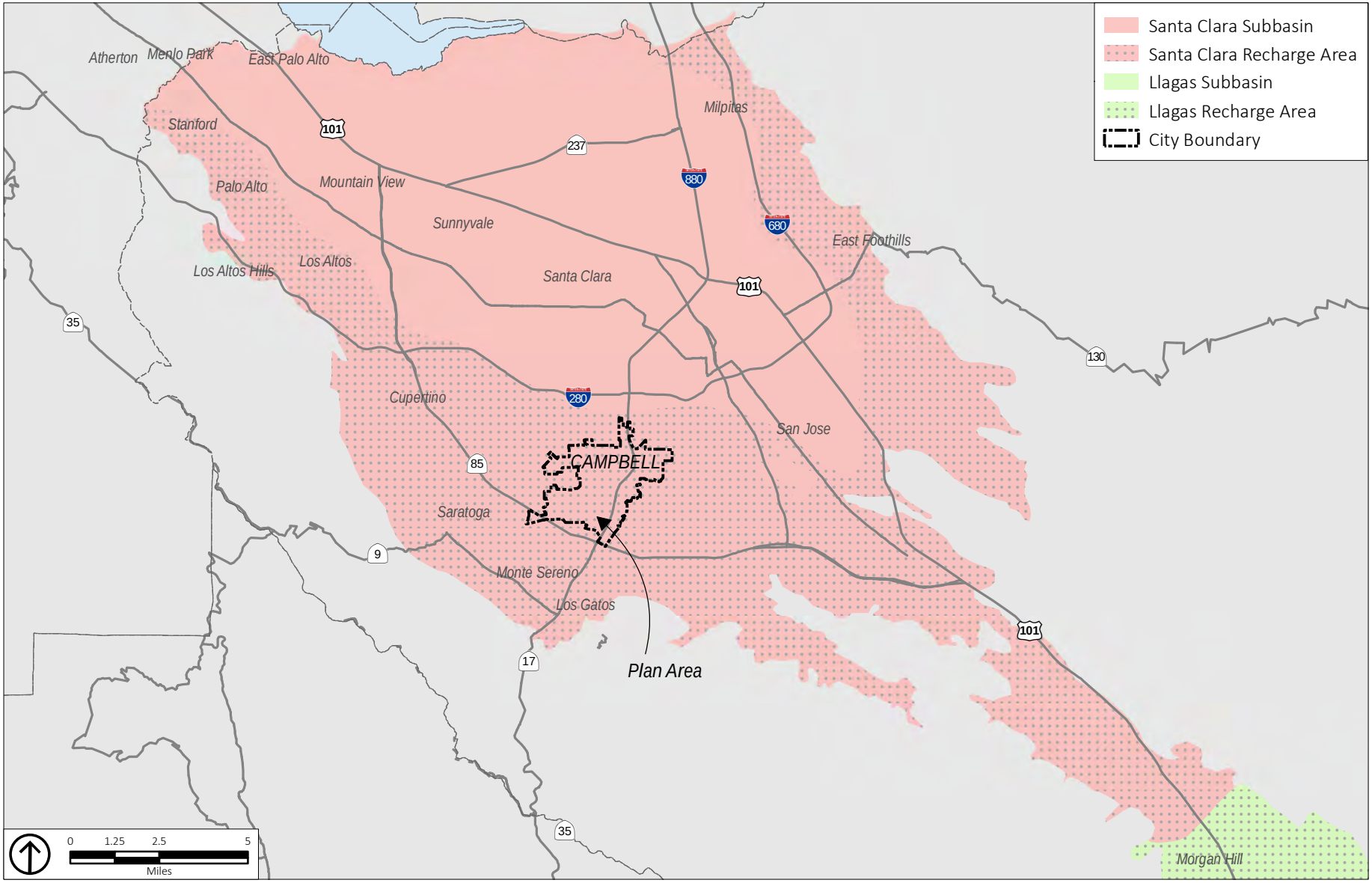
Groundwater levels within the Plan Area generally are 20 to 35 feet below ground surface (bgs).[17] However, groundwater levels are influenced by the level of water in the groundwater recharge ponds. When the ponds are dry, groundwater levels may drop to greater than 40 feet bgs.

[14] Santa Clara Bain Watershed Management Initiative, 2012, *Watershed Management Plan Volume 3: Watershed Master Plan.* Dated March 2012.

[15] Santa Clara Valley Water District, 2012, *2012 Groundwater Management Plan.*

[16] Santa Clara Valley Water District, 2012, *2012 Groundwater Management Plan.*

[17] State Water Resources Control Board, http://geotracker.waterboards.ca.gov, accessed on August 22, 2014.



Source: City of Campbell, 2013; 2012 Groundwater Management Plan, Santa Clara Valley Water District, 2012; PlaceWorks, 2014.

Figure 4.8-2
Groundwater Subbasins

Recharge areas are primarily comprised of high permeability aquifer materials such as sands and gravels that allow surface water to infiltrate into the aquifers. Most groundwater recharge occurs in these areas through the infiltration of precipitation and the SCVWDs managed recharge to augment groundwater supplies.[18] In the Santa Clara Valley, the areas with the highest recharge are along the creeks and on the western edge of the valley floor, just below the toe of the foothills. The City of Campbell is entirely within the Santa Clara Subbasin recharge area and six SCVWD groundwater recharge facilities with a total of 122.4 acres are located within the city boundaries. Water held in the groundwater recharge ponds seeps or percolates through the soil until it reaches the underground aquifers.

The Camden recharge ponds are located immediately east of the Plan Area and provide recreational opportunities for fishing, board sailing, canoeing, kayaking, and model boating activities. The Page recharge ponds are located west of the Plan Area at the intersection of Winchester Boulevard and Hacienda Avenue and currently are not available for public access. However, the City has set aside funding to add landscaping around these ponds, create a "demonstration" pond, and provide pedestrian access to the southern pond through a joint use agreement. Also, the settling basin for the Page recharge ponds is located within the Plan Area at APN 424-33-025. There is distribution piping and open channels that connect this facility to the Page recharge ponds that also are located within the Plan Area.

There are nine groundwater wells located within the limits of the Plan Area.[19] The SCVWD has established a Well Ordinance Program to regulate the construction, destruction, and maintenance of wells and other deep excavations. To protect groundwater quality and in accordance with SCVWD's Well Ordinance 90-1, all existing wells within the Plan Area on properties that are subject to new development or redevelopment activities need to be identified and properly registered with the SCVWD and either be maintained or destroyed in accordance with SCVWD standards. Destruction of any groundwater well and the construction of new wells, including monitoring wells, would require a permit from SCVWD prior to construction.

Water Quality

Surface water quality is affected by point source and non-point source pollutants. Point source pollutants are those emitted at a specific point, such as a pipe, while non-point source pollutants are typically generated by surface runoff from diffuse sources, such as streets, paved areas, and landscaped areas. Point source pollutants are controlled with pollutant discharge regulations or Waste Discharge Requirements (WDRs). Non-point source pollutants are more difficult to monitor and control although they are important contributors to surface water quality in urban areas.

Stormwater runoff pollutants vary based on land use, topography, the amount of impervious surface, and the amount and frequency of rainfall and irrigation practices. Runoff in developed areas typically contains

[18] Santa Clara Valley Water District, 2012, *2012 Groundwater Management Plan*.

[19] Santa Clara Valley Water District, 2014. Comment letter for Notice of Preparation (NOP) for the Dell Avenue Area Plan from Colleen Hagerty, Associate Civil Engineer, Community Projects Review Unit to Mr. Paul Kermoyan, Community Development Director, City of Campbell.

oil, grease, and metals accumulated in streets, driveways, parking lots, and rooftops, as well as pesticides, herbicides, particulate matter, nutrients, animal waste, and other oxygen-demanding substances from landscaped areas. The highest pollutant concentrations usually occur at the beginning of the wet season during the "first flush."

Santa Clara Valley streams do not receive discharges from industrial or municipal wastewater.[20] Industrial discharges are routed to municipal sanitary sewers and then to regional municipal wastewater treatment plants that discharge treated effluent to the tidal sloughs of San Francisco Bay. In general, pollutant concentrations in stormwater runoff do not vary significantly within an urbanized watershed. However, pollutant concentrations do increase when impervious cover is more than 40 to 50 percent of the drainage area.[21] Runoff volume is the most important variable in predicting pollutant loads.

The San Francisco Bay RWQCB monitors surface water quality through implementation of the Basin Plan and designates beneficial uses for surface water bodies and groundwater within the Santa Clara Valley. The potential and beneficial uses of the surface water bodies and groundwater to which stormwater from the Plan Area would be discharged are listed in Table 4.8-2.

TABLE 4.8-2 DESIGNATED BENEFICIAL USES OF SURFACE WATERS NEAR PLAN AREA

Water Body	Designated Beneficial Use
Surface Water	
Los Gatos Creek	MUN, FRSH, GWR, COLD, MIGR(P), RARE, SPWN(P), WARM, WILD, REC1, REC2(P)
Campbell Percolation Pond	GWR, COMM, COLD, SPWN, WARM, WILD, REC1, REC2
Groundwater	
Santa Clara Valley	MUN, PROC, IND, AGR

Note: Designated Beneficial Use abbreviations:

AGR – Agricultural supply	COLD – Cold freshwater habitat	COMM – Commercial and sport fishing
FRSH – Freshwater replenishment	GWR – Groundwater recharge	IND – Industrial service supply
MIGR – Fish migration	MUN – Municipal and domestic supply	PROC – Industrial process supply
RARE – Preservation of rare and endangered species	REC-1 – Water contact recreation	REC-2 – Non-contact water recreation
	SPWN – Fish spawning	WARM – Warm freshwater habitat
WILD – Wildlife habitat	(P) = Potential beneficial use, all others are existing beneficial uses.	

Source: San Francisco RWQCB, 2013. *Water Quality Control Plan*.

In accordance with Section 303(d) of the Clean Water Act, the State must present the EPA with a list of impaired water bodies that do not meet water quality standards. The only impaired water body in the vicinity of the Plan Area is Los Gatos Creek, which was listed as impaired for diazinon, a commonly used

[20] Santa Clara Basin Watershed Initiative, 2003. *Volume 1, Watershed Characteristics Report,* , accessed on May 2, 2014.
[21] Santa Clara Basin Watershed Initiative, 2003. *Volume 1, Watershed Characteristics Report,* , accessed on May 2, 2014.

household pesticide.[22] Once a water body has been placed on the 303(d) list of impaired waters, states are required to develop a Total Maximum Daily Load (TMDL) to address each pollutant causing impairment. A TMDL defines how much of a pollutant a water body can tolerate and still meet water quality standards. The TMDL for diazinon in Los Gatos Creek was approved by the EPA in 2007.

The Basin Plan also contains water quality criteria for groundwater. The Plan Area is within the Santa Clara Subbasin of the Santa Clara Valley Groundwater Basin. Groundwater in this subbasin is generally characterized as a bicarbonate type, with sodium and calcium as the principal cations.[23] Groundwater quality is typically very good. Only three principal aquifer zones out of 166 tested contained concentrations of aluminum or nitrate above Maximum Contaminant Levels (MCLs).[24]

Groundwater contamination can result from releases of hazardous materials from underground storage tanks or historical industrial activities. There is one property within the Plan Area, at 1551 Dell Avenue, that was investigated by the RWQCB for the release of volatile organic compounds (VOCs) into shallow groundwater. The site has since been closed and no further remedial action is required. However, the RWQCB has issued land use restrictions that prohibit the extraction of shallow groundwater at the site. If groundwater dewatering activities are required as part of future construction efforts within the Plan Area, a more detailed assessment of the potential for contaminated groundwater to be present is warranted.

Flooding

FEMA prepares maps of the 100-year flood hazard area of communities in the United States. For areas within the 100-year flood hazard zone, the risk of flooding in the designated area is 1 percent for any given year. Maps are also available for 500-year floods, which mean that in any given year, the risk of flooding in the designated area is 0.2 percent. Areas within the 100-year flood hazard area that are financed by federally backed mortgages are subject to mandatory federal insurance requirements and building standards to reduce flood damage. According to FEMA FIRM map 06085C0239H dated May 18, 2009, a very small portion of the southeast corner of the Plan Area is within the 100-year floodplain. This area is associated with the floodplain for Los Gatos Creek, as shown on Figure 4.8-3.

Dam Failure Inundation

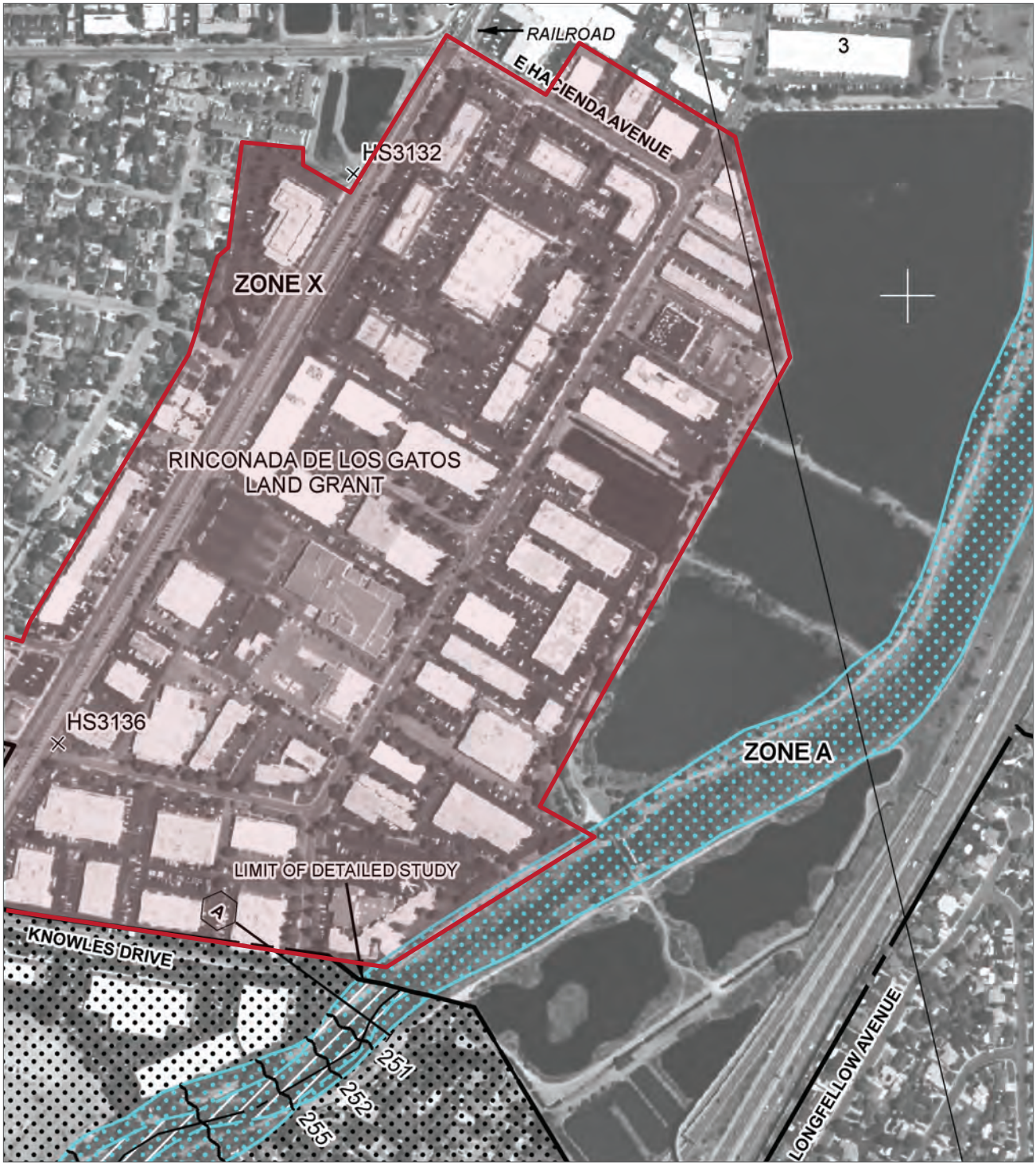
Dam failure is the uncontrolled release of impounded water behind a dam. Flooding, earthquakes, blockages, landslides, lack of maintenance, improper operation, poor construction, vandalism, and terrorism can all cause a dam to fail.[25] Dam failure can occur with little warning. Intense storms may produce floods in a few hours or even minutes for upstream locations. Flash floods occur within 6 hours of

[22] State Water Resources Control Board. *2010 Integrated Report, Clean Water Act, Section 303(d) List,* Accessed on August 21, 2014, http://www.waterboards.ca.gov/water_issues/programs/tmdl/integrated2010.shtml

[23] California Department of Water Resources, *California's Groundwater Bulletin 118, Basins and Subbasins of the San Francisco Bay Hydrologic Region*, http://www.water.ca.gov/pubs/groundwater/bulletin_118/basindescriptions/2-9.02.pdf, accessed on August 21, 2014.

[24] Santa Clara Valley Water District, 2012, *2012 Groundwater Management Plan.*

[25] California Emergency Management Agency, 2010, *State of California Multi-Hazard Mitigation Plan.*



Source: Federal Emergency Management Agency, May 18, 2009.

0 1,000
Scale (Feet)

Dell Avenue Specific Plan Area

Figure 4.8-3
100-Year Floodplain Map

the beginning of heavy rainfall, and dam failure may occur within hours of the first signs of breaching. Other failures and breaches can take much longer to occur, from days to weeks. However, dam failure is a very rare occurrence. There is no historic record of dam failure in Santa Clara County or the City of Campbell.[26]

Cal OES is required by State law to work with State and federal agencies, dam owners and operators, municipalities, floodplain managers, planners, and the public to make available dam inundation maps.[27] Dam inundation maps are used in the preparation of Local Hazard Mitigation Plans (LHMPs) and General Plan Safety Element updates. In addition, Cal OES requires all dam owners to develop Emergency Action Plans (EAPs) for warning, evacuation, and post-flood actions in the event of a dam failure.

There are three dams upstream of the Plan Area that have the potential to result in flooding in the Plan Area: Lake Elsman, Lexington Reservoir, and Vasona Reservoir. According to the latest Cal OES dam inundation map, the inundation zone for Vasona Reservoir does not reach the Plan Area.[28] The dam inundation zones for Lake Elsman and Lexington Reservoir are shown in Figure 4.8-4.

The Lexington Reservoir and the James J. Lenihan Dam are located on Los Gatos Creek about 3 miles south of Los Gatos. The dam was constructed in 1952 and is owned and operated by the SCVWD. It is a 195-foot-high, 1,000-foot-thick earthen dam that impounds 19,044 acre-feet of water and has a surface area of 412 acres.[29] The Plan Area is approximately 4.5 miles northeast of the Lexington Reservoir and is within the dam inundation zone. The dam inundation map shows that if the dam were to catastrophically fail, the approximate flood time to the Plan Area would be 35 minutes with a peak time of 75 minutes.

DSOD has designated the dam as a "High Hazard" dam due to its location in a highly seismic environment. In 2007, the SCVWD replaced an old 48-inch outlet pipe that ran through the base of the dam and discharges into Los Gatos Creek with a 54-inch pipe, new valves, outlet structures, and a control building. The repairs were made to allow the reservoir to drain quickly during emergencies, such as after a major earthquake that could cause cracks in the dam, or during a series of heavy weather storms that could pose flooding risks to Los Gatos and Campbell.

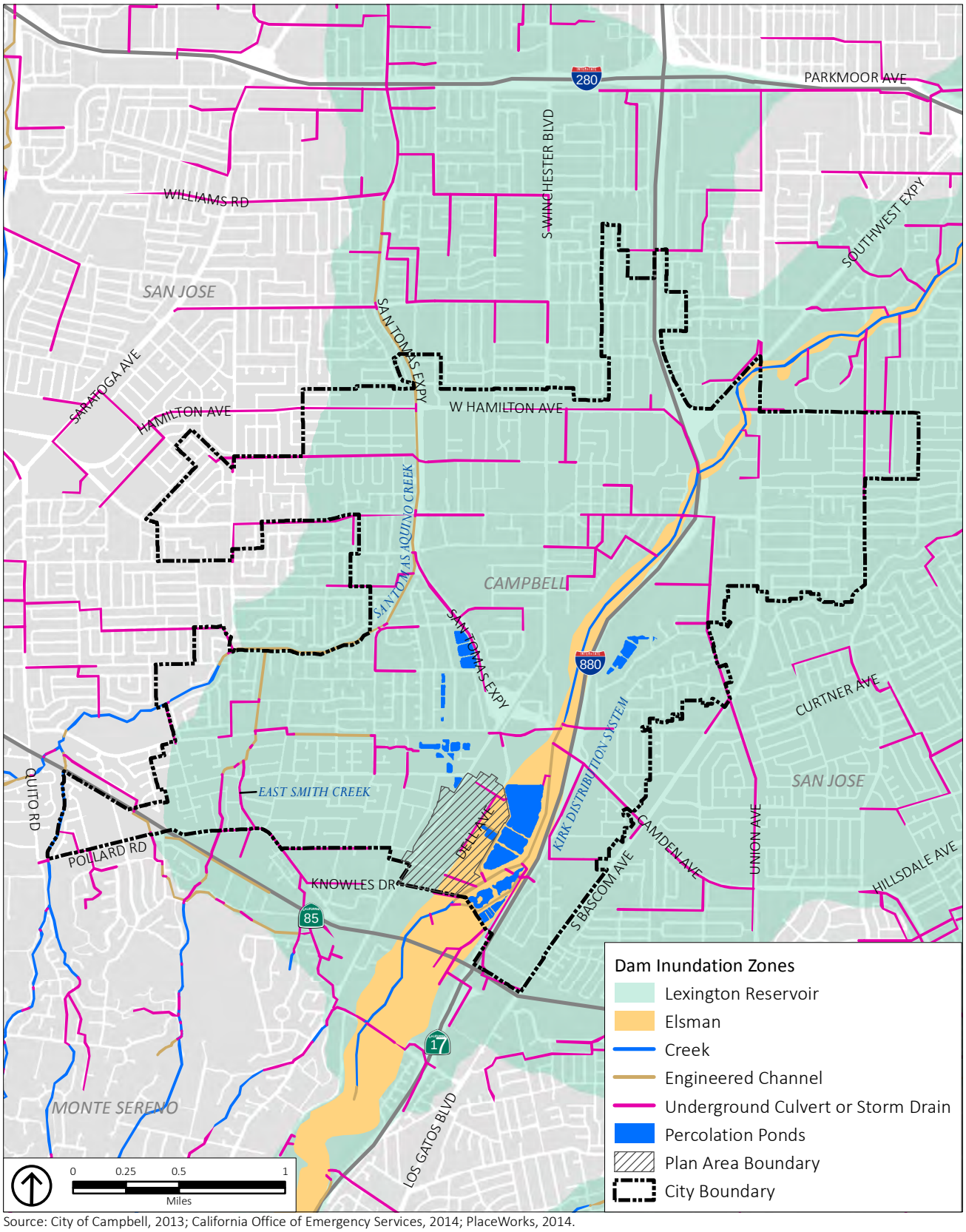
In December of 2012, a seismic evaluation of the Lenihan Dam was performed by Terra/GeoPentech (TGP) for the SCVWD as a requirement of the DSODs 2008 Phase III screening process of State dams located in highly seismic environments. The 2012 seismic evaluation indicated that the dam is seismically sound and would perform in a satisfactory manner in the event of a maximum credible earthquake and no seismic remediation was necessary. However, it was recommended that piezometric levels, vertical and lateral movement, and seepage flows continue to be monitored and evaluated, and that the condition of the dam be

[26] Santa Clara County, 2011, *Santa Clara County Hazard Mitigation Plan*.

[27] CalEMA, 2010, *State of California Multi-Hazard Mitigation Plan*

[28] California Office of Emergency Services, 2009, *Dam Inundation Registered Images and Boundary Files in Shape File Format*. Version DVD 3.

[29] Santa Clara Valley Water District, 2014, Lexington Reservoir and Lenihan Dam, http://www.valleywater.org/Services/LexingtonReservoirAndLenihanDam.aspx, accessed on August 25, 2014.



Source: City of Campbell, 2013; California Office of Emergency Services, 2014; PlaceWorks, 2014.

Figure 4.8-4
Dam Inundation Zones

inspected immediately following future earthquakes to check that movements and cracking are consistent with those expected based on the engineering analyses and DSODs independent analyses.[30]

Lake Elsman is located approximately 9 miles south of the Plan Area and is upstream of Lexington Reservoir. It is a 6,200-acre-foot reservoir created by a rolled earth fill dam called Austrian Dam on Los Gatos Creek. The lake and dam are owned by the San Jose Water Company. It was built in 1950 and has a height of 185 feet and width of 700 feet with a surface area of 96 acres. The inundation map shows a fairly narrow inundation zone that includes the Plan Area east of Dell Avenue. The inundation map does not provide the time of flood arrival or the depth of flooding. However, the inundation zone is at the edge of Dell Avenue, and areas near the edge of the inundation limit would have low flow depths and velocities.[31]

The dam incurred damage during the 1989 Loma Prieta earthquake because it was located directly above the northern segment of the fault rupture.[32] The damage included moderate settlement, transverse and longitudinal cracking, and spillway damage. Repairs were accomplished within eight weeks following the earthquake and consisted of excavating and recompacting the fill in areas of extensive cracking, epoxy grouting the cracking in the spillway and cement grouting voids beneath the spillway slabs, and grouting the rock at the left abutment contact with the fill. A new spillway was later constructed on the left abutment of the dam in 1993 to 1994.

Seiche, Tsunami, and Mudflows

Tsunami

A tsunami is a series of traveling ocean waves generated by a rare, catastrophic event, including earthquakes, submarine landslides, and volcanic eruptions. Tsunamis can travel over the ocean surface at speeds of 400 to 500 miles per hour (mph) or more, and wave heights at the shore can range from inches to an excess of 50 feet. Factors influencing the size and speed of a tsunami include the source and magnitude of the triggering event, as well as offshore and onshore topography. The Plan Area is more than 10 miles south of San Francisco Bay and is more than 200 feet above mean sea level (msl), which places the city at a distance that is considered too far to be affected by a tsunami.[33]

Seiche

A seiche is an oscillation wave generated in a closed or partially closed body of water, which can be compared to the back-and-forth sloshing in a bathtub. Seiches can be caused by winds, changes in

[30] TERRA/GeoPentech, prepared for Santa Clara Valley Water District, 2012, *Seismic Stability Evaluations of Chesbro, Lenihan, Stevens Creek, and Uvas Dams (SSE2). Lenihan Dam. Compilation Report*.

[31] Schall, J. and Lowrey, B., 1993, *Incorporating Dam Break Concerns in School Site Selection,* J. Urban Plann. Dev. 119(2), pages 72 to 83.

[32] United States Geological Survey, 1998, *The Loma Prieta, California, Earthquake of October 17, 1989 – Earth Structures and Engineering Characterization of Ground Motion.* USGS Professional Paper 1552-D.

[33] Association of Bay Area Governments (ABAG), 2014. *Interactive Tsunami Inundation Map*, http://gis.abag.ca.gov/website/Tsunami/index.html, accessed on April 5, 2014.

atmospheric pressure, underwater earthquakes, tsunamis, or landslides into the water body. Bodies of water such as bays, harbors, reservoirs, ponds, and swimming ponds can experience seiche waves up to several feet in height during a strong earthquake. There are no large bodies of water within the Plan Area. However, the Plan Area is located north of the Lexington Reservoir, Lake Elsman, and Vasona Reservoir. A seiche could theoretically occur in these reservoirs as the result of an earthquake or other disturbance, but the flooding impact would be less than that for the dam inundation zones. There are also percolation ponds immediately east of the Plan Area that could be impacted by seiches. However, the Bay Area has not been adversely affected by seiches during its history within this seismically active region of California.[34]

Mudflow

Mud and debris flows are mass movements of dirt and debris that occur after intense rainfall, earthquakes, and severe wildfires. The speed of a slide depends on the amount of precipitation, steepness of the slope, and alternate freezing and thawing of the ground. Most debris flows occur during intense rainfall in areas with steep sloped. The Plan Area is in a relatively flat area of the city and, according to the ABAG map of rainfall-induced landslides, it is outside of an area likely to produce debris flows.[35]

4.8.2 STANDARDS OF SIGNIFICANCE

The proposed Plan would result in a significant hydrology and water quality impact if it would:

1. Violate any water quality standards or waste discharge requirements.
2. Substantially deplete groundwater supplies or interfere substantially with groundwater recharge such that there would be a net deficit in aquifer volume or a lowering of the local groundwater table level (the production rate of pre-existing nearby wells would drop to a level that would not support existing land uses or planned uses for which permits have been granted).
3. Substantially alter the existing drainage pattern of the Plan Area, including through the alteration of the course of a stream or river, in a manner which would result in substantial erosion, siltation, or flooding on- or off-site.
4. Create or contribute runoff water that would exceed the capacity of existing or planned stormwater drainage systems or provide substantial additional sources of polluted runoff.
5. Otherwise substantially degrade water quality.
6. Place housing within a 100-year flood hazard area as mapped on a Federal Flood Hazard Boundary or Flood Insurance Rate Map, or other flood hazard delineation map, or place structures that would impede or redirect flood flows within a 100-year flood hazard area.

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[34] US Army Corps of Engineers (Corps), San Francisco District, Port of Oakland, 2000, *Oakland Harbor Navigation Improvement (-50 foot) Project SCH No. 97072051 Final Environmental Impact Statement/Report.*

[35] Association of Bay Area Governments (ABAG), 2014, *Interactive Rainfall-Induced Landslides Map,* http://gis.abag.ca.gov/website/LandslideDistribution/index.html, accessed on August 25, 2014.

7. Expose people or structures to a significant risk of loss, injury, or death involving flooding, including flooding as a result of the failure of a levee or dam.
8. Expose people or structures to a significant risk of loss, injury, or death involving inundation by seiche, tsunami, or mudflow.

4.8.3 ENVIRONMENTAL IMPACT DISCUSSION

This section analyzes potential impacts to hydrology and water quality.

HYD-1	Implementation of the proposed Plan would not violate any water quality standards or waste discharge requirements

Development or redevelopment allowed by the proposed Plan could affect drainage patterns and increase the overall amount of impervious surfaces, thus creating changes to stormwater flows and water quality. Increasing the total area of impervious surfaces can result in a greater potential to introduce pollutants to receiving waters. Urban runoff can carry a variety of pollutants, such as oil and grease, metals, sediments, and pesticide residues from roadways, parking lots, rooftops, and landscaped areas, and deposit them into an adjacent waterway via the storm drain system. New construction allowed by the proposed Plan could also result in the degradation of water quality with the clearing and grading of sites, releasing sediment, oil and greases, and other chemicals to nearby water bodies.

The estimated buildout of the proposed Plan includes 300 housing units, 20,000 square feet of retail space, and 2,292,000 square feet of new office space. The majority of the Plan Area is already built out with light industrial, research and development (R&D), and general commercial land uses. The new development would occur in areas already covered with impervious surfaces. Proposed development standards for the Plan Area would require at least 5 percent of the site area to be publicly accessible open space for the DAAP-West District and 10 percent of the site to be publicly accessible open space for the DAAP-Waterfront and DAAP-Central Districts. If a Core Tech development project reaches the proposed allowable Height Bonus, the project must also include a park or open space amenity greater than 7,000 square feet. Landscaping would also be required to meet the Model Water Efficient Landscape Ordinance (WELO) requirements. With implementation of these development standards and requirements, it is probable that there would be a reduction in the amount of impervious surfaces and a resultant beneficial impact on water quality within the Plan Area as compared to existing conditions. Also, the following construction and operational regulatory requirements would ensure that water quality impacts would be less than significant.

Construction Impacts

Clearing, grading, excavation, and construction activities allowed by the proposed Plan would have the potential to impact water quality through soil erosion and increased silt and debris discharged into runoff. Additionally, the use of construction materials such as fuels, solvents, and paints may present a risk to

surface water quality. Finally, the refueling and parking of construction vehicles and other equipment on site during construction may result in oil, grease, or related pollutant leaks and spills that may discharge into the storm drain system.

To minimize these potential impacts, new development within the Plan Area would be required to comply with the NPDES General Construction Permit (GCP) as well as prepare a SWPPP that requires the incorporation of BMPs to control sedimentation, erosion, and hazardous materials contamination of runoff during construction. The SWRCB mandates that projects that disturb one or more acres must obtain coverage under the Statewide GCP. The GCP also requires that prior to the start of construction activities, a project applicant must file Permit Registration Documents (PRDs) with the SWRCB, which includes a Notice of Intent (NOI), risk assessment, site map, annual fee, signed certification statement, SWPPP, and post-construction water balance calculations. In addition, projects must comply with the City of Campbell Grading Ordinance, as specified in Chapter 20.80 of the Municipal Code – Environmental Impact and Grading and Erosion Control, and implement City-approved BMPs to control stormwater runoff and minimize potential impacts to water quality.

Operational Impacts

Runoff from residential and commercial properties and parking lots typically contain oils, grease, fuel, antifreeze, and byproducts of combustion (such as lead, cadmium, nickel, and other metals), as well as fertilizers, herbicides, pesticides, and other pollutants. Precipitation at the beginning of the rainy season may result in an initial stormwater runoff (first flush) with high pollutant concentrations.

Water quality in stormwater runoff is regulated locally by the SCVURPPP, which includes provision C.3 of the MRP adopted by the San Francisco Bay RWQCB. All new and redevelopment projects that create or replace 10,000 square feet or more of impervious surface must incorporate site design, source control, and treatment measures to the maximum extent practicable. Also, the City of Campbell requires that each new development or redevelopment submit a Stormwater Management Plan and Certification of Engineered Stormwater Treatment for New and Redevelopment Projects to the City's Public Works Department prior to the issuance of grading or building permits. The stormwater treatment facilities must be designed per approved numeric sizing criteria. Owners of properties with treatment BMPs will also be required to certify on-going operation and maintenance by filing and recording a covenant submitted to the City.

Required compliance with the NPDES permit and C.3 provisions of the MRP and implementation of site design, source control, and treatment control measures for new development or redevelopment projects within the Plan Area would render any potential construction and operational impacts to water quality *less than significant*.

Significance Before Mitigation: Less than significant.

HYD-2	The proposed Plan would not substantially deplete groundwater supplies or substantially interfere with groundwater recharge.

Planned future development within the Plan Area could result in an increase in impervious surfaces, which would reduce infiltration and could lead to reduced groundwater recharge. However, as previously described, future development would be located on sites that have already been developed and currently have a high percentage of impervious surfaces. The applicants for new development and redevelopment would need to implement site design measures, LID, and BMPs, including infiltration features, that will contribute to groundwater recharge and minimize stormwater runoff. In addition, the proposed Plan's Land Use and Development Standards (Chapter 3 of the proposed Plan) specify setbacks from the Camden Ponds immediately east of the Plan Area as well as the Page settling basin within the Plan Area and associated piping and channels. This will ensure that the proposed Plan will not interfere with groundwater recharge at Camden Ponds and the Page settling basin.

Buildout allowed by the proposed Plan could lead to an increased demand for water, which could lead to an increase in groundwater pumping. Water supply impacts are discussed in Chapter 4.14, Utilities and Service Systems, of this Draft EIR. As discussed in Chapter 4.14, the water retailer for the City of Campbell, San Jose Water Company, obtains its water from groundwater wells and purchases from SCVWD. The SCVWDs 2010 UWMP indicates that there is a sufficient supply of water through 2035 even for multiple dry years.[36] The groundwater elevation in the Santa Clara Valley Subbasin has been steadily on the rise for the past 40 years under the management of the SCVWD. The SCVWD also operates and maintains an active groundwater recharge program with 18 major recharge systems, over 70 off-stream ponds with a combined surface area of more than 320 acres, and over 30 local creeks. Runoff is captured in the SCVWDs reservoirs and released into both in-stream and off-stream recharge ponds for percolation into the groundwater basin. In addition, imported water is delivered by the raw water conveyance system to streams and ponds.[37] Therefore, overdraft of the Basin is not projected.

There are nine groundwater wells located within the Plan Area, including one SCVWD observation well.[38] To protect groundwater quality and in accordance with SCVWDs Well Ordinance 90-1, all existing wells within the Plan Area on properties that are subject to new development or redevelopment activities would need to be identified and properly registered with SCVWD and either be maintained or destroyed in accordance with SCVWD standards. Destruction of any groundwater well and/or the construction of new wells, including monitoring wells, would require a permit from SCVWD prior to construction.

[36] Santa Clara Valley Water District, 2010, *Urban Water Management Plan*.
[37] Santa Clara Valley Water District, 2010, *Urban Water Management Plan*.
[38] Santa Clara Valley Water District, 2014. Comment letter for Notice of Preparation (NOP) for the Dell Avenue Area Plan from Colleen Hagerty, Associate Civil Engineer, Community Projects Review Unit to Mr. Paul Kermoyan, Community Development Director, City of Campbell.

The use of site design features required by provision C.3 of the MRP that encourage infiltration, and the proposed Plan Area development standards requiring at least 5 percent of the Plan Area to be publicly accessible open space for the DAAP-West District and 10 percent of the Plan Area to be publicly accessible open space for the DAAP-Waterfront and DAAP-Central Districts would reduce the impact of increased impervious surfaces on groundwater recharge. Both the San Jose Water Company and the SCVWDs Urban Water Management Plans state that there is a sufficient supply of water through 2035, even during multiple dry years. Also, the SCVWD groundwater well ordinance that imposes standards for maintaining or destroying groundwater wells would minimize groundwater quality impacts. Therefore, implementation of the proposed Plan would have a *less-than-significant* impact with respect to groundwater supplies or groundwater recharge.

Significance Before Mitigation: Less than significant.

HYD-3	**The proposed Plan would not substantially alter the existing drainage pattern of the Plan Area, including through the alteration of the course of a stream or river, in a manner, which would result in substantial erosion, siltation, or flooding on- or off-site.**

Development and land use changes allowed by the proposed Plan could result in an increase in impervious surfaces. This could result in an increase in stormwater runoff, higher peak discharges to drainage channels, and the potential to cause erosion or sedimentation in drainage swales and streams. As analyzed below, increased runoff volumes and velocities could create nuisance flooding in areas without adequate drainage facilities. However, none of the future development would require alteration of the course of an existing stream or river. Nearly all of the future development sites are in areas that are already developed or paved, and new development on these sites should not create a substantial increase in the amount of impervious surfaces. The Plan Area has an existing storm drain system and new development projects would be evaluated with respect to the need for infrastructure improvements.

All new development and redevelopment projects would be required, pursuant to the SCVURPPP and MRP, to implement construction phase BMPs, post-construction design measures that encourage infiltration in pervious areas, and post-construction source control measures to help keep pollutants out of stormwater. In addition, post-construction stormwater treatment measures are required for projects that create or replace 10,000 square feet or more of impervious surface. Post-construction stormwater quantity (flow peak, volume, and duration) controls are also required for projects in locations that create or replace one acre or more of impervious surface and may cause downstream erosion, as identified by the Hydromodification Management Plan (HMP) Applicability Map, City of Campbell.[39] A small undeveloped parcel east of Dell Avenue in the central portion of the Plan Area and the parcels east of Dell Avenue and south of Division Street are within the mapped areas that require hydromodification. For projects in these areas, flow

[39] Santa Clara Valley Urban Runoff Pollution Prevention Program, 2014, *HMP Applicability Map, City of Campbell*, http://www.scvurppp-w2k.com/HMP_app_maps/Campbell_HMP_Map.pdf, accessed on August 25, 2014.

controls would be required so that post-project runoff does not exceed pre-project runoff rates and durations. Implementation of these provisions would minimize the amount of stormwater runoff from new development and redevelopment sites within the Plan Area.

During construction, project applicants are subject to the NPDES construction permit requirements, including preparation of a SWPPP. In addition, the City's Municipal Code (Chapter 20.80 - Environmental Impact and Grading and Erosion Control) sets requirements for erosion control during construction, including the prevention of sediment or damage to off-site property. These control measures would further reduce the potential for substantial erosion or siltation and would ensure that runoff from a project site is protective of the beneficial uses of receiving waters. Once constructed, the requirements for new development or redevelopment would include source control measures and site design measures that address stormwater runoff and would reduce the potential for erosion or siltation.

In addition, Provisions C.3 of the MRP require new development and redevelopment projects, meeting certain criteria, to implement stormwater treatment measures to contain site runoff, using specific numeric sizing criteria based on volume and flow rate. For hydromodification projects, post-project runoff shall not exceed estimated pre-project rates and durations where the increased stormwater discharge rates and durations would result in increased potential for erosion.[40]

With implementation of these erosion and sediment control measures and regulatory provisions to limit runoff for new development and redevelopment sites, development allowed by the proposed Plan would not result in significant increases in erosion and sedimentation or contribute to on-site or off-site flooding. Therefore, implementation of the proposed Plan would have a *less-than-significant* impact with respect to alterations in drainage patterns contributing to erosion, siltation, and/or flooding.

Significance Before Mitigation: Less than significant.

HYD-4	**The proposed Plan would not create or contribute runoff water that would exceed the capacity of existing or planned stormwater drainage systems or provide substantial additional sources of polluted runoff.**

As discussed previously, an increase in impervious surfaces with development allowed by the proposed Plan could result in an increase in stormwater runoff that could exceed the capacity of existing or planned stormwater drainage systems. The City's existing storm drainage system is designed to convey runoff from the 5-year storm event. The 5-year storm event in Campbell would result in 2.79 inches of rainfall in a 24-hour period and has a 1 in 5 or 20 percent chance of occurring in any given year. The City also collects fees from developers and subdividers to defray the costs of constructing additional storm drain facilities. In addition, the City coordinates with surrounding jurisdictions and Santa Clara County to provide regional

[40] Santa Clara Valley Urban Runoff Pollution Prevention Program, 2014, http://www.scvurppp-w2k.com/nd_wp.shtml#other, accessed on August 25, 2014.

storm drainage for the Santa Clara Valley area. The SCVWD maintains the creeks through which stormwater runoff is channeled, with ultimate discharge into San Francisco Bay. In summary, the City and Santa Clara County's coordination efforts to ensure there is adequate capacity for stormwater runoff and the requirement for developer fees to fund the design and implementation of new stormwater infrastructure will ensure that new development within the Plan Area would not exceed the capacity of the storm drain system.

In general, the City's storm drain system is adequate for conveying stormwater runoff to the local creeks. Localized flooding within the City is limited and occurs only in low spots or where infrastructure is unable to accommodate peak flows during a storm event.[41] Flood waters dissipate quickly after heavy rain ceases and localized flooding mainly occurs in the San Tomas Area neighborhood where no curbing, gutters, or storm drain infrastructure is present. The Plan Area is already built out and has an existing storm drain system. However, new development or redevelopment projects would be required to construct adequately sized storm drainage systems to convey on-site storm water runoff to existing storm drain facilities.

In areas subject to Santa Clara County or SCVWD jurisdiction, projects must be designed such that the stormwater runoff generated from the 10-year storm (i.e., a storm that would generate 3.31 inches of rainfall in 24-hours and has a 10 percent change of occurring in any given year) is conveyed in the storm drainage system (underground pipes or open channels). Also, the stormwater runoff generated from the 100-year design storm must be safely conveyed away from the site without creating and/or contributing to downstream or upstream flooding conditions.[42] In areas subject to hydromodification requirements, post-project stormwater runoff rates must be less than or equal to pre-project values. All new projects would be required to provide hydrologic and hydraulic calculations comparing existing and post-development conditions in the SWMP. The site design and hydrology calculations would be subject to City review to verify that any increased project flows could be accommodated by the existing drainage system. In addition, there are C.3 provisions of the MRP that require the implementation of on-site stormwater treatment measures to contain site runoff, using specific numeric sizing criteria based on volume and flow rates. With implementation of these measures, impacts to storm drain capacities would be less than significant.

New development and redevelopment within the Plan Area would not create substantial additional sources of polluted runoff. During the construction phase, projects would be required to prepare SWPPPs and erosion and sediment control plans, thus limiting the discharge of pollutants from the site. During operation, projects must implement BMPs and LID measures that minimize the amount of stormwater runoff and associated pollutants. Additionally, new development or redevelopment projects would be required to pay storm drainage fees pursuant to Chapter 20.56 of the City's Municipal to support expansion and improvements to the existing storm drain system.

Development within the Plan Area would not require significant expansions of the existing stormwater drainage infrastructure, because the majority of the sites involve redevelopment of already developed

[41] City of Campbell, 2001. *The City of Campbell General Plan, Health and Safety Element*.
[42] Santa Clara County, 2007. *Drainage Manual*. Adopted August 14, 2007.

properties that have an existing storm drainage system with adequate capacity to convey stormwater. Also, new development and redevelopment would be required to comply with the C.3 provisions of the MRP which requires the installation of stormwater treatment measures that detain stormwater on-site for a certain period of time and treat primarily through settling and infiltration. This requirement typically results in lower stormwater flow rates and volumes as compared to existing conditions. Because of the City and County regulatory requirements for new development and redevelopment projects, storm drain impacts associated with future development allowed by the proposed Plan would be *less than significant*.

Significance Before Mitigation: Less than significant.

HYD-5	**Implementation of the proposed Plan would not otherwise substantially degrade water quality.**

Pollutants commonly associated with construction sites that can impact stormwater are sediments, nutrients, trace metals, pesticides, oil, grease, fuels, and miscellaneous construction wastes. Pollutants generated from the operational phase of future development may include sediment, nutrients, organic compounds, trash and debris, oxygen-demanding substances, bacteria and viruses, oil and grease, and pesticides/herbicides.

As required by City and County storm water management guidelines, BMPs would be required for development projects allowed by the proposed Plan during both construction and operation of future projects. These BMPs would control and prevent the release of sediment, debris, and other pollutants into the storm drain system. Implementation of BMPs during construction would be in accordance with the provisions of a SWPPP, which would be required for each development project that disturbs more than one acre of land and would minimize the release of sediment, soil, and other pollutants. Operational BMPs would be required to meet the C.3 provisions of the MRP and future project applicants would be required to submit a Certificate of Engineered Storm Water Treatment for New and Redevelopment Projects to the City of Campbell's Public Works Department. These requirements include the incorporation of site design, source control, and treatment control measures to treat and control runoff before it enters the storm drain system. With implementation of these BMPs in accordance with City and County requirements, the potential impact on water quality would be *less than significant*.

Significance Before Mitigation: Less than significant.

HYD-6	**The proposed Plan would not place housing within a 100-year flood hazard area as mapped on a Federal Flood Hazard Boundary or Flood Insurance Rate Map, or other flood hazard delineation map, or place structures that would impede or redirect flood flows within a 100-year flood hazard area.**

The Plan Area is outside of the 100-year floodplain, with the exception of a very small portion of the southeast corner of the site, which is within the 100-year floodplain associated with the Los Gatos Creek. However, no housing would be placed within this 100-year floodplain as the planned zoning for this area is tech use with the potential for food and drink establishments. Also, it is highly unlikely that any structures would be placed within this flood zone because the floodplain occupies a very small portion (less than 5 percent) of the total 4.53-acre parcel. Therefore, the potential that structures would impede or redirect flood flows within a 100-year flood hazard area would be *less than significant*.

Significance Before Mitigation: Less than significant.

HYD-7	**The proposed Plan would not expose people or structures to a significant risk of loss, injury, or death involving flooding, including flooding as a result of the failure of a levee or dam.**

According to mapping compiled by ABAG and Cal OES,[43] as shown on Figure 4.8-3, the entire Plan Area is within the Lexington Reservoir dam inundation zone and the Plan Area east of Dell Avenue is within the Lake Elsman dam inundation zone. The dam inundation zone for Lexington Reservoir encompasses a large area, including most of the City of Campbell. The dam inundation zone for Lake Elsman is relatively small and includes only the Plan Area east of Dell Avenue.

Dam inundation zones are based on the highly unlikely scenario of a total catastrophic dam failure occurring in a very short period of time. Existing State and local regulations address the potential for flood hazards as a result of dam failure. The Lexington Reservoir and Lake Elsman are under the jurisdiction of the DSOD. The dams have been assessed for seismic stability and have been deemed capable to withstand the maximum credible earthquake.

The probability of dam failure is extremely low and the City of Campbell and Santa Clara County have never been impacted by a major dam failure. Dams in California are continually monitored by various governmental agencies, including the California Division of Safety of Dams, which conducts inspections twice a year and reviews all aspects of dam safety. Dam owners are also required to maintain Emergency Action Plans (EAPs) that include procedures for damage assessment and emergency warnings. In addition, the City of Campbell, in conjunction with Santa Clara County, addresses the possibility of dam failure in the Local Hazard Mitigation Plan, which also provides emergency response actions. Therefore, implementation of the proposed Plan would not expose people or structures to a significant risk of loss, injury, or death in the case of dam failure and impacts are considered to be *less than significant*.

Significance Before Mitigation: Less than significant.

[43] Association of Bay Area Governments (ABAG), 2003. Dam Inundation Hazard Map for Campbell, www.abag.ca.gov/cgi-bin/pickdamx.pl, accessed August 25, 2014.

HYD-8	**The proposed Plan would not be impacted by inundation as a result of a seiche, tsunami, or mudflow.**

There are no large bodies of water within the City of Campbell that could generate seiches, but the Plan Area is located north of Lexington Reservoir, Lake Elsman, and Vasona Reservoir. A seiche could theoretically occur in these reservoirs as the result of an earthquake or other disturbance, but the flooding impact would be less than that for the dam inundation zones. The percolation ponds immediately east of the Plan Area have the potential to be impacted by seiches, but the Bay Area has not been adversely affected by seiches during its history within this seismically active region of California.[44] Since the area occupied by the percolation ponds is relatively small and no seiches have occurred in the Bay Area, the percolation ponds are not considered to be impacted by seiches.

The Plan Area is not located within the limits of an existing or historical landslide or debris flow zone, according to the ABAG mapping site.[45] In addition, the Plan Area is not within a tsunami inundation zone.[46] Therefore, impacts due to seiches, tsunamis, or mudflows would be *less than significant*.

Significance Before Mitigation: Less than significant.

4.8.4 CUMULATIVE IMPACTS

HYD-9	**The proposed Plan, in combination with past, present, and reasonably foreseeable projects, would result in less-than-significant cumulative impacts with respect to hydrology and water quality.**

Future development allowed by the proposed Plan, in conjunction with existing and planned development in the City of Campbell and Town of Los Gatos, could result in a cumulatively considerable impact to water quality due to construction activities and increases in post-development runoff. As discussed in Chapter 4.0, the cumulative projects considered for this analysis include the County Courthouse, Albright, and North 40 projects, which would generate 869,000 square feet of commercial and 269,000 square feet of retail development along with 150 hotel rooms, 73 single-family homes, and 336 multi-family units all within the Town of Los Gatos. However, the Plan Area is located in an area that is almost completely developed and is not expected to generate stormwater runoff in excess of present volumes.

All construction projects that involve the disturbance of one or more acres of land are subject to the NPDES Construction Permit requirements for implementation of individual SWPPPs, which outline erosion

[44] US Army Corps of Engineers, San Francisco District, Port of Oakland, 2000, *Oakland Harbor Navigation Improvement (-50 foot) Project SCH No. 97072051 Final Environmental Impact Statement/Report.*

[45] Association of Bay Area Governments (ABAG), 2014. *Landslide Maps and Information,* http://quake.abag.ca.gov/landslides/, accessed August 27, 2014.

[46] Association of Bay Area Governments (ABAG), 2014. *Interactive Tsunami Inundation Map,* http://gis.abag.ca.gov/website/Hazards/?hlyr=tsunami, accessed August 27, 2014.

control, sediment control, wind erosion control, tracking control, non-storm water management and waste management, and materials pollution control BMPs. Additionally, new development and significant redevelopment projects are required to prepare and implement Stormwater Management Plans for long-term implementation and maintenance of source-control, site design, and treatment-control BMPs to ensure compliance with water quality goals and the City's Municipal Code. Thus, pollutants generated within the Plan Area and by cumulative projects in the City would be mitigated during construction activities and project operation. Compliance with the C.3 provisions of the MRP and the City's certification requirement for engineered stormwater treatment facilities would also prevent long-term storm water quality impacts. As a result, cumulative impacts to stormwater flow volumes and water quality resulting from build out of the proposed Plan would be less than significant.

In addition, no significant flooding issues have been identified in the Plan Area. Given the developed nature of the surrounding area and the requirement for all projects to implement site BMPs, the volume, velocity, and peak runoff quantities of runoff to the storm drain system associated with nearby projects should not be substantially different from pre-project conditions. Because of the regulatory requirements for all new development and redevelopment within the City of Campbell to install on-site stormwater control measures along with the implementation of construction and operational BMPs, cumulative impacts to hydrology and water quality would be *less than significant*

Significance Before Mitigation: Less than significant.

4.8.5 SUMMARY OF SIGNIFICANT IMPACTS AND MITIGATION MEASURES

The proposed Plan would not result in any significant impacts to hydrology or water quality. Therefore, no mitigation measures are required.

4.9 LAND USE AND PLANNING

This chapter describes the existing land use character of the Plan Area and evaluates the potential land use and policy consistency impacts of future development allowed by the Dell Avenue Area Plan (proposed Plan). A summary of the relevant regulatory setting and existing conditions is followed by a discussion of proposed Plan's impacts.

4.9.1 ENVIRONMENTAL SETTING

4.9.1.1 REGULATORY FRAMEWORK

This section summarizes existing regional and local agencies, regulations, and plans that pertain to land use. There are no federal or State regulations applicable to land use in the Plan Area.

Regional Regulations

Association of Bay Area Governments Projections 2013

The Association of Bay Area Governments (ABAG) is the official planning agency for the San Francisco Bay region, which is composed of the nine counties of Alameda, Contra Costa, Marin, Napa, San Francisco, San Mateo, Santa Clara, Solano, and Sonoma, and contains 101 jurisdictions. ABAG is responsible for taking the overall regional housing needs allocation provided by the State and preparing a formula for allocating that housing need by income level across its jurisdiction.[1] ABAG produces growth forecasts on four-year cycles so that other regional agencies, including the Metropolitan Transportation Commission (MTC) and the Bay Area Air Quality Management District (BAAQMD), can use the forecast to make project funding and regulatory decisions.

ABAG projections are the basis for the regional Ozone Attainment Plan and Regional Transportation Plan (RTP), each of which are discussed in Chapters 4.2, Air Quality, and 4.13, Transportation and Traffic, of this Draft EIR. In this way, ABAG projections have practical consequences that shape growth and environmental quality. The General Plans, Zoning regulations, and growth management programs of local jurisdictions inform the ABAG projections. The ABAG projections are also developed to reflect the impact of "smart growth" policies and incentives that could be used to shift development patterns from historical trends toward a better jobs-housing balance, increased preservation of open space, and greater development and redevelopment in urban core and transit-accessible areas throughout the ABAG region.

[1] ABAG Finance Authority, *Affordable Housing Financing.* http://www.abag.ca.gov/services/finance/fan/housing.htm, accessed on August 22, 2014.

Plan Bay Area, Strategy for a Sustainable Region

The MTC and ABAGs *Plan Bay Area* is the Bay Area's RTP/Sustainable Community Strategy (SCS). The Final Plan Bay Area was adopted on July 18, 2013.[2] The SCS sets a development pattern for the region, which, when integrated with the transportation network and other transportation measures and policies, would reduce greenhouse gas (GHG) emissions from transportation (excluding goods movement) beyond the per capita reduction targets identified by the California Air Resources Board (CARB). To meet this goal, the SCS encourages the concentration of jobs near employment centers and public transportation. Implementation of Plan Bay Area would achieve a 16 percent per capita reduction of GHG emissions by 2035 and a 10 percent per capita reduction by 2020 from 2005 conditions.[3]

In 2008, MTC and ABAG initiated a regional effort (FOCUS) to link local planned development with regional land use and transportation planning objectives. Through this initiative, local governments identified Priority Development Areas (PDAs). The PDAs form the implementing framework for Plan Bay Area. The PDAs are areas along corridors that are served by public transit and that allow opportunities for development of transit-oriented, infill development within existing communities that are expected to host the majority of future development. Overall, well over two-thirds of all regional growth projected by 2040 is allocated within PDAs. The PDAs throughout the Bay Area are expected to accommodate 80 percent (or over 525,570 units) of new housing and 66 percent (or 744,230) of new jobs.[4] The PDAs in the Plan Area are located along Winchester Boulevard.[5] To read more about Plan Bay Area: Jobs-Housing Connection Scenario, go to www.OneBayArea.org.

While the SCS does not directly govern land uses within Campbell, there are a number of benefits available to the City from being consistent with the SCS, including streamlining of California Environmental Quality Act (CEQA) review pursuant to Senate Bill (SB) 375 (the Sustainable Communities and Climate Protection Act of 2008) for applicable transit priority and residential or mixed-use projects, as well as high eligibility for transportation funding, provided that policies and land use patterns in the General Plan align with the goals of the SCS.

Habitat Conservation Plan

The Santa Clara Valley Habitat Plan (SCVHP) was prepared by Santa Clara County and a number of participating local agencies (Local Partners) with the intent of providing a framework to protect, enhance, and restore natural resources in specific areas of the county, while improving and streamlining the

[2] It should be noted that the Bay Area Citizens filed a lawsuit on MTCs and ABAGs adoption of *Plan Bay Area*.

[3] Metropolitan Transportation Commission (MTC) and Association of Bay Area Governments (ABAG), 2013. *Final Plan Bay Area, Strategy for a Sustainable Region,* page 96.

[4] Metropolitan Transportation Commission (MTC) and Association of Bay Area Governments (ABAG), 2013. *Final Plan Bay Area, Strategy for a Sustainable Region.*

[5] Metropolitan Transportation Commission (MTC) and Association of Bay Area Governments (ABAG), 2013. Bay Area Priority Development Areas, http://geocommons.com/maps/141979, accessed August 8, 2014.

environmental permitting process for impacts on threatened and endangered species. Participating entities include the County of Santa Clara, City of San Jose, City of Morgan Hill, City of Gilroy, Santa Clara Valley Water District, and Santa Clara Valley Transportation Authority. The City of Campbell is not a participating Local Partner, but the Santa Clara Valley Water District's (SCVWDs) facilities within the city limits, including percolation ponds, the Los Gatos County Park, and Los Gatos Creek and Trails, are part of the SCVHPs study area. Within the Plan Area, the Santa Clara Valley Water District's (SCVWDs) desilting ponds, located between Dell Avenue and the SCVWD percolation ponds, are under the SCVHPs jurisdiction, as shown in Figure 3-2 of Chapter 3, Project Description, of the Draft EIR.[6]

Santa Clara Valley Water Resources Protection Collaborative Guidelines and Standards for Land Use near Streams

On October 24, 2006, the SCVWD adopted the Water Resources Protection Ordinance (Ordinance 06-1).[7] Beginning on February 28, 2007, this ordinance established the policy through which the SCVWD issues permits for modifications, entry, use, or access to SCVWD facilities or easements. This Ordinance was adopted following the creation of the *Guidelines and Standards for Land Use Near Streams: A Manual of Tools, Standards, and Procedures to Protect Streams and Streamside Resource in Santa Clara County* (Guidelines and Standards) by the Santa Clara Valley Water Resources Protection Collaborative (Collaborative). The Collaborative includes the SCVWD and representatives from the County of Santa Clara, the 15 cities within the county, the Guadalupe-Coyote Resource Conservation District, the San Francisco Bay Regional Water Quality Control Board, and representatives of various community interests.[8] The Collaborative members share the water and watershed resources protection goals of flood management, drinking water quality and adequate quantity, surface and groundwater quality and quantity, and habitat protection and enhancement throughout the county. In 2008, the City of Campbell adopted the Guidelines and Standards for Land Use near Streams per the City's resolution No. 10952.

A property that is adjacent to a stream or located within 50 feet of the top of the bank is considered a Streamside Protection Area and is subject to the Guidelines and Standards. In the southeastern corner of the Plan Area, the properties near Los Gatos Creek fall into the Streamside Protection Area.

Land use activities that are exempt from the Guidelines and Standards include:

- Less than 3 cubic yards of earthwork.
- Interior building construction and alterations.
- Erection of storage buildings not greater than 120 square feet.
- Replacement of sewer or water laterals.

[6] Santa Clara Valley Habitat Agency Geobrowser, http://www.hcpmaps.com/habitat, accessed on August 8, 2014.

[7] Santa Clara Valley Water District, 2006. Water Resource Protection Ordinance 06-1, http://www.valleywater.org/uploadedFiles/Programs/BusinessInformationPermits/Permits/Ordinance071213%281%29.pdf, accessed August 27, 2014.

[8] Santa Clara Valley Water Resources Protection Collaborative, 2007. Guidelines and Standards for Land Use Near Streams: A Manual of Tools, Standards, and Procedures to Protect Streams and Streamside Resource in Santa Clara County.

- Re-roofing.
- Wood fences 6 feet in height or less.
- Exterior decks less than or equal to 30 inches above grade (decks or pathways should not overhang or extend beyond the creek bank).

All other land use activities are subject to guidelines and standards described in Chapter 3 of the Guidelines and Standards. Chapter 3 addresses the following issues: riparian corridor protection, bank stability/ streambed conditions, encroachments on the top of a bank, erosion prevention and repair, grading, outfalls, pump stations and site drainage, channelization, utility encroachments, trail construction, septic systems, trash control and removal, protection of water quality, groundwater protection, and flood protection. In particular, *Guideline I.G., Land Uses Next to Riparian Corridors/Streams*, requires avoiding the construction of loading docks, trash enclosures, chemical storage areas, stationary noise producing mechanical equipment, new paved areas, active recreational areas, agricultural growing areas, and grazing activities within riparian corridors. *Guideline I.H., Light*, requires avoiding bright colors and glossy or glare-producing building finishes on structures facing the stream or riparian areas, keeping direct lighting away from riparian corridors, and maximizing distance of lighting from riparian corridors. Chapter 4 of the Guidelines and Standards provides vegetation guidelines to protect native riparian plants.

Airport Comprehensive Land Use Plans

There are no heliports located within Campbell listed by the Federal Aviation Administration (FAA).[9] The nearest heliport is located approximately 3.1 miles to the northeast of the Plan Area at the County Medical Center in San Jose. There are no additional heliports within five miles of the Plan Area.[10]

The City of Campbell does not host any public or private airports or airstrips. The Plan Area is located approximately 5.3 miles to the southwest of the San Jose International Airport. The Santa Clara County Airport Land Use Commission (ALUC) has adopted a Comprehensive Land Use Plan (CLUP) for areas surrounding San Jose International Airport. The Plan Area is not located within any protected airspace zones defined by the ALUC.[11]

Local Regulations

General Plan

The City of Campbell's General Plan, adopted on November 6, 2001, serves as an effective guide for orderly growth and development, provision of public services and facilities, and conservation of natural

[9] Federal Aviation Administration, 2014. Airport Facilities Data, www.faa.gov/airports/airport_safety/airportdata_5010/, accessed August 8, 2014.

[10] AirNav, http://www.airnav.com/airports/us/CA, accessed on April 12, 2014.

[11] Santa Clara County Airport Land-Use Commission, 2011. *Comprehensive Land Use Plan,* Santa Clara County, Norman Y. Mineta, San Jose International Airport.

resources. The General Plan establishes policies to guide development and conservation in Campbell through 2020. The seven State-mandated General Plan elements (Land Use, Circulation, Conservation, Housing, Open Space, Noise, and Safety) were combined into five elements under the City's General Plan as follows:

- Land Use and Transportation
- Open Space, Parks and Public Facilities
- Health and Safety
- Conservation and Natural Resources
- Housing

Key policies and strategies of the General Plan Land Use and Transportation Element and policies related to land use provided in the other four elements of the General Plan are included in Table 4.9-1.

General Plan Land Use Designations

The Land Use and Transportation Element describes the general distribution of land uses and the density and intensity of development within Campbell. There are four General Plan land use designations within the Plan Area, as shown on Figure 3-3 of Chapter 3 of this Draft EIR. The following are the descriptions of the land use designations excerpted from the General Plan.

- **General Commercial:** This category permits commercial uses that need exposure to high volumes of automobile traffic or access to transit corridors. The building forms should typically frame the street, with parking lots either behind or under the building. Auto-related uses, such as auto repair, are not allowed in the General Commercial areas.
- **Light Industrial:** This designation is intended to provide and protect industrial lands for a wide range of light manufacturing, industrial processing, general service, warehousing storage and distribution, and service commercial uses, such as automobile repair facilities. Industries producing substantial amounts of hazardous waste, odor, and other pollutants are not permitted. Businesses serving commercial uses such as food services or office supply are allowed as ancillary uses, subject to appropriate standards.
- **Research and Development:** This designation accommodates campus-like environments for corporate headquarters, research and development facilities, and offices. The Research and Development designation accommodates uses such as incubator-research facilities, testing, packaging, publishing, and printing.
- **Open Space:** This designation provides for a variety of uses of land that include areas of natural resources, recreation and enjoyment of scenic beauty, such as parks, creeks, and trails. Historically, Campbell contained large expansive open space in the form of orchard land. Today, however, there is no land devoted to commercial agriculture, though non-commercial agricultural uses are allowed in areas designated for residential and open space land uses.

TABLE 4.9-1 CITY OF CAMPBELL GENERAL PLAN GOALS, POLICIES, AND STRATEGIES PERTAINING TO LAND USE AND PLANNING

Goal/Policy/ Strategy Number	Goal/Policy/Strategy Text
Land Use and Transportation Element	
Goal LUT-1	*Coordinated land use and transportation planning in the region.*
Policy LUT-1.5	Land Use Planning and the Regional Transportation System: Support land use planning that complements the regional transportation system.
Strategy LUT-1.5a	Transit-Oriented Developments: Encourage transit-oriented developments including employment centers such as office and research and development facilities and the city's highest density residential projects by coordinating the location, intensity, and mix of land uses with transportation resources, such as Light Rail.
Strategy LUT-1.5d	Higher Floor Area Ratios (FARs): Develop provisions for allowing higher FARs in new projects that provide a mix of uses, maintain a jobs/housing balance or are located within proximity to Light Rail.
Goal LUT-3	*Options in ownership and rental housing in terms of style, size, and density that contribute positively to the surrounding neighborhood.*
Strategy LUT-3.1c	*High Density Residential:* Allow higher residential densities in the North of Campbell Area (NOCA), South of Campbell Area (SOCA), and areas near the Light Rail stations as an incentive to redevelop older, less intensive uses (see individual plans for allowed densities).
Goal LUT-5	*Preservation and enhancement of the quality character and land use patterns that support the neighborhood concept.*
Policy LUT-5.1	Neighborhood Integrity: Recognize that the City is composed of residential, industrial and commercial neighborhoods, each with its own individual character; and allow change consistent with reinforcing positive neighborhood values, while protecting the integrity of the city's neighborhoods.
Policy LUT-5.3	Variety of Commercial and Office Uses: Maintain a variety of attractive and convenient commercial and office uses that provide needed goods, services and entertainment.
Strategy LUT-5.3a	Commercial Design Guidelines: Establish commercial and mixed-use design guidelines to ensure attractive and functional buildings and site design, and to ensure compatibility with adjacent land uses.
Strategy LUT-5.3k	Auto Services: Restrict auto related uses to minor auto services (e.g., oil changers and auto parts stores) on major streets that define Campbell's image. These "image" streets are defined in the Streetscape Standards located in Appendix A.
Policy LUT-5.5	Industrial Diversity: Promote a variety of industrial use opportunities that maintain diversified services and a diversified economic base.
Strategy LUT-5.5a	Services in Industrial Areas: Encourage convenient retail and commercial services (restaurants and hotels) in industrial areas to support businesses, their customers and their employees.
Strategy LUT-5.5c	Floor Area Ratio (FAR) Guidelines: Develop guidelines for Industrial designated land use, including a provision that allows higher FARs for larger parcels that encourage research and development uses in the Dell and McGlincey neighborhoods.
Goal LUT-9	A compatible land use pattern citywide.
Policy LUT-9.3	Design and Planning Compatibility: Promote high quality, creative design and site planning that is compatible with surrounding development, public spaces and natural resources.
Strategy LUT-9.3d	Building Design: Design buildings to revitalize streets and public spaces by orienting the building to the street, including human scale details and massing that engages the pedestrian.
Goal LUT-10	*Landscaping, natural resources and amenities that are visible and accessible to the public.*
Policy LUT-10.1	Landscaping: Encourage the retention and planting of landscaping to enhance the natural and built environment.

TABLE 4.9-1 CITY OF CAMPBELL GENERAL PLAN GOALS, POLICIES, AND STRATEGIES PERTAINING TO LAND USE AND PLANNING

Goal/Policy/ Strategy Number	Goal/Policy/Strategy Text
Strategy LUT-10.1a	Natural Feature Retention: Encourage site design that incorporates or otherwise retains natural features such as mature trees, terrain, vegetation, wildlife and creeks.
Strategy LUT-10.1 c	Outdoor Common Areas: Encourage well-designed and landscaped outdoor common areas for eating, relaxing, or recreation for new projects, and if feasible, when buildings are remodeled or expanded. When possible, the common outdoor areas should adjoin natural features.
Goal LUT-11	*A physically connected, efficient community with safe access and linkages throughout the city for a variety of transportation modes and users.*
Policy LUT-11.1	Physically Connected Transportation Infrastructure: Strive to achieve physically connected transportation infrastructure.
Strategy LUT-11.1d	Bicycle and Pedestrian Connections in Development: Encourage new or redeveloping projects to provide logical bicycle and pedestrian connections on site, between parking areas, buildings, and street sidewalks and to existing or planned public right-of-way facilities and encourage pedestrian passages between street-front sidewalks and rear-lot parking areas. Ensure that the bicycle and pedestrian connections interface safely.
Strategy LUT-11.1e	Bicycle and Pedestrian Connections Between Neighborhoods: Facilitate the construction of connected pedestrian and bicycle facilities (e.g., bridges, pathways, sidewalks and bike lanes) between and within neighborhoods that are attractive, well-lit, comfortable, tree lined and safe, especially within one-half mile of major activity centers, schools and parks.
Policy LUT-11.2	Services Within Walking Distance: Encourage neighborhood services within walking distance of residential uses.
Goal LUT-13	*Strong and stable sources of City revenues while promoting an appropriate balance of land uses and a high quality of life in the City.*
Policy LUT-13.1	Variety of Uses: Attract and maintain a variety of uses that create an economic balance within the City while maintaining a balance with other community land use needs, such as housing and open space, and while providing high quality services to the community.
Goal LUT-17	*Preserve the informal neighborhood character, low-density residential areas and reduce auto traffic.*
Policy LUT-17.1	San Tomas Area Neighborhood Plan (STANP): Comply with the requirements of the STANP (see plan in Appendix A of the General Plan).
Strategy LUT-17.1b	Landscaping: Ensure that new developments provide new tree planting, shrubs, greenery and other landscaping materials, and preserve existing trees and shrubs.
Strategy LUT-17.1c	General Plan/Zoning Amendments: Ensure that new General Plan or Zoning amendments of property equal the predominant General Plan and/or Zoning designations of parcels contiguous to, or directly across a public right-of-way from the subject site.
Open Space, Parks and Public Facilities Element	
Goal OSP-3	*Ensure that new development provides and/or contributes toward additional open space, parks and recreational facilities.*
Policy OSP-3.5.	Non-Residential Open Space: Require open space and/or recreational facilities in major non-residential projects.
Housing Element	
Goal H-4	*Provide adequate housing sites through appropriate land use and Zoning designations to accommodate the City's share of regional housing needs.*
Policy H-4.2	Mixed-Use Development: Promote mixed-use development where housing is located near jobs, services, shopping, schools, and public transportation.

TABLE 4.9-1 CITY OF CAMPBELL GENERAL PLAN GOALS, POLICIES, AND STRATEGIES PERTAINING TO LAND USE AND PLANNING

Goal/Policy/ Strategy Number	Goal/Policy/Strategy Text
Program H-4.2a	Five-year Objective: The City will continue to allow and promote residential uses in conjunction with commercial and/or office uses. The City may provide financial, technical, and/or other assistance to facilitate mixed-use development along commercial corridors and around transit stations.
Policy H-4.3	Planned For Densities: To encourage the efficient and sustainable use of land, the City encourages residential development that is proposed near existing light rail stations (within 1/4 mile radius) and/or within the boundaries of the Winchester Boulevard Plan and East Campbell Avenue plan areas, to achieve at least 75 percent of the maximum General Plan Land Use category densities.

Source: City of Campbell General Plan, 2001.

City of Campbell Municipal Code

Besides the General Plan, the City of Campbell Municipal Code is the primary tool that regulates physical development in Campbell. The Municipal Code contains all ordinances for the city, and identifies land use categories, site development regulations, and other general provisions that ensure consistency between the General Plan and proposed development projects. The Municipal Code is organized by Title, Chapter, and Article. The current Municipal Code is up to date through Ordinance No. 2179, passed June 2, 2014. The following provisions of the Municipal Code implement the goals and policies of the General Plan.

Zoning Ordinance

Title 21 of the Municipal Code sets forth the City's Zoning Ordinance. The Zoning Ordinance regulates land use and development in the city. It describes Zoning districts and contains the Zoning Map and development standards for the Zoning districts. The Zoning Ordinance is the mechanism used to implement the goals, objectives, and policies of the existing General Plan and to regulate all land use within the city. The Zoning Ordinance establishes allowable land use intensities, including density and floor area ratio (FAR). The Plan Area includes five Zoning districts as shown in Figure 4.9-1. The following are the descriptions of these districts excerpted from the Zoning Ordinance:

- **C-2 (General Commercial):** The C-2 Zoning district is intended to provide a wide range of retail sales and business and personal services, primarily oriented to the automobile customer and accessible to transit corridors, to provide for general commercial needs of the city, and to promote stable and attractive commercial development, which will afford a pleasant shopping environment. Building forms should typically frame the street with parking lots located either behind or under the structures they are designed to serve. Auto-related uses (e.g., auto repair) are generally prohibited from locating in this zoning district. The C-2 zoning district is consistent with the General Commercial land use designation of the General Plan.
- **PF/OS (Public Facilities/Open Space):** The purpose of the P-F/O-S Zoning district is to protect and preserve open space land as a limited and valuable resource and to permit a reasonable use of open

space land, while at the same time preserving and protecting its inherent characteristics to assure its continued availability as agricultural land, scenic land, recreation land, conservation, or natural resource land.

- **M-1 (Light Industrial):** The purpose of the M-1 Zoning district is to encourage sound industrial development (e.g., light manufacturing, industrial processing, storage and distribution, warehousing), in addition to service commercial uses (e.g., motor vehicle repair facilities) in the city by providing and protecting an environment exclusively for this type of development, subject to regulations identified in the Zoning Code, which are necessary to protect nearby residential uses from hazards, noises, or other related disturbances. Industries producing substantial amounts of hazardous waste, odor, or other pollutants would be prohibited. Businesses serving commercial uses (e.g., food service or office supply) would generally be allowed as ancillary uses, subject to appropriate development and design standards and guidelines. The M-1 zoning district is consistent with the Light Industrial land use designation of the General Plan.
- **C-M (Controlled Manufacturing):** The C-M Zoning district is intended to provide a stable environment conducive to the development and protection of specialized manufacturing, packaging, printing, publishing, testing, and research and development, with associated administrative office facilities often providing a campus-like environment as a corporate headquarters. These facilities are operated and maintained in a clean and quiet manner and continually meet the standards identified in the Zoning Code. The C-M Zoning District is consistent with the Research and Development land use designation of the General Plan.
- **P-D (Planned Development):** The P-D Zoning district is intended to provide a degree of flexibility that is not available in other Zoning districts so as to allow developments that are more consistent with site characteristics while creating an optimum quantity and use of open space and good design. The Zoning district allows within its boundaries uses or developments determined to be in conformance with the underlying land use designation of the General Plan. It is not the intent of the P-D Zoning district to allow more residential units than would normally be allowed by other residential Zoning districts.

Site and Architectural Review

Chapter 21.42 of the Municipal Code requires the Community Development Director, the Site and Architectural Review Committee, and the Planning Commission to review and approve architectural and site designs of buildings within the city to promote and ensure the goals and objectives identified in the General Plan. A project will be approved only when the project is consistent with the General Plan and applicable design guidelines, and promotes harmonious development with the surrounding area.

Tree Protection Ordinance

Chapter 21.32 of the Municipal Code requires a Tree Removal Permit to cut down, destroy, or remove any protected trees listed in Chapter 21.32.050. In general, tree removal is only permitted when the burden of

preserving the tree outweighs the benefit to the public. Based on the findings of permit application review, the City may require the applicant to revise development plans to accommodate existing trees, provide replacement trees, pay for in-lieu fees, or provide a combination of the last two. For heritage tree removal, a permit application should be filed with the historic preservation Board in conjunction with a development application, and a public hearing is required.

Landscape Ordinance

Chapter 21.26 of the Municipal Code includes landscaping requirements that are intended to enhance aesthetics of development, ensure landscape screening and buffers where necessary, preserve visual character throughout the city, and conserve water resources.

San Tomas Area Neighborhood Plan

The City adopted the San Tomas Area Neighborhood Plan (STANP) for the San Tomas Area, which encompasses 1.5 square miles in the southwest portion of the city, generally bounded by San Tomas Aquino Creek to the north, San Tomas Expressway and Winchester Boulevard to the east, and the city boundary to the south and west. The Plan Area and the STANP overlap on the west side of Winchester Boulevard roughly between Division Street and Hacienda Avenue. Last amended in 2000, the goals of the STANP are to preserve and enhance the low-density residential character of the neighborhood and to ensure that new development and additions are compatible with the surrounding area.

The STANP is divided into two sections: land use and transportation. The land use section contains goals and policies, as well as development standards and guidelines for residential development, including setbacks, massing, and lot sizes, in the San Tomas Area. The STANP specifies development standards for residential zones (R-1-6, R-1-8, R-1-9, R-1-10, and R-1-16) and the Planned Development (PD) zone. The portion of the Plan Area within the STANP boundary is zoned C-2 and P-D. The STANP only allows Low (less than 6 units per acre) or Low-Medium Density Projects (6 to 13 units per acre) in the PD zone and requires such projects to have single-family residential design and scale. The intent of this standard is to avoid development of small lot subdivisions within the STANP area. However, the STANP allows for changes to the General Plan and Zoning designations where appropriate, as discussed further below.

The transportation section includes goals and policies that call for maintaining the rural character of the streets and require adequate traffic, pedestrian and bicycle circulation, and safety. The STANP also includes a San Tomas Public Improvement Plan, which identifies locations for curb, gutter, sidewalk, and lighting improvements, as well as street sections requiring rolled curbs.

While the STANP overrides the City's Zoning Code[12], the City's Zoning Code governs any development standards not addressed in the STANP.[13] The STANP sets forth criteria for General Plan and Zoning

[12] City of Campbell, Municipal Code, Title 21, Article 2, Section 21.12.030.
[13] City of Campbell, 2000. *San Tomas Area Neighborhood Plan*, page 4.

Amendments within the STANP area to ensure future amendments are in line with the intent of the STANP. The criteria are:

1. The proposed General Plan and/or Zoning designation should be at least equal to the predominate General Plan and/or Zoning designation of parcels contiguous to, or directly across a public right-of-way from the subject site.
2. Notwithstanding the above, existing parcels that are designated for single-family residential development, and which are contiguous to other parcels designated for single-family residential, must remain designated for single family residential.
3. With the exception of parcels directly abutting Winchester Boulevard, no General Plan Amendment in the San Tomas Area should exceed the low-medium density classification of 6-13 units per acre.
4. In situations where no General Plan and/or Zoning designation is predominant, the Planning Commission and City Council shall determine the appropriate General Plan and/or Zoning designation based upon land use factors specific to the subject site. The factors to be considered include, but are not limited to, the following: compatibility with adjoining land uses, privacy impacts, traffic, and noise.
5. Notice of a public hearing for a General Plan and/or Zoning Amendment shall be as specified in Chapter 21.78 of the Campbell Municipal Code. In addition, a notice containing the time, place and general purpose of the hearing shall be placed at the project site at least 10 days prior to the meeting.

Streetscape Standards[14]

Rehabilitation or construction of new streets within the Plan Area would be subject to the City's Streetscape Standards, adopted on August 3, 1993. The Streetscape Standards, found in the City's General Plan as Appendix A2, include design standards, implementation guides, and technical requirements for sidewalks and landscaping that apply to Hamilton Avenue, Bascom Avenue, Winchester Boulevard, and a portion of West Campbell Avenue. These standards are intended to be used in tandem with Chapter 21.26 of the Municipal Code. The street cross-section drawing for Winchester Boulevard calls for a 10-foot-wide sidewalk with a 4-foot tree well adjacent to a curb, as well as a minimum 5- to 8-foot landscaping strip behind the sidewalk. It also requires street trees to be planted every 30 feet in the tree well. The Streetscape Standards require the planting of Chinese Pistache (*Pistacia chinensis*) for the section of Winchester Boulevard located within the Plan Area.

[14] City of Campbell, 1993, Streetscape Standards, http://www.ci.campbell.ca.us/DocumentCenter/View/168, accessed August 4, 2014.

Source: City of Campbell, 2013; PlaceWorks, 2013.

- R-1-6 Single Family Residential (6,000 sq. ft. min. lot)
- R-1-8 Single Family Residential (8,000 sq. ft. min. lot)
- R-1-10 Single Family Residential (10,000 sq. ft. min. lot)
- R-D Two Family Residential
- R-3 Multiple-Family Residential
- R-M Multiple-Family Residential
- C-2 General Commercial
- M-1 Light Industrial
- C-M Controlled Manufacturing
- C-PD Condominium Planned Development
- P-D Planned Development
- P-F Public Facilities
- PF/OS Public Facilities/Open Space
- Plan Area Boundary

Figure 4.9-1
Zoning Map

4.9.1.2 EXISTING CONDITIONS

This section describes the existing conditions in the Plan Area related to land use. The Plan Area is generally bounded on the east by the percolation ponds and Los Gatos Creek, the north by Hacienda Avenue, the west by Winchester Boulevard, and the south by Knowles Drive as shown on Figure 3-2. The Plan Area also includes several parcels on the west side of Winchester Boulevard.

Surrounding Land Uses and Context

The Plan Area is located in the southeastern portion of Campbell's city limits, just south of the downtown area. Adjacent land uses include commercial, office, retail, institutional, and single- and multi-family residential uses, as follows:

- **North of the Plan Area:** In the area north of Hacienda Avenue and east of Winchester Boulevard, there is a cluster of industrial uses, similar to the uses within the Plan Area. In the area north of Hacienda Avenue and along the Winchester Boulevard corridor, there are small retail stores, automobile services, and offices, with single-family residential uses behind those streets. This area also includes SCVWDs water facilities. Several higher density (two to three stories) multi-family residential buildings exist along Hacienda Avenue.
- **East of the Plan Area:** This area includes the Hacienda Percolation Ponds and Los Gatos Creek. On the east side of State Route 17 are single-family residential neighborhoods.
- **South of the Plan Area:** Immediately south is a campus of low-density offices and adjacent to the campus to the south is a mix of office and multi-family residential uses. Farther to the south across the Los Gatos Creek, are single-family residential neighborhoods.
- **West of the Plan Area:** This area includes mostly single-family residential uses. Also located approximately ½ mile west of the Plan Area are the Santa Clara County Health Department buildings, medical facilities, and Capri Elementary School.

Existing Land Uses within the Plan Area

As seen in Figure 4.9-2, existing land uses in the Plan Area are grouped into eleven types.[15] The Plan Area is a built-out environment with few vacant parcels or buildings. The predominant uses in this portion of the Plan Area are largely non-manufacturing light industrial-related and office-related uses that include automobile services; light industrial, including uses such as manufacturing, printing, machine shops, and building materials; medical, office, public, research and development/information technology; bio-tech, such as research and development labs related to the medical field; commercial, such as convenience stores;

[15] For parcels east of Winchester Boulevard, there is often more than one distinct use per parcel. For these parcels, the predominant land use is shown.

service commercial, such as fitness centers, catering, and indoor farming; gas station; and single-family residential.

Uses along the west side of Winchester Boulevard are more distinctly defined, as parcel sizes are smaller and there is only one use per parcel. This area contains auto-oriented service uses, with a few single-family residential parcels. A larger parcel near the northern end of the Plan Area includes a research and development/information technology use.

4.9.2 STANDARDS OF SIGNIFICANCE

The proposed Plan would result in a significant land use impact if it would:

1. Physically divide an established community.
2. Conflict with any applicable land use plan, policy, or regulation of an agency with jurisdiction over the Plan Area (including, but not limited to the General Plan, specific plan, local coastal program, or Zoning ordinance) adopted for the purpose of avoiding or mitigating an environmental effect.
3. Conflict with any applicable habitat conservation plan or natural community conservation plan.

4.9.3 ENVIRONMENTAL IMPACT DISCUSSION

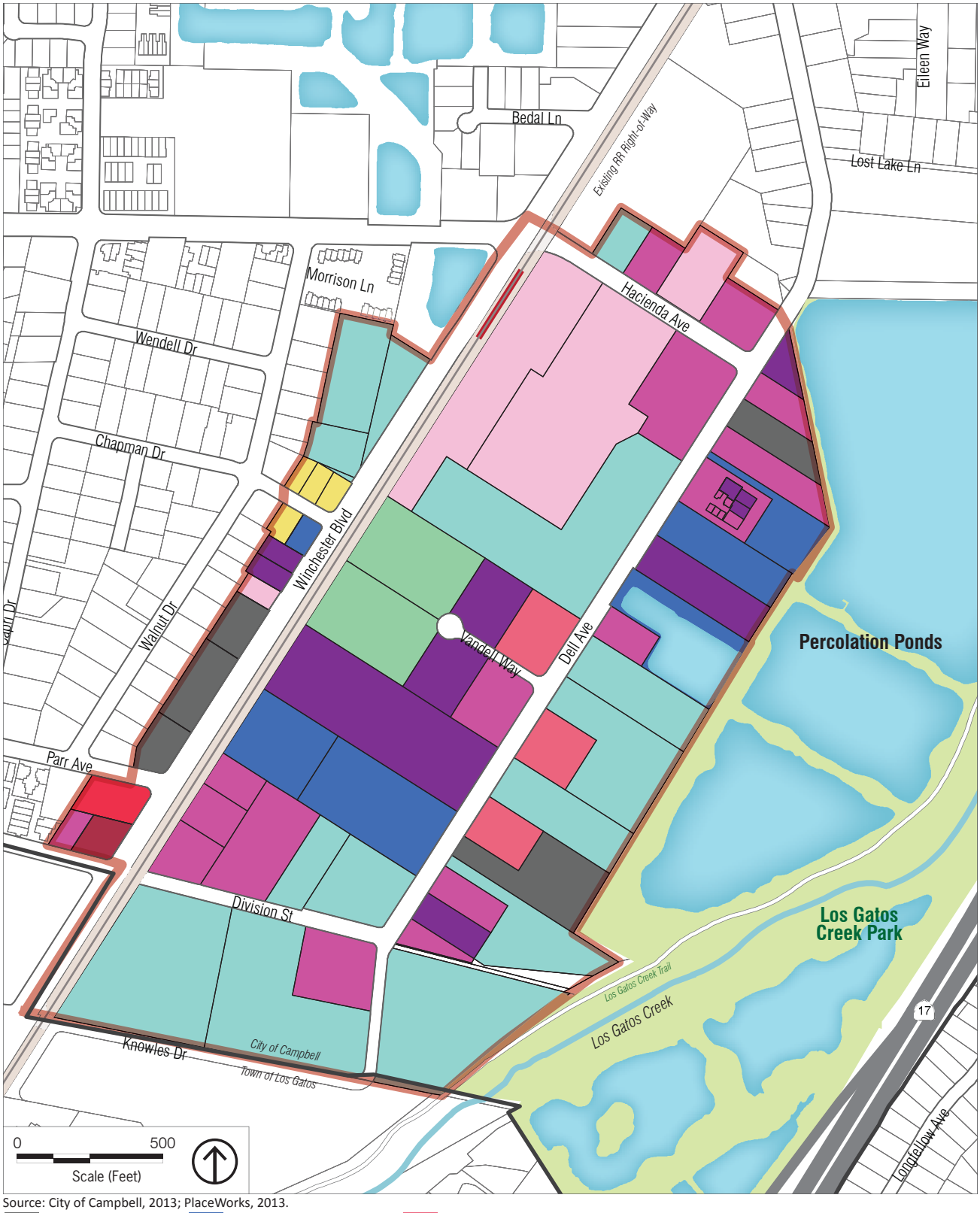
This section analyzes potential impacts to land use and planning.

LAND-1 The proposed Plan would not physically divide an established community.

Implementation of the proposed Plan would have a significant environmental impact if development or infrastructure projects allowed by the proposed Plan would physically divide an established community.

The Plan Area as a whole, except for its western portion, is physically separated from surrounding neighborhoods by roadways and natural features, including the Hacienda Percolation Ponds and Los Gatos Creek to the east, Hacienda Avenue to the north, and Knowles Drive to the south. The features serve as a physical barrier between the Plan Area and nearby areas, and the Plan Area would not create any new physical barriers within areas to the north, east, or south of the Plan Area.

Along its western boundary, the Plan Area includes parcels on the west side of Winchester Boulevard that border an existing residential neighborhood. The proposed Plan would allow for the development of higher density mixed-use buildings in this location compared to existing land uses, which include mostly auto-oriented service uses. However, the proposed development would not result in a physical division of the adjacent residential community, nor would it create new physical barriers between the Plan Area and surrounding neighborhood. The proposed development would retain and enhance



Source: City of Campbell, 2013; PlaceWorks, 2013.

- Automobile services
- Light Industrial
- Medical
- Office and office-related
- Public/Quasi Public
- R&D/Information Technology
- Bio-Tech
- Commercial
- Service Commercial
- Gas Station
- Single-Family Residential
- Plan Area Boundary

Figure 4.9-2
Existing Land Uses in the Plan Area

the existing roadway network. In addition, the proposed Plan includes required design standards to reduce inconsistency and promote design that is complementary to and harmonious with adjacent properties and the surrounding area. These required standards include:

- Parcels in the DAAP-West District that are adjacent to existing single-family residential uses are required to ensure transitions in development scale downward to the single-family residential development. No buildings are permitted within 24 feet of single-family residences.
- Building heights in the DAAP-West District are required to follow a "wedding-cake" model, locating taller building elements along the street frontage.

Further, implementation of the proposed Plan would enhance pedestrian, bicycle, and vehicle circulation throughout the Plan Area and surrounding vicinity by providing streetscape improvements and four new west-east connections from the Winchester Boulevard corridor to the water front and associated open space, as shown in Figure 3-5 in Chapter 3, Project Description.

In addition, the following goals, policies, and strategies from the General Plan would support the connectivity goals of the proposed Plan:

- Goal LUT-11: A physically connected, efficient community with safe access and linkages throughout the city for a variety of transportation modes and users.
- Policy LUT-11.1: Physically Connected Transportation Infrastructure. Strive to achieve physically connected transportation infrastructure.
- Strategy LUT-11.1d: Bicycle and Pedestrian Connections in Development. Encourage new or redeveloping projects to provide logical bicycle and pedestrian connections on site, between parking areas, buildings, and street sidewalks and to existing or planned public right-of-way facilities and encourage pedestrian passages between street-front sidewalks and rear-lot parking areas. Ensure that the bicycle and pedestrian connections interface safely.
- Strategy LUT-11.1e: Bicycle and Pedestrian Connections between Neighborhoods. Facilitate the construction of connected pedestrian and bicycle facilities (e.g., bridges, pathways, sidewalks and bike lanes) between and within neighborhoods that are attractive, well lit, comfortable, tree-lined, and safe, especially within ½-mile of major activity centers, schools, and parks.

Because the proposed Plan would aim to improve connectivity and would not create physical barriers within existing communities, a *less-than-significant* impact to land use would occur.

Significance Before Mitigation: Less than significant.

LAND-2	**The proposed Plan would conflict with an applicable land use plan, policy, or regulation adopted for the purpose of avoiding or mitigating an environmental effect.**

Implementation of the proposed Plan would have a significant environmental impact if it would conflict with community goals adopted to reduce environmental impacts, as expressed in adopted plans, policies, or regulations.

Plan Bay Area

As described above, the purpose of Plan Bay Area is to help locate jobs and housing within close proximity of transit corridors. While the SCS does not directly govern land uses within Campbell, there are a number of benefits available to the City from being consistent with the SCS, including streamlining of CEQA pursuant to Senate Bill (SB) 375 (the Sustainable Communities and Climate Protection Act of 2008) for applicable transit priority and residential or mixed-use projects, as well as high eligibility for transportation funding, provided that policies and land use patterns set forth in the General Plan align with the goals of the SCS. Because the Plan Area proposes job-generating land uses near mixed-use housing and a proposed light rail station, the proposed Plan is consistent with the goals of *Plan Bay Area* by focusing on mixed-use and transit-oriented development, providing better connectivity between the Plan Area and regional transit destinations. Therefore, the impact associated with consistency with *Plan Bay Area* is *less than significant*.

Guidelines and Standards for Land Use Near Streams

The Santa Clara Valley Water Resources Protection Collaborative Guidelines and Standards for Land Use Near Streams set forth requirements and procedures for new development or redevelopment near streams, and the Plan Area includes properties located within the Streamside Protection Area, which is a project that is within 50 feet from the top of a stream bank. As described in Chapter 3 of the Draft EIR, the proposed Plan envisions Core Tech Uses to be developed on these properties and encourages eating and drinking establishments to be developed near the waterfront. The proposed Plan also requires a 20-foot setback from property lines abutting the waterfront as well as a height restriction of 20 feet for structures located between 20 feet and 60 feet of a waterfront-facing parcel line. This proposed setback requirement is in line with the goal of the Guidelines and Standards, providing a buffer between the riparian area and urban development. In addition, the proposed Plan includes two conceptual pedestrian crossings that would connect the Plan Area to the Los Gatos Creek Trail. Although the proposed Plan does not require the construction of these crossings, since the crossings are within the Streamside Protection Area, they would be subject to the Guidelines and Standards for Land Use Near Streams.

All development projects allowed by the proposed Plan within the Streamside Protection Area would require an encroachment permit from SCVWD and would be required to comply with the provisions of the Guidelines and Standards. This includes avoiding locating uses that may impact water quality near the Los Gatos Creek. Such uses include loading docks, trash enclosures, chemical storage areas, stationary noise producing mechanical equipment, new paved areas, or active recreational areas. Projects would also be required avoid light and glare impacts to the riparian corridor and use locally native plants for all landscaping.

Given that the proposed Plan includes setbacks and height restrictions for development near the waterfront and given that any development within the Streamside Protection Area would need to work with the SCVWD through the issuance of an encroachment permit to avoid conflicts with the Guidelines and Standards for Land Use Near Streams, the proposed Plan would not conflict with the Guidelines and Standards, and impacts would be less than significant.

Airport Comprehensive Land Use Plan

No airports or private airstrips are located within or in the immediate proximity to the Plan Area. In addition, the Plan Area is not located within any protected airspace zones defined by the Airport Land Use Commission, and has no heliports listed by the Federal Aviation Administration. Therefore, no conflicts with a CLUP for an airport would occur

City of Campbell General Plan

As described in Chapter 3, Project Description, of this Draft EIR, the project evaluated by this Draft EIR includes a General Plan Amendment to ensure consistency between the land use designations and other pertinent policies of the proposed Plan and the City of Campbell General Plan, including policies involving the San Tomas Area Neighborhood Plan. Nevertheless, the proposed Plan is consistent with and implements many existing General Plan land use goals, policies, and strategies that establish a framework for future development in the Plan Area, including the following:

- Policy LUT-1.5: Land Use Planning and the Regional Transportation System. Support land use planning that complements the regional transportation system.
- Strategy LUT-1.5a: Transit-Oriented Developments. Encourage transit-oriented developments including employment centers such as office and research and development facilities and the city's highest density residential projects by coordinating the location, intensity, and mix of land uses with transportation resources, such as Light Rail.
- Strategy LUT-1.5d: Higher Floor Area Ratios (FARs). Develop provisions for allowing higher FARs in new projects that provide a mix of uses, maintain a jobs/housing balance, or are located within proximity to Light Rail.
- Strategy LUT-3.1c: High Density Residential. Allow higher residential densities in the North of Campbell Area (NOCA), South of Campbell Area (SOCA), and areas near the Light Rail stations as an incentive to redevelop older, less intensive uses (see individual plans for allowed densities).
- Policy LUT-5.1: Neighborhood Integrity. Recognize that the City is composed of residential, industrial, and commercial neighborhoods, each with its own individual character; and allow change consistent with reinforcing positive neighborhood values, while protecting the integrity of the city's neighborhoods.

- Policy LUT-5.3: Variety of Commercial and Office Uses. Maintain a variety of attractive and convenient commercial and office uses that provide needed goods, services, and entertainment.
- Strategy LUT-5.3a: Commercial Design Guidelines. Establish commercial and mixed-use design guidelines to ensure attractive and functional buildings and site design, and to ensure compatibility with adjacent land uses.
- Strategy LUT-5.3k: Auto Services. Restrict auto related uses to minor auto services (e.g., oil changers and auto parts stores) on major streets that define Campbell's image. These "image" streets are defined in the Streetscape Standards located in Appendix A.
- Strategy LUT-5.5a: Services in Industrial Areas. Encourage convenient retail and commercial services (restaurants and hotels) in industrial areas to support businesses, their customers, and their employees.
- Strategy LUT-5.5c: Floor Area Ratio (FAR) Guidelines. Develop guidelines for Industrial designated land use, including a provision that allows higher FARs for larger parcels that encourage research and development uses in the Dell and McGlincey neighborhoods.
- Policy LUT-9.3: Design and Planning Compatibility. Promote high quality, creative design and site planning that is compatible with surrounding development, public spaces, and natural resources.
- Strategy LUT-9.3d: Building Design. Design buildings to revitalize streets and public spaces by orienting the building to the street, including human scale details and massing that engages the pedestrian.
- Policy LUT-10.1: Landscaping. Encourage the retention and planting of landscaping to enhance the natural and built environment.
- Strategy LUT-10.1a: Natural Feature Retention. Encourage site design that incorporates or otherwise retains natural features such as mature trees, terrain, vegetation, wildlife, and creeks.
- Strategy LUT-10.1c: Outdoor Common Areas. Encourage well-designed and landscaped outdoor common areas for eating, relaxing, or recreation for new projects, and if feasible, when buildings are remodeled or expanded. When possible, the common outdoor areas should adjoin natural features.
- Policy LUT-11.2: Services within Walking Distance. Encourage neighborhood services within walking distance of residential uses.
- Policy LUT-13.1: Variety of Uses. Attract and maintain a variety of uses that create an economic balance within the City while maintaining a balance with other community land use needs, such as housing and open space, and while providing high quality services to the community.
- Policy OSP-3.5: Non-Residential Open Space. Require open space and/or recreational facilities in major non-residential projects.
- Goal LUT-17: Preserve the informal neighborhood character, low-density residential areas and reduce auto traffic.

- Policy LUT-17.1: San Tomas Area Neighborhood Plan (STANP). Comply with the requirements of the STANP (see plan in Appendix A of the General Plan).
- Strategy LUT-17.1c: General Plan/Zoning Amendments. Ensure that new General Plan or Zoning amendments of property equal the predominant General Plan and/or Zoning designations of parcels contiguous to, or directly across a public right-of-way from the subject site.

To avoid conflicts with the General Plan, upon adoption of the proposed Plan, the General Plan would be amended to ensure consistency between the documents. Therefore, the impact would be *less than significant*.

Campbell 2009-2014 Housing Element

The City's adopted Housing Element describes how Campbell plans to meet the projected housing needs of all economic segments of the community and the City's regional housing needs allocation (RHNA). The Housing Element includes the policies listed in Table 4.9-1 that call for high-density urban infill housing and addresses the provision of housing for city residents, including mixed-use and infill housing. The proposed Plan is consistent with the goals and policies of the Housing Element. Specifically, the proposed Plan would allow a variety of housing types within the Plan Area, including mixed-use and multi-family residential. Additionally, the proposed Plan promotes residential uses in the form of mixed-use residential, which increases housing near jobs and transit. Therefore, the proposed Plan is consistent with:

- Program H-4.2a. Five-year Objective: The City will continue to allow and promote residential uses in conjunction with commercial and/or office uses. The City may provide financial, technical, and/or other assistance to facilitate mixed-use development along commercial corridors and around transit stations.
- Policy H-4.3. Planned For Densities: To encourage the efficient and sustainable use of land, the City encourages residential development that is proposed near existing light rail stations (within 1/4 mile radius) and/or within the boundaries of the Winchester Boulevard Plan and East Campbell Avenue plan areas, to achieve at least 75 percent of the maximum General Plan Land Use category densities.

As a result, the proposed Plan would not conflict with the Housing Element and would result in a *less-than-significant* impact.

City of Campbell Municipal Code

The City's Zoning Ordinance (Title 21 of the Municipal Code) regulates development standards and land uses. The Plan Area is subject to various existing height limits, FARs, densities, setbacks, open space, landscaping, and parking requirements. However, as described in Chapter 3 of this Draft EIR, the Zoning Ordinance would be amended to ensure that development intensities, heights, landscaping, and other pertinent requirements are consistent between the proposed Plan and the Zoning Ordinance. Therefore, upon amendment of the Zoning Ordinance, the proposed Plan would be consistent with the Zoning Ordinance.

Further, all development under the proposed Plan would be subject to the provisions of the Tree Protection Ordinance, Chapter 21.32 of the Campbell Municipal Code, which require permit approval prior to removal of any protected trees listed in Chapter 21.32.050.

In addition, the City's Site and Architectural Review process would ensure that future development under the proposed Plan would comply with applicable land use plans, policies, or regulations.

Overall, because the proposed Plan includes an amendment to the Zoning Ordinance to ensure consistency with the proposed Plan, and because any development allowed by the proposed Plan would be required to comply with the City's Tree Protection Ordinance and project review procedures, the proposed Plan would not conflict with the provisions of the Municipal Code, and impacts would be *less than significant*.

San Tomas Area Neighborhood Plan

The San Tomas Area Neighborhood Plan (STANP) encompasses parcels west of Winchester Boulevard, including a portion of the Plan Area. The STANP parcels within the Plan Area are zoned General Commercial (C-2) and Planned Development (PD). As described in Section 4.9.1.1, commercially zoned parcels are not subject to development standards set forth in the STANP.[16] This is because the STANP does not include standards for commercial uses and defaults to the Municipal Code standards in this case.

Parcels zoned PD are only allowed to accommodate low or low-medium density residential development of up to 16 units per acre within the STANP boundaries. However, the STANP includes an exception for parcels directly abutting Winchester Boulevard. All of the parcels within the Plan Area that are also included in the STANP abut Winchester Boulevard with the exception of the Barracuda property located at 3175 Winchester Boulevard and includes APNs 40621016, 40621017, and 40621019. APNs 40621016 and 40621017 abut Winchester Boulevard, but APN 40621019 does not abut Winchester Boulevard. It is likely that the parcels with APNs 40621016 and 40621019 were combined during the building permit process, but the City would need to undertake a Certificate of Compliance to confirm this either way. Regardless of whether the parcels are combined, the proposed Plan includes an amendment to the STANP to exclude the parcels in the Plan Area that are also within the STANP to ensure consistency with the proposed Plan. Therefore, changing the General Plan Land Use and Zoning designation for these parcels would not conflict with the General Plan and Zoning Amendment Criteria established in the STANP as described in section 4.9.1.1.

Because the STANP would be amended concurrently with the proposed Plan to ensure consistency between the documents, the proposed Plan would not conflict with the STANP and the impact would be *less than significant*.

[16] City of Campbell, 2000. *San Tomas Area Neighborhood Plan*, page 4.

Streetscape Standards

The Streetscape Standards set forth design standards and requirements for sidewalks and landscaping along Winchester Boulevard in the Plan Area. In compliance with the Streetscape Standards, the proposed Plan calls for a 10-foot-wide sidewalk with a 4-foot tree well adjacent to a curb along Winchester Boulevard. The proposed Plan also requires a 5-foot front setback to provide open space, including outdoor dining areas. Consistent with the Streetscape Standards, the proposed Plan would require such front setback areas be landscaped per the City's Landscaping Requirements (Municipal Code Chapter 21.26). The proposed Plan would also defer to the City's Streetscape Standards for any required landscaping specifications, such as the planting of Chinese Pistache (*Pistacia chinensis*)) along Winchester Boulevard. Therefore, the proposed Plan would not conflict with the Streetscape Standards and impacts would be *less than significant*.

Overall, because the project includes amendments to the General Plan, Zoning Ordinance, and San Tomas Area Neighborhood Plan that will ensure consistency with the proposed Plan, and because any development allowed by the proposed Plan would be required to comply with the Campbell Streetscape Standards, the proposed Plan would not conflict with the provisions of the General Plan, Zoning Ordinance, and San Tomas Area Neighborhood Plan, and impacts would be *less than significant*.

Significance Before Mitigation: Less than significant.

LAND-3	**The proposed Plan would not conflict with an applicable habitat conservation plan or natural community conservation plan.**

The Santa Clara Valley Habitat Plan (SCVHP) study area encompasses a small portion of the Plan Area that includes the SCVWD's percolation ponds which abuts the Plan Area. Implementation of the proposed Plan, however, would not trigger construction of new buildings or structures within the SCVHP study area, including the SCVWD's percolation ponds. In addition, the SCVWD would continue to maintain the percolation ponds pursuant to the provisions of the SCVHP. Therefore, implementation of the proposed Plan would not result in a significant impact to the desilting ponds.

However, outside of the Plan Area boundary, the proposed Plan suggests constructing new pedestrian crossings within the SCVHP study area. The proposed Plan recommends the installation of two small pedestrian crossings over the engineered channel that is located immediately outside of the eastern boundary of the Plan Area, in order to improve connections from Dell Avenue to the Los Gatos Creek Trail. The construction of the pedestrian crossings would not be precluded by the HCP, but the pedestrian crossings would be subject to the SCVHP's permit process, mitigation requirements, and fee payment. The pedestrian crossings would also be subject to independent CEQA review to ensure their consistency with the SCVHP. Therefore, implementation of the proposed Plan would not conflict with the SCVHP.

Significance before Mitigation: Less than significant.

4.9.4 CUMULATIVE IMPACTS

LAND-4	**The proposed Plan, in combination with past, present, and reasonably foreseeable projects, would result in less than significant cumulative impacts with respect to land use and planning.**

This section analyzes potential impacts related to land use and planning that could occur from a combination of the proposed Plan with other past, present, and reasonably foreseeable projects in the Campbell city limit. Cumulative impacts would occur if development or infrastructure projects associated with the proposed Plan, together with other cumulative projects, would physically divide an existing community or conflict with applicable land use plans, policies, or regulations or with an adopted conservation plan.

As discussed above the proposed Plan would not conflict with any applicable land use plans, policies, or regulations, as amended for consistency with the proposed Plan. In addition, the proposed Plan would not physically divide an existing community, nor would the proposed Plan conflict with an adopted conservation plan. No other cumulative projects are located in the immediate Plan Area vicinity that would, in combination with the proposed Plan, divide a surrounding neighborhood or create a policy conflict. Therefore, the proposed Plan would not contribute to a cumulative land use and planning impact, so the impact would be less than significant.

Significance Before Mitigation: Less than significant.

4.9.5 SUMMARY OF SIGNIFICANT IMPACTS AND MITIGATION MEASURES

The proposed Plan would not result in any significant project-specific or cumulative impacts related to land use and planning, and therefore no mitigation measures are required.

4.10 NOISE

This section describes the regulatory framework and existing conditions related to noise sources and the overall noise environment in the vicinity of the proposed Dell Avenue Area Plan (proposed Plan), and evaluates the potential impacts that could occur as a result of implementation of the proposed Plan, as well as the potential impacts of the existing noise environment upon development allowed by the proposed Plan. The technical data and modeling used to for the analysis in this section are located in Appendix C, Technical Noise Data and Modeling.

4.10.1 ENVIRONMENTAL SETTING

4.10.1.1 OVERVIEW OF NOISE FUNDAMENTALS

Noise Descriptors

Noise is most often defined as unwanted sound. Although sound can be easily measured, the perception of noise and the physical response to sound complicate the analysis of its impact on people. People judge the relative magnitude of sound sensation in subjective terms such as "noisiness" or "loudness."

The following are brief definitions of terminology used in this section:

- **Sound.** A disturbance created by a vibrating object, which when transmitted by pressure waves through a medium such as air, is capable of being detected by a receiving mechanism, such as the human ear or a microphone.
- **Noise.** Sound that is loud, unpleasant, unexpected, or otherwise undesirable.
- **Decibel (dB).** A unit-less measure of sound on a logarithmic scale.
- **A-Weighted Decibel (dBA).** An overall frequency-weighted sound level in decibels that approximates the frequency response of the human ear.
- **Equivalent Continuous Noise Level (L_{eq}).** The mean of the noise level, averaged over the measurement period.
- **Statistical Sound Level (L_n).** The sound level that is exceeded "n" percent of time during a given sample period. For example, the L_{50} level is the statistical indicator of the time-varying noise signal that is exceeded 50 percent of the time (during each sampling period), which means that half of the sampling time, the changing noise levels are above this value and half of the time they are below it. This is called the "median sound level." The L_{10} level, likewise, is the value that is exceeded 10 percent of the time (i.e., near the maximum sound level) and this is often known as the "intrusive sound level." The L_{90} is the sound level exceeded 90 percent of the time and is often considered the "effective background level" or "residual noise level."

- **Day-Night Sound Level (L_{dn} or DNL).** The energy-average of the A-weighted sound levels occurring during a 24-hour period, with 10 dB added to the sound levels occurring during the period from 10:00 p.m. to 7:00 a.m.
- **Community Noise Equivalent Level (CNEL).** The energy-average of the A-weighted sound levels occurring during a 24-hour period, with 5 dB added to the levels occurring during the period from 7:00 p.m. to 10:00 p.m. and 10 dB added to the sound levels occurring during the period from 10:00 p.m. to 7:00 a.m.

For general community/environmental noise, CNEL and L_{dn} values rarely differ by more than 1 dB. As a matter of practice, L_{dn} and CNEL values are considered to be equivalent/interchangeable and are treated as such in this assessment.

Characteristics of Sound

Sound is a pressure wave transmitted through the air. It is described in terms of loudness or amplitude (measured in decibels), frequency or pitch (measured in Hertz [Hz] or cycles per second), and duration (measured in seconds or minutes). The standard unit of measurement of the loudness of sound is the decibel (dB). Changes of 1 to 3 dB are detectable under quiet, controlled conditions and changes of less than 1 dBA are usually indiscernible. A 3 dB change in noise levels is considered the minimum change that is detectable with human hearing in outside environments. A change of 5 dB is readily discernable to most people in an exterior environment whereas a 10 dBA change is perceived as a doubling (or halving) of the sound.

The human ear is not equally sensitive to all frequencies. Sound waves below 16 Hz are not heard at all and are "felt" more as a vibration. Similarly, while people with extremely sensitive hearing can hear sounds as high as 20,000 Hz, most people cannot hear above 15,000 Hz. In all cases, hearing acuity falls off rapidly above about 10,000 Hz and below about 200 Hz. Since the human ear is not equally sensitive to sound at all frequencies, a special frequency dependent rating scale is usually used to relate noise to human sensitivity. The dBA performs this compensation by discriminating against frequencies in a manner approximating the sensitivity of the human ear.

Measurement of Sound

Sound intensity is measured through the A-weighted measure to correct for the relative frequency response of the human ear. That is, an A-weighted noise level de-emphasizes low and very high frequencies of sound similar to the human ear's de-emphasis of these frequencies.

Unlike units of measures that are computed with arithmetic functions (such as adding or subtracting numbers) decibels are measured and processed on a logarithmic scale. This logarithmic scale is used to better account for the large variations in pressure amplitude (the nominal range of human hearing is 0 to 140 dBA, which represents a ratio in pressures of 100 trillion to one). All noise levels in this study are relative to the industry-standard pressure reference value of 20 micropascals. Because of the physical

characteristics of noise transmission and perception, the relative loudness of sound does not closely match the actual amounts of sound energy. Table 4.10-1 presents the subjective effect of changes in sound pressure levels.

TABLE 4.10-1 CHANGE IN APPARENT LOUDNESS

± 3 dB	Threshold of human perceptibility
± 5 dB	Clearly noticeable change in noise level
± 10 dB	Half or twice as loud
± 20 dB	Much quieter or louder

Source: Bies and Hansen, 2009.

In practical application, an increase of 10 dB is 10 times more intense than 1 dB, while 20 dB is 100 times more intense, and 30 dB is 1,000 times more intense. A sound as soft as human breathing is about 10 times greater than 0 dB. The decibel system of measuring sound gives a rough connection between the physical intensity of sound and its perceived loudness to the human ear. Ambient sounds generally range from 30 dBA (very quiet) to 100 dBA (very loud). To help relate noise level values to common experience, Table 4.10-2 shows typical noise levels from noise sources.

Sound levels are generated from a source and their decibel level decreases exponentially as the distance from that source increases. This phenomenon is known as "spreading loss." For a single point source, such as stationary equipment or activity at a project site, sound levels decrease by approximately 6 dB for each doubling of distance from the source. If noise is produced by a line source, such as highway traffic, the sound decreases by 3 dB for each doubling of distance in a hardscape environment. Line source noise in a relatively flat environment with absorptive vegetation decreases by 4.5 dB for each doubling of distance.

Time variation in noise exposure is typically expressed in terms of a steady-state energy level equal to the energy content of the time varying period (called L_{eq}), or alternately, as a statistical description of the sound level that is exceeded over some fraction of a given observation period. For example, as described above, the L_{50} noise level represents the noise level that is exceeded 50 percent of the time. These "L" values are typically used to demonstrate compliance for stationary noise sources with a city's noise ordinance, as discussed below. Other values typically noted during a noise survey are the L_{min} and L_{max}. These values represent the minimum and maximum noise levels obtained over the measurement period.

Because community receptors are more sensitive to unwanted noise intrusion during the evening and at night, State law and the City of Campbell require that, for planning purposes, an artificial dB increment be added to quiet time noise levels in a 24-hour noise descriptor called the Community Noise Equivalent Level (CNEL) or Day-Night Noise Level (L_{dn}). As described above, the CNEL descriptor requires that an artificial increment of 5 dBA be added to the actual noise level for the hours from 7:00 p.m. to 10:00 p.m. and 10 dBA for the hours from 10:00 p.m. to 7:00 a.m. The L_{dn} descriptor uses the same methodology except that there is no artificial increment added to the hours between 7:00 p.m. and 10:00 p.m. Both descriptors give roughly the same 24-hour level with the CNEL being only slightly more restrictive (i.e., higher).

TABLE 4.10-2 TYPICAL NOISE LEVELS

Common Outdoor Activities	Noise Level (dBA)	Common Indoor Activities
	110	Rock Band
Jet Flyover at 1,000 feet		
	100	
Gas Lawn Mower at 3 feet		
	90	
Diesel Truck at 50 feet, at 50 mph		Food Blender at 3 feet
	80	Garbage Disposal at 3 feet
Noisy Urban Area, Daytime		
	70	Vacuum Cleaner at 10 feet
Commercial Area		Normal speech at 3 feet
Heavy Traffic at 300 feet	60	
		Large Business Office
Quiet Urban Daytime	50	Dishwasher Next Room
Quiet Urban Nighttime	40	Theater, Large Conference Room (background)
Quiet Suburban Nighttime		
	30	Library
Quiet Rural Nighttime		Bedroom at Night, Concert Hall (background)
	20	
		Broadcast/Recording Studio
	10	
Lowest Threshold of Human Hearing	0	Lowest Threshold of Human Hearing

Source: Caltrans, 2009.

Psychological and Physiological Effects of Noise

Noise is defined as unwanted sound, and is known to have several adverse effects on people, including hearing loss, speech and sleep interference, physiological responses, and annoyance. Physical damage to human hearing begins at prolonged exposure to noise levels higher than 85 dBA. Exposure to high noise levels affects our entire system, with prolonged noise exposure in excess of 75 dBA increasing body tensions, and thereby affecting blood pressure, functions of the heart and the nervous system. In

comparison, extended periods of noise exposure above 90 dBA could result in permanent hearing damage. Based on these known adverse effects of noise, the federal government, the State of California, and many local governments have established criteria to protect public health and safety and to prevent disruption of certain human activities from noise.

Vibration Fundamentals

Vibration is a trembling, quivering, or oscillating motion of the earth. Like noise, vibration is transmitted in waves, but in this case through the earth or solid objects. Unlike noise, vibration is typically of a frequency that is felt rather than heard.

Vibration can be either natural as in the form of earthquakes, volcanic eruptions, sea waves, landslides, or human-caused as from explosions, the action of heavy machinery, or heavy vehicles such as trains. Both natural and human-caused vibration may be continuous, such as from operating machinery, or transient, such as from an explosion. The way in which vibration is transmitted through the earth is called propagation. Propagation of earthborn vibrations is complicated and difficult to predict because of the endless variations in the soil through which waves travel. There are three main types of vibration propagation: surface, compression, and shear waves. Surface waves, or Raleigh waves, travel along the ground's surface. These waves carry most of their energy along an expanding circular wave front, similar to ripples produced by throwing a rock into a pool of water. P waves, or compression waves, are body waves that carry their energy along an expanding spherical wave front. The particle motion in these waves is longitudinal (i.e., in a "push-pull" fashion). P waves are analogous to airborne sound waves. S waves, or shear waves, are also body waves that carry energy along an expanding spherical wave front. However, unlike P waves, the particle motion is transverse or "side-to-side and perpendicular to the direction of propagation."

As vibration waves propagate from a source, the energy is spread over an ever-increasing area such that the energy level striking a given point is reduced with the distance from the energy source. Wave energy is also reduced with distance as a result of material damping in the form of internal friction, soil layering, and void spaces. The amount of attenuation provided by material damping varies with soil type and condition as well as the frequency of the wave.

As with noise, vibration can be described by both its amplitude and frequency. Amplitude may be characterized in three ways: displacement, velocity, and acceleration. Particle displacement is a measure of the distance that a vibrated particle travels from its original position, and, for the purposes of soil displacement, is typically measured in inches or millimeters. Particle velocity is the rate of speed at which soil particles move in inches per second or millimeters per second. Particle acceleration is the rate of change in velocity with respect to time and is measured in inches per second or millimeters per second. Typically, particle velocity and/or acceleration are used to describe vibration. Table 4.10-3 presents the human reaction to various levels of peak particle velocity.

TABLE 4.10-3 HUMAN REACTION TO TYPICAL VIBRATION LEVELS

Vibration Level Peak Particle Velocity (in/sec)	Human Reaction	Effect on Buildings
0.006–0.019	Threshold of perception, possibility of intrusion	Vibrations unlikely to cause damage of any type
0.08	Vibrations readily perceptible	Recommended upper level of vibration to which ruins and ancient monuments should be subjected
0.10	Level at which continuous vibration begins to annoy people	Virtually no risk of "architectural" (i.e., not structural) damage to normal buildings
0.20	Vibrations annoying to people in buildings	Threshold at which there is a risk to "architectural" damage to normal houses with plastered walls and ceilings
0.4–0.6	Vibrations considered unpleasant by people subjected to continuous vibrations and unacceptable to some people walking on bridges	Vibrations at a greater level than normally expected from traffic, and would cause "architectural" damage and possibly minor structural damage

Sources: California Department of Transportation (Caltrans). 2004, June. *Transportation- and Construction-Induced Vibration Guidance Manual*. California Department of Transportation (Caltrans), Division of Environmental Analysis. 2002, February. *Transportation Related Earthborne Vibration (Caltrans Experiences)*. Technical Advisory, Vibration. TAV-02-01-R9601.

Vibrations also vary in frequency, which affects perception. Typical construction vibrations fall in the 10 to 30 Hz range and usually occur around 15 Hz. Traffic vibrations exhibit a similar range of frequencies; however, due to their suspension systems, buses often generate low frequencies around 3 Hz at high vehicle speeds. It is less common, but possible, to measure traffic frequencies above 30 Hz.

Noise- and Vibration-Sensitive Receptors

Certain land uses are particularly sensitive to noise and vibration. These uses include residences, schools, libraries, churches, nursing homes, hospitals, and open space/recreation areas where quiet environments are necessary for enjoyment, public health, and safety. Commercial and industrial uses are generally not considered noise- and vibration-sensitive uses, unless noise and vibration would interfere with their normal operations and business activities.

4.10.1.2 REGULATORY FRAMEWORK

To limit population exposure to physically and/or psychologically damaging as well as intrusive noise levels, the State of California, various county governments, and most municipalities in the state have established standards and ordinances to control noise. There are no federal noise or vibration standards applicable to activities or uses in the Plan Area; therefore, this analysis only addresses State and local standards.

State Regulations

State of California Code of Regulations, Title 24, Part 2

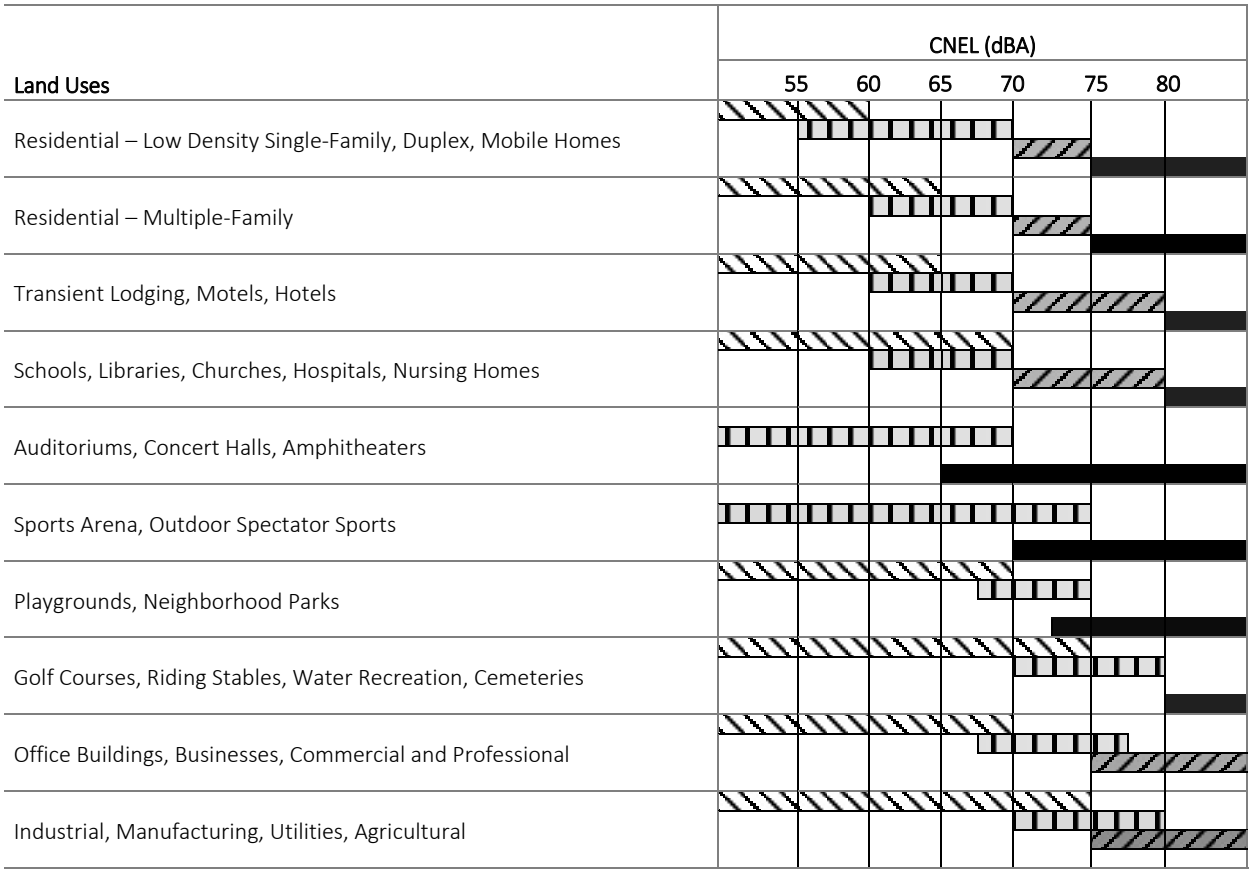
The State of California's noise insulation standards are codified in the California Code of Regulations (CCR), Title 24, Building Standards Administrative Code, Part 2, California Building Code (CBC). These noise standards are applied to new construction in California for the purpose of interior noise compatibility from exterior noise sources. The regulations specify that acoustical studies must be prepared when noise-sensitive structures, such as residential buildings, schools, or hospitals, are located near major transportation noise sources, and where such noise sources create an exterior noise level of 65 dBA CNEL or higher. Acoustical studies that accompany building plans must demonstrate that the structure has been designed to limit interior noise in habitable rooms to acceptable noise levels. For new residential buildings, schools, and hospitals, the acceptable interior noise limit for new construction is 45 dBA CNEL.

California Code of Regulations Title 21, Subchapter 6, (Airport Noise Standards) establishes 65 dBA CNEL as the acceptable level of aircraft noise for persons living in the vicinity of airports. Title 21 applies to airports that have been designated "noise problem airports," which includes the San Jose and San Francisco International Airports. Noise-sensitive land uses in locations where the aircraft exterior noise level exceeds 65 dBA CNEL are generally incompatible, unless (1) an aviation easement for aircraft noise has been acquired by the airport proprietor, or (2) the residence is a high-rise apartment or condominium that has an interior CNEL of 45 dBA or less in all habitable rooms despite aircraft noise and an air circulation or air conditioning system, as appropriate. Assembly Bill (AB) 2776 requires any person who intends to sell or lease residential properties within an airport influence area to disclose that fact to the person buying the property.

California Noise/Land Use Compatibility Matrix

The California Office of Noise Control has prepared a land use compatibility chart for community noise to provide urban planners with a tool to gauge the compatibility of land uses relative to existing and future ambient noise levels. This land use compatibility chart identifies 'normally acceptable', 'conditionally acceptable', and 'clearly unacceptable' noise levels for various land uses. A conditionally acceptable designation implies new construction or development should be undertaken only after a detailed analysis of the noise reduction requirements for each land use is made and needed noise insulation features are incorporated in the design. By comparison, a normally acceptable designation indicates that standard construction can occur with no special noise reduction requirements. Campbell has adopted its own compatibility standards; however, Campbell's standards do not cover the full range of land uses considered by the State Guidelines. Since the City of Campbell has adopted less comprehensive standards, the State Guidelines are included as Table 4.10-4 for reference.

TABLE 4.10-4 STATE OF CALIFORNIA LAND USE COMPATIBILITY GUIDELINES FOR COMMUNITY NOISE ENVIRONMENTS



Normally Acceptable:
Specified land use is satisfactory based upon the assumption that any buildings involved are of normal conventional construction, without any special noise insulation requirements.

Normally Unacceptable:
New construction or development should generally be discouraged. If new construction does proceed, a detailed analysis of the noise reduction requirements must be made and needed noise insulation features included in the design.

Conditionally Acceptable:
New construction or development should be undertaken only after a detailed analysis of the noise reduction requirements is made and the needed noise insulation features included in the design. Conventional construction, but with closed windows and fresh air supply systems or air conditioning will normally suffice.

Clearly Unacceptable:
New construction or development generally should not be undertaken.

Source: Governor's Office of Planning and Research, General Plan Guidelines 2003.

Local Regulations

2001 Campbell General Plan

The Conservation and Natural Resources Element of the 2001 Campbell General Plan 2025 sets forth land use compatibility guidelines for noise-sensitive residential land uses and outdoor activity areas. The land use noise compatibility standards adopted by the City are different from those in the State of California General Plan Guidelines, in that they are not presented as a table or chart, and apply only to residential development. These standards are reflected in the text of the General Plan's noise policies, and are also included in the City's Municipal Code. Relevant text from both the General Plan and the Municipal Code are included in Table 4.10-5. In addition, the Conservation and Natural Resources Element sets forth the following goals, policies, strategies, and actions to prevent the generation or reception of excessive noise.

Campbell Municipal Code

The provisions of the Campbell Municipal Code that would be most specifically relevant to the proposed Plan are reproduced below. The Municipal code contains additional provisions that are not applicable at the Plan level, but which could at times apply to specific future activities, operations, or permitting that could occur under implementation of the proposed Plan. These less directly relevant provisions are discussed in a generalized fashion below.

Some noise-related provisions of the Municipal Code pertain to definition of terms, measurement techniques, or other non- or quasi-regulatory issues. For brevity, only provisions considered actionable for adoption and implementation of the proposed Plan are included.

Section 21.16.070 Noise.

E. Residential noise standards.

1. Noise from stationary sources. New residential development shall conform to a stationary source noise exposure standard of sixty-five (65) dBA for exterior noise levels and forty-five (45) dBA for interior noise levels.

2. Traffic-related noise. New residential development shall conform to a traffic-related noise exposure standard of sixty (60) dBA CNEL for outdoor noise in noise-sensitive outdoor activity areas and forty-five (45) dBA CNEL for indoor noise. New development that does not and cannot be made to conform to this standard shall not be allowed.

TABLE 4.10-5 CITY OF CAMPBELL GENERAL PLAN GOALS, POLICIES, AND STRATEGIES PERTAINING TO NOISE

Goal/Policy/ Strategy Number	Goal/Policy/Strategy Text
Cultural and Natural Resource Element	
Goal CNR-10	*Protect the community, especially sensitive noise receptors such as schools, hospitals, and senior facilities, from excessive noise.*
Policy CNR-10.1	Noise Reduction: Reduce noise levels at the source.
Strategy CNR-10.1a	Noise Ordinance: Adopt and strictly enforce a Noise Ordinance that establishes noise standards for various noise-sensitive land uses and for all Zoning Districts.
Strategy CNR-10.1b	Minimization of Noise Exposure and Generation: Encourage practices and technologies that minimize noise exposure and noise generation in new development and redevelopment.
Strategy CNR-10.1c	Noise and New Development: Evaluate the potential for noise pollution and ways to reduce noise impacts when reviewing development proposals. Noise from Stationary Sources: New residential development shall conform to a stationary source noise exposure standard of 65 dBA for exterior noise levels and 45 dBA for interior noise levels. Acoustical studies shall be required for all new noise-sensitive projects that may be affected by existing noise from stationary sources. Where existing stationary noise sources exceed the City's noise standards, mitigation measures shall be implemented to reduce noise exposure to or below the allowable levels of the Noise Ordinance. Traffic-Related Noise: New residential development shall conform to a traffic related noise exposure standard of 60 dBA CNEL for outdoor noise in noise-sensitive outdoor activity areas and 45 dBA CNEL for indoor noise. New development, which does not and cannot be made to conform to this standard shall not be permitted. Acoustical studies, describing how the exterior and interior noise standards will be met, shall be required for all new residential developments with a noise exposure greater than 60 dBA CNEL. The studies should also satisfy the requirements set forth in Title 24, part 2, of the California Administrative Code, Noise Insulation Standards, for multiple-family attached residential projects, hotels, motels, etc., regulated by Title 24. Table CNR-2: Traffic-Related Noise Conditions at General Plan Buildout should be used as the basis to initially identify areas with potential excessive noise exposure.
Strategy CNR-10.1d	Noise Mitigation Measures: Review and require noise mitigation measures for development projects, including setbacks between uses, earth berms, sound walls, landscaping and site design that shields noise-sensitive uses with non-sensitive structures such as parking lots, utility areas and garages, or orients buildings to shield outdoor spaces from noise sources.
Strategy CNR-10.1e	Construction Noise Mitigation: Require mitigation measures during construction, including limits on operating times of noise producing activities (including vehicles).
Strategy CNR-10.1f	Sound Walls: In cases where sound walls are used as mitigation, they should be encouraged to help create an attractive setting with features such as setbacks, changes in alignment, detail and texture, pedestrian access (if appropriate) and landscaping.
Strategy CNR-10.1g	Expansion of Bay Area Airports: Participate in public forums regarding expansion of Bay Area Airports, including San Jose Airport and San Francisco International Airport, to ensure that future activities do not increase noise levels in Campbell.
Strategy CNR-10.1h	Helicopter Noise Reduction: Undertake measures to limit helicopter overflight noise in the City.
Strategy CNR-10.1i	Vehicle Noise Reduction: Employ roadway design, traffic signalization, reduced speed limits and other traffic management techniques to reduce noise caused by speed or acceleration of vehicles.
Strategy CNR-10.1j	Truck Traffic Limits: Limit commercial, industrial and construction truck traffic in residential areas.
Strategy CNR-10.1k	Vasona Light Rail: Work with VTA to identify potential noise impacts resulting from the planned Vasona Light Rail and develop adequate mitigation measures to reduce significant adverse impacts on residents and businesses.

TABLE 4.10-5 CITY OF CAMPBELL GENERAL PLAN GOALS, POLICIES, AND STRATEGIES PERTAINING TO NOISE

Goal/Policy/ Strategy Number	Goal/Policy/Strategy Text
Policy HS-6.2	Noise and Safety Impacts: Protect Campbell residents from noise and safety impacts associated with airport overflights. Campbell General Plan.
Strategy HS-6.2a	Protection from Noise and Safety Impacts: Work with the Federal Aviation Administration, San Jose International Airport, San Francisco International Airport, adjoining communities and other applicable organizations to protect Campbell residents from noise and safety impacts associated with airport overflights.

F. Acoustical studies required.

1. Acoustical studies. Acoustical studies are required for all new noise-sensitive projects that may be affected by existing noise from stationary sources, including all new residential developments with a noise exposure greater than 60 dBA CNEL. The studies shall also satisfy the requirements set forth in Title 24, Part 2, of the California Administrative Code, Noise Insulation Standards, for multiple-family attached residential projects, hotels, motels, etc., regulated by Title 24.

2. Mitigation measures. Where acoustical studies show that existing stationary noise sources exceed, or will exceed maximum allowable noise levels, mitigation shall be identified to reduce noise exposure to or below the allowable levels of this chapter. Mitigation measures may include increased setbacks between uses, earth berms, sound walls, landscaping, and site design that shields noise-sensitive uses with non-sensitive structures, (e.g., parking lots, utility areas and garages), or orientation of buildings to shield outdoor spaces from noise sources. In cases where sound walls are used as mitigation, they should be encouraged to help create an attractive setting with features such as setbacks, changes in alignment, detail and texture, pedestrian access (if appropriate) and landscaping.

G. Exemptions. Sound or noise emanating from the following sources and activities are exempt from the provisions of this chapter:

1. Municipal Code provisions. The provisions of this chapter shall not apply where noise standards are specified elsewhere in the Municipal Code.

2. City parks. The provisions of this chapter shall not apply to city-sanctioned recreational activities/programs conducted in public parks.

3. Safety, warning, and alarm devices. Safety, warning, and alarm devices, including house and car alarms, and other warning devices that are designed to protect the health, safety, and welfare, provided the devices are not negligently maintained or operated.

4. Schools. The normal operation of public and private schools typically consisting of classes, daytime recreation, and other school-sponsored activities.

5. Emergencies. Emergencies involving the execution of the duties of duly authorized governmental personnel and others providing emergency response to the general public, including sworn peace officers, emergency personnel, utility personnel, and the operation of emergency response vehicles and equipment. Also included is work by private or public utilities when restoring utility services.

6. Private construction. Private construction (e.g., construction, alteration or repair activities) between the hours of 8:00 a.m. and 5:00 p.m. Monday through Friday, and between the hours of 9:00 a.m. and 4:00 p.m. Saturday, in compliance with Section 18.04.052 of the Municipal Code. The community development director may impose further limitations on the hours and day of construction or other measures to mitigate significant noise impacts on sensitive uses.

7. Powered equipment. Powered equipment shall be limited to the hours of 8:00 a.m. and 7:00 p.m. Monday through Friday, and between the hours of 9:00 a.m. and 6:00 p.m. Saturday, Sunday and nationally recognized holidays.

8. City projects and activities. Noise from construction of public works projects and maintenance activities, or city-sponsored events, may be exempted from the provisions of the noise ordinance by the city manager or his designee should the public benefit of alternative work hours and or noise levels require such modification.

H. Violations/penalties. The violation of any provision contained in this chapter is declared to be a misdemeanor and shall be punishable as prescribed in Chapter 21.70 (Enforcement).

Section 21.16.090 Vibration.

Uses, activities, and processes shall not generate ground vibration that is perceptible without instruments by the average person at any point along or beyond the property line of the parcel containing the activities. Vibrations from temporary construction, demolition, and vehicles that enter and leave the subject parcel (e.g., construction equipment, trains, trucks, etc.) shall be exempt.

Section 18.04.052 Hours of construction—Time and noise limitations.

Construction activity shall be limited to the hours of 8:00 a.m. and 5:00 p.m. daily, Monday through Friday. Saturday hours of construction shall be 9:00 a.m. and 4:00 p.m. There shall be no construction activity on Sundays or National Holidays.

No loud environmentally disruptive noise over fifty dbs [sic], such as air compressors without mufflers, continuously running motors or generators, loud playing musical instruments or radios will be allowed

during the authorized hours of construction, Monday through Saturday, where such noise may be a nuisance to adjacent residential neighbors. Such nuisances shall be discontinued.[1]

Exception.

(a) Construction activity is permitted for homeowner permits, when the work is being performed by only the owner of the property, provided no construction activity or loud noises are conducted prior to 6:00 a.m. or after 7:00 p.m., Monday through Saturday, and prior to 8:00 a.m. or after 6:00 p.m. on Sundays or National Holidays.

(b) Where emergency conditions exist, as determined by the building official, construction activity or construction noise may be permitted at any hour or day of the week. Such emergencies shall be completed as rapidly as possible to prevent any disruption to the residential neighborhood.

(c) When the building official determines that construction activity and/or construction noises will not be detrimental to the adjacent neighbors, an exception to the time of work activity may be granted to the general contractor who shall be responsible for controlling the site for loud disruptive noises as described above. Hours of operation shall be determined by the building official on a case-by-case basis.

(d) If the building official determines that construction activity and/or construction noises, as described herein above, are unreasonably interfering in the reasonable use and enjoyment of adjacent properties, the building official shall notify the general contractor in writing that the exception has been voided and canceled and the construction time and noise conditions as described in Section 18.04.052 shall apply immediately and the general contractor shall be subject to the penalty(ies) as provided for in this code.

(1) Construction activity, under contracts awarded by the city (or redevelopment agency) for public improvements, shall be allowed during the working hours specified by the city engineer, as described in the construction project contract documents. Such working hours shall be designed to prevent unnecessary hazard or inconvenience to members of the public. In establishing such working hours, the city engineer may consider:

(A) The impact of the work on vehicular and pedestrian traffic;

(B) The proximity of the work to residential neighborhoods, schools, hospitals and libraries; and

(C) Other factors relating to the public safety, health and welfare.

(2) Deviation from the working hours specified in the contract documents shall be deemed a violation of a mandatory provision of the code.

[1] Per discussions with City staff, the "spirit" of this portion of the code is intended to prevent—to the greatest extent possible—the use of unusual equipment, loud stereos, or equipment that is not appropriately muffled.

Other Municipal Code Provisions

The Campbell Municipal Code contains additional provisions related to noise that are either very generalized or which pertain to highly specific activities that are not directly connected to proposed Plan adoption and implementation. The following are brief descriptions of these less applicable Municipal Code Provisions:

- Regulation of noise from Wireless Telecommunications Facilities, including noise from routine and emergency operation of associated equipment and/or generators.
- Restriction of noise from large family child care facilities, including limitations on noise level and the times at which elevated levels of noise may occur.
- Establishment of performance standards for adult-oriented businesses.
- Definition of Park Quiet Zones.
- Zoning-related prohibition of excessive noise or vibration that could create a nuisance or hazard, and establishment of procedures for determining adherence or potential exceptions to noise standards.
- Prohibitions of excessive or otherwise disturbing noise from animals.
- Prohibition of unreasonable or disturbing noises in parks.

4.10.1.3 EXISTING CONDITIONS

The EIR for the 2001 Campbell General Plan comprehensively discusses the main noise sources in the city: nearby freeways, as well as major arterial and collector roadways, commercial and industrial operations, and, to a lesser extent, noise from railway and aircraft activity. These main noise sources will also be predominant in the Plan Area; therefore, use of the 2001 General Plan EIR information will be consistent with a Plan-level noise environment analysis.

Sensitive Receptors

As discussed above in Section 4.10.1.1, sensitive receptors include residences, schools, hospital facilities, places of worship, and certain open space/recreation areas where quiet environments are necessary for the enjoyment, public health, and safety of the community. Sensitive receptors in the Plan Area and its vicinity include single- and multi-family residential, as well as institutional uses, such as daycare centers.

Noise Sources

On-Road Vehicles

On-road vehicles represent the most significant and constant source of noise in the Plan Area. Highway 17 runs parallel to the eastern boundary of the Plan Area, with the San Tomas Expressway and Highway 85

running, respectively, to the north and south of the Plan Area. Winchester Boulevard is a major north-south arterial that runs through the Plan Area. Although it is not as significant a thoroughfare, Dell Avenue is another north-south roadway that provides primary access to the Plan Area. Additional roadways traversing the Plan Area in a general east-west direction include Knowles Drive and Hacienda Avenue. The majority of traffic and resultant noise are associated with traffic flows on Winchester Boulevard, Highway 17, and to a lesser extent, the San Tomas Expressway and Highway 85. Although the preceding roadways comprise the most notable sources of on-road vehicle noise in the Plan Area, traffic on other minor roadways also contributes to the noise environment of the Plan Area to a lesser degree.

Data and figures included in the EIR for the 2001 General Plan indicate that noise levels associated with vehicular traffic along surface streets are typically in the range 65 to 75 dBA L_{eq} during the daytime, when measured at distances within 50 feet of the outermost lane. Nighttime noise levels would tend to be lower, due to reduced traffic volumes. These ranges of sound levels are within 50 feet of the roadway and would be experienced by first-row receptors. Second-row and more distant receptors would be expected to experience levels from 10 to 20 dBA below the noise levels experienced adjacent to the roadway, due to the combination of distance attenuation and barrier shielding from intervening structures.[2]

Traffic noise from vehicles on Highway 17 at the nearest noise measurement location, at a distance of approximately 1,150 feet from the center of the freeway, resulted in a 15-minute L_{eq} of 52.7 dBA. The Plan Area is separated from Highway 17 by numerous stormwater retention ponds, which provide between 1,100 and 1,500 feet of buffer distance. Intervening structures separate the Plan Area from Highway 85 with a buffer of about 1,350 feet, and from the San Tomas Expressway with a buffer of about 1,750 feet. Some portions of nearby Highway 85 have sound walls that serve to reduce noise immediately adjacent to the freeway. However, these soundwalls would have a minimal impact on noise perceived in the Plan Area, given the distance from the freeway. The noise monitoring location nearest Winchester Boulevard experienced a 24-hour noise level of 68.1 CNEL.

At more distant receptor locations within the Plan Area, freeway noise would be most noticeable during the early morning hours, particularly when the wind is blowing toward the receptors from the freeway or during strong temperature inversions (normally during the winter). At such times, the freeway noise can be characterized as a "low roar." Conversely, at locations near heavily traveled local streets, the freeway is not a significant contributor to the noise environment, since the local traffic noise dominates.

For many locations adjacent to freeways or major surface streets, the existing ambient noise level is above 60 dBA CNEL, which is the outdoor noise standard for residential land uses exposed to traffic noise in Campbell.

[2] First-row receptors are those that immediately face a noise source, without any substantial intervening structures; second-row receptors have one "row" of structures between them and the noise source, and so forth. Although receptors are not usually arranged in perfect rows, this is a simple means of describing the general number of intervening structures.

Railways

The Plan Area includes one, seldom-used Union Pacific rail line, which now exclusively serves the Hanson Permanente quarry and cement plant near Campbell.[3] As described in the EIR for the 2001 General Plan, this railway presently operates at very low frequencies, with approximately three train trips in each direction per week, usually during the daytime or early evening. Therefore, this railway contributes only very minimally to the community noise environment of the Plan Area.

Stationary-Source Noise

Stationary sources of noise may occur in association with all types of land uses, but stationary source noise that is sufficiently loud or constant so as to result in a significant impact under California Environmental Quality Act (CEQA) is usually only associated with industrial, or in some limited cases, certain commercial land uses. Currently, the Plan Area is mostly developed with commercial, light industrial, and office park uses. Commercial uses can generate noise from HVAC systems, loading docks, trash compactors, and other sources. Noise generated by commercial uses is generally short and intermittent. Industrial uses may generate noise from HVAC systems, loading docks, and machinery required for manufacturing or other industrial processes. Industrial uses may generate noise on a more continual basis, or intermittently, depending on the processes and types of machinery involved.

Service and industrial land uses, mostly light industrial, are located throughout the Plan Area, but are most-heavily concentrated to the east of Winchester Boulevard. Examples of such uses in the Plan Area include printing facilities, roofing contractors, construction firms, kitchen rental businesses, and auto body shops. The Plan Area also includes numerous technology firms, as well as dance and yoga studios, a café, and a USPS facility. All of these uses could contribute to noise from HVAC and other mechanical systems.

Airports and Heliports

The nearest public use airport is Norman Y. Mineta San Jose International Airport; approximately 5.7 miles to the northeast in the City of San Jose. The nearest private use airport is Reid-Hillview Airport of Santa Clara County, which is located approximately 8.5 miles to the east-northeast of the Plan Area. At these distances, aircraft would not contribute substantially to the noise environment of the Plan Area. Santa Clara Valley Medical Center operates a private heliport approximately 3.1 miles to the northeast of the Plan Area. However, helicopter takeoffs and landings from this site would be sporadic and would not occur in close enough proximity to the Plan Area to result in a substantial impact on its noise environment.

[3] The EIR for the 2001 Campbell General Plan indicates that trains for other industrial operations will on rare occasion use this rail line; however, other more recent planning documents indicate that such use of the rail line has either ceased or would be unlikely to occur within the Plan Area. Specifically, the General Plan for the City of Campbell, which shares this railway, indicates that the only rail trips through that city are those related to the quarry. There are presently no other industrial uses between the Plan Area and the Quarry that could contribute to traffic along this portion of the railway.

Noise Measurements

Noise measurements were taken in the Plan Area and its vicinity from August 18 through 19, 2014, together providing well-distributed geographical coverage of the Plan Area. This document uses two long-term and six short-term noise monitoring locations within the Plan Area, and two short-term monitoring locations just outside the Plan Area. Measurements were taken using the Larson Davis Model 820 noise monitor. The precise locations of the noise level measurements are shown in Figure 4.10-1, and Table 4.10-6 summarizes the noise monitoring results.

TABLE 4.10-6 SUMMARY OF NOISE MONITORING RESULTS

Monitoring Location	Start Date/Time	Duration	L_{eq}/CNEL
Short-Term Location 1	1:31 p.m. 8/18/2014	15 minutes	53.3 dBA $L_{eq\text{-}15min}$
Short-Term Location 2	2:01 p.m. 8/18/2014	15 minutes	60.8 dBA $L_{eq\text{-}15min}$
Short-Term Location 3	2:37 p.m. 8/18/2014	15 minutes	52.7 dBA $L_{eq\text{-}15min}$
Short-Term Location 4	2:58 p.m. 8/18/2014	15 minutes	60.0 dBA $L_{eq\text{-}15min}$
Short-Term Location 5	3:17 p.m. 8/18/2014	15 minutes	61.9 dBA $L_{eq\text{-}15min}$
Short-Term Location 6	4:09 p.m. 8/19/2014	15 minutes	50.5 dBA $L_{eq\text{-}15min}$
Short-Term Location 7	3:22 p.m. 8/19/2014	15 minutes	67.1 dBA $L_{eq\text{-}15min}$
Short-Term Location 8	3:45 p.m. 8/19/2014	15 minutes	53.7 dBA $L_{eq\text{-}15min}$
Long-Term Location 1	8/18/2014 (13:13) – 8/19/2014 (13:30)	24 hours	68.1 dBA CNEL
Long-Term Location 2	8/18/2014 (16:17)– 8/19/2014 (17:07)	24 hours	62.5 dBA CNEL

Short-Term Location 1

Short-term noise monitoring Location 1 represents the noise environment in the vicinity of potential redevelopment sites in the central portion of the Plan Area, and captured noise generated by mechanical equipment associated with nearby office and light industrial uses, as well as passing cars along Vandell Way. Existing land uses in the vicinity of this location include primarily light industrial and office park. This location was along Vandell Way, halfway between Winchester Boulevard and Dell Avenue, approximately 280 feet northwest of the intersection of Vandell Way and Dell Avenue. This location was approximately 2,000 feet northwest of Highway 17, 3,100 feet north of Highway 85, 3,300 feet southwest of the San Tomas Expressway, and approximately 600 feet southeast of Winchester Boulevard and the Union Pacific tracks. 15 minutes of noise measurements were acquired, beginning at 1:28 p.m. on Monday August 18, 2014.

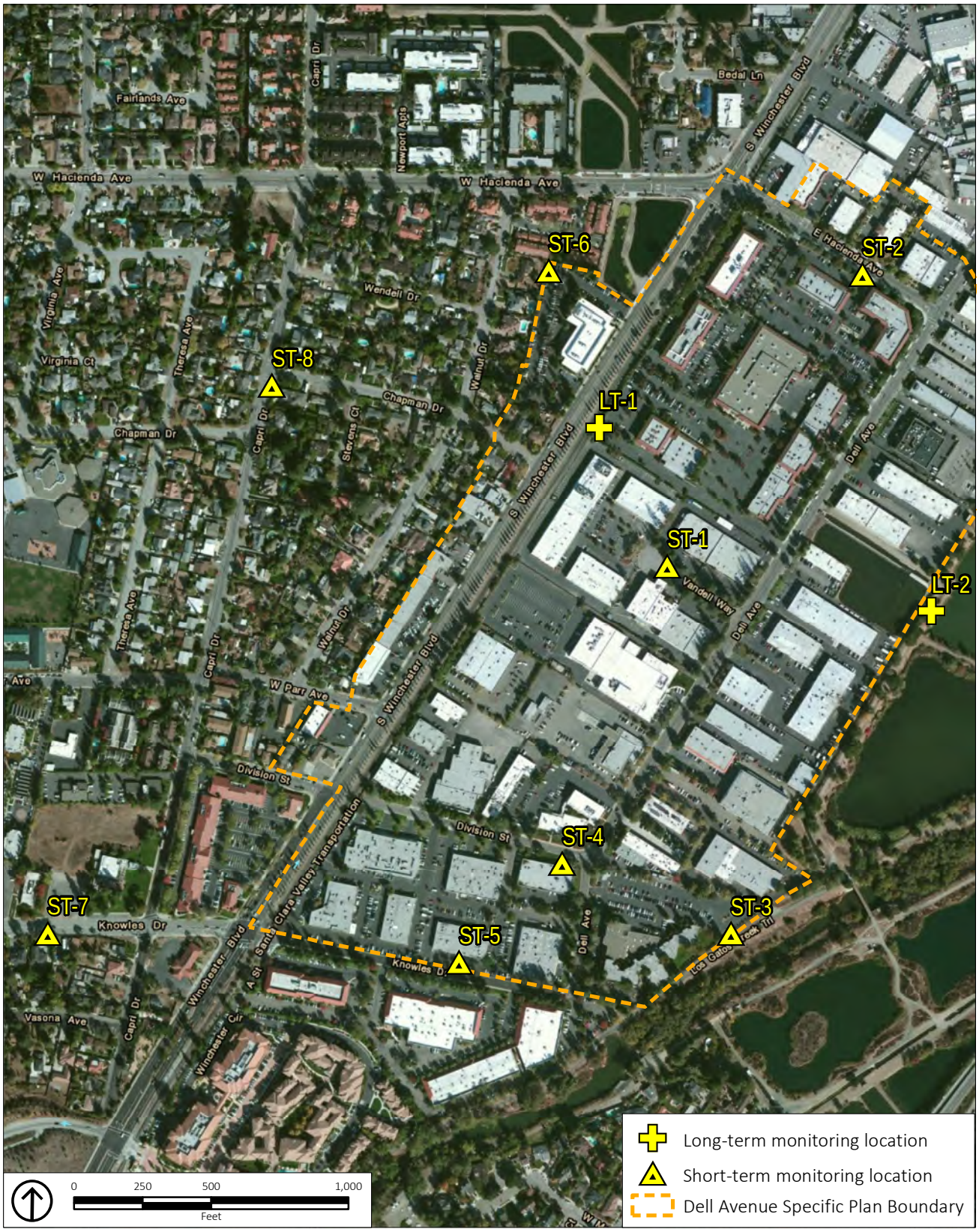


Figure 4.10-1
Noise Monitoring Locations

During the measurement period, winds were from the northeast at approximately 5 miles per hour (mph), and the air temperature was 79 degrees Fahrenheit (°F).

The noise environment of short-term Location 1 was a characterized by a mix of noise sources, including mechanical equipment associated with nearby uses, distant traffic noise along Dell Avenue, passing cars along Vandell Way, and sounds of birds. The 15-minute equivalent noise level at this location (L_{eq}) was 53.3 dBA.

Short-Term Location 2

Short-term noise monitoring Location 2 represents the noise environment in the vicinity of potential redevelopment sites in the northern portion of the Plan Area, and captured noise generated primarily by passing cars along East Hacienda Avenue and Dell Avenue. Existing land uses in the vicinity of this location include primarily light industrial and office park. This location was along East Hacienda Ave, approximately 210 feet northwest of its intersection with Dell Avenue. This location was 1,750 feet northwest of Highway 17, 0.8 miles northeast of Highway 85, 2,000 feet southwest of the San Tomas Expressway, and approximately 650 feet east of Winchester Boulevard and the Union Pacific line. Fifteen minutes of noise measurements were acquired, beginning at 1:55 p.m. on Monday August 18, 2014. During the measurement period, winds were from the northeast at approximately 7 mph, and the air temperature was 82°F.

The noise environment of short-term Location 2 was a characterized primarily by passing cars and trucks along East Hacienda Avenue, as well as more distant traffic noise along Dell Avenue. One train passage was noted, with the train consisting of two freight engines and not freight cars. Train noise included the sound of the engines, several horn honks, and the sound of the crossing gates. The 15-minute equivalent noise level at this location (L_{eq}) was 60.8 dBA.

Short-Term Location 3

Short-term noise monitoring Location 3 represents the noise environment in the vicinity of potential redevelopment sites in the southeastern portion of the Plan Area, and captured noise generated by distant traffic along Highway 17, nearby use of power tools, as well as cars using parking areas associated with adjacent light industrial and office uses. Existing land uses in the vicinity of this location include primarily light industrial and office park, with adjacent open space areas just to the east. This location was along the Los Gatos Creek trail, approximately 550 feet southeast of the intersection of Dell Avenue and Division Street. This location was 1,150 feet northwest of Highway 17, approximately 2,000 feet northeast of Highway 85, and approximately 1,425 feet southeast of Winchester Boulevard and the Union Pacific line. Fifteen minutes of noise measurements were acquired, beginning at 2:28 p.m. on Monday August 18, 2014. During the measurement period, winds were from the north at approximately 5 mph, and the air temperature was 79°F.

The noise environment of short-term Location 3 was a characterized by a mix of noise sources, including distant traffic noise along Highway 17, cars using the adjacent parking areas, and sound of activity at adjacent uses, including truck door slams and, less frequently, power tools. A few overflights by large aircraft were also noted. The 15-minute equivalent noise level at this location (L_{eq}) was 52.7 dBA.

Short-Term Location 4

Short-term noise monitoring Location 4 represents the noise environment in the vicinity of potential redevelopment sites in the southern portion of the Plan Area, and captured noise generated by traffic along Dell Avenue and Division Street. Existing land uses in the vicinity of this location include primarily light industrial and office park, with nearby open space areas approximately 600 feet to the southeast. This location was along the south side of Division Street, approximately 65 feet west of the intersection of Dell Avenue and Division Street. This location was one-third mile northwest of Highway 17, 2,000 feet northwest of Highway 85, and approximately 850 feet southeast of Winchester Boulevard and the Union Pacific line. Fifteen minutes of noise measurements were acquired, beginning at 2:48 p.m. on Monday August 18, 2014. During the measurement period, winds were light and variable, and the air temperature was 82°F.

The noise environment of short-term Location 4 was a characterized primarily by passing traffic along Division Street and Dell Avenue. More distant traffic along Winchester Boulevard and Highway 17 could also be discerned at times. The 15-minute equivalent noise level at this location (L_{eq}) was 60.0 dBA.

Short-Term Location 5

Short-term noise monitoring Location 5 represents the noise environment in the vicinity of potential redevelopment sites on the southern boundary of the Plan Area, and captured noise generated by traffic along Knowles Drive, as well as by HVAC equipment associated with adjacent office/light industrial uses. Existing land uses in the vicinity of this location include primarily light industrial and office park, with some uses having customer-serving storefronts. This location was along the north side of Knowles Drive 24 feet from the centerline of the roadway, and approximately 400 feet west-northwest of the intersection with Dell Avenue. This location was approximately 1,900 feet northwest of Highway 17, 1,475 feet northeast of Highway 85, and 750 feet east of Winchester Boulevard and the Union Pacific line. Fifteen minutes of noise measurements were acquired, beginning at 3:11 p.m. on Monday August 18, 2014. During the measurement period, winds were from the northwest at 5 mph with gusts to 8 mph, and the air temperature was 78°F.

The noise environment of short-term Location 5 was a characterized primarily by passing traffic along Knowles Drive, as well as by noise from nearby HVAC equipment associated with nearby uses. Traffic and transit vehicles along Winchester Boulevard could also occasionally be discerned. One distant overflight by a large aircraft was noted. The 15-minute equivalent noise level at this location (L_{eq}) was 61.9 dBA.

Short-Term Location 6

Short-term noise monitoring Location 6 represents the noise environment at the rear property lines of residential uses at the western boundary of the Plan Area, and captured noise generated by traffic along Winchester Boulevard, as well as by HVAC equipment associated with adjacent office and residential uses. Existing land uses in the vicinity of this location include single- and multi-family residential, and commercial office with surrounding parking. This location was at the boundary between commercial and residential uses at the rear of 3175 Winchester Boulevard, approximately 680 feet southwest of the intersection of Winchester Boulevard and Hacienda Avenue. This location was approximately 2,900 feet northwest of Highway 17, 4,000 feet northeast of Highway 85, 0.5 miles south of the San Tomas Expressway, and approximately 400 feet northwest of Winchester Boulevard and the Union Pacific line. Fifteen minutes of noise measurements were acquired, beginning at 4:07 p.m. on Monday August 18, 2014. During the measurement period, winds were light from the west, and the air temperature was 82°F.

The noise environment of short-term Location 5 was a characterized primarily by traffic along Winchester Boulevard, the sound of children at play at adjacent residences, as well as by noise from nearby HVAC equipment associated with nearby uses. One overflight by a small aircraft was noted. The 15-minute equivalent noise level at this location (L_{eq}) was 50.5 dBA.

Short-Term Location 7

Short-term noise monitoring Location 7 is representative of noise generated by major roadways and received by adjacent residential uses in the vicinity of the Plan Area, but within the town of Los Gatos. Existing land uses in the vicinity of the location were single-family residential, low-intensity commercial and medical offices. This location was in front of 388 Knowles Drive, approximately 38 feet from centerline of the roadway, and 700 feet from the centerline of Winchester Boulevard. The location was also approximately 1,000 feet to the north-northeast of the centerline of Highway 85, and 0.6 miles to the west of Highway 17. Beginning at 3:21 p.m. on Tuesday, August 19, 2014, 15 minutes of noise measurements were acquired. During measurements, winds were from the west at 7 mph, and the air temperature was 81°F.

The noise environment of short-term Location 7 was characterized primarily by the sound of traffic along Knowles Drive, with noise from traffic along Winchester Boulevard and Highway 85 discernible at times. No aircraft overflights were noted during noise measurements. The 15-minute equivalent noise level (L_{eq}) at this location was 67.1 dBA.

Short-Term Location 8

Short-term noise monitoring Location 8 represents the noise environment in the residential neighborhoods to the west of the Plan Area, and captured noise generated by distant traffic along Winchester Drive and Highway 85, as well as by passing vehicles along Capri Drive and Chapman Drive. Existing land uses in the vicinity of this location include single-family residential, with retail and light industrial further to the east. This location was along the east side of Capri Drive, approximately 50 feet south of its intersection with

Chapman Drive and 25 feet from the centerline of the roadway. This location was approximately 1,000 feet west of Winchester Boulevard and the Union Pacific line, 750 feet south of W Hacienda Avenue, 3,600 feet northwest of Highway 17, 3,150 feet north of Highway 85, and approximately 3,500 feet southwest of the San Tomas Expressway. 15 minutes of noise measurements were acquired, beginning at 3:44 p.m. on Monday August 18, 2014. During the measurement period, winds were from the west at 5 mph with gusts to 8 mph, and the air temperature was 81°F.

The noise environment of short-term Location 8 was a characterized primarily by distant traffic along Winchester Boulevard and Highway 17, as well as passing vehicles along Capris Drive and Chapman Drive. During a substantial portion of measurements, rustling leave, residential HVAC systems, and sounds from birds were the dominant sources of noise. One overflight by a small aircraft was noted. The 15-minute equivalent noise level at this location (L_{eq}) was 53.7 dBA.

Long-Term Location 1

Long-term noise monitoring Location 1 represents the noise environment in the vicinity of potential redevelopment sites in the central portion of the Plan Area, and captured noise generated by traffic along Winchester Boulevard, as well as the Union Pacific rail line. Existing land uses in the vicinity of this location include primarily light industrial and office park. This location was 100 feet southeast of Winchester Boulevard, approximately 215 feet northwest of its intersection with Chapman Drive. This location was approximately 2,500 feet northwest of Highway 17, 3,500 feet northeast of Highway 85, 3,000 feet southwest of the San Tomas Expressway, and approximately 40 feet southeast of the Union Pacific line. Noise level data over a 24-hour period were acquired, beginning at 1:18 p.m. on Monday August 18, 2014. At the start of the 24-hour measurement period, winds were from the northeast at 5 mph, and during the measurement period, the air temperature ranged from approximately 61°F to 81°F.

The noise environment of long-term Location 1 was a characterized by a mix of noise sources, including cars, trucks, service vehicles, and transit along Winchester Boulevard, as well as minor noise associated with the parking areas for adjacent commercial/light industrial uses. The sound of overflights by small aircraft could also occasionally be discerned. The 24-hour CNEL at this location was 68.1 dBA. The highest and lowest hourly L_{eq} levels observed at this location were, respectively, 69.6 dBA during the period of 8:00 a.m. to 9:00 a.m., and 53.2 dBA during the 1:00 a.m. to 2:00 a.m. hour. A time history chart of the hourly data for long-term Location 1 is included in Appendix C.

Long-Term Location 2

Long-term noise monitoring Location 2 represents the noise environment in the vicinity of potential redevelopment near the eastern edge of the Plan Area, and captured noise generated by traffic along Highway 17, adjacent business operations, and, to a lesser extent, activity along the Los Gatos Creek Trail. Existing land uses in the vicinity of this location include primarily light industrial and office park, with open space areas located immediately adjacent to the east. This location was 550 feet to the southeast of Dell Avenue at the rear of 1450 Dell Avenue. This location was approximately 1,100 feet northwest of Highway

17, 3,400 feet north of Highway 85, and approximately 1,400 feet southeast of the VTA tracks. Noise level data over a 24-hour period were acquired, beginning at 4:21 p.m. on Monday August 18, 2014. At the start of the 24-hour measurement period, winds were from the northeast at 5 mph, and during the measurement period, the air temperature ranged from approximately 61°F to 81°F.

The noise environment of long-term Location 2 was a characterized primarily by the sound of traffic along Highway 17, as well as minor noise associated with the parking and loading areas for adjacent commercial/ light industrial uses. The sound of overflights by small aircraft could also occasionally be discerned. The 24-hour CNEL at this location was 62.4 dBA. The highest and lowest hourly L_{eq} levels observed at this location were, respectively, 61.9 dBA during the period of 10:00 a.m. to 11:00 a.m., and 48.1 dBA during the 2:00 a.m. to 3:00 a.m. hour. A time history chart of the hourly data for long-term Location 2 is included in Appendix C.

4.10.2 STANDARDS OF SIGNIFICANCE

The proposed Plan would result in a significant noise impact if it would:

1. Expose persons to or generate noise levels in excess of standards established in the local general plan or noise ordinance, or applicable standards of other agencies.
2. Expose persons to or generate excessive ground-borne vibration or ground-borne noise levels.
3. Result in a substantial permanent increase in ambient noise levels in the project vicinity above levels existing without the project.
4. Result in a substantial temporary or periodic increase in ambient noise levels in the project vicinity above levels existing without the project.
5. For projects within an area covered by an airport land use plan or within 2 miles of a public airport or public use airport when such an airport land use plan has not been adopted, or within the vicinity of a private airstrip, expose people residing or working in the project area to excessive aircraft noise levels.
6. For a project within the vicinity of a private airstrip, expose people residing or working in the project area to excessive noise levels.

4.10.3 ENVIRONMENTAL IMPACT DISCUSSION

This section analyzes potential project-specific and cumulative impacts to noise.

NOI-1	**Implementation of the proposed Plan would not result in the exposure of persons to or generation of noise levels in excess of standards established in the General Plan or Municipal Code, or applicable standards of other agencies.**

Implementation of the proposed Plan would have a significant impact if it would expose new or existing sensitive receptors to incompatible levels of noise from either operations or increased traffic resulting from implementation of the proposed Plan.

Code of Regulations Title 24, California Building Code

Since the proposed Plan includes land uses that could result in the development of residential units, the indoor living spaces of future developments under the proposed Plan would be required to comply with the interior noise standards of Title 24 of the California Building Code. Based on the noise contours presented in the Campbell 2001 General Plan, as well as the short- and long-term measurements taken in the Plan Area, much of the Plan Area falls within areas that are potentially subject to ambient noise levels in excess of 60 dBA. Therefore, all applicants for future residential developments under the proposed Plan must submit a report with their building plans demonstrating how noise control measures incorporated into the design of the project would meet the 45 dBA interior noise limit for any habitable room for new residential buildings due to exterior noise. Compliance with Title 24 will therefore be addressed at the project level.

Campbell 2001 General Plan

The following discussion addresses how the proposed Plan would comply with each of the General Plan Goals, Policies, and Strategies discussed in Section 4.10.1.2, Regulatory Framework, above.

Implementation of the proposed Plan would comply with the following pertinent policies and actions of the General Plan 2025 in regard to the preventing the generation of or exposure to excess noise, as discussed further below.

- Goal CNR-10: The proposed Plan, through adherence to the specific policies and strategies subsequent to Goal CNR-10, would serve to protect the Campbell community from excessive noise.
- Policy CNR-10.1: Through adherence to specific strategies subject to Policy CNR-10.1, as well as through future individual project design and review, the proposed Plan would serve to ensure that noise levels are reduced at the source.
- Strategy CNR-10.1a: All future projects under the proposed Plan would comply with noise-related provisions of the Campbell Municipal Code, and the proposed Plan would therefore be consistent with this General Plan strategy.
- Strategy CNR-10.1b: All future projects under the proposed Plan would incorporate practices and technologies to reduce the generation or reception of noise, consistent with State and local regulations and policies. By incorporating such practices and technologies, as needed, the proposed Plan would be consistent with this General Plan strategy.
- Strategy CNR-10.1b: Future development under the proposed Plan would be evaluated for compliance with applicable City and State noise standards. If needed, future developments would either incorporate

strategies to meet those standards, or in limited cases, would be subject to findings indicating why compliance is not feasible. Compliance with these requirements would include ensuring that habitable areas in new residential developments do not experience interior noise levels in excess of 45 dBA CNEL, and that outdoor recreation areas of new residential developments do not experience noise levels in excess of 65 dBA CNEL from stationary sources or 60 dBA CNEL from traffic sources.

As individual projects are proposed, they would be required to either demonstrate that the ambient noise levels are acceptable for the given land use, or that the project would incorporate specific building design, insulation, or other noise attenuating techniques to ensure that interior and exterior living areas meet applicable standards. Additionally, during the design and project review phases of individual developments, project applicants would be required to demonstrate compliance with these standards; potential approaches to address noise issues related to these policies and actions include site design, shielding for stationary equipment, sound-rated windows and insulation, and berms or other landscape features.

Interior noise levels within buildings of standard residential construction are approximately 15 dBA lower than exterior noise levels with the windows partially open for ventilation. With the windows closed, standard residential construction typically provides 20 to 25 decibels of exterior to interior noise reduction. Where exterior noise levels range from 60 to 65 dBA CNEL, the interior noise level can typically be maintained below City standards (45 dBA CNEL), assuming standard construction methods, and the incorporation of forced air mechanical ventilation systems in residential units. These systems allow the occupant the option of controlling noise by closing the windows. In noise environments where exterior levels exceed 65 dBA CNEL exterior-to-interior noise reduction features, such as sound-rated building elements (e.g., wall systems, windows, and doors), are required to maintain interior noise levels at or below 45 dBA CNEL. Future projects proposed under the proposed Plan would be required to demonstrate compliance with this strategy and Strategy CNR-10.1d. This would ensure that future development meets the City's exterior and interior noise standards, and would not expose residents to excessive noise levels.

The proposed Plan would potentially locate new residential uses along Winchester Boulevard, which currently experiences ambient noise levels from traffic in excess of 60 dBA. Under policy CNR-10.1 and strategies CNR-10.1a through CNR-10.1c, new residential uses along this corridor would be required to demonstrate that outdoor areas hosting noise-sensitive activities would not be exposed to these excessive noise levels. As discussed above, second-row receptors (i.e., those located behind a first row of structures) typically experience a 10 to 20 dBA reduction in noise levels from first row structures. Long-term noise measurement site LT-1 was located in close proximity to Winchester Boulevard and the Union Pacific rail line. Twenty-four-hour ambient noise levels at this location were 68.1 dBA CNEL. No intervening structures were present between Winchester Boulevard and this noise measurement location; therefore, anticipated noise levels behind a first row of buildings along Winchester Boulevard would range from 48.1 to 58.1 dBA CNEL. Thus, by locating outdoor areas subject to noise-sensitive activities at the rear of proposed structures, the 60 dBA standard could likely

be achieved in many cases. For residential units located above ground-floor retail/commercial uses, noise attenuation is much less pronounced than for the second-row receptors described above. Specifically, at building heights of five stories or less, noise levels perceived by residential units over commercial would be generally similar to those experienced at the ground floor, with some modest decreases due to height. Thus, for this size building, it is typical to conservatively exclude any consideration of how height decreases reception of exterior noise.[4] As individual developments are proposed under the proposed Plan, each one would undergo project-level environmental review (including appropriate, site-specific considerations for both horizontal and vertical sound propagation characteristics) to confirm that selected approaches are sufficient to limit noise levels in noise-sensitive outdoor areas to 60 dBA CNEL.

- Strategy CNR-10.1d: Consistent with the discussion regarding Strategy CNR-10.1c, above, future development under the proposed Plan would be required to undergo review by the City and incorporate appropriate noise mitigations at the time of project approval. In light of this requirement, the Plan would comply with this strategy.
- Strategy CNR-10.1e: Construction of future development under implementation of the proposed Plan would, as necessary, be required to implement mitigation measures to prevent the generation of excessive noise, or to otherwise ensure that sensitive receptors do not experience excessive noise. Potential construction-related noise impacts and mitigation measures to reduce those impacts are discussed further under impact NOISE-4, below. The proposed Plan would therefore comply with this strategy.
- Strategy CNR-10.1f: The proposed Plan does not currently incorporate plans for soundwalls; however, in the event that soundwalls are proposed pursuant to implementation of the proposed Plan, those soundwalls would be planned and constructed in a manner that conforms to this policy.
- Strategy CNR-10.1g: Implementation of the proposed Plan would not impede or otherwise affect City participation in airport planning efforts; therefore, implementation of the proposed Plan would comply with this policy.
- Strategy CNR-10.1h: Implementation of the proposed Plan would not impede or otherwise affect City efforts to reduce noise from helicopters; therefore, implementation of the proposed Plan would comply with this policy.
- Strategy CNR-10.1i: As changes and improvements are made to roadways in the Plan Area, specific road projects would be evaluated for their compliance with applicable City policies and standards. New or modified roadways within the proposed Plan would be designed to maximize efficiency and public

[4] Above five the stories, the amount of decrease at each level would depend mostly upon the width and configuration of the adjacent roadway. For much taller buildings where the building height far exceeds the width of the adjacent roadway, the exact configuration and width of the roadway below is much less important for residents living on higher floors. However, these determinations would be highly dependent on local conditions, so it is not possible to make a general statement about the impact of being on an upper floor with regard to adherence to standards for the interior noise environment of potential new units.

benefit, while minimizing impacts. Given that roadways built or changed under the proposed Plan would conform with City policies, the proposed Plan would comply with this policy.

- Strategy CNR-10.1j: Implementation of the proposed Plan would not impede or otherwise affect City efforts to reduce noise from truck traffic in residential neighborhoods. Although implementation of the proposed Plan could impact the volume or routes of truck traffic, these changes are not anticipated to result in increased levels of truck traffic in residential neighborhoods. Rather, it is expected that truck traffic will continue to primarily use Dell Avenue, Winchester Boulevard, and adjacent freeways, consistent with existing traffic patterns. Therefore, implementation of the proposed Plan would comply with this policy.
- Strategy CNR-10.1k: Implementation of the proposed Plan would not impede or otherwise affect City participation in planning efforts for Vasona Light Rail, including those to develop mitigations to reduce noise impacts on residents and businesses; therefore, implementation of the proposed Plan would comply with this strategy.
- Policy HS-6.2: Implementation of the proposed Plan would not impede or otherwise affect City efforts to protect residents from noise impacts resulting from aircraft overflights; therefore, implementation of the proposed Plan would comply with this policy.
- Strategy HS-6.2a: See discussion regarding Policy HS-6.2, above.

Campbell Municipal Code

Overall, the numerical noise standards included in the Campbell Municipal Code match those incorporated into the policies of the Campbell 2001 General Plan. For residential uses, the Code regulates exterior and interior noise levels from stationary and traffic-related noise sources. Consistent with the policies of the General Plan, the Municipal Code limits residential interior noise levels to 45 dBA CNEL, and limits exterior noise levels in sensitive outdoor areas to 65 dBA CNEL from stationary sources and 60 dBA from traffic sources. Consistent with the discussion above, as individual projects come forward under implementation of the proposed Plan, they would be required to demonstrate conformance with these standards, either as a result of sufficiently quiet surroundings, or through the incorporation of specific design, construction, or other mitigation measures.

Future development of projects under implementation of the proposed Plan would be required to conform with applicable Municipal Code provisions relating to conducting acoustical studies and implementing appropriate mitigation measures. As individual projects are proposed under the proposed Plan, they would be required during review to comply with this and corresponding requirements for acoustical studies under the State's Title 24 energy efficiency standards. Projects would subsequently be required to incorporate those mitigation measures deemed by the acoustical study to be necessary to meet local and State requirements.

Currently, the Plan Area is mostly developed with industrial, commercial, and a minimal amount of residential land uses. In an urban setting like Campbell, as demonstrated in the results on the ambient noise level measurements, the major sources of noise are related to transportation, even in the presence of commercial and light-industrial uses. Commercial and industrial uses can generate noise from HVAC systems, loading docks, trash compactors, industrial equipment, and other sources. Noise generated by commercial uses is generally short and intermittent and would usually be overshadowed by traffic noise. Noise from industrial uses may in some cases be more continuous. Nevertheless, the proposed Plan does not propose to directly juxtapose noise-sensitive uses with land uses typically associated with generation of excessive noise. Under the land use component of the proposed Plan, most new uses would be "tech" offices, with little to no activity requiring significant industrial machinery. Uses relating to technology component manufacturing or technology product assembly at a small scale would be allowed only on a limited basis; and potential food and drink uses would be located on the easternmost side of the Plan Area, far from existing and proposed residential uses. The Campbell Municipal Code does not contain any quantitative noise standards or regulations related specifically to the generation or reception of industrial or commercial noise. Any issues relating to excessive industrial or commercial noise at sensitive receptors would therefore be governed by the interior/exterior noise standards discussed above, and reviewed at the project-level.

Most other noise-related provisions of the Municipal Code relate to specific, point sources of noise, such as barking dogs or loud gatherings. Noise from such sources would continue to be regulated on a complaint basis, subject to the jurisdiction of local law enforcement. Title 21 contains general directives for projects and uses to appropriately analyze and prevent excessive noise impacts, with compliance with these provisions taking place during project review, as individual projects are proposed. Any commercial or industrial developments proposed under implementation of the proposed Plan would be required to demonstrate during project review that they would not generate excessive levels of noise that could have deleterious impacts on the welfare of sensitive receptors. For additional discussion of potential noise impacts related to industrial and commercial operations, see impact NOISE-3.

With regard to vibration, the Campbell Municipal Code requires that "Uses, activities, and processes shall not generate ground vibration that is perceptible without instruments by the average person at any point along or beyond the property line of the parcel containing the activities." However, the Code also exempts construction activities from this provision. In general, only industrial land uses, typically heavy industrial, are associated with operations-related generation of excessive vibration. Given that the Plan Area currently features a mix of commercial, light industrial, and residential, and would continue to allow only limited manufacturing, it is unlikely that implementation of the proposed Plan would result in the development of uses that could generate vibration perceptible beyond the property line. Additionally, vibration tends to attenuate rapidly with distance, with 200 feet serving as a typical screening distance for vibration impacts. Given that the vast majority of new uses would be located greater than 200 feet from existing or proposed sensitive receptors the likelihood of vibration impacts would be further diminished. As individual projects are proposed, or as particular land uses undertake specific activities, those projects and activities would be

subject to review and regulation by the City to prevent excessive vibration. (For additional discussion of vibration impacts, see discussion under impact NOISE-2.)

Overall, required project-level compliance with applicable State and local regulations relating to interior and exterior noise, noise generation, and vibration would serve to ensure that implementation of the proposed Plan would not result in violations of applicable noise and vibration standards. Therefore, in this regard, the proposed Plan would result in a *less-than-significant* impact.

Significance Before Mitigation: Less than significant.

NOISE-2	**Implementation of the proposed Plan could result in the exposure of persons to or generation of excessive groundborne vibration or groundborne noise levels.**

Specific quantitative thresholds for what is considered "excessive" vibration or groundborne noise are not identified in CEQA. Furthermore, the City of Campbell has not established such thresholds. Since perception of vibrations varies between individuals, it is necessary to establish a quantitative threshold that reflects levels of vibration typically capable of causing perception, annoyance, or damage. Therefore, based on criteria from the Federal Transit Administration (FTA), which are regarded as standard practice, a significant impact would occur if:

- Implementation of the proposed Plan would result in ongoing exceedance of the criteria for annoyance presented in Table 4.10-3.
- Implementation of the proposed Plan would result in vibration exceeding the criteria presented in Table 4.10-3 that could cause buildings architectural damage.

The following discusses potential vibration impacts generated by short-term construction and long-term operations that may occur under implementation of the proposed Plan.

Short-Term Construction Vibration Impacts

Under implementation of the proposed Plan, potential demolition and construction associated with individual development and infrastructure projects would take place on a variety of schedules over an extended period of time. Any construction-related vibration for a particular project would be limited to the timeframe of demolition and construction, and would also be limited geographically to the areas closest to vibration-intensive construction activities. Construction could include site preparation work, demolition, excavation, foundation work, and erecting of new structures.

The effect of vibration on buildings in the vicinity of a construction site varies depending on soil type, ground strata, and receptor-building construction. The results from vibration can range from no perceptible effects at the lowest vibration levels, to low rumbling sounds and perceptible vibrations at moderate levels,

to slight structural damage at the highest levels. Vibration from construction activities rarely reaches the levels that can damage structures, but groundborne vibration and groundborne noise can reach perceptible and audible levels in buildings that are very close to the construction site.[5]

As shown in Table 4.10-7, which lists vibration levels for construction equipment, pile driving is the construction technique with the greatest potential to generate high ground vibration levels and is of primary concern in regard to structural damage, particularly when it occurs within 100 feet of structures. Other construction activities, such as caisson drilling, the use of jackhammers, rock drills and other high-power or vibratory tools, and the use of rolling stock equipment (e.g., tracked vehicles and compactors) may also potentially generate substantial vibration in the immediate vicinity.

TABLE 4.10-7 GROUNDBORNE VIBRATION LEVELS FOR CONSTRUCTION EQUIPMENT

Equipment	Approximate Velocity Level at 25 Feet (VdB)	Approximate PPV[a] Velocity at 25 Feet (inch/sec)
Pile Driver (Impact) Upper Range	112	1.518
Pile Driver (Impact) Lower Range	104	0.644
Pile Driver (Sonic) Upper Range	105	0.734
Pile Driver (Sonic) Lower Range	93	0.170
Large Bulldozer	87	0.089
Caisson Drilling	87	0.089
Jackhammer	79	0.035
Small Bulldozer	58	0.003
Loaded Trucks	86	0.076

Source: Federal Transit Administration, *Transit Noise and Vibration Impact Assessment*, 2006.

Demolition, excavation, and grading activities typically generate the highest vibration levels during construction activities. Except for pile driving, maximum vibration levels measured at a distance of 25 feet from an individual piece of typical construction equipment rarely exceed the thresholds for human annoyance for industrial uses (i.e., 84 to 90 VdB) or the thresholds for architectural damage at any type of receptor land use (i.e., 0.2 to 0.5 RMS velocity in inches per second). The potential for annoying or damaging vibration from construction activities associated with implementation of the proposed Plan depends on the construction method proposed for individual projects, per City regulations, and as required

[5] Federal Transit Administration (FTA), 2006. Transit Noise and Vibration Impact Assessment. United States Department of Transportation. FTA-VA-90-1003-06.

by CEQA, individual projects would be evaluated for their potential of annoying or damaging vibration as they are proposed. Potential impacts at the project-level would be determined by the anticipated equipment mix, and local site conditions.

Given that construction and demolition activities through implementation of the proposed Plan could make use of vibration-intensive construction equipment (i.e., pile drivers or excavators), that construction could take place in close proximity to existing structures and sensitive uses, and that the City of Campbell does not currently have in place regulations or General Plan policies that would serve to limit vibration from construction activities, construction activities could result in levels of vibration sufficient to cause architectural damage and/or human annoyance. Thus, overall implementation of the proposed Plan would potentially result in the exposure of people to or generation of excessive levels of construction-related vibration, and the impact would be *significant*.

Significance Before Mitigation: Potentially significant (Construction Vibration).

Vibration Related to Operations

The proposed Plan includes commercial, light industrial (primarily "tech"), and residential mixed-use land uses. None of these uses are typically associated with the potential generation of perceptible and/or potentially damaging levels of vibration on an ongoing basis, though light industrial uses are more likely to result in vibration than the other proposed uses. Heavy industrial uses, which have greater potential to result in significant vibration, are not included as part of the proposed Plan. As discussed further in the project description, the majority of proposed uses in the Plan Area would be related to "Tech" and complimentary uses. Two novel land uses, "CoreTech" and "CoreTech Complimentary" are proposed:

- CoreTech: "Professional uses related to the innovation and product development of consumer electronics, software, and web solutions for consumers and businesses. Additional core tech uses include mobile devices and software, social media startups, data processing and web hosting, online retail, information systems, and research and development that is supportive of these uses," and
- CoreTech Complimentary: "Professional services, such as professional consultants, engineering and design firms, and financial, insurance and real estate related services. Similarly, biotechnology, scientific labs, and healthcare facilities, along with technology component manufacturing or technology product assembly at a small scale, may also be appropriate on a limited basis."

Given that the CoreTech uses would not involve large-scale use of industrial machinery typically associated with the generation of excessive vibration, it is unlikely that uses in this category would generate vibration perceptible at nearby receptors. CoreTech complimentary would include "technology component manufacturing or technology product assembly." However, as noted above, such uses would be at a small scale and would only be deemed appropriate on a limited basis. Furthermore, this limited basis would need to be consistent with provisions of the Campbell Municipal Code and the performance standards of the Zoning Code, which require that uses not generate excessive vibration this is perceptible beyond the

property boundary of the generating use. As individual uses and developments are proposed, they would be required to undergo project-level environmental review to determine their particular potential for vibration impacts. Therefore, through adherence to applicable City regulations and through subsequent environmental review, operations-related vibration impacts would be reduced to a *less-than-significant* level.

Significance Before Mitigation: Less than significant (Operations Vibration).

NOISE-3	**Implementation of the proposed Plan would not result in a substantial permanent increase in ambient noise levels in the Plan Area and vicinity above levels existing without implementation of the Plan.**

Implementation of the proposed Plan would have a significant impact if it would result in a substantial permanent increase in ambient noise levels in the Plan Area and vicinity above levels existing without implementation of the Plan. CEQA does not define what noise level increase would be considered substantial; however, the common practice in impact assessments generally considers any 5 dBA or greater increase due to a project to be substantial, and considers a 3 dBA or greater increase due to a project to be substantial if the resulting noise level would be in excess of an applicable ambient noise level standard. The City of Campbell does not establish specific thresholds for ambient noise increases. Thus, in the absence of explicit thresholds, the aforementioned +5 and +3 dBA thresholds are used for evaluating substantial permanent increases to ambient noise levels.

Operational Noise

Noise is regulated by numerous codes and ordinances across federal, State, and local agencies. Implementation of the proposed Plan would potentially result in the development of commercial retail, tech-related commercial office and light industrial, and residential mixed use. Ongoing occupancy and use of residences, commercial uses, and light industrial uses would involve noise-generating activities and equipment that would be similar to those that currently exist in the area, including landscaping, maintenance, HVAC systems, and day-to-day activity by residents and workers.

Landscaping, maintenance, HVAC systems, and human activity are all intermittent sources of low-level noise that typically occur with residential and commercial land uses. The frequency, intensity, and duration of these activities tend to vary over time depending on any number of factors, and development allowed by the proposed Plan is anticipated to result in their continued occurrence.

In addition to the noise sources associated with residential and commercial uses, light industrial uses may generate noise from manufacturing equipment, utility vehicles, and other industrial machinery. Though most of these activities take place in indoor areas, some machinery may include exterior components, such as exhaust systems, that would introduce noise to the surrounding environment. Similarly, use of vehicles and other mobile equipment may take place both indoors and outdoors

Implementation of the proposed Plan would include an increase in the number of dwelling units and residents, as well as potential increases in the number of commercial and office uses and workers; it can therefore be assumed that there would be some marginal increase in the noise resulting from basic human activity and building systems such as HVAC. Overall, such activities and systems associated with new residential, retail, and office uses are not typically considered to be a source of excessive noise that would result in a significant impact to ambient noise levels in an already urbanized area. Additionally, since this area already includes numerous commercial and light industrial uses, it is unlikely that a change to similar uses with an emphasis on technology development would result in a significant increase to operations-related noise.

Implementation of the proposed Plan could also introduce new light-industrial uses, namely small-scale technology component manufacturing or technology product assembly. These uses could result in generation in the sort light-industrial noise discussed above; however, such uses would be small scale and limited within the Plan Area. Moreover, given the Plan Area is already developed with small-scale light-industrial uses, the noise generated by new small scale manufacturing and assembly uses is not anticipated to differ greatly from existing noise, in regard to either subjective quality or noise-level.

Implementation of the proposed Plan would also introduce new mixed-use residential to the west side of Winchester Boulevard; however, residential uses are not typically regarded as a source of excessive noise sufficient to result in significant impacts. In addition to the low probability of these new residential uses generating excessive noise, any noise generated by these uses would likely be less than that generated by existing uses, and such noise would remain subject to the regulations of the Campbell Municipal Code. Any excessive noise from human activity at residential sources, such as loud music, conversation, or animals, would be subject to the provisions of Chapter 6.10, Nuisance Abatement, and/or Title 7, Animals, among others. Additionally, the proposed Plan would include the following development standards that would serve to buffer existing residential uses from new residential uses:

- Parcels in the proposed Plan West District that are adjacent to existing single-family residential uses are required to ensure transitions in development scale downward to the single-family residential development. No buildings are permitted within 24 feet of single-family residences.
- Building heights in the proposed Plan West District are required to follow a “wedding-cake” model, locating taller building elements along the street frontage.

Given these considerations, routine ongoing activities and operations of newly developed land uses in the Plan Area would not contribute to a substantial permanent increase to ambient noise levels.

On-Road Vehicle Noise

The new residences and commercial uses that are allowed by the proposed Plan would increase the population of the area by up to 726 new residents, with many residents continuing to make trips by private automobile. As shown in Section 4.13, Transportation and Traffic, of this Draft EIR, the proposed Plan is

anticipated to generate 2,487 daily net vehicle trips, with 493 new net trips over existing conditions; this increased traffic could result in higher ambient noise levels. Noise would be generated primarily by vehicular traffic, with sensitive receptors along major roads experiencing the greatest potential impact.

Given that the overall mix of vehicles and daily travel patterns of residents and workers are not expected to change significantly under the proposed Plan, potential increases to traffic noise are purely a function of increases to traffic volumes on roadways in the Plan Area. Table 4.10-8 illustrates the increases to 24-hour ambient noise levels that would be expected on the primary roadways serving the Plan Area. Based on these projections, increased traffic associated with implementation of the proposed Plan itself would not result in increases to ambient noise levels of 3 dBA or greater. Even accounting for the cumulative impact of anticipated future growth, implementation of the proposed Plan would not result in increases of 3 dBA or greater that could result in noise levels that are unacceptable for surrounding land uses or in violation of other local exterior noise standards. Given that the analysis shows no significant increase in noise levels on the Plan Area roadways that would be most impacted, it can be assumed that other roadways in the vicinity would likewise not experience a significant increase in traffic noise, since they would handle an even lower proportion of traffic increases related to implementation of the proposed Plan.

Overall, routine ongoing activities and operations of newly developed land uses and on-road vehicles in the Plan Area would not contribute to a substantial permanent increase to ambient noise levels, and the impact would be *less than significant*.

Significance Before Mitigation: Less than significant.

NOISE-4	**Implementation of the proposed Plan would not result in a substantial temporary or periodic increase in ambient noise levels in the Plan Area and vicinity above levels existing without implementation of the Plan.**

Implementation of the proposed Plan would have a significant impact if it would result in a substantial temporary or periodic increase in ambient noise levels in the Plan Area or vicinity above levels existing without implementation of the proposed Plan. Such temporary or periodic increases are typically associated with construction activity, and construction activity could occur at various times throughout implementation of the proposed Plan as individual projects are developed.

Temporary or periodic increases in ambient noise levels under implementation of the proposed Plan would chiefly result from construction activities associated with demolition, excavation, and construction associated with individual projects. Table 4.10-9 below shows typical noise levels generated by commonly dozers, scrapers, and trucks. Typical equipment to be used for construction phases of projects includes backhoes, cranes, aerial lifts, generators, pumps, dumpers, rollers, and pavers. In some limited instances, individual projects may use rock blasters or pile drivers.

TABLE 4.10-8 EXISTING AND PROJECTED ROADWAY TRAFFIC VOLUMES AND RESULTING NOISE LEVEL INCREASES

Roadway Segment	Existing Average Daily Traffic	2040 Average Daily Traffic (No Project)	2040 Average Daily Traffic (With Project)	Projected Noise Level Increase (dBA)[a]		
				Cumulative Noise Increase (No Project)	Cumulative Noise Increase (With Project)	Noise Increase from Proposed Plan Implementation
Dell Avenue, from E Sunny Oaks Ave to E Hacienda Ave	3,629	4,057	4,005	+0.5	+0.4	-0.1
Dell Avenue, from E Hacienda Ave to Knowles Drive	3,804	4,227	4,180	+0.5	+0.4	0.0
Winchester Boulevard, from San Tomas Expwy to E Hacienda Ave	16,712	22,120	27,867	+1.2	+2.2	+1.0
Winchester Boulevard, from E Hacienda Ave to Knowles Drive	12,733	14,227	20,492	+0.5	+2.1	+1.6
Winchester Boulevard, from Knowles Drive to Hwy 85	13,855	15,669	18,773	+0.5	+1.3	+0.8
Highway 17, from Camden Ave to Hwy 85	125,792	143,699	143,416	+0.6	+0.6	+0.0
W Sunnyoaks Ave, from Virginia Ave to Winchester Blvd	9,134	10,551	10,309	+0.6	+0.5	-0.1
E Sunnyoaks Ave, from Winchester Blvd to Camden Ave	3,126	3,702	4,192	+0.7	+1.3	+0.5
W Hacienda Ave, from Virginia Ave to Winchester Blvd	7,990	11,887	11,930	+1.7	+1.7	0.0
E Hacienda Ave, from Winchester Blvd to Dell Avenue	543	576	572	+0.3	+0.2	0.0
Knowles Drive, from Winchester Blvd to Dell Avenue	1,009	982	973	-0.1	-0.2	0.0
Highway 84, from Winchester Blvd to Highway 17	124,245	146,155	145,015	+0.7	+0.7	0.0
San Tomas Expwy, from Winchester Blvd to Highway 17	57,225	71,149	73,956	+0.9	+1.1	+0.2

a. Resulting maximum theoretical increase CNEL or Ldn from projected traffic increases.
Source: PlaceWorks, 2014, based on traffic volumes provided by W-Trans in 2014.

TABLE 4.10-9 EQUIPMENT NOISE EMISSION LEVELS FOR COMMON CONSTRUCTION EQUIPMENT

Construction Equipment	Typical Noise Level (dBA) At 50 Feet	Construction Equipment	Typical Noise Level (dBA) At 50 Feet
Air Compressor	81	Paver	89
Backhoe	80	Pneumatic Tool	85
Ballast Equalizer	82	Pump	76
Ballast Tamper	83	Rail Saw	90
Compactor	82	Rock Drill	98
Concrete Mixer	85	Roller	74
Concrete Pump	71	Saw	76
Concrete Vibrator	76	Scarifier	83
Crane, Derrick	88	Scraper	89
Crane, Mobile	83	Shovel	82
Dozer	85	Spike Driver	77
Generator	81	Tie Cutter	84
Grader	85	Tie Handler	80
Impact Wrench	85	Tie Inserter	85
Jack Hammer	88	Truck	88
Loader	85		

Source: Federal Transit Administration, 2006, *Transit Noise and Vibration Impact Assessment*.

Construction noise impacts typically occur when construction activities take place during noise-sensitive times of the day (e.g., early morning, evening, or nighttime hours), when construction activities occur immediately adjacent to noise sensitive land uses, or when construction durations last over extended periods of time. Although construction activities may briefly or occasionally serve to elevate ambient noise levels at adjoining sensitive receptors, these impacts would generally be limited to the temporary demolition and construction periods. Limiting construction activities to daytime hours is often a simple method to reduce the potential for construction noise impacts. In areas immediately adjacent to construction activities, used pieces of construction equipment, but is not meant to imply that all the equipment listed would be used for the construction of development projects allowed by the proposed Plan. Typical equipment used for demolition and site preparation of individual projects could include excavators, skid steer loaders, graders,

temporary noise barriers and the selection and utilization of "quiet" construction equipment can also reduce the potential for significant noise impacts.

The Municipal Code contains provisions, which would serve to reduce the impact from construction noise. As discussed above, Chapter 18.04.052 specifies that "construction shall be limited to the hours of 8:00 a.m. and 5:00 p.m. daily, Monday through Friday. Saturday hours of construction shall be 9:00 a.m. and 4:00 p.m. There shall be no construction activity on Sundays or National Holidays." Additional construction restrictions empower building officials to disallow or impose additional requirements on construction activity that is environmentally disruptive or detrimental of adjacent neighbors. As individual projects are proposed, project-level review would be necessary to evaluate and mitigate potential impacts from the particular construction activities associated with each project. Additionally, the majority of construction activities associated with implementation of the proposed Plan would take place east of Winchester Boulevard, at least 120 feet away from the nearest existing sensitive receptors, and often considerably farther.

Through individual project review and through compliance with the permissible hours and other requirements for construction activities stipulated in the City's Municipal Code, the proposed Plan would not result in substantial temporary or periodic increases in ambient noise levels in the Plan Area and its vicinity, and the impact would be *less than significant*.

Significance Before Mitigation: Less than significant.

NOISE-5	**Implementation of the proposed Plan would not expose people residing or working in the vicinity of the Plan Area to excessive aircraft noise levels, for a project located within an airport land use plan, or where such a plan has not been adopted, within 2 miles of a public airport or public use airport.**

The Plan Area is not within an airport land use plan or within 2 miles of a public use airport. The nearest public use airport is Norman Y. Mineta San Jose International Airport, approximately 5.7 miles to the northeast in the City of San Jose. Given the distance from the Plan Area to the nearest airport, future residents and workers would not be exposed to excessive noise from aircraft using a public use airport, and there would be *no impact*.

Significance Before Mitigation: No impact.

NOISE-6	**Implementation of the proposed Plan would not expose people residing or working in the project area to excessive noise levels, for a project within the vicinity of a private airstrip.**

There are no private use airstrips or airports within 2 miles of the Plan Area. The nearest private use airport is Reid-Hillview Airport of Santa Clara County, which is located approximately 8.5 miles to the east-northeast of the Plan Area. Santa Clara Valley Medical Center operates a private heliport approximately 3.1 miles to the northeast of the Plan Area; however, helicopter takeoffs and landings from this site would be sporadic and would not occur in close enough proximity to the Plan Area to result in substantial perception of noise. Therefore, future residents or workers in the Plan Area would not be exposed to excessive noise from aircraft using a private airport or heliport in the vicinity, and the impact would be *less than significant*.

Significance Before Mitigation: Less than significant.

4.10.4 CUMULATIVE IMPACTS

NOISE-7	**Implementation of the proposed Plan would not contribute to cumulative noise impacts in the area.**

The analysis of the proposed Plan in Section 4.10.3 above addresses both project-level and cumulative impacts in regard to noise and groundborne noise and vibration in the Plan Area because the noise measurements and projections accounted for cumulative projects. Although multiple simultaneous nearby noise sources may, in combination, result in higher overall noise levels, this effect is captured and accounted for by the ambient noise level metrics that form the basis of the standards of significance for noise analysis. Any measurement of sound or ambient noise, whether for the purpose of evaluating land use compatibility, establishing compliance with noise standards, or determining point-source violations of a noise ordinance, necessarily will incorporate noise from all other nearby, perceptible sources. Ambient noise level measurements included noise from building operations and equipment, such as HVAC, vehicles and traffic, freight trains, human activity, and animals and natural sounds such as rustling leaves. To specifically estimate the proposed Plan's contribution to traffic noise, existing traffic levels were compared to those projected with completion of the proposed Plan, as well as other anticipated projects in the vicinity as listed on Table 4.1, Cumulative Impact Analysis, of this Draft EIR. As demonstrated above, the proposed Plan's contribution to increases in ambient noise levels and vibration would be less than significant, even when accounting for traffic increases from anticipated nearby projects. Although the proposed Plan would have significant impacts with regard to construction-related vibration, vibration from construction activity tends to be short-lived and intermittent, and also tends to attenuate over very short distances, making cumulative vibration impacts very unlikely. The proposed Plan would therefore not contribute to cumulatively considerable noise and vibration the impact would be *less than significant*.

Significance Before Mitigation: Less than significant.

4.10.5 SUMMARY OF SIGNIFICANT IMPACTS AND MITIGATION MEASURES

The proposed Plan would result in the following significant impact with respect to noise.

NOISE-2	**Implementation of the proposed Plan could result in the exposure of persons to or generation of excessive groundborne vibration or groundborne noise levels.**

Mitigation Measure NOISE-2: For construction that would use vibration-intense equipment such as pile driving, rock blasting and vibratory rollers that would occur within 200 feet of existing residential, commercial, and school buildings, a construction vibration mitigation plan shall be developed in close coordination with Campbell City staff so that alternative construction techniques or scheduling approaches are undertaken. The construction vibration mitigation plan shall consider the following available controls to reduce construction noise levels as low as practical:

- During project review, City staff shall coordinate with the applicant and/or construction contractor to discuss alternative methods of construction for vibration-intense activities in close proximity to sensitive uses or existing structures. As part of this coordination, the applicant and/or construction contractor shall identify construction methods not involving vibration-intensive equipment or activities. For example, drilled foundation caisson holes that would produce less vibration than pile driving methods, or the use of non-explosive rock breaking methods.
- The applicant or constructor contractor shall implement reduced-vibration alternative methods identified during project review during subsequent excavation, grading, and construction for work conducted in close proximity to sensitive structures or uses.
- If at all possible, vibration-intense construction activities should take place during times when nearby sensitive receptors, such as schools, are at their lowest utilization/occupancy.
- During plan review and/or prior to the start of construction activities, the applicant and/or construction contractor shall inspect and report on the current foundation and structural condition of the existing buildings in the immediate vicinity of the construction site.
- During construction, if any vibration levels cause cosmetic or structural damage to existing buildings in close proximity to a project site, the applicant shall immediately issue "stop-work" orders to the construction contractor to prevent further damage. Work shall not restart until the building is stabilized and/or preventive measures are implemented to relieve further damage to the building(s).

Significance After Mitigation: Less than significant.

4.11 POPULATION AND HOUSING

This chapter describes the population and housing characteristics of the Plan Area, and potential population and housing impacts from implementation of the proposed Dell Avenue Area Plan (proposed Plan).

4.11.1 ENVIRONMENTAL SETTING

4.11.1.1 REGULATORY FRAMEWORK

This section summarizes key State, regional, and local regulations and policies pertaining to population and housing that are applicable to the proposed Plan. There are no federal regulations regarding population and housing that are applicable to the proposed Plan.

State Regulations

California Housing Element Law

California Housing Element Law[1] includes provisions related to the requirements for housing elements of local government General Plans. Among these requirements, some of the necessary parts include an assessment of housing needs and an inventory of resources and constraints relevant to the meeting of these needs. Additionally, in order to assure that counties and cities recognize their responsibilities in contributing to the attainment of the State housing goals, this section of the Government Code calls for local jurisdictions to plan for, and allow the construction of, a share of the region's projected housing needs.

Regional Regulations

Association of Bay Area Governments Projections 2013

The Association of Bay Area Governments (ABAG) is the official comprehensive planning agency for the San Francisco Bay region, which is composed of the nine counties of Alameda, Contra Costa, Marin, Napa, San Francisco, San Mateo, Santa Clara, Solano, and Sonoma, and contains 101 cities. ABAG is responsible for taking the overall regional housing needs allocation (RHNA) provided by the State and preparing a formula for allocating that housing need by income level across its jurisdiction, as described in more detail below. ABAG produces growth forecasts on 4-year cycles so that other regional agencies, including the Metropolitan Transportation Commission (MTC) and the Bay Area Air Quality Management District (BAAQMD), can use the forecast to make project funding and regulatory decisions.

ABAG projections are the basis for the Regional Transportation Plan (RTP) and the regional Ozone Attainment Plan. In this way, ABAG projections have practical consequences that shape growth and

[1] Government Code Section 65580-65589.8.

environmental quality. The General Plans, zoning regulations and growth management programs of local jurisdictions inform ABAG projections. The projections are also developed to reflect the impact of "smart growth" policies and incentives that could be used to shift development patterns from historical trends toward a better jobs-housing balance, increased preservation of open space, and greater development and redevelopment in urban core and transit-accessible areas throughout their region.

Regional Housing Needs Allocation

Housing Element law requires local jurisdictions to plan for, and allow the construction of, a share of the region's projected housing needs. This share is called the Regional Housing Needs Allocation. State law mandates that each jurisdiction provide sufficient land to accommodate a variety of housing opportunities for all economic segments of the community to meet or exceed the RHNA. As the regional planning agency, ABAG calculates the RHNA for individual jurisdictions within San Clara County, including Campbell.

Plan Bay Area, Strategy for a Sustainable Region

MTC and ABAG *Plan Bay Area* is the Bay Area's Regional Transportation Plan/Sustainable Community Strategy (SCS). The Final *Plan Bay Area* was adopted on July 18, 2013.[2] The SCS sets a development pattern for the region, which, when integrated with the transportation network and other transportation measures and policies, would reduce greenhouse gas (GHG) emissions from transportation (excluding goods movement) beyond the per capita reduction targets identified by California Air Resources Board (CARB). Implementation of the *Plan Bay Area* would meet a 16 percent per capita reduction of GHG emissions by 2035 and a 10 percent per capita reduction by 2020 from 2005 conditions.[3]

In 2008, MTC and ABAG initiated a regional effort (FOCUS) to link local planned development with regional land use and transportation planning objectives. Through this initiative, local governments identified Priority Development Areas (PDAs). The PDAs form the implementing framework for *Plan Bay Area*. The PDAs are transit-oriented infill development opportunity areas within existing communities that are expected to host the majority of future development. Overall, well over two-thirds of all regional growth by 2040 is allocated within PDAs. The PDAs throughout the San Francisco Bay Area are expected to accommodate 80 percent (or over 525,570 units) of new housing and 66 percent (or 744,230) of new jobs.[4] There are two PDAs within the City of Campbell: the Central Redevelopment Area PDA and the VTA Cores, Corridors, and Station Areas PDA. The Central Redevelopment PDA is entirely within the Campbell city limit and ABAG projects that the Central Redevelopment Area PDA will accommodate 1,470 new

[2] It should be noted that the Bay Area Citizens filed a lawsuit on MTC and ABAG adoption of *Plan Bay Area*.

[3] Metropolitan Transportation Commission (MTC) and Association of Bay Area Governments (ABAG), 2013, *Final Plan Bay Area, Strategy for a Sustainable Region, page 96*.

[4] Metropolitan Transportation Commission (MTC) and Association of Bay Area Governments (ABAG), 2013, *Final Plan Bay Area, Strategy for a Sustainable Region*.

housing units and 2,340 new jobs by 2040 within its PDA.[5] A portion of the VTA Cores, Corridors, and Station Areas PDA is within the Campbell city limit, mainly along Winchester Boulevard. ABAG projects that the VTA Cores, Corridors, and Station Areas PDA will accommodate 71,303 housing units and 165,917 jobs. The Plan Area is within the VTA Cores, Corridors, and Station Areas PDA.

Local Regulations

Campbell General Plan 2001

The City of Campbell's General Plan 2001 contains in its Land Use and Transportation Element the following goals, policies, and strategies related to population and housing (Table 4.11-1):

TABLE 4.11-1 CITY OF CAMPBELL GENERAL PLAN GOALS, POLICIES, AND STRATEGIES PERTAINING TO POPULATION AND HOUSING

Goal/Policy/ Strategy Number	Goal/Policy/Strategy Text
Land Use and Transportation Element	
Strategy LUT-1.5a	Encourage transit-oriented developments including employment centers such as office and research and development facilities and the city's highest density residential projects by coordinating the location, intensity, and mix of land uses with transportation resources, such as Light Rail.
Strategy LUT-1.5d	Higher Floor Area Ratios (FARs): Develop provisions for allowing higher FARs in new projects that provide a mix of uses, maintain a jobs/housing balance, or are located in proximity to Light Rail.
Policy LUT-2.4	Job and Housing Balance: Maintain Campbell's balance of jobs and housing units to encourage residents to work in Campbell, and to limit the impact on the regional transportation system.
Goal LUT-3	*Options in ownership and rental housing in terms of style, size, and density that contribute positively to the surrounding neighborhood.*
Policy LUT-3.1	Variety of Residential Densities: Provide land use categories for and maintenance of a variety of residential densities to offer existing and future residents of all income levels, age groups and special needs sufficient opportunities and choices for locating in Campbell.
Strategy LUT 3.1a	Consistency with the Housing Element. Ensure consistency with the City's Housing Element including ensuring that there is adequate land designated to meet Housing goals.
Strategy LUT-3.1c	High Density Residential: Allow higher residential densities in the North of Campbell Area (NOCA), South of Campbell Area (SOCA), and areas near the Light Rail stations as an incentive to redevelop older, less intensive uses.
Policy LUT-14.6	Mixed Residential and Non-Residential Uses: Allow residential uses that are mixed whether horizontally or vertically with non-residential uses.
Policy LUT-15.1	Parcel Consolidation: Encourage property owners to combine parcels into larger building sites to accommodate quality mixed-use developments.

[5] Metropolitan Transportation Commission (MTC) and Association of Bay Area Governments (ABAG), 2013, *Final Plan Bay Area, Strategy for a Sustainable Region, Appendices A and B.*

Campbell 2015-2023 Housing Element

The City's Housing Element, adopted in February 2015, describes how the City of Campbell plans to meet the projected housing needs of all economic segments of the community and the City's fair share allocation of regional housing needs. Goal H-4 and its associated policies and programs of the Housing Element encourages high-density urban infill housing near transit stations and jobs, services, and shopping such as what may occur in portions of the Plan Area. The Housing Element also addresses the provision of housing for city residents, including affordable, mixed-use, and infill housing, and includes an analysis of whether Campbell has provided adequate sites to meet its RHNA obligations. The existing Campbell Housing Element contains the following goals, policies, and programs that are related to population and housing (Table 4.11-2):

TABLE 4.11-2 CITY OF CAMPBELL GENERAL PLAN GOALS, POLICIES, AND PROGRAMS PERTAINING TO POPULATION AND HOUSING

Goal/Policy/ Program Number	Goal/Policy/Program Text
Housing Element	
Goal H-4	*Provide adequate housing sites through appropriate land use and zoning designations to accommodate the City's share of regional housing needs.*
Policy H-4.2	Mixed Use Development: Promote mixed-use development where housing is located near jobs, services, shopping, schools, and public transportation.
Policy H-4.3	Planned for Densities: To encourage the efficient and sustainable use of land, the City encourages residential development that is proposed near existing light rail stations (within ¼ mile radius) and/or within the boundaries of the Winchester Boulevard Plan and East Campbell Avenue plan areas, to achieve at least 75 percent of the maximum General Plan Land Use category densities.
Policy H-5.1	Provide regulatory and/or financial incentives where appropriate to offset or reduce the costs of affordable housing development, including density bonuses and flexibility in site development standards.
Program H-5.1b	Parking Standard Modifications: In addition to parking reductions to affordable and senior housing projects under the City's density bonus ordinance, Campbell's Planning Commission has the authority to determine that certain circumstances warrant an adjustment to a project's parking requirements. Such circumstances include, but are not limited to, the proximity of a project to light rails stations, transit corridors, or major employment center. The Commission may also allow for shared parking for mixed-use projects.

Inclusionary Housing Ordinance

The City of Campbell enacted an Inclusionary Housing Ordinance to provide additional means to facilitate affordable housing. The standards for inclusionary housing are set forth in Title 21, Zoning, of the City's Municipal Code under Chapter 21.24, Inclusionary Housing. As stated in Section 21.24.020, the purpose of the Inclusionary Hosing Ordinance is to further the City's efforts to require housing available to very low-, low-, and moderate-income households. It is intended in part to implement State policy that declares that local governments have a responsibility to exercise their powers to facilitate the development of housing to

adequately provide for the housing needs of all economic segments of the community, as stated in Government Code Section 65580.

The Inclusionary Housing Ordinance is also intended to implement the Housing Element of the General Plan, which calls for the adoption of an inclusionary housing program to require either production of affordable housing at moderate-, low-, and very-low-income levels or payment of in-lieu and/or impact fees, where applicable, toward affordable housing development. In addition to the allocation of fees, the Inclusionary Housing Ordinance allows for land dedication as an alternative to payment of fees. The goal of this Ordinance is, to the extent legally permissible, to have a minimum percentage of very-low-, low- and/or moderate-income units built within each new residential development or to provide funding for new development of housing affordable to very low, low and moderate income households.

4.11.1.2 EXISTING CONDITIONS

This section describes the existing population, housing, and employment conditions in Campbell.

Population

According to the California Department of Finance (DOF), Campbell's 2014 population is 41,993, which is a 4 percent increase over the 2013 population of 40,373.[6] Campbell has an average household size of 2.49 persons, compared to 2.98 persons per household for Santa Clara County as a whole.[7]

As shown in Table 4.11-3, ABAG predicts that the population in Campbell is projected to grow to total of 47,800 by 2040. Because ABAG 2013 projections are used in regional planning efforts, ABAG numbers are used for the purpose of evaluating environmental impacts in this Draft EIR.

Housing

In 2014, Campbell had 17,604 housing units, with a 4.6 percent vacancy rate.[8] Of those units, approximately 59 percent are single-family homes, approximately 39 percent are multi-family units, and approximately 2 percent are mobile homes.

According to the American Communities Survey, the median initial construction year for Campbell's occupied housing units was between 1980 and 1989, making the average home approximately 25 years old in 2010.[9]

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[6] State of California, Department of Finance, *Report E-1, Population Estimates for Cities, Counties, and the State, January 1, 2013-2014*.

[7] State of California, Department of Finance, *Report E-5, Population and Housing Estimates for Cities, Counties, and the State, January 1, 2011-2014*.

[8] State of California, Department of Finance, *Report E-5, Population and Housing Estimates for Cities, Counties, and the State, January 1, 2011-2014*.

[9] US Census, 2007 to 2011 American Community Survey 5-Year Estimates, Table DP04.

TABLE 4.11-3 ABAG PROJECTIONS 2013 POPULATION, HOUSEHOLDS, AND EMPLOYMENT FORECASTS FOR CAMPBELL

								Change 2010-2040	
	2010	2015	2020	2025	2030	2035	2040	Number	Percent
Total Population	39,148	40,400	41,700	43,100	44,500	46,100	47,800	8,652	22.1%
Households	16,163	16,700	17,250	17,780	18,340	18,880	19,440	3,277	20.3%
Household Size	2.42	2.42	2.42	2.42	2.43	2.44	2.46	0.04	1.7%
Total Jobs	27,320	29,410	31,690	32,400	33,120	34,110	35,170	7,850	28.7%
Employed Residents	20,240	21,770	23,410	23,790	24,180	24,850	25,540	5,300	26.2%
Jobs/Employed Residents Ratio	1.35	1.35	1.35	1.36	1.37	1.37	1.38	0.03	2.0%

Note: The data in this table includes the Campbell city limit and Sphere of Influence (SOI).
Source: ABAG, Projections, 2013.

Employment

As shown above in Table 4.11-3, there were 20,240 employed residents in Campbell in 2010, and ABAG expects this number to grow by 26.2 percent by 2040 to 25,540 employed residents. Campbell is relatively "jobs rich," with a high number of jobs compared to employed residents. The city had a ratio of 1.35 jobs to employed residents in 2010. This ratio is expected to increase slightly by 2040 to 1.38 jobs per employed resident.

4.11.2 STANDARDS OF SIGNIFICANCE

Implementation of the proposed Plan would result in a significant population and housing impact if it would:

1. Induce substantial unexpected population growth, or growth for which inadequate planning has occurred, either directly (for example, by proposing new homes and businesses) or indirectly (for example, through extension of roads or other infrastructure).
2. Displace substantial numbers of existing housing units, necessitating the construction of replacement housing elsewhere.
3. Displace substantial numbers of people, necessitating the construction of replacement housing elsewhere.
4. Contribute to cumulative population and housing impacts in the area.

4.11.3 ENVIRONMENTAL IMPACT DISCUSSION

This section analyzes potential project-specific and cumulative impacts to population and housing.

POP-1	**Implementation of the proposed Plan would not induce substantial unexpected population growth, or growth for which inadequate planning has occurred, either directly (for example, by proposing new homes and businesses) or indirectly (for example, through extension of roads or other infrastructure).**

Direct Growth Inducement

The proposed Plan would result in a significant impact related to population growth if it would lead to substantial unplanned growth, either directly or indirectly. As described in Chapter 3, Project Description, of this Draft EIR, development allowed by the proposed Plan is expected to generate approximately 300 new housing units, approximately 20,000 square feet of commercial space, and approximately 2.3 million square feet of office space. This anticipated future development would result in approximately 726 new residents and approximately 7,394 new jobs.

As discussed in Section 4.11.1.1, to achieve ABAG/MTC sustainable vision for the Bay Area, the Plan Bay Area land use concept plan for the region concentrates the majority of new population and employment growth in the region in PDAs. PDAs are transit-oriented infill development opportunity areas within existing communities. Overall, well over two-thirds of all regional growth by 2040 is allocated within PDAs. The region's PDAs are expected to accommodate 80 percent (or over 525,570 units) of new housing and 66 percent (or 744,230) of new jobs. Portions of the Plan Area along Winchester Boulevard are within the VTA Mixed-Use Corridor PDA identified in Plan Bay Area. [10] Although this is a planned PDA, a PDA that has not undergone formal land use planning by VTA, the One Bay Area 2040 projections take into consideration growth associated with the potential implementation of this PDA.

ABAG projects Campbell's population to grow to approximately 47,800, an increase of 8,652 from the 2010 population of 39,148. The 726 new residents that would result from implementation of the proposed Plan represent less than 9 percent of this total expected population growth for the city, and thus would not exceed ABAG expected population level.

Furthermore, intensification of the Plan Area is consistent with both General Plan and ABAG policies that promote the job growth next to housing and transit connections. For example, General Plan Policy H-4.2 and Strategy LUT-1.5a calls for housing to be located near jobs.

[10] Metropolitan Transportation Commission (MTC) and Association of Bay Area Governments (ABAG), 2013. *Plan Bay Area,* http://geocommons.com/maps/141979, accessed September 2014.

Indirect Growth Inducement

As discussed, the proposed Plan is anticipated to add a net increase of 7,394 jobs in the Plan Area. While some new employees may relocate to Campbell, it is anticipated that the majority would be absorbed in the existing housing stock. Some of the new employees may move to the new residential units included as a part of the proposed Plan, and would be captured within the estimated growth of 726 residents described above. Additionally, many of these new employees will not relocate and instead will choose to commute to the Plan Area from outside of Campbell. In addition, the projected job growth is within the ABAG job projections for Campbell. ABAG projects jobs in Campbell to increase by approximately 7,850 jobs from 2010 to 2040, most of which would occur within the two PDAs within the city limits, including the PDA that is within the Plan Area. Lastly, the Plan Area is already served by public utilities and is an infill site in a developed area of the City. Therefore, considering that the amount of direct and indirect growth anticipated would not exceed ABAG projections for population and job growth, the proposed Plan would not induce substantial unexpected population or job growth, or growth for which inadequate planning has occurred, either directly or indirectly, and a *less-than-significant* impact would result in this respect.

Significance Before Mitigation: Less than significant.

POP-2	**Implementation of the proposed Plan would not displace substantial numbers of existing housing, necessitating the construction of replacement housing elsewhere.**

The proposed Plan would have a significant impact if it would displace substantial numbers of existing housing, necessitating the construction of replacement housing elsewhere. Overall, as described in Chapter 3, Project Description, of this Draft EIR, the proposed Plan would allow an increase in the total number of housing units in the Plan Area (300 net new housing units). Because the Plan Area does not include any existing housing units, future development allowed by the proposed Plan would not displace existing housing through redevelopment so replacement housing elsewhere would not be required.

The proposed Plan would encourage residential development in combination with non-residential development. Any redevelopment in the Plan Area would increase the amount of housing available in the city, and would not require replacement housing because no housing units would be lost in the redevelopment process.

Because the proposed Plan would allow a net increase of housing and would not displace existing housing, it would not require replacement housing outside the Plan Area. Therefore, impacts related to the displacement of housing would be *less than significant*.

Significance Before Mitigation: Less than significant.

POP-3	**Implementation of the proposed Plan would not displace substantial numbers of people, necessitating the construction of replacement housing elsewhere.**

The proposed Plan would have a significant environmental impact if it would displace a substantial number of people, thereby requiring construction of replacement housing elsewhere. As described above, the proposed Plan does not involve the removal of any existing residential units and would allow development of 300 new housing units through 2040. For these reasons, replacement housing would not be required outside of the Plan Area. As such, impacts associated with the displacement of people would be *less than significant*.

Significance Before Mitigation: Less than significant.

4.11.4 CUMULATIVE IMPACTS

POP-4	**Implementation of the proposed Plan would not contribute to cumulative population and housing impacts in the area.**

The proposed Plan would contribute to a cumulative impact if it, together with past, present, and reasonably foreseeable projects in the area, would result in substantial unplanned growth or the displacement of people or housing. For purposes of this discussion, the cumulative area is considered to be the City of Campbell and the Town of Los Gatos.

In total, the cumulative projects shown in Table 4-1 in Section 4.0 of this Draft EIR, would result in approximately 409 new housing units in the Town of Los Gatos located adjacent to the Plan Area. Using an average household size of 2.43 for the housing growth analyzed within the Town of Los Gatos,[11] these new units would result in 994 new residents in Los Gatos by 2040. Together with the estimated 726 new residents from implementation of the proposed Plan, the cumulative population increase would be 1,720, which is less than 7 percent of the ABAG anticipated population increase of 11,938, for Campbell and Los Gatos from 2010 to 2040. Therefore, cumulative population growth would not exceed planned levels.

Additionally, the cumulative projects identified in Chapter 4.0 which include the Albright and North 40 development projects in Los Gatos, would be expected to add approximately 869,000 square feet of office space. Assuming an average employment density of one job per 300 square feet of office space,[12] cumulative projects plus the proposed Plan, would generate approximately 9,640 new office jobs in Los Gatos and Campbell by 2040. Cumulative projects would also be expected to generate approximately 269,000 square

[11] State of California, Department of Finance, May 2014, *E-5 Population Estimates for Cities, Counties, and the State - January 1, 2011- 2014*. Sacramento, California.

[12] http://www.mwcog.org/uploads/committee-documents/bl5aX1pa20091008155406.pdf.

feet of retail and service space in Los Gatos. Combined with the maximum estimated 20,000 square feet of retail and service space that could develop under the proposed Plan, and assuming an average employment density of one job per 400 square feet,[13] cumulative projects would generate an additional 723 new retail jobs in Campbell and Los Gatos. In addition, the cumulative analysis assumes development of up to 150 hotel rooms in Los Gatos. Assuming an average employment density of 0.3 jobs per room, cumulative projects would generate approximately 45 hotel-related jobs.[14] Cumulative projects, including the proposed plan would therefore generate a total of approximately 10,408 new jobs within Campbell and Los Gatos. Given that ABAG projects an additional 13,260 jobs will be added in Campbell and Los Gatos between 2010 and 2040, cumulative projects, including the proposed Plan, would be within the total projected job growth by 2040.

As noted above, up to 300 new housing units could be constructed within the Plan Area by 2040, so replacement housing outside the Plan Area would not be required. Further, cumulative projects would add 364 new housing units in Los Gatos. The housing growth in Los Gatos and Campbell is expected by the jurisdictions and has been planned for and sufficient housing is expected to accommodate future population. These jurisdictions are required by State law to use the Housing Element, as well as other planning processes, such as utility master plans, to plan for and control future growth. Therefore, there would be a *less-than-significant* cumulative impact to housing and population in Los Gatos and Campbell.

Significance Before Mitigation: Less than significant.

4.11.5 SUMMARY OF SIGNIFICANT IMPACTS AND MITIGATION MEASURES

The proposed Plan would not result in any significant impacts with respect to population or housing. Therefore, no mitigation measures are required.

[13] http://www.mwcog.org/uploads/committee-documents/bl5aX1pa20091008155406.pdf.
[14] http://www.mwcog.org/uploads/committee-documents/bl5aX1pa20091008155406.pdf.

4.12 PUBLIC SERVICES AND RECREATION

This chapter describes existing public services and recreation facilities in the City of Campbell and evaluates the potential environmental consequences on public services and recreation from future development that could occur by adopting and implementing the Dell Avenue Area Plan (proposed Plan). The public services and recreation facilities analyzed in this chapter include fire and police protection services, schools, libraries, and parks and recreation. For each service, a summary of the relevant regulatory setting and existing conditions is followed by a discussion of potential impacts from future development permitted under the proposed Plan.

4.12.1 FIRE PROTECTION SERVICES

This section describes the current fire protection regulations, resources, and response times for fire protection services in Campbell, as well as the proposed Plan's potential impacts to fire protection services.

4.12.1.1 ENVIRONMENTAL SETTING

Regulatory Framework

This section summarizes key State and local regulations related to fire protection services. There are no federal regulations pertaining to fire protection that apply to the proposed Plan.

State Regulations

California Building Code

The California Building Code (CBC), which is located in Part 2 of Title 24 of the California Code of Regulations, establishes the minimum State building standards. The CBC is based on the International Building Code, but has been amended to account for California conditions. The CBC is generally adopted on a jurisdiction-by-jurisdiction basis, subject to further modification based on local conditions. Commercial and residential buildings are plan-checked by City building officials for compliance with the CBC. Typical fire safety requirements of the CBC include installation of sprinklers in all high-rise buildings; establishment of fire resistance standards for fire doors, building materials, and particular types of construction; and clearance of debris and vegetation within a prescribed distance from occupied structures in wildfire hazard areas.

California Fire Code

The California Fire Code (CFC) incorporates, by adoption, the International Fire Code of the International Code Council, with California amendments. This is the official Fire Code for the State and all political subdivisions. It is located in Part 9 of Title 24 of the California Code of Regulations (CCR). The CFC is revised and published approximately every three years by the California Building Standards Commission.

Local Regulations

City of Campbell General Plan

The City of Campbell General Plan adopted on November 6, 2001 contains, in its Health and Safety Element, policies and strategies related to fire protection and emergency services. Policies and strategies relevant to fire protection services are listed in Table 4.12-1.

TABLE 4.12-1 CITY OF CAMPBELL GENERAL PLAN POLICIES PERTAINING TO FIRE SERVICES

Policy Number	Policy Text
Health and Safety Element	
Policy HS-2.3	Fire and Emergency Medical Service. Ensure that fire and emergency medical services meet existing and future demand.
Policy HS-2.4	Fire Safety. Promote fire safety through education and building design.
Policy HS-4.1	Reduction of Fire Hazards. Regulate land use and development to diminish fire hazards.

Source: City of Campbell General Plan, 2001.

Campbell Municipal Code

The Campbell Municipal Code, organized by Title, Chapter, and Section, contains all ordinances for the city. The City's Fire Code, which is in Title 17 (Fire Protection), Chapters 17.04 through 17.80 (Fire Code) of the Municipal Code, regulates permit processes, emergency access, hazardous material handling, and fire protection systems, including automatic sprinkler systems, fire extinguishers, and fire alarms. Title 18 of the Municipal Code sets forth the standards for building and construction in the city. The City has adopted by reference the most recent CBC, subject to additions and amendments as outlined in Chapter 18.04 (Building Code).

Existing Conditions

The Santa Clara County Fire Department (SCCFD) provides fire and emergency medical services to the City of Campbell. The SCCFD is responsible for providing services to a population of 213,000 within Santa Clara County, including the communities of Campbell, Cupertino, Los Altos, Los Altos Hills, Los Gatos, Monte Sereno, and Saratoga. The SCCFD currently operates 15 stations in the seven communities it serves. The SCCFD consists of the following four divisions:

- **Fire Prevention Division:** The Fire Prevention Division provides fire, life, safety, and hazardous material inspection services for building construction, annual building inspection, and hazardous materials regulation.

- **Operations Division:** The Operations Division provides services including fire suppression, fire investigation, emergency medical response, hazard material response and enforcement, and technical rescues.
- **Training Division:** The Training Division is responsible for providing training, including emergency medical services.
- **Support Services Division:** The Support Services Division is responsible for all vehicle, facilities, and communication services.

Staffing and Facilities

There are 297 SCCFD employees, which has a daily staffing of 64 firefighters and officers operating out of its 15 fire stations. SCCFDs equipment include 19 types of firefighting equipment, such as fire trucks and three command vehicles. The fire suppression staff include approximately 18 trained volunteer firefighters. The two stations located within the City of Campbell are the Sunnyoaks Fire Station and the Campbell Fire Station and are described below:

- **Station 10 – Sunnyoaks Fire Station:** Located at 485 W. Sunnyoaks Avenue, this facility is owned by the City of Campbell and leased by the Santa Clara County Fire Department. The station equipment consists of Engine 80 and Reserve Engine 180. The Sunnyoaks Fire Station is located approximately 1 mile northwest of the Plan Area.
- **Station 11 – Campbell Fire Station:** Located at 123 Union Avenue, this facility is owned by the City of Campbell and leased by the Santa Clara County Fire Department. The station equipment consists of Engine 81 and Reserve Truck 181. The Campbell Fire Station is located approximately 3.5 miles northeast of the Plan Area.

These two stations are responsible for fire services for a population of 40,027 in the City of Campbell. If one of the fire engines is dispatched to an emergency, the next closest available unit will respond. In the event that there is a confirmed fire, 4 fire engines, 1 truck, 1 hazardous materials unit, 2 battalion chiefs, 1 safety officer, and a duty fire investigator will respond. Additionally, if any engine from either station is dispatched to a fire, the Santa Clara County Fire District will "cover" the Sunnyoaks or Campbell Fire Station so that there is coverage in Campbell at all times.[1]

- The SCCFD is one of the participants in the California State Fire and Rescue Mutual Aid Plan, and has response agreements with other fire agencies, including Mountain View Fire, Palo Alto Fire, San Jose Fire, Sunnyvale Fire, Scotts Valley Fire, Woodside Fire, Santa Cruz County Fire, and California Department of Forestry and Fire Protection (CAL FIRE). These agreements are for closest available apparatus, second due for emergency calls, and areas pre-designated as threat zones. SCCFD also has mutual aid agreements with every department within Santa Clara County. Each agency has specified

[1] Stocksick, Debbie. Operations Captain, Santa Clara County Fire Department. Personal communication with Travis Bradley, PlaceWorks, July 29, 2014.

how many pieces of apparatus and what kind can be offered so that no one agency will unreasonably deplete its own resources in furnishing mutual aid during extraordinary events.[2]

Average Response Times

The two fire stations in Campbell are ranked first and third for responding to the most emergencies. The performance goal for structure fires is to have an effective firefighting force on scene in less than 15 minutes from dispatch, at least 90 percent of the time. The average response time to the 748 fires within Campbell in 2013 was 12 minutes and 49 seconds. The performance goal for medical calls is for the first unit to arrive on scene with a paramedic in under 7 minutes, at least 90 percent of the time. The average response time for 2013 rescue and emergency medical services (EMS) calls in Campbell in 2013 was just over 5 minutes.[3]

Planning

The 2010-2014 SCCFD Business Plan and 2014-2019 SCCFD Strategic Plan address planning for adequate equipment and facilities and identifying service demand growth patterns. Because there are currently no development impact fees, the primary source of the SCCFDs funding is property taxes. The Department receives 2 percent of all property taxes annually.[4] In addition to property taxes, the SCCFD receives revenues from licenses and permits fees, intergovernmental revenues, use of money and property, charges for services, sale of capital assets and other revenues.[5] On August 20, 2012 the SCCFDs approved fixed fees for fire code permits, review, and inspection.[6] In Fiscal Year 2012, the SCCFD had a total budget of $82 million, and spent $81 million,[7] which gave it a budget surplus for the following fiscal year.

4.12.1.2 THRESHOLDS OF SIGNIFICANCE

The proposed Plan would have a significant impact to fire protection and emergency services if it would result in substantial adverse physical impacts associated with the provision of new or physically altered fire protection facilities or a need for new or physically altered fire protection facilities, the construction of which could cause significant environmental impacts in order to maintain acceptable service ratios, response times, or other performance objectives for fire protection services.

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[2] Stocksick, Debbie, Operations Captain, Santa Clara County Fire Department. Personal communication with Travis Bradley, PlaceWorks, July 29, 2014.

[3] Stocksick, Debbie, Operations Captain, Santa Clara County Fire Department. Personal communication with Travis Bradley, PlaceWorks, July 29,2014.

[4] Santa Clara County Fire Department, 2010. *Business Plan, January 2010-December 2014,* pages 7-8.

[5] Santa Clara County Fire Department, 2013, *2012 Annual Report.*

[6] Santa Clara County Fire Marshal Office, Fixed Fees For Fire Code Permits, Review and Inspection, http://www.sccgov.org/sites/fmo/Fees/permitfees/Pages/default.aspx, accessed on November 22, 2013.

[7] Santa Clara County Fire Department, 2013. *2012 Annual Report.*

4.12.1.3 ENVIRONMENTAL IMPACT DISCUSSION

This section analyzes the proposed Plan's potential impacts to fire protection services.

PS-1	**Implementation of the proposed Plan would not result in the provision of or need for new or physically altered fire protection facilities, the construction or operation of which could cause significant environmental impacts.**

A significant environmental impact could result if implementation of the proposed Plan would increase demand for fire protection services to the extent that the construction of new or physically altered fire protection facilities would be needed. As described in Chapter 3, Project Description, of this Draft EIR, development of the 300 housing units permitted under the proposed Plan could bring as many as 726 new residents to Campbell. It is unknown whether future residents of the Plan Area would move to Campbell from other communities outside of the SCCFD service area, or relocate within Campbell or the SCCFD service area. Additionally, it is anticipated that development allowed by the proposed Plan would result in a net increase of 2,292,000 square feet of office space and 20,000 square feet of commercial space, which would create 7,394 new jobs. These uses would bring new residents, employees, and visitors to the Plan Area and would likely increase the number of calls for fire protection and emergency medical services.

Development allowed by the proposed Plan is projected to occur throughout the 2040 planning horizon, which would result in a gradual increase in demand for fire protection services that would be accommodated by the SCCFD. The 2010-2014 SCCFD Business Plan addresses planning for adequate equipment and facilities, evaluation of the condition of facilities and equipment, and identifying service demand growth patterns in order to plan for and accommodate future growth. The 2014-2019 SCCFD Strategic Plan, which is updated every five years, serves as a comprehensive vision that provides strategies for accommodating future growth through the identification of goals and objectives aimed at improving existing fire protection and emergency medical services. The Strategic Plan includes Objective 6b, which requires the SCCFD to review, analyze, and define the scope of fire prevention services, sufficient to meet present and future needs. Also, Goal 8 and the supporting objectives, aim to maintain and enhance current levels of service. Adhering to this objective and goal would ensure that there are sufficient fire prevention services to meet the needs of future growth.

Further, the SCCFD has confirmed that the existing facilities, equipment, and staffing levels would be adequate to accommodate growth allowed by the proposed Plan.[8]

[8] Stocksick, Debbie. Operations Captain, Santa Clara County Fire Department. Personal communication with Travis Bradley, PlaceWorks, July 29,2014.

The Campbell General Plan includes policies and strategies that would ensure adequate fire protection services are available for the residents of Campbell. Within the Health and Safety Element, Policy HS-2.3, Fire and Emergency Medical Services, would require the City to ensure that fire and emergency medical services meet existing and future demand. Policy HS-2-4, Fire Safety, would require the City to promote fire safety through education and building design. Also, Policy HS-4-1, Reduction of Fire Hazards, would require the City to regulate land use and development to diminish fire hazards.

Future development would also be required to comply with the City's Fire Code per Municipal Code Title 17 (Fire Protection), including compliance with the permit processes, emergency access, hazardous material handling, and fire protection systems (including automatic sprinkler systems, fire extinguishers, and fire alarms).

Compliance with the State and local regulations, in conjunction with SCCFDs planning processes, would ensure that future growth allowed by the proposed Plan would result in *less-than-significant* impacts.

Significance Before Mitigation: Less than significant.

4.12.1.4 CUMULATIVE IMPACTS

PS-2	**Implementation of the proposed Plan, in combination with past, present, and reasonably foreseeable projects, would result in less than significant cumulative impacts with respect to fire protection service.**

The methodology used for cumulative impact analysis is described in Chapter 4.0, Environmental Evaluation, of this Draft EIR. The cumulative setting for fire protection services takes into account growth allowed by the proposed Plan, in combination with growth projected by the Association of Bay Area Governments (ABAG) in the service area of the SCCFD, which includes the cities of Campbell, Los Altos, Monte Sereno, and Saratoga, and towns of Los Altos Hills and Los Gatos. A significant cumulative environmental impact would result if this cumulative growth would exceed the ability of SCCFD to adequately serve its service area, thereby requiring construction of new facilities or modification of existing facilities, the construction of which could cause environmental impacts. As discussed in Chapter 4.0, the cumulative projects considered for this analysis include the County Courthouse, Albright, and North 40 projects, which would generate 869,000 square feet of commercial and 269,000 square feet of retail development along with 150 hotel rooms, 73 single-family homes, and 336 multi-family units all within the Town of Los Gatos.

The SCCFD assesses its ability to serve Campbell and neighboring cities through its 2010-2014 SCCFD Business Plan and 2014-2019 SCCFD Strategic Plan. These documents address planning for adequate equipment and facilities and identifying service demand growth patterns. As a part of the strategic planning process, SCCFD developed goals and objectives which are intended to become the focus of the efforts by the SCCFD. Objective 3A from the Strategic Plan calls for the SCCFD to utilize space needs analysis to

create a plan. One of the critical tasks under this objective calls for the SCCFD to form a taskforce/committee to triage building needs. Additionally, Objective 4B from the Strategic Plan calls for the SCCFD to identify and develop the needs assessment process. Objective 4C calls for the SCCFD to conduct the needs assessment process.

As described above under impact PS-1, the proposed Plan itself would not create a need for new or physically altered facilities in order for the SCCFD to provide fire protection services to its service area. Moreover, in accordance with the objectives in the SCCFD's Strategic Plan, a needs assessment would be done in the future which would take into account projected demands throughout the SCCFD's service area. If the planning efforts done by the SCCFD result in a determination that additional facilities would be needed to accommodate growth in the SCCFD service area, since fire protection services facilities are not included as a part of the proposed Plan, subsequent, independent CEQA review would be required and impacts would need to mitigated, when feasible. Therefore, if the proposed Plan, in combination with past, present, and reasonably foreseeable projects, would result in the provision of new or physically altered fire protection facilities, the impacts of such construction would be minimized to the extent required by the law. Therefore, cumulative impacts related to the construction of fire protection services would be *less than significant*.

Significance Before Mitigation: Less than significant.

4.12.1.5 SUMMARY OF SIGNIFICANT IMPACTS AND MITIGATION MEASURES

The proposed Plan would not result in any significant impacts to fire protection services. Therefore, no mitigation measures are required.

4.12.2 POLICE PROTECTION SERVICES

This section describes the current police protection regulations, resources and response times in Campbell, as well as the proposed Plan's potential impacts to police protection services.

4.12.2.1 ENVIRONMENTAL SETTING

Regulatory Framework

This section summarizes local policies related to police services in Campbell. There are no federal or State regulations pertaining to law enforcement that apply to the city.

Local Regulations

City of Campbell General Plan

The Health and Safety Element of the Campbell General Plan contains policies which encourage public safety when considering building design as well as fiscal impacts of future development on police services. Policies and strategies relevant to police protection services are listed in Table 4.12-2.

TABLE 4.12-2 CITY OF CAMPBELL GENERAL PLAN POLICIES PERTAINING TO POLICE SERVICES

Policy Number	Policy Text
Health and Safety	
Policy HS-2.1	Police Facilities and Personnel. Provide police facilities and personnel that meet citizens' needs and ensure a safe and secure environment for people and property.
Policy HS-2.2	Elimination of Crime. Work cooperatively to eliminate causes of crime.

Source: City of Campbell General Plan, 2001.

Existing Conditions

The Campbell Police Department (CPD) is responsible for all public safety and emergency preparedness services in the City of Campbell. The CPD is also responsible for management of the City's contract with the Santa Clara County Fire Department for fire and medical emergency services. All emergency and public safety issues (police, fire, and emergency medical services (EMS)) are handled through the CPD communication center as it is the Primary Public Answering Point (PPAP). Dispatch for fire and EMS services are handled through the Santa Clara County Fire Department. The CPD is primarily comprised of three major divisions:[9]

- **Field Services (Patrol)** is responsible for responding to emergency and non-emergency calls for service, and consists of patrol teams, community service officers, and reserve officers.
- **Special Enforcement** includes the Investigative Services Unit (Detectives) and Traffic Unit.
- **Support Services** is comprised of the Communications Unit (Dispatch), the Records Unit, and the Property Evidence Unit.

Staffing and Facilities

The CPD headquarters is located at 70 North First Street in Campbell, approximately 2 miles north of the Plan Area. The Department has 70 full-time employees. The Field Services Division is staffed by 20 police officers, 4 police agents, and 4 police sergeants. The Investigative Services Unit of the Special Enforcement Division is comprised of one sergeant and five investigators and is managed by the Special Enforcement

[9] City of Campbell, http://www.ci.campbell.ca.us/253/Police-Department, accessed on July 30, 2014

Division Captain. Additionally, an investigator from the Investigative Service Unit is assigned to the Santa Clara County Specialized Enforcement Team (SCCSET) regional task force to combat crime in Santa Clara County. The Traffic Unit of the Special Enforcement Division is staffed by one sergeant, one agent, two officers, and two community officers and is managed by the Special Enforcement Division Captain. Additional staff make up the Communications Unit, Records Unit, and Property/Evidence Unit of the Support Services Division.[10] This staffing level equates to a staffing ratio of one approved, sworn police officer to every 1,000 residents.[11]

Response Time

The CPD handles approximately 35,000 calls for service a year, writes over 5,500 police reports, and makes approximately 1,800 arrests. The target response time for the City of Campbell, as it relates to response times on calls for service, is to respond to emergency calls within 5 minutes. In 2013, the CPD was able to meet this target 95 percent of the time for emergency calls. For non-emergency calls, the CPD strives to respond to calls in 20 minutes or less and averaged a 97 percent success rate for non-emergency calls in 2013.[12]

4.12.2.2 THRESHOLDS OF SIGNIFICANCE

The proposed Plan would have a significant impact to police protection services if it would result in substantial adverse physical impacts associated with the provision of new or physically altered police protection facilities, or the need for new or physically altered police protection facilities, the construction of which could cause significant environmental impacts, in order to maintain acceptable service ratios, response times, or other performance objectives for police protection services.

4.12.2.3 ENVIRONMENTAL IMPACT DISCUSSION

This section analyzes the proposed Plan's potential impacts to police protection services.

PS-3	**Implementation of the proposed Plan would not result in the provision of or need for new or physically altered police protection facilities, the construction or operation of which could cause significant environmental impacts.**

[10] City of Campbell, http://www.ci.campbell.ca.us/253/Police-Department, accessed July 30, 2014

[11] Cefalu, Joe, Captain, City of Campbell Police Department. Personal email communication with Travis Bradley, PlaceWorks, July 28, 2014.

[12] Cefalu, Joe, Captain, City of Campbell Police Department. Personal email communication with Travis Bradley, PlaceWorks, July 28, 2014

A significant environmental impact would result if implementation of the proposed Plan would increase demands for police protection services to the extent that the construction of new or physically altered police facilities would be needed. As described in Chapter 3, Project Description, of this Draft EIR, development of the 300 housing units allowed by the proposed Plan could bring as many as 726 new residents to Campbell. It is unknown whether future residents of the Plan Area would move to Campbell from other communities or relocate within Campbell. Additionally, it is anticipated that development allowed by the proposed Plan result in a net increase of 2,292,000 square feet of office space and 20,000 square feet of commercial space, which would create 7,394 jobs. These uses would bring new residents, employees, and visitors to the Plan Area and would likely increase the number of calls for police protection services.

Buildout of the proposed Plan would occur over the 2040 buildout horizon, which would result in a gradual increase in demand for police protection services that would be accommodated by the CPD. The CPD has confirmed that future development allowed by the Plan would not result in the need for expansion or addition of facilities.[13]

The General Plan includes policies and strategies that ensure adequate police protection services are available for the residents of Campbell. Within the Health and Safety Element, Policy HS-2.1, Police Facilities and Personnel, requires that the City provide police facilities and personnel that meet citizens' needs and ensure a safe and secure environment for people and property. Policy HS-2.2, Elimination of Crime, requires that the City work cooperatively to eliminate causes of crime.

Based on confirmation by the Campbell Police Department, along with compliance with the General Plan policies listed above, a *less-than-significant* impact would occur with respect to the need for new or physically altered police protection facilities.

Significance Before Mitigation: Less than significant.

4.12.2.4 CUMULATIVE IMPACTS

PS-4	**Implementation of the proposed Project, in combination with past, present, and reasonably foreseeable projects, would result in less than significant cumulative impacts with respect to police protection services.**

The methodology used for the cumulative impact analysis is described in Chapter 4.0, Environmental Evaluation, of this Draft EIR. The cumulative setting for police protection services takes into account growth allowed by the proposed Plan, in combination with cumulative projects in Campbell (see Table 4-1). A significant cumulative environmental impact would result if this cumulative growth would exceed the

[13] Cefalu, Joe, Captain, City of Campbell Police Department. Personal email communication with Travis Bradley, PlaceWorks, July 28, 2014

ability of the CPD to adequately serve its service area, thereby requiring construction of new facilities or modification of existing facilities, the construction of which could cause significant environmental impacts.

Growth allowed by the proposed Plan would not have any cumulative impact to police services beyond Campbell. As described above in Impact PS-3, the CPD has confirmed that new or physically altered facilities would not be needed to serve development allowed by the proposed Plan.[14] Additionally, compliance with existing General Plan policies would require the City to recognize impacts to the CPD's ability to provide adequate facilities and personnel when approving various land use decisions. Although the construction of new police protection facilities would not be required under implementation of the proposed Plan, if the proposed Plan in combination with past, present, and reasonably foreseeable projects would result in the need for new or physically altered police protection facilities, subsequent, independent CEQA review would be required and impacts would need to mitigated, when feasible. Therefore, the proposed Plan would have a *less-than-significant* cumulative effect with respect to police protection services.

Significance Before Mitigation: Less than significant.

4.12.2.5 SUMMARY OF SIGNIFICANT IMPACTS AND MITIGATION MEASURES

The proposed Plan would not result in any significant impacts to police services. Therefore, no mitigation measures are required.

4.12.3 SCHOOLS

This section describes the existing regulations and conditions with regard to schools serving Campbell, as well as the proposed Plan's potential impacts to schools.

4.12.3.1 ENVIRONMENTAL SETTING

Regulatory Framework

This section summarizes key State and local regulations related to schools. There are no federal regulations pertaining to schools that apply to the proposed Plan.

State Regulations

<u>Senate Bill 50</u>

Senate Bill (SB) 50 (funded by Proposition 1A, approved in 1998) limits the power of cities and counties to require mitigation of school facilities impacts as a condition of approving new development and provides instead for a standardized developer fee. SB 50 generally provides for a 50/50 State and local school

[14] Cefalu, Joe, Captain, City of Campbell Police Department. Personal communication with Travis Bradley, PlaceWorks, July 28, 2014.

facilities funding match. SB 50 also provides for three levels of statutory impact fees. The application level depends on whether State funding is available, whether the school district is eligible for State funding and whether the school district meets certain additional criteria involving bonding capacity, year round school and the percentage of moveable classrooms in use.

California Government Code, Section 65995(b), and Education Code Section 17620

SB 50 amended California Government Code Section 65995, which contains limitations on Education Code Section 17620, the statute that authorizes school districts to assess development fees within school district boundaries. Government Code Section 65995(b)(3) requires the maximum square footage assessment for development to be increased every two years, according to inflation adjustments. On January 25, 2012 the State Allocation Board (SAB) approved increasing the allowable amount of statutory school facilities fees (Level I School Fees) from $2.97 to $3.20 per square foot of assessable space for residential development of 500 square feet or more, and from $0.47 to $0.51 per square foot of chargeable covered and enclosed space for commercial/industrial development.[15] Per California Government Code Section 65995, the payment of fees is deemed to fully mitigate the impacts of new development on school facilities.

Mitigation Fee Act (California Government Code 66000-66008)

Enacted as AB 1600, the Mitigation Fee Act requires a local agency establishing, increasing, or imposing an impact fee as a condition of development to identify the purpose of the fee and the use to which the fee is to be put.[16] The agency must also demonstrate a reasonable relationship between the fee and the purpose for which it is charged, and between the fee and the type of development plan on which it is to be levied. The Act came into force on January 1, 1989.

Local Regulations

City of Campbell General Plan

The City of Campbell's General Plan, adopted on November 6, 2001, contains the Open Space, Parks, and Public Facilities Element. The Open Space, Parks, and Public Facilities Element contains policies and strategies to encourage school districts to maintain and enhance existing educational opportunities. Relevant policies related to schools are listed in Table 4.12-3.

[15] State Allocation Board Meeting, January 25, 2012, http://www.documents.dgs.ca.gov/opsc/Resources/Index_Adj_Dev.pdf, accessed on September 4, 2014.

[16] California Government Code, Sections 66000-66008, http://www.leginfo.ca.gov/cgi-bin/displaycode?section=gov&group=65001-66000&file=66000-66008, accessed on September 4, 2014.

TABLE 4.12-3 CITY OF CAMPBELL GENERAL PLAN POLICIES PERTAINING TO SCHOOLS

Policy Number	Policy Text
Policy OSP-8.1	Education. Support efforts by the Campbell Union and Moreland School Districts to maintain and enhance existing educational opportunities.
Policy LUT-5.6	Industrial Impact. Reduce the imapct of existing industrial uses on adjacent residences, schools, and other sensetive uses.

Source: City of Campbell General Plan, 2001.

Existing Conditions

The City of Campbell is served by three school districts: Campbell Union School District (CUSD), Campbell Union High School District (CUHSD), and Moreland School District (MSD). The CUSD and CUHSD are the two school districts currently serving the Plan Area.

Campbell Union School District

The CUSD serves the entire City of Campbell and operates 12 schools, including 9 elementary schools and 3 middle schools. Among the 12 schools, 6 elementary schools are located within the Campbell city boundary. The CUSD collects development impact fees, which fund improvements and new facilities to mitigate impacts from new development. The CUSD collects $2.24 per square foot for residential development and $0.36 per square foot for commercial and industrial development.[17]

TABLE 4.12-4 CAMPBELL UNION SCHOOL DISTRICT ENROLLMENT TRENDS: YEARS 2006-2014

	Past/Current Enrollment							
Grade/School	'06-'07	'07-'08	'08-'09	'09-'10	'10-'11	'11-'12	'12-'13	'13-'14
Capri Elementary	603	607	608	643	666	707	759	689
Rolling Hills Middle	1,017	1,000	917	869	885	892	975	989

Source: California Department of Education, Public School Enrollment District Report 2014.

Schools anticipated to be affected by the proposed Plan include Capri Elementary, which is located a ½-mile west of the Plan Area, and Rolling Hills Middle School, located 2 miles southwest of the Plan Area. In the 2013-14 school year CUSD enrollment was 7,653. Capri elementary is considered to be at or near capacity with approximately 689 students during the 2013-2014 school year. Rolling Hills Middle school is considered to be slightly under capacity with 989 students attending in the 2013-2014 school year.[18] Current capacity and enrollment data for these schools were unavailable; however, an upward trend in

[17] Campbell Union School District Website, accessed on September 15, 2014. http://www.cuhsd.org/domain/296

[18] Crawford, James, Deputy Superintendent Administrative Services. Personal communication with Travis Bradley, PlaceWorks, August 8, 2014.

enrollment is reflected in previous years for Capri Elementary with 603 students in 2006-07, rising to 689 in the 2013-14 school year.[19] Rolling Hills Middle School has also seen a steady upward trend since having 869 students in 2009-10, with 2013-14 enrollment at 989 students. The CUSD currently does not have any plans to expand schools facilities to address capacity constraints and renovations are on hold due to a lack of funding.[20]

Campbell Union High School District

The CUHSD serves Campbell, San Jose, Santa Clara, Saratoga, Los Gatos and several unincorporated parts of Santa Clara County. The District currently operates six schools within the county and has been growing in the past decade, with enrollment increasing from 6,752 in 2001 to 6,974 in 2013. Students within the Plan Area would attend Westmont High School, which is located just outside the City limit. Table 4.12-5 shows current enrollment and capacity for the six schools in the CUHSD. The CUHSD collects development impact fees, which fund improvements and new facilities to mitigate impacts from new developments. Development fees are $0.79 per square foot for residential development and $0.013 per square foot for commercial development.[21]

The Plan Area is currently served by Westmont High School, which is located just outside the city limit. As shown in Table 4.12-5, Westmont High School is currently below its capacity. Westmont High School has been modernizing its facilities and adding enrollment capacity through Capital Improvement projects to the A Wing, J Wing, Engineering Wing, and portable buildings.[22]

4.12.3.2 STANDARDS OF SIGNIFICANCE

The proposed Plan would have a significant impact related to schools if, in order to maintain acceptable service ratios or other performance objectives, the proposed Plan would result in the provision of or need for new or physically altered school facilities, the construction or operation of which could cause significant environmental impacts.

4.12.3.3 ENVIRONMENTAL IMPACT DISCUSSION

PS-5	**The proposed Plan would not result in the provision of or need for new or physically altered school facilities, the construction or operation of which could cause significant environmental impacts.**

[19] Education Data Partnership, www.ed-data.k12.ca.us, accessed December 9, 2014.

[20] Crawford, James, Deputy Superintendent Administrative Services. Personal communication with Travis Bradley, PlaceWorks, July 23, 2014.

[21] Campbell Union High School District, http://www.cuhsd.org/domain/296, accessed September 15, 2014.

[22] Wheelehan, Ron, Chief Business Officer Assistant Superintendent. Personal communication with Travis Bradley, PlaceWorks, July 23, 2014.

TABLE 4.12-5 CURRENT CAPACITY AND ENROLLMENT FOR THE CUHSD

Schools	Capacity	Current Enrollment	Remaining Capacity
Boynton High School	380	305	75
Branham High School	1,431	1,396	35
Del Mar High School	1,647	1,073	574
Leigh High School	1,782	1,644	138
Prospect High School	1,539	1,288	251
Westmont High School	1,647	1,573	74
TOTAL	8,426	7,279	1,147

Source: Ron Wheelehan, Assistant Superintendent Business. Personal communication with Travis Bradley, PlaceWorks. August 18, 2014.

Campbell Union School District

Development allowed by the proposed Plan is expected to include 300 new residential units. Applying a student generation rate of 0.40 students for every unit,[23] development allowed by the proposed Plan would be expected to generate 120 students in kindergarten through the sixth grade that would attend Capri Elementary School. Applying a student generation rate of 0.10 students for every unit, development allowed by the proposed Plan would be expected to generate 30 students in grades 7-8 that would attend Rolling Hills Middle School.[24] Cumulatively, development allowed by the proposed Plan would directly generate 150 students in kindergarten through eighth grade.

As described in Chapter 3, Project Description, of this Draft EIR, the proposed Plan is projected to result in a net increase of 7,394 jobs by the 2040 buildout horizon which could generate additional residents and students in Campbell. While a portion of these new employees would likely move to Campbell, it is anticipated that most of these people would be absorbed in the existing housing stock in Campbell which is already part of the CUSD service area or would move into the residential component of the proposed Plan. Additionally, many of these new employees would choose to commute into Campbell from surrounding communities and any children living in these households would therefore attend schools in other areas.

[23] Crawford, James, Deputy Superintendent, Administrative Services. Personal communication with Travis Bradley, Placeworks, July 23, 2014.

[24] Crawford, James, Deputy Superintendent, Administrative Services. Personal communication with Travis Bradley, Placeworks, July 23, 2014.

Therefore, the job growth anticipated by the proposed Plan is not anticipated to generate additional need for school services beyond what is analyzed in this Draft EIR.

Given that Capri Elementary School is already at capacity and Rolling Hills Middle School is nearly at capacity, it is likely that new development allowed under the proposed Plan would generate the need for the construction or expansion of new school facilities. Development allowed by the proposed Plan would be subject to a mitigation fee of $2.24 per square foot for residential development and $0.36 per square foot for commercial development, as well as parcel taxes. The payment of school fees is deemed to fully mitigate the impacts of new development on school facilities, per California Government Code Section 65995, if and when new school facilities are required. Therefore, impacts related to the CUSD would be *less than significant*.

Campbell Union High School District

Development allowed by the proposed Plan is expected to include 300 new residential units. Applying a student generation rate of 0.17 students for every unit,[25] development allowed by the proposed Plan would be expected to generate 51 high school students that would attend Westmont High School in the CUHSD. In the 2013/2014 school year, Westmont High School was under capacity by 74 students, but is expected to be over capacity in upcoming years.[26]

As discussed above, the proposed Plan is projected to result in a net increase of 7,394 jobs by the 2040 buildout horizon which could generate additional residents and students in Campbell. While a portion of these new employees would likely move to Campbell, it is anticipated that most of these people would be absorbed in the existing housing stock in Campbell which is already part of the CUHSD service area or would move into the residential component of the proposed Plan. Additionally, many of these new employees would choose to commute into Campbell from surrounding communities and any children living in these households would therefore attend schools in other areas. Therefore, the job growth anticipated by the proposed Plan is not anticipated to generate additional need for school services beyond what is analyzed in this Draft EIR.

Although the CUHSD has plans to make improvements to the A Wing, J Wing, and add portable buildings at Westmont High School to accommodate additional students,[27] new or expanded facilities to serve these new students may be required.

[25] Wheelehan, Ron, Chief Business Officer Assistant Superintendent. Personal communication with Travis Bradley, PlaceWorks, July 23, 2014.

[26] Crawford, James, Deputy Superintendent, Administrative Services. Personal communication with Travis Bradley, PlaceWorks, July 23, 2014.

[27] Wheelehan, Ron, Chief Business Officer Assistant Superintendent. Personal communication with Travis Bradley, PlaceWorks, July 23, 2014.

Development under the Plan would be subject to the mitigation fee of $0.79 per square foot for residential development and $0.013 per square foot for commercial development, as well as parcel taxes. The payment of school fees is deemed to fully mitigate the impacts of new development on school facilities, per California Government Code Section 65995. Therefore, impacts related to the CUHSD would be *less than significant*.

Significance Before Mitigation: Less than significant.

4.12.3.4 CUMULATIVE IMPACTS

PS-6	**The proposed Plan, in combination with past, present, and reasonably foreseeable projects, would result in less-than-significant cumulative impacts with respect to schools.**

The methodology used for the cumulative impact analysis is described in Chapter 4.0, Environmental Evaluation, of this Draft EIR. This section analyzes potential impacts related to schools that could occur from implementation of the Plan in combination with reasonably foreseeable growth in the area served by the CUSD and the CUHSD. Cumulative projects would add new students to the CUSD and CUHSD, in addition to those generated by development allowed by the proposed Plan, which could result in the need for new or expanded school facilities. However, these cumulative projects would also be subject to the school mitigation fees discussed under Impact PS-5. Under Section 65995 of the California Government Code, the payment of impact fees is deemed to fully mitigate the impacts of new development on school facilities. Therefore, cumulative impacts related to school facilities would be *less than significant*.

Significance Before Mitigation: Less than significant.

4.12.3.5 SUMMARY OF SIGNIFICANT IMPACTS AND MITIGATION MEASURES

The proposed Plan would not result in any significant impacts to schools. Therefore, no mitigation measures are required.

4.12.4 LIBRARIES

This section describes the existing regulations and conditions regarding library services in Campbell, as well as the proposed Plan's potential impacts to libraries.

4.12.4.1 ENVIRONMENTAL SETTING

Regulatory Framework

This section summarizes key State and local regulations related to libraries. There are no federal regulations pertaining to libraries that apply to the proposed Plan.

State Regulations

The Mello-Roos Communities Facilities Act of 1982

The Mello-Roos Community Facilities Act, Government Code Section 53311 et seq., provides an alternative method of financing certain public capital facilities and services through special taxes. This State law empowers local agencies to establish Community Facilities Districts (CFDs) to levy special taxes for facilities such as libraries. Such districts exist within the City of Campbell.

Local Regulations

City of Campbell General Plan

The City of Campbell's General Plan, adopted on November 6, 2001, contains the Open Space, Parks, and Public Facilities Element. The Open Space, Parks, and Public Facilities Element contains policies and strategies to encourage adequate library facilities to serve the residents within the city. Applicable policies are listed in Table 4.12-6

TABLE 4.12-6 CITY OF CAMPBELL GENERAL PLAN POLICIES AND STRATEGIES PERTAINING TO LIBRARIES

Policy/Strategy Number	Policy/Strategy Text
Policy OSP-7.1	Library facilities: Ensure that library facilities offer residents adequate opportunities to obtain knowledge and information.
Strategy OSP-7.1a	Provision of Library Services: Coordinate with the Santa Clara County Library System to provide adequate library facilities.
Strategy OSP- 7.1b	Library Outreach Services: Encourage the Santa Clara County Library System and/or other appropriate agencies to provide library outreach services for seniors and the disabled who cannot visit library facilities.
Strategy OSP-7.1c.	Funding Sources: Coordinate with Santa Clara County Library System to provide funding for library facilities and activities, examining other potential funding sources, including County, State, federal, corporate, and private contributions.

Source: City of Campbell General Plan, 2001.

Santa Clara County Library Strategic Plan, 2008

The Santa Clara County Library Strategic Plan seeks to create clarity and focus on how the Santa Clara County Library District (SCCLD) should invest its resources on the wants, preferences, and needs of current users (as defined by research at individual libraries) and also expand its user base. In order to accomplish this, the Strategic Plan identifies a vision for the future as well as goals and policies intended to achieve that desired outcome.

Existing Conditions

The SCCLD governs and administers seven community libraries, one branch library, two bookmobiles, the Home Service Library, and the 24-7 online library for all library users. The SCCLD serves all unincorporated communities of Santa Clara County, as well as nine Santa Clara County cities, including Campbell, Cupertino, Gilroy, Los Altos, Los Altos Hills, Milpitas, Monte Sereno, Morgan Hill, and Saratoga. As one of the SCCLD's member cities, Campbell has a community library located on 77 Harrison Avenue, located approximately 2 miles north of the Plan Area.

The SCCLD adopted the Santa Clara County Library Strategic Plan on October 28, 2008. The Strategic Plan sets forth goals and objectives over a 3- to 5-year horizon to achieve its vision to serve the community. The Strategic Plan also establishes the SCCLD's assumptions about the future over a 5- to 10-year horizon. The goals and objectives are intended to improve the libraries existing services and do not apply to future development in Campbell.

Library Facility and Services

The Campbell Community Library lends books, media, and digital content to all age groups, and provides educational and entertainment programs and events for children, teens, adults, and families. It also offers free internet-enabled public computers, offers access to database and reference and research service, and provides self-service copy machines for residents. The library is well known for having story times for families, especially for families with babies, toddlers, and preschool children. The library provides different learning opportunities and classes, which include, but are not limited to, English language learning conversation classes, baby sign language classes, sewing classes, computer programming classes, and Zumba classes.[28]

Library Funding

Library services are primarily funded by County property taxes. Individuals living in the unincorporated areas and in the nine cities served by the SCCLD have a portion of their property taxes designated for the SCCLD. People living outside the district do not pay SCCLD taxes. In addition to the property tax, district property is also assessed for enhanced service through a Community Facilities District. Voters endorsed the assessment in 1994, 2005, and 2013. The special tax provides 18 percent of the SCCLD's revenues. In addition, the District receives many gifts of money, equipment, books, and time from friends of the library as well as from residents of the county.[29]

[28] Santa Clara County Library District website, "Campbell Library Programs and Events" http://www.sccl.org/Locations/Campbell/About-Us/Library-Profile, accessed on July 17, 2014.

[29] Griffen, Chuck, Financial and Administrative Services Director, Santa Clara County Library District. Personal email communication with Travis Bradley, PlaceWorks, July 23, 2014.

4.12.4.2 THRESHOLDS OF SIGNIFICANCE

The proposed Plan would result in a significant impact if, in order to maintain acceptable service ratios or other performance objectives, the proposed Plan would result in the provision of or need for new or physically altered library facilities, the construction or operation of which could cause significant environmental impacts.

4.12.4.3 ENVIRONMENTAL IMPACT DISCUSSION

PS-7	**The proposed Plan would not result in the provision of or need for new or physically altered library facilities.**

Development allowed by the proposed Plan could potentially result in the direct growth of 726 new residents in the Plan Area by 2040. As described above, the proposed Plan is projected to result in a net increase of 7,394 jobs by the 2040 buildout horizon .While a portion of these new employees would likely move to Campbell, it is anticipated that most of these people would be absorbed in the existing housing stock or would move into the residential component of the proposed Plan. Also, many of the new employees are likely to commute into Campbell from surrounding communities and would thus utilize library services in other areas. Nonetheless, growth permitted under the proposed Plan could increase the demand for the library services at the Campbell Community Library. Buildout of the proposed Plan would occur over the 2040 buildout horizon, which would result in a gradual increase in demand for library services. Given that increased use of library facilities would be gradual, the additional new library users in the Plan Area would not likely cause or accelerate the need for facility expansion.[30]

Several General Plan policies promote library services and facilities. Policy OSP-7.1, Library Facilities, requires the City to ensure that library facilities offer residents adequate opportunities to obtain knowledge and information. Strategy 7.1a, Provision of Library Facilities, requires the City to coordinate with the Santa Clara County Library System to provide adequate library facilities. Strategy 7.1b, Library Outreach Services, requires the City to encourage the Santa Clara County Library System and other appropriate agencies to provide library services for seniors and the disabled who cannot visit library facilities. Strategy 7.1c, Funding Sources, requires the City to coordinate with the Santa Clara County Library System to provide funding for library facilities and activities, examining other potential funding sources, including County, State, federal, and private contributions.

Based on confirmation by the SCCLD, along with compliance with existing General Plan policies and strategies, a *less-than-significant* impact would occur with respect to the need for new or physically altered library facilities.

[30] Griffen, Chuck, Financial and Administrative Services Manager, Personal communication with Travis Bradley, PlaceWorks, July 23, 2014.

Significance Before Mitigation: Less than significant.

4.12.4.4 CUMULATIVE IMPACTS

PS-8	**The proposed Plan, in combination with past, present, and reasonably foreseeable projects, would result in less than significant cumulative impacts with respect to libraries.**

The methodology used for the cumulative impact analysis is described in Chapter 4.0, Environmental Evaluation, of this Draft EIR. This section analyzes potential impacts to library services that could occur from development allowed by the proposed Plan in combination with reasonably foreseeable growth in the Santa Clara County Library service area. Implementation of the proposed Plan in conjunction with these related projects would further increase demands on library services.

Future growth within the SCCLD will increase the demand for library services and facilities. The Santa Clara County Library Strategic Plan accounts for the entire SCCLD service area and provides a basis for analyzing the most efficient allocation of funds both for the district as a whole as well as among the different libraries in the SCCLD service area. This would not only allow for adequate funding to satisfy demand at the Campbell Community Library, but would also ensure that surrounding libraries are adequate to fulfill demand, which in turn would reduce the demand at the Campbell Community Library by reducing deficiencies at surrounding facilities. As a result, a *less-than-significant* cumulative impact associated with libraries would occur.

Significance Before Mitigation: Less than significant.

4.12.4.5 SUMMARY OF SIGNIFICANT IMPACTS AND MITIGATION MEASURES

The proposed Plan would not result in any impacts to libraries. Therefore, no mitigation measures are required.

4.12.5 PARKS AND RECREATION

This section describes the regulatory framework and existing conditions related to parks and recreation in Campbell, as well as the proposed Plan's potential impacts to parks and recreation facilities.

4.12.5.1 ENVIRONMENTAL SETTING

Regulatory Framework

This section summarizes key State and local regulations related to park and recreation services. There are no federal regulations pertaining to park and recreation services that apply to the proposed Plan.

State Regulations

The Quimby Act

The 1975 Quimby Act (California Government Code Section 66477) authorizes cities and counties to adopt ordinances requiring that developers set aside land, donate conservation easements, or pay fees for park improvements. Revenues generated through the Quimby Act cannot be used for operation and maintenance of park facilities.[31] A 1982 amendment (AB 1600) requires agencies to clearly show a reasonable relationship between the public need for the recreation facility or parkland and the type of development project upon which the fee is imposed. Cities with a high ratio of park space to inhabitants can set a standard of up to 5 acres per 1,000 persons for new development. Cities with a lower ratio can only require the provision of up to 3 acres of park space per thousand people. The calculation of a city's park space to population ratio is based on a comparison of the population count of the last federal census to the amount of city-owned parkland.

Local Regulations

Santa Clara County Parks and Recreation Department

The Santa Clara County Parks Department operates on a voter-approved measure in which a fixed portion of the property taxes collected are set aside from the General Fund to acquire and develop a regional park system. District facilities that serve Campbell include Los Gatos Creek Trail and Los Gatos Creek County Park. This regional trail is intended to link existing or planned regional parks and open space areas, create a network of regional trails and alternative transportation corridors, provide access to significant natural areas and historic sites, and provide a variety of recreational opportunities to multiple communities and jurisdictions.

Santa Clara County Open Space Authority

In 1993, the City of Campbell incorporated into the Santa Clara County Open Space Authority (SCCOSA), which encompasses all areas within Santa Clara County except those within the jurisdiction of the Mid-Peninsula Open Space District. The SCCOSA has the ability to acquire land and create assessment districts, which in return can fund the acquisition of open space lands. The City of Campbell may apply for a portion of these funds to help finance City open space projects.[32]

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[31] Westrup, Laura, 2002. *Quimby Act 101: An Abbreviated Overview, Sacramento: California Department of Parks and Recreation*, http://www.parks.ca.gov/pages/795/files/quimby101.pdf.

[32] City of Campbell, 2001. *City of Campbell General Plan EIR*, page 214.

City of Campbell General Plan

The City of Campbell's General Plan, adopted on November 6, 2001, contains the Open Space, Parks, and Public Facilities Element. The Open Space, Parks, and Public Facilities Element contains policies to encourage a full range of park and recreational resources, for linking the community, outdoor recreation, preservation of natural resources, and public health and safety. General Plan policies and strategies relevant to parks and recreation concentrate on how the City of Campbell will provide open space, parks, and public facilities to meet the diverse needs of its residents. Policies that address parks and recreation are listed in Table 4.12.7.

TABLE 4.12-7 CITY OF CAMPBELL GENERAL PLAN POLICIES PERTAINING TO PARKS AND RECREATION

Policy Number	Policy Text
Section 6, Health and Safety	
Policy OSP-1.1	Regional Open Space, Parks and Recreational Facilities. Support efforts to enhance, enlarge, and provide public access to regional open space, parks and recreation facilities to meet the needs of Campbell residents.
Policy OSP-1.2	Regional Public Agency Lands. Utilize appropriately located surplus public agency lands for open space, parks and recreation facilities as they become available.
Policy OSP-1.3	Facilities Improvement, Maintenance and Use Agreements with Regional Agencies. Utilize a variety of techniques to increase, preserve or maintain regional open space facilities such as facilities improvement, joint maintenance or use agreements.
Policy OSP-2.1	Park Standard. Strive to provide 3 acres of open space, park land and recreational facilities and 1 acre of school open space and recreational facilities for every 1,000 residents.
Policy OSP-2.2	Maintain and Renovate Existing Open Space, Park, and Recreation Facilities. Maintain and renovate existing open space, park and recreation facilities to improve their usefulness, safety, and appearance.
Policy OSP-2.3	Efficient Utilization. Ensure efficient utilization of open space and recreational facilities.
Policy OSP-2.4	Park Design. Design safe and accessible open space, parks, and recreation facilities.
Policy OSP-3.1	Standards for Residential Projects. Ensure the provision of private open space or recreational facilities in residential projects.
Policy OSP-3.2	Park Impact Fees. Continue to require new residential development to pay park impact fees to use for the acquisition and development of park land and recreational facilities.
Policy OSP-3.3	Update Fees. Ensure that park development fees are periodically updated to accurately reflect the cost of park and recreation facility acquisition and development.
Policy OSP-3.5	Non-residential Open Space. Require open and/or recreational facilities in major non-residential projects.
Policy OSP-5.2	Access Standard. Strive to provide open space, parks or recreation facilities within ½-mile radii of all City residents.

Source: City of Campbell General Plan, 2001.

City of Campbell Municipal Code

The Campbell Municipal Code, organized by Title, Chapter, and Section, contains all codified ordinances for the city.

Title 13 – Public Property

Title 13 of Campbell Municipal Code sets regulations and standards for parks and recreation facilities and buildings in the city. Title 13 regulates any activities that may occur at parks and recreation buildings at the time of events and/or use, which includes, but is not limited to, conduct, vehicle requirements, picnic area requirements, advertising and sale restrictions, protection of wildlife, administrative and enforcement authority, special use policies, and violation penalties.

Chapter 13.08 (Park Impact Fees and Parkland Dedication Developments) of the Campbell Municipal Code requires development impact fees to acquire and maintain parks and recreational facilities to mitigate impacts from new development. The collected fee is for acquisition, improvement, maintenance, rehabilitation, expansion, or implementation of parks and recreational facilities. The fee is calculated by multiplying the park acreage standard, average number of persons per residential dwelling unit, and value per acre.

Title 20 – Subdivisions and Land Development

Title 20 of the Campbell Municipal Code sets regulations for subdivisions, including park dedication and in-lieu fees. Chapter 20.24 (Park Impact Fees and Park Land Dedication Subdivisions) includes different determinations of dedication requirements in the city. The Park Land Dedication regulations are applied to all development, except commercial or industrial subdivisions not involving any residential units, buildings, or structures, or the conversion of an apartment building to a stock cooperative, condominium, or townhouse units when no new dwelling units are added. The amount of land dedicated is determined by multiplying the average number of persons per unit and the park acreage standard of 4 acres of parkland for every 1,000 residents. This combines the ratio of 3 acres of parks and open space per 1,000 residents, and the 1 acre per 1,000 residents of school space available for public access. The City may also require payment of a fee in lieu of dedicating land and providing improvements, which would be determined based upon the fair market value of the land which would otherwise be required to be dedicated.

Title 21 – Zoning

Title 21, Article 3 (Development and Operational Standards), of the Campbell Municipal Code sets regulations and standards for land uses within the city boundary. The city land is categorized into different zones, permitted, and conditionally permitted land uses, which may include parks and recreational facilities. Chapter 21.18 (Nonresidential Open Space and Recreation Facilities) is dedicated to land use and development standards for open space and recreation buildings in nonresidential projects. The intent of

these standards is to make commercial and industrial projects more attractive and pedestrian oriented through the provision of open spaces, including plazas, benches, and outdoor eating and seating areas.

Existing Conditions

The Campbell Municipal Code defines a park as any land owned by a public entity that is open to the public for recreational uses. The City of Campbell owns and operates several facilities which include parks, community swimming pools, recreational fields, gymnasiums, open spaces, and picnic areas, all of which are open and accessible to the public.

Parks

The City of Campbell categorizes each park into four separate categories: Community Parks, Neighborhood Parks, Passive Parks, and Special Open Space Facilities. Each type of park is characterized by scale, varying amenities, and the neighborhoods they serve. Campbell has five community parks, two neighborhood parks, four passive parks, and two special open space facilities. The city is also home to several regionally-owned and maintained facilities, which includes the Santa Clara County Parklands, Santa Clara Valley Water District groundwater recharge facilities, and lands owned by the Santa Clara County Open Space Authority.[33] The Los Gatos Creek County Trail and Los Gatos Creek County Park together comprise more than 53 acres and are maintained by Santa Clara County. The Hacienda Percolation Ponds, which are adjacent to the Plan Area, is one of six facilities owned and operated by the Santa Clara Valley Water District (SCVWD). Based on a 1999 agreement, the City of Campbell and the Campbell Union School District jointly use open space areas within certain school sites and therefore some school sites are included in the recreation acreage. Table 4.12-8 lists existing parks and recreation facilities.

Recreational Facilities

Public recreational facilities within the city include a fitness center, all-weather track, football field, tennis courts, an adult center, and a skate park, all of which are located at the Campbell Community Center. The City Parks and Recreation Department sponsors seasonal recreational activities and programs for all ages. The Community Center has a wide variety of facilities for wedding receptions and parties, business and meetings, seminars, athletic activities, fundraisers, and special events.

Los Gatos Creek Trail

The Los Gatos Creek Trail runs from San Jose south through Campbell and Los Gatos and is managed by several different agencies including the Cities of Campbell and San Jose, Santa Clara County, and the Town of Los Gatos. The Campbell section of the trail includes a paved walkway approximately 3 miles in length,

[33] City of Campbell, 2001 General Plan EIR, page 214.

TABLE 4.12-8 EXISTING PARKS AND RECREATION FACILITY ACREAGE

Name	Location	Useable Acreage
Community Parks		
Campbell Community Center	1 West Campbell Avenue	31.6
Campbell Park	Campbell Avenue and Gilman Avenue	3.2
Edith Morley Park	615 Campbell Technology Parkway	4.0
John D. Morgan Park	540 Rincon Avenue	24.0
Stojanovich Family Park	316 Union Avenue	1.3
Neighborhood Parks		
Jack Fischer Park	Abbott Avenue and Pollard Avenue	4.1
Virginia Park	460 Virginia Avenue	0.5
Passive Parks		
Ainsley Park	435 East Campbell Avenue	0.1
Gomes Park	2170 Winchester Boulevard	0.1
Hyde Park	90 S. First Street	0.3
Orchard City Green	70 N. First Street	0.8
Regional Parks, Open Space, and Recreational Facilities		
Los Gatos Creek County Trail		43.8
Los Gatos Creek County Park		9.0
Santa Clara Valley Water District Groundwater Recharge Facilities		89.7
School Sites		
Dover	1300 Sheffield Avenue	6.3
Campbell Middle School	295 Cherry Lane	6.1
Capri Elementary	850 Chapman Drive	4.3
Forest Hill Elementary	4450 McCoy Avenue	8.0

TABLE 4.12-8 EXISTING PARKS AND RECREATION FACILITY ACREAGE

Name	Location	Useable Acreage
Rolling Hills Middle School	1585 More Avenue	12.9
Rosemary Elementary	401 W. Hamilton Avenue	8.0
Recreational Facilities		
Campbell Community Center	1 W. Campbell Avenue	
Total		258.10

Source: City of Campbell General Plan, 2001.

including a 2-mile par course loop. The City of Campbell is responsible for maintenance and trail use from the Bascom Avenue under crossing to Los Gatos Creek County Park.[34]

4.12.5.2 STANDARDS OF SIGNIFICANCE

The proposed Plan would have a significant impact with regard to parks and recreation if it would:

- Result in substantial adverse physical impacts associated with the provision of new or physically altered parks and recreational facilities, or need for new or physically altered parks and recreation facilities, the construction of which could cause significant environmental impacts, in order to maintain acceptable service ratios, or other performance objectives.
- Increase the use of existing neighborhood and regional parks or other recreational facilities, such that substantial physical deterioration of the facility would occur, or be accelerated.
- Include or require the construction or expansion of recreational facilities which might have an adverse physical effect on the environment.

4.12.5.3 ENVIRONMENTAL IMPACT DISCUSSION

PS-9	**The proposed Plan would not result in the provision of or need for new or physically altered parks and recreation facilities.**

The proposed Plan would have a significant impact if population growth associated with development allowed by the Plan would result in an inadequate parkland ratio in Campbell. The City of Campbell has an adopted parkland standard of 4 acres of parkland for every 1,000 residents. As shown in Table 4.12-8, there

[34] City of Campbell, "Facilities" http://www.ci.campbell.ca.us/Facilities/Facility/Details/Los-Gatos-Creek-Trail-29, accessed August 1, 2014.

are approximately 258 acres of parkland in Campbell, or approximately 6.4 acres per 1,000 residents, based on an existing population of 40,027.[35] Therefore, the City is currently meeting its adopted standard established under Policy OSP-2.1 in the existing General Plan. Furthermore, the City also meets its current standard of ensuring that each household is within a ½-mile walk of a neighborhood park or community park with neighborhood facilities, and that the route is reasonably free of physical barriers, including streets with heavy traffic.[36]

Development allowed by the proposed Plan could directly bring 726 new residents to the city. In addition to the direct growth allowed by the proposed Plan, a net increase of 7,394 jobs is anticipated in the Plan Area by the 2040 buildout horizon. While a portion of these new employees would likely move to Campbell, it is anticipated that most of these people would be absorbed in the existing housing stock in Campbell or would move into the residential component of the proposed Plan and be captured in the direct growth described above. Additionally, many of these new employees would choose to commute into Campbell from surrounding communities. Aside from the employees themselves, the increase in commercial space would also increase the number of visitors in Campbell and some of these visitors may use the local park system. This direct and indirect growth would increase use of existing parkland. Considering the direct growth associated with buildout of the proposed Plan, adding 726 new residents to the City's existing population, would result in a parkland ratio of 6.3 acres of parkland per 1,000 residents, well within the City's adopted standard of 4 acres of parkland per 1,000 residents.[37] Considering the indirect population growth associated with the proposed Plan, even in the unlikely scenario where all of the people who get the 7,394 jobs created by the proposed Plan move to Campbell, the City would still be in compliance with the adopted City standard with a parkland ratio of 5.4 acres parkland per 1,000 residents.[38] Therefore, because the City standard would continue to be met at buildout, additional parkland would not be required to serve development allowed by the proposed Plan.

Furthermore, future development allowed by the proposed Plan would be required to comply with Municipal Code Chapter 13.08, Park Impact Fees and Parkland Dedication Developments, which requires developers to pay impact fees to maintain existing parks and recreation facilities, as well as comply with Municipal Code Title 20, Subdivisions and Land Development, which requires residential developments to dedicate parklands or pay in-lieu fees to accommodate and offset their fair share of impacts to parklands.

Future development would also be required to comply with the following General Plan policies:

- Policy OSP-2.1: Park Standard. Strive to provide 3 acres of open space, parkland, and recreational facilities and 1 acre of school open space and recreational facilities per 1,000 residents.

[35] 258 acres / 40,027 population x 1,000 residents = 6.4 acres per 1,000 residents

[36] Maurantonio, Regina, Recreation and Community Services Director. Personal communication with Travis Bradley, PlaceWorks, July 31,2014.

[37] 40,027 existing population + 726 new residents = 40,753 new population. 258 acres / (40,753 population / 1,000 residents) = 6.3 acres per 1,000 residents

[38] 40,027 existing population + 726 new residents + 7,394 potential indirect growth= 48,147 potential new population. 258 acres / (48,147 population / 1,000 residents) = 5.4 acres per 1,000 residents

- Policy OSP-3.2: Park Impact Fees. Continue to require new residential development to pay park impact fees to use for the acquisition and development of parkland and recreational facilities.
- Policy OSP-5.2: Access Standards. Strive to provide open space, parks, or recreational facilities within ½-mile radii of all city residents.

Overall, development allowed by the proposed Plan would not result in the need for new parks and recreational facilities to be constructed in Campbell. In addition, new development would be required to comply with the regulations and parkland dedication requirements. Therefore, impacts would be *less than significant*.

Significance Before Mitigation: Less than significant.

PS-10	**The proposed Plan would not increase the use of existing neighborhood and regional parks or other recreational facilities, such that substantial physical deterioration of the facility would occur, or be accelerated.**

An increase in population would occur as result of development allowed by the proposed Plan, thereby increasing the use of existing neighborhood and regional parks or other recreational facilities. However, developers would be required to pay impact fees to mitigate potential impacts to existing parkland and recreation facilities, in compliance with Municipal Code Chapter 13.08. Fees collected under Chapter 13.08 could be applied to the acquisition, improvement, maintenance, rehabilitation, or expansion of existing parkland or recreation facilities. The payment of fees would serve to mitigate impacts to existing parklands and recreation facilities as a result of growth allowed by the proposed Plan. New development allowed by the proposed Plan may include the development of on-site open space to ensure a visually appealing environment and high-quality pedestrian-oriented setting. For instance, all development in the DAAP-Waterfront and DAAP-Central Districts, as shown on Figure 3-6, must provide 10 percent of the site area to publicly-accessible open space or pay an in-lieu fee. On-site open space would help to offset or reduce potential use of existing parkland. Therefore, it is not anticipated that a substantial deterioration of facilities would occur as a result of the proposed Plan and a *less-than-significant* impact would occur.

Significance Before Mitigation: Less than significant.

PS-11	**The proposed Project would not include or require the construction or expansion of recreational facilities that might have an adverse physical effect on the environment.**

As discussed above in impact discussion PS-9, the City currently meets its adopted standard of providing 4 acres of parkland per 1,000 residents, and would continue to meet this standard with development allowed by the proposed Plan. Therefore, new recreational facilities would not need to be constructed to serve development allowed by the proposed Plan. New development allowed by the proposed Plan may

include the development of on-site open space to ensure a visually appealing environment and high-quality pedestrian-oriented setting. For instance, all development in the DAAP-Waterfront and DAAP-Central Districts, as shown on Figure 3-6, must provide 10 percent of the site area to publicly-accessible open space or pay an in-lieu fee. In addition, developers would be required to pay impact fees to mitigate potential impacts to existing parklands and recreation facilities, in compliance with Municipal Code Chapter 13.08. These requirements would help to offset or reduce potential impacts of new Plan Area users on existing recreational facilities. Therefore, potential impacts would be *less than significant*.

Significance Before Mitigation: Less than significant.

4.12.5.4 CUMULATIVE IMPACTS

PS-12	**The proposed Plan, in combination with past, present, and reasonably foreseeable projects, would result in less-than-significant cumulative impacts with respect to parks and recreational facilities.**

The methodology used for the cumulative impact analysis is described in Chapter 4.0, Environmental Evaluation, of this Draft EIR. The geographic scope for this discussion includes park and recreation facilities within the city boundary, as well as Santa Clara County, and the Santa Clara County Open Space Authority.

The City would require future development to fund park improvements and dedicate land through compliance with Municipal Code Chapter 13.08 and Title 20, which would help to ensure the provision of adequate parkland in compliance with the City standard of providing 4 acres per 1,000 residents. Although development allowed by the proposed Plan would cumulatively increase the demand for park and recreational services in the city, compliance with the City's Municipal Code, along with applicable General Plan policies, would ensure that adequate parkland and recreational facilities are provided through in-lieu fees, maintenance fees, or parkland dedication in order to meet the City standards, which would offset or reduce potential impacts that future development would have on park and recreation services in the city.

Potential future impacts to Santa Clara Parks, as well as the Santa Clara County Open Space Authority, would be mitigated through the contribution of property taxes to ensure facilities at these locations are adequately maintained and sufficient to accommodate growth allowed by the proposed Plan.

Overall, the proposed Project would not contribute to any potential significant cumulative impacts to park and recreational facilities and cumulative impacts to park and recreational services would be *less than significant*.

Significance Before Mitigation: Less than significant.

4.12.5.5 SUMMARY OF SIGNIFICANT IMPACTS AND MITIGATION MEASURES

The proposed Plan would not result in any significant impacts to parks and recreation facilities. Therefore, no mitigation measures are required.

4.13 TRANSPORTATION AND TRAFFIC

This chapter provides an overview of the existing transportation and traffic conditions in the vicinity of the Dell Avenue Area Plan (proposed Plan) and discusses the associated regulatory framework. It also evaluates the potential for implementation of the proposed Plan to result in significant environmental impacts, direct and indirect, related to transportation and traffic. The analysis focuses on potential impacts to intersections and roadway segments, pedestrian and bicycle facilities, and transit service. Significant impacts are quantified and mitigation measures are identified to address these impacts, as necessary. All technical analyses related to this study are included in Appendix D.

4.13.1 ENVIRONMENTAL SETTING

4.13.1.1 REGULATORY FRAMEWORK

This section describes federal, State, regional, and local environmental laws and policies that are relevant to the California Environmental Quality Act (CEQA) review process for transportation and circulation. These policies provide a context for the impact discussion related to the proposed Plan's consistency with the applicable regulatory conditions.

Federal Regulations

Americans with Disabilities Act

The Americans with Disabilities Act (ADA) of 1990 provides comprehensive rights and protections to individuals with disabilities. The goal of the ADA is to assure equality of opportunity, full participation, independent living, and economic self-sufficiency for people with disabilities. To implement this goal, the US Access Board, an independent Federal agency created in 1973 to ensure accessibility for people with disabilities, has created accessibility guidelines for public rights-of-way. While these guidelines have not been formally adopted, they have been widely followed by jurisdictions and agencies nationwide in the last decade. These guidelines, last revised in July 2011, address various issues, including roadway design practices, slope and terrain issues, and pedestrian access to streets, sidewalks, curb ramps, street furnishings, pedestrian signals, parking, public transit, and other components of public rights-of-way. These guidelines would apply to proposed roadways in the Plan Area.

State Regulations

California Department of Transportation

The California Department of Transportation (Caltrans) is the primary State agency responsible for transportation issues. One of its duties is the construction and maintenance of the State highway system. Caltrans approves the planning, design, and construction of improvements for all State-controlled facilities

including State Route (SR) 17, SR 85, and the associated interchanges for these facilities located in the Plan Area. Caltrans has established standards for roadway traffic flow and developed procedures to determine if State-controlled facilities require improvements. For projects that may physically affect facilities under its administration, Caltrans requires encroachment permits before any construction work may be undertaken. For projects that would not physically affect facilities, but may influence traffic flow and levels of service at such facilities, Caltrans may recommend measures to mitigate the traffic impacts of such projects.

The following Caltrans procedures and directives are relevant to the proposed Plan, particularly to State roadway facilities:

- **Level of Service Target.** Caltrans maintains a minimum level of service (LOS) at the transition between LOS C and LOS D for all of its facilities.[1] Where an existing facility is operating at less than the LOS C/D threshold, the existing measure of effectiveness should be maintained.[2]
- **Caltrans Project Development Procedures Manual.** This manual outlines pertinent statutory requirements, planning policies, and implementing procedures regarding transportation facilities. It is continually and incrementally updated to reflect changes in policy and procedures. For example, the most recent revision incorporates the Complete Streets policy from Deputy Directive 64-R1, which is detailed below.
- **Caltrans Deputy Directive 64.** This directive requires Caltrans to consider the needs of non-motorized travelers, including pedestrians, bicyclists, and persons with disabilities, in all programming, planning, maintenance, construction, operations, and project development activities and products. This includes incorporation of the best available standards in all of Caltrans' practices.
- **Caltrans Deputy Directive 64-RI.** This directive requires Caltrans to provide for the needs of travelers of all ages and abilities in all planning, programming, design, construction, operations, and maintenance activities and products on the State highway system. Caltrans supports bicycle, pedestrian, and transit travel with a focus on "complete streets" that begins early in system planning and continues through project construction and maintenance and operations.
- **Caltrans Director's Policy 22.** This policy establishes support for balancing transportation needs with community goals. Caltrans seeks to involve and integrate community goals in the planning, design, construction, and maintenance and operations processes, including accommodating the needs of bicyclists and pedestrians.

California Complete Streets Act of 2008 (AB 1358)

Originally passed in 2008, California's Complete Streets Act came into force in 2011 and requires local jurisdictions to plan for land use transportation policies that reflect a "complete streets" approach to

[1] Level of service is explained further below in Section 4.13.3.2, Level of Service Standards and Analyses Methodologies.
[2] California Department of Transportation, 2010, Guide for the Preparation of Traffic Impact Studies.

mobility. "Complete streets" comprises a suite of policies and street design guidelines which provide for the needs of all road users, including pedestrians, bicyclists, transit operators and riders, children, the elderly, and the disabled. From 2011 onward, any local jurisdiction—county or city—that undertakes a substantive update of the circulation element of its general plan must consider "complete streets" and incorporate corresponding policies and programs.

State Transportation Improvement Program

The California Transportation Commission (CTC) administers the public decision-making process that sets priorities and funds projects envisioned in long-range transportation plans. The CTC's programming includes the State Transportation Improvement Program (STIP), a multi-year capital improvement program of transportation projects on and off the State highway system, funded with revenues from the State Highway Account and other funding sources.

Regional Regulations

Metropolitan Transportation Commission

The Metropolitan Transportation Commission (MTC) is the transportation planning, coordinating, and financing agency for the nine-county Bay Area, including Santa Clara County. It also functions as the federally mandated metropolitan planning organization (MPO) for the region. It is responsible for regularly updating the Regional Transportation Plan (RTP), a comprehensive blueprint for the development of mass transit, highway, airport, seaport, railroad, bicycle, and pedestrian facilities. The current RTP, Transportation 2035, was adopted on April 22, 2009. The Transportation 2035 was prepared by MTC in partnership with the Association of Bay Area Governments (ABAG), the Bay Area Air Quality Management District (BAAQMD), and the Bay Conservation and Development Commission (BCDC). MTC updates the RTP every 4 years. Transportation 2035 is described in detail later in this section.

MTC has established its policy on Complete Streets in the Bay Area. The policy states that projects funded all, or in part, with regional funds (e.g., federal, State Transportation Improvement Program, and bridge tolls) must consider the accommodation of bicycle and pedestrian facilities, as described in Caltrans Deputy Directive 64. These recommendations do not replace locally adopted policies regarding transportation planning, design, and construction. Instead, these recommendations facilitate the accommodation of pedestrians, including wheelchair users, and bicyclists into all projects where bicycle and pedestrian travel is consistent with current adopted regional and local plans.

Transportation 2035 Plan

On April 22, 2009, MTC adopted the Transportation 2035 Plan for the San Francisco Bay Area, which specifies how some $218 billion in anticipated federal, State, and local transportation funds will be spent in the nine-county Bay Area during the next 25 years. The vision for Transportation 2035 is to support a prosperous and globally competitive Bay Area economy, provide for a healthy and safe environment, and

promote equitable mobility opportunities for all residents. Among the cornerstones of the new plan are a joint regional planning initiative known as FOCUS, which provides incentives for cities and counties to promote future growth near transit in already urbanized portions of the Bay Area. The plan also launches a Transportation Climate Action Campaign to reduce transportation-related greenhouse gas emissions.

Santa Clara Valley Transportation Authority

Santa Clara Valley Transportation Authority (VTA) is the Congestion Management Agency (CMA) for Santa Clara County, tasked with preparing the Congestion Management Plan (CMP) that describes the strategies to address congestion problems and monitoring compliance. MTC requires the local transportation authority, such as the VTA, to establish transportation plans that can feed into the larger RTP. VTA works cooperatively with MTC, transit agencies, local governments, Caltrans, and the Bay Area Air Quality Management District. The CMP contains level-of-service standards for highways and arterials, multimodal performance standards, a capital improvement program, a program for analyzing land use decisions, and a travel demand management (TDM) program.

The minimum level-of-service standard for CMP designated facilities in Santa Clara County is LOS E, except for facilities grandfathered in at LOS F, which states that intersections operating at LOS F at the baseline year for implementation of an LOS standard can be grandfathered in. The LOS standards for Santa Clara County were established in October of 1991; thus, any intersection operating at LOS F prior to the established 1991 LOS standards, are not held to the minimum standard of LOS E.[3] Member Agencies, which include the cities and County of Santa Clara, must ensure that CMP roadways operate at or better than the minimum level-of-service standard or they face losing gas tax subventions. VTA monitors the performance of the CMP facilities at a minimum of every 2 years. If the minimum level-of-service standards are not met, Member Agencies must develop multimodal improvement plans to address the congestion.[4]

Valley Transportation Plan 2040

The Valley Transportation Plan 2040 (VTP 2040) is the countywide long-range transportation plan for Santa Clara County. As the CMA for the county, VTA periodically updates this 25-year plan.

VTP 2040 provides a planning and policy framework for developing and delivering future transportation projects. Location-specific improvements for all modes of travel are covered in three major program areas: Highways, Local System, and Transit. The Highways Program includes major freeway improvements, local freeway interchanges, and express lanes. The Local System includes local roadway improvements, expressway improvements, pedestrian and bicycle projects, and technology-related projects. The Transit Program includes projects related to transit efficiency and new transit improvements. Additional program areas that do not include specific projects: pavement management, community design and Transportation

[3] Santa Clara County VTA, Congestion Management Plan, 2013, page 29.
[4] Santa Clara County VTA, Congestion Management Plan, 2013, pages 29-30.

Programs. The VTP 2040 also identifies transportation needs through a systematic approach based on input from local jurisdictions, elected officials and the community.

Countywide Bicycle Plan

The *Santa Clara Countywide Bicycle Plan* (VTA, 2008) identifies potential bicycle network improvements within the Plan Area. These improvements are intended to decrease the distance between crossing points of physical barriers and increase the safety of these crossings. Gaps between access a cross physical barriers were identified where there was more than 1 mile between accessible crossings. This distance was determined to be a deterrent to pedestrian and bicycle activity. Within the Plan Area several of these gap locations were identified. Potential across barrier connections are recommended to provide connections to the Los Gatos Creek Trail over SR 17 between Campbell Avenue and San Tomas Expressway, between San Tomas Expressway and the Pedestrian Overcrossing at Mozart Avenue, as well as between the Pedestrian Overcrossing at Mozart Avenue and Lark Avenue. Additional across barrier connections are recommended over Los Gatos Creek between the Campbell Park Bridge and the Camden Avenue Pedestrian Bridge, as well as between San Tomas Expressway and the Pedestrian Bridge at Lark Avenue. The Countywide Bicycle Plan also recommends bicycle lanes or shoulders on existing roadway overcrossings with inadequate lane widths.

Bay Area Air Quality Management District

The Bay Area Air Quality Management District (BAAQMD) is the public agency tasked with regulating air pollution in the nine-county Bay Area, including Santa Clara County. A primary source of air pollution in the Bay Area region is from motor vehicles, air district regulations affect transportation planning in the Project Study Area. The BAAQMD's goals include reducing health disparities due to air pollution, achieving and maintaining air quality standards, and implementing exemplary regulatory programs and compliance of federal, State, and regional regulations. Air quality impacts are discussed in detail in Chapter 4.2, Air Quality, of this Draft EIR.

Local Regulations

The proposed project would be located in the City of Campbell; however, its impacts would span multiple jurisdictions, with each municipality enforcing rules, regulations, and requirements pertaining to operation and maintenance for the transportation network within their respective jurisdiction. The proposed project would be required to coordinate with and abide by the established plan goals and policies established by the City of Campbell, City of San Jose and Santa Clara Valley Transportation Authority (VTA) and Town of Los Gatos. Specific objectives and policies applicable to the proposed Project are summarized below:

Campbell General Plan

The City of Campbell's General Plan provides a framework for development within the city. Policies and strategies that are pertinent to the transportation analysis for the proposed Plan are shown in Table 4.13-1.

TABLE 4.13-1 CITY OF CAMPBELL GENERAL PLAN GOALS, POLICIES, AND STRATEGIES PERTAINING TO TRANSPORTATION AND TRAFFIC

Goal/Policy/ Strategy Number	Goal/Policy/Strategy Text
Policy LUT-1.5	Land Use Planning and the Regional Transportation System: Support land use planning that complements the regional transportation system.
Strategy LUT-1.5a	Transit-Oriented Developments: Encourage transit-oriented developments including employment centers such as office and research and development facilities and the city's highest density residential projects by coordinating the location, intensity, and mix of land uses with transportation resources, such as Light Rail.
Strategy LUT-1.5e	Shuttle Services: Encourage major employers to develop shuttle services connecting employment areas with multi-modal or regional transit facilities and business districts.
Strategy LUT-1.5f	Transportation Impact Mitigation: Require appropriate mitigation measures for new development that impacts the transportation system and consider collecting impact/mitigation fees as an in-lieu fee that could be used toward approved capital improvement projects.
Policy LUT-2.1	Alternative Transportation: Encourage the use of alternative transportation such as ridesharing, public transit, walking, and bicycling to reduce reliance on automobile use.
Strategy LUT-2.1a	Public Transit Services: Work with transit providers to provide improved public transit services, conveniently located passenger waiting areas, attractive shelters and amenities between neighborhood centers and major transit corridors.
Strategy LUT-2.1b	Transportation for the Disadvantaged: Encourage the provision of efficient transportation services for the transportation disadvantaged, such as demand responsive paratransit services.
Strategy LUT-2.1c	Transportation Management Programs: Consider alternative parking requirements and programs such as Transportation Demand Management (TDM) programs for new development, for single occupant vehicles in projects in Downtown, near transit lines, near Light Rail Stations and where shared parking is feasible.
Strategy LUT-2.1d	Alternative Fueled Vehicles: Encourage the use of alternative fueled vehicles (e.g., Electric cars) and encourage the installation of recharge facilities at commercial and employment centers.
Strategy LUT-2.1e	High Occupancy Vehicles: Encourage preferential parking treatment for high-occupancy vehicles and alternative fueled vehicles at employment and activity centers.
Strategy LUT-2.1f	School Commuting: Support the integration of public school commuting into the local transit system. For example, support the coordination and scheduling of bus routes with school functions and after school extra-curricular activities of high school students.
Strategy LUT-2.1g	Amenities: Improve amenities such as seating, lighting, signage, secure bicycle parking, street trees, and interpretive stations along bicycle and pedestrian paths, in City parks, on transit vehicles and at multi-modal transit stations to encourage walking and cycling and enhance the feeling of safety.
Strategy LUT-2.1h	Bicycle Facilities: Encourage adequate and secure bicycle facilities at employment centers, activity centers, and residential projects.
Strategy LUT-2.1i	Pedestrian Facilities Plan: Develop a Community Pedestrian Facilities Plan for the City.
Strategy LUT-2.1j	Bicycle Plan: Regularly update the citywide bicycle plan to ensure that it provides safe and convenient commuter and recreation routes throughout the City for bicyclists of all abilities.
Strategy LUT-2.1k	Transit Schedule Integration: Support the integration of light-rail, bus, and shuttle schedules and multi-modal transit stations to reduce the loss of time associated with using public transportation.
Strategy LUT-2.1l	Taxi Service: Encourage a responsive private sector taxi service
Strategy LUT-2.1m	Reduced Fare or Voucher Systems: Support transit agencies in implementing or continuing reduced fare or no fare voucher systems for populations in need.
Policy LUT-2.2	Hierarchy of Streets: Maintain a hierarchy of streets that includes freeways, expressways, arterials, collectors, and local access streets.

TABLE 4.13-1 CITY OF CAMPBELL GENERAL PLAN GOALS, POLICIES, AND STRATEGIES PERTAINING TO TRANSPORTATION AND TRAFFIC

Goal/Policy/ Strategy Number	Goal/Policy/Strategy Text
Strategy LUT-2.2a	Roadways for a Variety of Users: Design roadway space for a variety of users, including motor vehicles, transit vehicles, bicycles, and pedestrians when constructing or modifying roadways.
Strategy LUT-2.2b	Street Capacity: Avoid major increases in street capacity unless necessary to remedy severe traffic congestion or critical neighborhood traffic problems.
Strategy LUT-2.2c	Truck Movements: Regulate truck movements in a manner that balances the efficient movement of goods with the small town character of Campbell's street system.
Strategy LUT-2.2d	Slow Traffic in Downtown: Evaluate slowing traffic in the Downtown area by reducing through traffic lanes and trading the area for improved turning lanes, landscaping and bicycle lanes, and consider conversion of one-way streets to two-way travel.
Strategy LUT-2.2e	Variety of Alternate Routes: Design and maintain the City street network to provide a variety of alternate routes, so that traffic loads on any one street are minimized.
Strategy LUT-2.2f	Cut-Through Traffic: Discourage cut-through traffic in residential neighborhoods by improving the operation of arterials and collectors.
Policy LUT-2.3	Roadway and Intersection Disruption Minimization: Minimize traffic disruptions along arterial roadways and major intersections.
Strategy LUT-2.3a	Intersection Level of Service: To the extent possible, maintain level of service (LOS) on designated intersections consistent with the Santa Clara County Congestion Management Plan.
Strategy LUT-2.3b	Operation and Performance of Streets: Monitor the operation and performance of street systems. Strategy LUT-2.3c: Roadway and Intersection Capacities: Assess improvements to increase roadway and intersection capacities for all types of transportation.
Strategy LUT-2.3d	Winchester Boulevard: Evaluate alternative methods to reduce speed on Winchester Boulevard, including boulevard treatments such as bulb-outs or on-street parking and encourage north-south transit on the 17 Freeway and San Tomas Expressway.
Strategy HS-1.1f	Adequate Access: Require adequate access for emergency vehicles, including minimum street width and vertical clearance. The Uniform Fire Code currently sets the minimum street width at 20 feet. Larger buildings may require a minimum width of 30 feet.

Source: City of Campbell, General Plan, 2001.

4.13.1.2 EXISTING CONDITIONS

This section presents a discussion of the existing transportation and traffic conditions in the Plan Area, including roadways, pedestrian, bicycle and transit systems as well as traffic operations and safety analysis.

Study Intersections and Periods

The Plan Area includes 28 key intersections as listed below. These intersections are the most likely to be impacted by the proposed Plan. Intersections that are a part of the CMP network are specifically identified. The locations of the study intersections and the existing lane configurations and controls are shown in Figure 4.13-1.

Source: W-Trans, 2014.

Figure 4.13-1
Study Area

City of Campbell Study Intersections

1. San Tomas Expressway/Hamilton Avenue (CMP)
2. San Tomas Expressway/Campbell Avenue (CMP)
3. San Tomas Expressway/SR 17 Southbound Ramps (CMP)
4. Camden Avenue/White Oaks Road-Curtner Avenue (CMP)
5. Winchester Boulevard/West Sunnyoaks Avenue
6. Winchester Boulevard/Hacienda Avenue
7. East Sunnyoaks Avenue/Dell Avenue (unsignalized)
8. Hacienda Avenue/Dell Avenue (unsignalized)

City of San Jose Study Intersections

1. Bascom Avenue/Curtner Avenue (CMP)
2. Bascom Avenue/Camden Avenue (CMP)
3. SR 85 NB Off-Ramp/Bascom Avenue (CMP)
4. SR 85 SB Off-Ramp/Bascom Avenue (CMP)
5. Bascom Avenue/Samaritan Drive (CMP)

Town of Los Gatos Study Intersections

1. Winchester Boulevard/Knowles Drive
2. Winchester Boulevard/SR 85 Northbound Ramps
3. Winchester Boulevard/SR 85 Southbound Ramps
4. Winchester Boulevard/Albright Way-Courtside Drive
5. Winchester Boulevard/Wimbledon Drive
6. Winchester Boulevard/Lark Avenue
7. Lark Avenue/SR 17 Southbound Ramps
8. Lark Avenue/SR 17 Northbound Ramps
9. Lark Avenue/Los Gatos Boulevard (CMP)
10. Winchester Boulevard/Daves Avenue
11. Blossom Hill Road/Santa Cruz Avenue-Winchester Boulevard
12. Santa Cruz Avenue/Saratoga Los Gatos Road (CMP)
13. Saratoga Los Gatos Road/University Avenue
14. Los Gatos Boulevard/Saratoga Los Gatos Road
15. Santa Cruz Avenue/Main Street

Operating conditions during a typical weekday AM and PM peak periods were evaluated to capture the highest volumes on the local transportation network. The morning peak hour occurs between 7:00 and 9:00 AM and reflects conditions during the home to work or school commute, while the PM peak hour occurs between 4:00 and 6:00 PM and typically reflects the highest level of congestion during the homeward bound commute.

It is noted that Winchester Boulevard/Knowles Drive is located on the City limits boundary between the City of Campbell and the Town of Los Gatos. For the purpose of analysis, the standards of significance established by the Town of Los Gatos were applied, since the Town has stricter standards than the City of Campbell, as discussed later in the Standards of Significance section.

Additionally, it is noted that the intersection of Winchester Boulevard/Albright Way-Courtside Drive (Intersection 17) would only exist with the development of the proposed Albright Project in the Town of Los Gatos as described in Section 4.13.5. As such, this intersection was not included in the Existing Conditions scenario, but was included in the Background Conditions and all subsequent scenarios as part of the traffic impact analysis.

Roadway Network

Study Freeway Segments

The operations of the following freeway segments designated as Congestion Management Program (CMP) facilities were also evaluated.

- Northbound SR 17 between Bear Creek Road and Saratoga-Los Gatos Road
- Northbound SR 17 between Saratoga-Los Gatos Road and Lark Avenue
- Northbound SR 17 between Lark Avenue and SR 85
- Northbound SR 17 between SR 85 and San Tomas Expressway/Camden Avenue
- Northbound SR 17 between San Tomas Expressway/Camden Avenue and Hamilton Avenue
- Northbound SR 17 between Hamilton Avenue and I-280
- Southbound SR 17 between I-280 and Hamilton Avenue
- Southbound SR 17 between Hamilton Avenue to San Tomas Expressway/Camden Avenue
- Southbound SR 17 between San Tomas Expressway/Camden Avenue to SR 85
- Southbound SR 17 between SR 85 and Lark Avenue
- Southbound SR 17 between Lark Avenue and Saratoga-Los Gatos Road
- Southbound SR 17 between Saratoga-Los Gatos Road and Bear Creek Road
- Northbound SR 85 between SR 87 and Almaden Expressway
- Northbound SR 85 between Almaden Expressway and Camden Avenue
- Northbound SR 85 between Camden Avenue and Union Avenue
- Northbound SR 85 between Union Avenue and Bascom Avenue
- Northbound SR 85 between Bascom Avenue and SR 17
- Northbound SR 85 between SR 17 and Winchester Boulevard
- Northbound SR 85 between Winchester Boulevard and Saratoga Avenue
- Northbound SR 85 between Saratoga Avenue and Saratoga-Sunnyvale Road
- Northbound SR 85 between Saratoga-Sunnyvale Road and Stevens Creek Boulevard
- Northbound SR 85 between Stevens Creek Boulevard and I-280
- Southbound SR 85 between I-280 and Stevens Creek Boulevard

- Southbound SR 85 between Stevens Creek Boulevard and Saratoga-Sunnyvale Road
- Southbound SR 85 between Saratoga-Sunnyvale Road and Saratoga Avenue
- Southbound SR 85 between Saratoga Avenue and Winchester Boulevard
- Southbound SR 85 between Winchester Boulevard and SR 17
- Southbound SR 85 between SR 17 and Bascom Avenue
- Southbound SR 85 between Bascom Avenue and Union Avenue
- Southbound SR 85 between Union Avenue and Camden Avenue
- Southbound SR 85 between Camden Avenue and Almaden Expressway
- Southbound SR 85 between Almaden Expressway and SR 87

Regional Roadway Network

Within the Plan Area, regional access is primarily provided by San Tomas Expressway, SR 17, and SR 85 as described below.

San Tomas Expressway is a six-to eight lane north-south expressway that connects US 101 in Santa Clara to SR 17 in Campbell. East of SR 17 and north of US 101, San Tomas Expressway transitions to Camden Avenue and Montague Expressway respectively. Within the Plan Area, San Tomas Expressway has three lanes in each direction including a high occupancy vehicle (HOV) lane in each direction of travel, with the HOV restrictions applying during defined hours only.

SR 17 is a four- to-eight lane, north-south State highway, extending between SR 1 in Santa Cruz and I-280 in San Jose. North of I-280, SR 17 transitions into I-880 to Oakland. Access to the Plan Area is provided via interchanges at San Tomas Expressway-Camden Avenue and Lark Avenue.

SR 85 is a six-lane State Highway, extending between US 101 in Mountain View and south San Jose, where it once again joins with US 101. Within the Plan Area, SR 85 runs generally in the east-west direction and consists of two mixed-flow lanes plus an HOV lane in each direction of travel. Interchanges with Winchester Boulevard and Los Gatos Boulevard provide access to the Plan Area from SR 85.

Local Roadway Network

The Plan Area is served by a network of arterials, collectors, and local streets. Through traffic is generally served by arterial streets, while collector streets connect arterials to local streets and land uses. Local streets provide direct access to land uses. These roadways are summarized below:

- *Winchester Boulevard* is a north-south arterial roadway extending from Santa Clara southward to Los Gatos. Within most of the Plan Area, Winchester Boulevard consists of four-lanes (two lanes in each direction) plus a two-way left-turn lane (TWLTL) with a posted speed limit of 40-mph. Winchester Boulevard changes designation to Santa Cruz Avenue south of Blossom Hill Road, in Los Gatos, and to Lincoln Street north of Market Street, in Santa Clara. Access to the Plan Area is provided via its intersection with SR 85.

- *Los Gatos Boulevard-Bascom Avenue* is a 4- to 6-lane north-south arterial that extends from East Main Street, south of Saratoga Los Gatos Road, to I-880 in San Jose. North of Samaritan Drive it is known as Bascom Avenue; south of Samaritan Drive it is called as Los Gatos Boulevard. South of Lark Avenue, Los Gatos Boulevard has three travel lanes in each direction, parking lanes on both sides of the street and a landscaped median. North of Samaritan Drive, Bascom Avenue has three travel lanes in each direction and a center left-turn lane.
- *Lark Avenue* is a four-lane east-west arterial that runs between Winchester Boulevard and Los Gatos Boulevard in Los Gatos with a posted speed limit of 30 mph.
- *Hacienda Avenue* is an east-west, residential collector with one lane in each direction of travel. It extends between Del Loma Drive, just north of SR 85, eastward past Winchester Boulevard to Dell Avenue, where it terminates. Hacienda Avenue provides access to the Plan Area.
- *West Sunnyoaks Avenue* is an east-west, residential collector with one lane in each direction, connecting Virginia Avenue and Winchester Boulevard.
- *East Sunnyoaks Avenue* is an east-west, commercial/industrial collector with one lane in each direction that runs between San Tomas Expressway and Dell Avenue.
- *Dell Avenue* is a north-south commercial/industrial collector with one lane in each direction. It connects San Tomas Expressway to the north and Knowles Drive to the south and provides direct access to the Plan Area.
- *Knowles Drive* is an east-west local street that connects Pollard Road and Dell Avenue. Within the Plan Area, Knowles Drive has one to two lanes in each direction. Access to the Plan Area is provided via Knowles Drive.

Alternative Modes of Transportation

Pedestrian Facilities

Pedestrian facilities include sidewalks, crosswalks, pedestrian signal phases, curb ramps, curb extensions, and various streetscape amenities such as lighting, benches, etc. In general, a network of sidewalks, crosswalks, pedestrian signals, and curb ramps provide access for pedestrians in the vicinity of the proposed Plan Area; however, sidewalk gaps, obstacles, and barriers can be found along some or all of the roadways connecting to the Plan Area. Existing gaps and obstacles along the connecting roadways impact convenient and continuous access for pedestrians and present safety concerns. The following list includes locations where appropriate pedestrian infrastructure would address potential conflict points:

- *Dell Avenue* – Intermittent sidewalk coverage is provided on Dell Avenue with gaps on one or both sides of the street between East Sunnyoaks Avenue and Knowles Drive.

- *Winchester Boulevard* – Within the Plan Area, sidewalks do not exist on the east side of Winchester Boulevard. However, on the west side of Winchester Boulevard, there are continuous sidewalks. South of Lark Avenue, an intermittent sidewalk is provided on both sides of Winchester Boulevard.
- *Hacienda Avenue* – Intermittent sidewalks exist on both sides of the roadway on either side of Winchester Boulevard.
- *Knowles Drive* – On the east side of Winchester Boulevard, a continuous sidewalk exists on the south side of Knowles Drive; however, no sidewalk is provided on the north side of the roadway. West of Winchester Boulevard, an intermittent sidewalk exists on both sides of Knowles Drive.
- *Winchester Boulevard/Hacienda Avenue* – Marked crosswalks with pedestrian signal heads and push buttons are provided across all legs of the intersections. Curb ramps also exist at all corners of the intersection. However, due to a lack of sidewalks on the north and south side of Hacienda Avenue just east of Winchester Boulevard, pedestrian connectivity to the Plan Area is incomplete.
- *Winchester Boulevard/Knowles Drive* – Marked crosswalks, with pedestrian facilities including signal heads and push buttons, are provided on the western and southern legs of the intersections. Curb ramps are provided at the intersection corners where marked crosswalks are present.
- *Hacienda Avenue/Dell Avenue* – A marked crosswalk exists on the south of Dell Avenue at Hacienda Avenue. A sidewalk exists only at the southwest corner of this intersection.

Bicycle Facilities

The 2012 Caltrans *Highway Design Manual*, 2012, classifies bikeways into three categories:

- *Class I Multi-Use Path*: a completely separated right-of-way for the exclusive use of bicycles and pedestrians with cross flows of motorized traffic minimized.
- *Class II Bike Lane*: a striped and signed lane for one-way bike travel on a street or highway.
- *Class III Bike Route*: signing only for shared use with motor vehicles within the same travel lane on a street or highway.

Within the Plan Area, a Class I multi-use path exists adjacent to Los Gatos Creek. The Los Gatos Creek Trail extends from south of Los Gatos through Vasona Park and into San Jose. The trail can be accessed from the Plan Area via Dell Avenue. A Class II bike lane exists on Winchester Boulevard south of Lark Avenue. Bicyclists ride in the roadway and/or on sidewalks along all other streets within the project Plan Area.

Transit Facilities

Existing transit service to the Plan Area is provided by the VTA. VTA provides bus transit, light rail transit (LRT) and paratransit services within Santa Clara County, including Campbell. VTA provides bus service to the immediate Plan Area via two local routes that are described below.

Bus Route 37 provides weekday service between Capitol LRT station and West Valley College connecting Camden Avenue, Winchester LRT Station, Winchester Boulevard, and Hacienda Avenue. Service is provided between 6:00 AM to 7:00 PM with an approximately 30 minute headway during the AM and PM peak hours.

Bus Route 48 provides both weekday and weekend service between Los Gatos Civic Center to the Winchester Transit Center in Campbell via Winchester Boulevard, Hacienda Avenue, and Knowles Drive. During weekdays, service is provided between 6:00 AM to 8:30 PM with an approximately 30-60 minute headway. On weekends service is provided between 7:30 AM to 7:30 PM with an approximately 60 minute headway.

Additionally, the Winchester Transit Center is located approximately 1 mile north of the Plan Area. The Winchester Transit Center provides connections to all the above bus routes and currently serves as the southern station and termination point of the VTA LRT line 902 between Mountain View and Winchester.

Furthermore, VTA operates the Outreach Paratransit services that provides transportation to individuals with disabilities who are unable to utilize fixed route transit services.

Vasona Light Rail Transit Extension

VTA is currently planning to extend light rail service along the Winchester Boulevard corridor, referred to as the Vasona Light Rail Transit Extension. The proposed Vasona LRT Extension includes 1.6 miles of new double light rail tracks running in the existing railroad right-of-way along Winchester Boulevard, along with two new light rail stations: the Hacienda Station and the Vasona Junction Station. This would be an extension of VTA Route 902, which currently travels between Campbell-Winchester Station and Downtown Mountain View and operates at 15-minute headways during the peak periods and 30-minutes during the off-peak periods and the weekend.

The installation of these new light rail tracks would require the existing freight rail tracks to be relocated within the right-of-way. Winchester Station would no longer serve as the end of the line; the Vasona Junction Station would become the end of the line. At full buildout the proposed extension is expected to serve approximately 775 daily boardings at the Hacienda Station and 870 daily boardings at the Vasona Junction Station.

The proposed Hacienda Station would be located along Winchester Boulevard south of Hacienda Avenue, adjacent to the Plan Area. Construction of this station would require acquisition of additional right-of-way to the east of the railroad right-of-way, and removing 80 parking spots of the Vasona Technology Park. The station would also require partial removal of the center turn lane of Winchester Boulevard to accommodate the expanded right-of-way. There are two alternatives for the Hacienda Station, one with a park-and-ride lot and one without the park-and-ride lot. If constructed, the park-and-ride lot would be located just to the north of Hacienda Avenue to the east of Winchester Boulevard. The park-and-ride lot would accommodate 35 vehicles.

The proposed Vasona Junction Station would be located along Winchester Boulevard adjacent to the Netflix development just north of the SR 85 on-ramp. The Vasona Junction Station would include a park-and-ride lot as well as two bus stops located in a currently vacant parcel to the south of the Netflix development. There would be parking spaces for 135 vehicles. All vehicular and bus access to the station parking lot would occur from Winchester Circle, which is currently the interior roadway through the Netflix site. Direct pedestrian and bicycle access would be provided from the parking lot to the adjacent Los Gatos Creek Trail.

Level of Service Methodologies

Intersection Levels of Service

Level of Service (LOS) is used to rank traffic operation on various types of facilities based on traffic volumes and roadway capacity using a series of letter designations ranging from A to F. Generally, LOS A represents free flow conditions and LOS F represents forced flow or breakdown conditions. A unit of measure that indicates a level of delay generally accompanies the LOS designation.

The study intersections that are currently controlled by a traffic signal were analyzed using the signalized methodology published in the *Highway Capacity Manual* (HCM), Transportation Research Board, 2000 as well as the *Traffic Level of Service Analysis Guidelines*, Santa Clara County Transportation Authority, Congestion Management Program, 2003. These sources contain methodologies for various types of intersection control, all of which are related to a measurement of delay in average number of seconds per vehicle. The signalized methodology is based on factors including traffic volumes, green time for each movement, phasing, whether or not the signals are coordinated, truck traffic, and pedestrian activity. Average stopped delay per vehicle in seconds is used as the basis for evaluation in this LOS methodology. It should be noted that the City of Campbell, City of San Jose, and Town of Los Gatos employ the Traffix CMP default values for the analysis parameters. The ranges of delay associated with the various levels of service are indicated in Table 4.13-2.

The unsignalized study intersections with stop signs on all approaches were analyzed using the "All-Way Stop-Controlled" Intersection methodology from the HCM. This methodology evaluates delay for each approach based on turning movements, opposing and conflicting traffic volumes, and the number of lanes. Average vehicle delay is computed for the intersection as a whole, and is then related to a LOS.

The ranges of delay associated with the various levels of service are indicated in Table 4.13-3.

Freeway Levels of Service

Freeways in the Plan Area identified as being in the Congestion Management Program (CMP) in Santa Clara County were analyzed using the data published in *VTA's 2012 Annual Monitoring and Conformance Report*, which is based on the density of traffic flow using methods described in the 2000 HCM. Density is expressed in passenger's cars per mile per lane. Vehicle density is calculated using the following formula:

TABLE 4.13-2 SIGNALIZED INTERSECTION LEVEL OF SERVICE CRITERIA

LOS	Average Control Delay (seconds per vehicle)	Description
A	Delay ≤ 10.0	Free Flow; minimal to no delay.
B+	10.0 < Delay ≤ 12.0	Stable flow, but speeds are beginning to be restricted by traffic conditions; slight delays.
B	12.0 < Delay ≤ 18.0	
B-	18.0 < Delay ≤ 20.0	
C+	20.0 < Delay ≤ 23.0	Stable flow, but most drivers cannot select their own speeds and feel somewhat restricted; acceptable delays.
C	23.0 < Delay ≤ 32.0	
C-	32.0 < Delay ≤ 35.0	
D+	35.0 < Delay ≤ 39.0	Approaching unstable flow, and drivers have difficulty maneuvering; tolerable delays.
D	39.0 < Delay ≤ 51.0	
D-	51.0 < Delay ≤ 55.0	
E+	55.0 < Delay ≤ 60.0	Unstable flow with stop and go; delays.
E	60.0 < Delay ≤ 75.0	
E-	75.0 < Delay ≤ 80.0	
F	Delay > 80.0	Total breakdown; congested conditions with excessive delays.

Source: *Traffic Level of Service Guidelines*, Santa Clara County Congestion Management Program, 2003.

TABLE 4.13-3 ALL-WAY STOP-CONTROLLED INTERSECTION LEVEL OF SERVICE CRITERIA

LOS A	Delay of 0 to 10 seconds. Upon stopping, drivers are immediately able to proceed.
LOS B	Delay of 10 to 15 seconds. Drivers may wait for one or two vehicles to clear the intersection before proceeding from a stop.
LOS C	Delay of 15 to 25 seconds. Drivers will enter a queue of one or two vehicles on the same approach, and wait for vehicle to clear from one or more approaches prior to entering the intersection.
LOS D	Delay of 25 to 35 seconds. Queues of more than two vehicles are encountered on one or more approaches.
LOS E	Delay of 35 to 50 seconds. Longer queues are encountered on more than one approach to the intersection.
LOS F	Delay of more than 50 seconds. Drivers enter long queues on all approaches.

Source: *Highway Capacity Manual*, Transportation Research Board, 2000.

D = V/(N*S), where:
D= density in vehicles per mile per lane (vpmpl)
V=peak hour volume, in vehicles per hour (vph)
N= number of travel lanes
S= average travel speed, in miles per hour (mph)

The CMP requires that mixed-flow lanes and auxiliary lanes be analyzed separately from HOV carpool lanes. The CMP specifies that a capacity of 2,300 vehicles per hour per lane (vphpl) be used for segments three lanes or wider in one direction, a capacity of 2,200 vphpl be used for segments two lanes wide in one direction and a capacity of 1800 vphpl be used on HOV lanes. VTA CMP definitions for freeway segment levels of service are summarized in Table 4.13-4.

TABLE 4.13-4 FREEWAY SEGMENT LEVEL OF SERVICE (SANTA CLARA COUNTY)

LOS	Density	Description
A	Density<11.0	Free flow operations
B	11.0<density<18.0	Reasonably free flow, and free flow speeds are maintained
C	18.0<density<26.0	Flow with speeds and or near the free-flow speed
D	26.0<density<46.0	Level at which speed begins to decline with increasing flow
E	46.0<density<58.0	Operation at capacity
F	58.0<density	Breakdown in vehicular flow

Source: Santa Clara Valley Transportation Authority, 2011 Monitoring and Conformance Report.

Traffic Operation Standards

The City of Campbell, City of San Jose, and Town of Los Gatos levels of service standard for intersections is LOS D. For CMP intersections and freeway segments, the acceptable level of service standard is LOS E. These standards are discussed in more details in the Thresholds of Significance, Section 4.13.2.

Existing Conditions Traffic Operations

Traffic Volumes

Existing AM and PM peak hour traffic volumes at the study intersections were obtained from published traffic studies conducted near the Plan Area, including the *Albright Way Development, January, 2013,* Hexagon Transportation Consultants, Inc. Additional traffic volume data was also provided by the City of Campbell, Town of Los Gatos, and VTA staff. At study intersections where recent traffic counts were not available, new

turning movement counts were collected in September 2013 and May 2014 while local schools were in session. The existing peak hour traffic volumes are shown in Figure 4.13-2A and Figure 4.13-2B.

Intersection Levels of Service

Under existing conditions, the San Tomas Expressway/SR 17 SB Ramps intersection (CMP) operates at an unacceptable LOS F during the AM peak hour. All of the remaining study intersections operate acceptably during both the AM and PM peak hours. The intersection levels of service are summarized in Table 4.13-5 and the calculations are provided in Appendix D.

Freeway Levels of Service

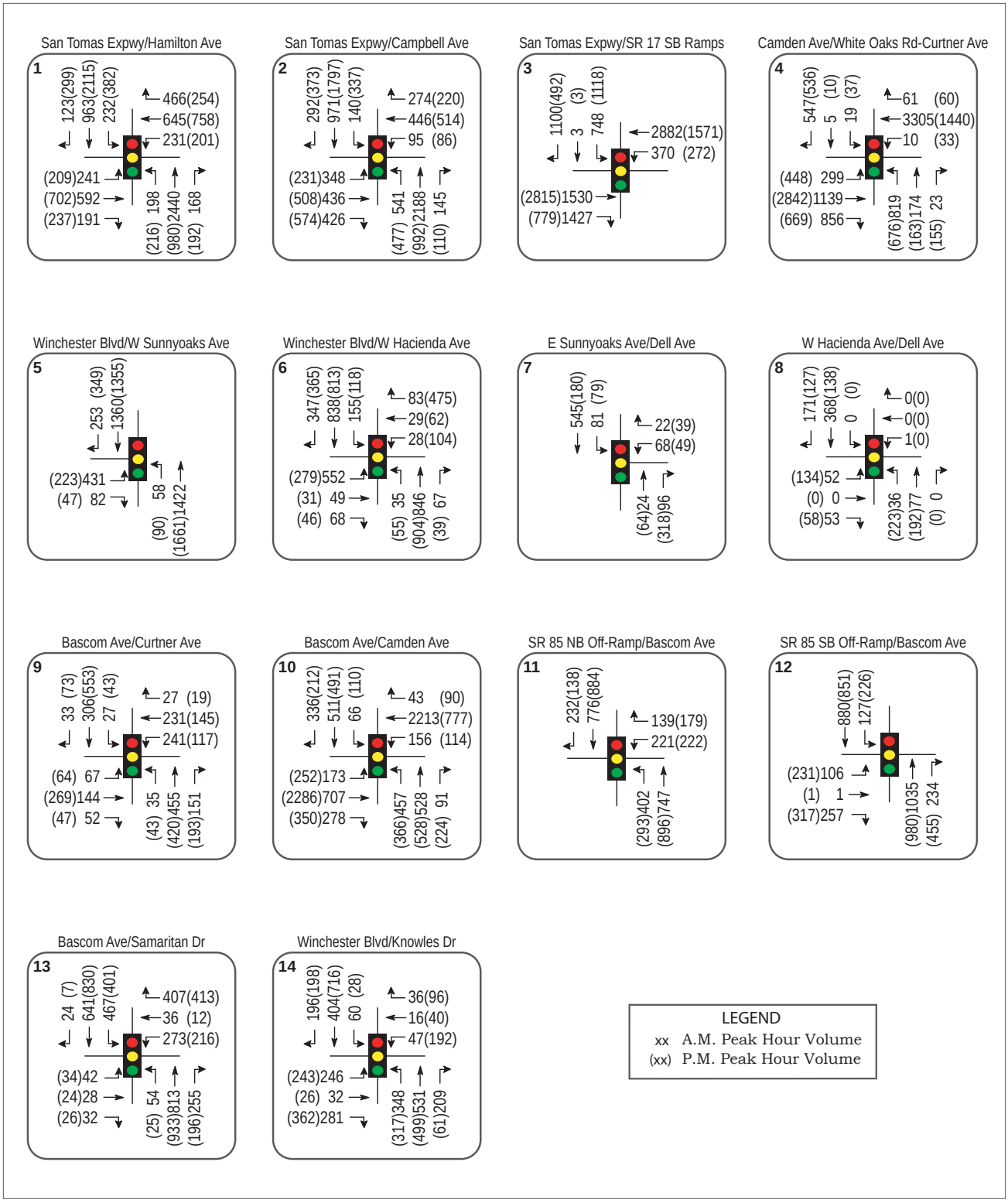
Under Existing Conditions, mixed-flow lanes on 15 of the 32 directional freeway segments analyzed operate at an unacceptable LOS F during at least one of the peak hours. For HOV lanes, five of the segments currently operate at an unacceptable LOS F during the AM peak hour. The freeway levels of service results are summarized in Table 4.13-6.

Collision Analysis

The collision histories for the study intersections were reviewed to determine any trends or patterns that may indicate a safety issue. Collision rates were calculated based on 5-year collision data available from the California Highway Patrol as published in their *Statewide Integrated Traffic Records System* (SWITRS) reports (April 30, 2008 to September 30, 2012) and data obtained from the City of Campbell (January 1, 2008 to December 31, 2012). The calculated collision rates for the study intersections were compared to average collision rates for similar facilities statewide, as indicated in *2010 Accident Data on California State Highways*, Caltrans.

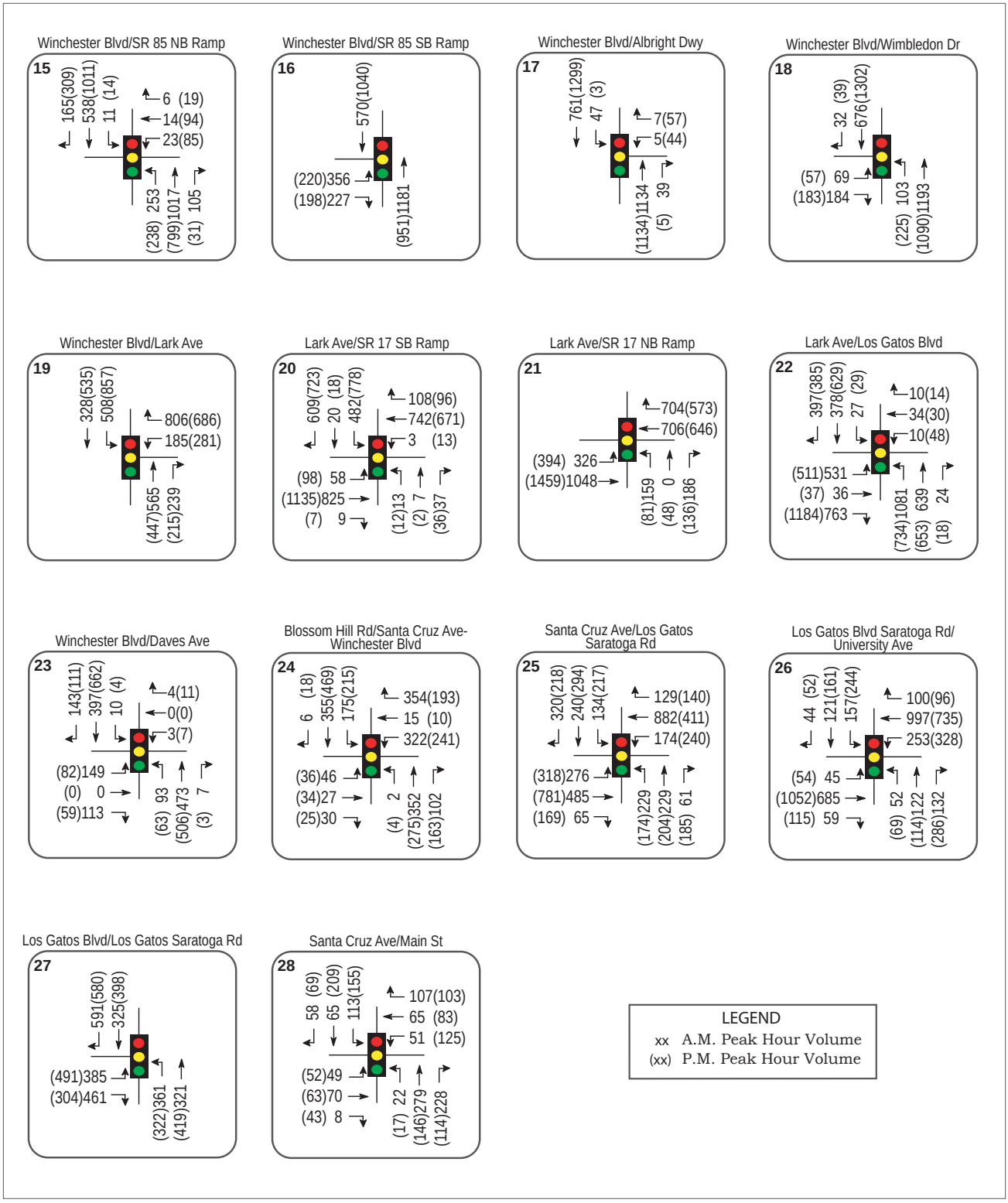
The study intersections of San Tomas Expressway/Hamilton Avenue, Winchester Boulevard/West Sunnyoaks Avenue, Hacienda Avenue/Dell Avenue, and Santa Cruz Avenue/Main Street were determined to have collision rates higher than the statewide average for similar facilities. All of the remaining intersections experienced collision rates lower than the statewide averages for similar facilities. No fatalities were reported during the 5-year period studied. The calculated collision rates are presented in Table 4.13-7 and details are provided in Appendix D.

The collision data for study intersections with higher-than-average collision rate was further examined to determine any apparent trends in collision types. The majorities of the collisions reported at San Tomas Expressway/Hamilton Avenue were rear-end and broadside type collisions, which are common collision types for a signalized intersection on an arterial, especially where conditions are occasionally congested. The primary collision factor associated with the rear-end collision was "unsafe speed" and with the broadside collision the primary collision factor was "traffic signals and signs." This intersection has approach speeds of 45 mph and five approach lanes in all directions.



Source: W-Trans, 2014.

Figure 4.13-2A
Existing Traffic Volumes



Source: W-Trans, 2014.

Figure 4.13-2B
Existing Traffic Volumes

TABLE 4.13-5 EXISTING PEAK HOUR INTERSECTION LEVELS OF SERVICE

		Existing Conditions			
		AM Peak		PM Peak	
	Study Intersection	Delay	LOS	Delay	LOS
1.	San Tomas Expressway/Hamilton Ave*	57.5	E+	49.7	D
2.	San Tomas Expressway/Campbell Ave*	57.8	E+	70.5	E
3.	San Tomas Expressway/SR 17 SB Ramps*	**121.2**	**F**	62.5	E
4.	Camden Ave/White Oaks Rd-Curtner Ave*	70.0	E	49.2	D
5.	Winchester Blvd/West Sunnyoaks Ave	22.9	C+	14.1	B
6.	Winchester Blvd/Hacienda Ave	28.3	C	36	D+
7.	East Sunnyoaks Ave/Dell Ave	30.1	D	10.6	C
8.	Hacienda Ave/Dell Ave	13.5	B	21.3	C
9.	Bascom Ave/Curtner Ave*	34.1	C-	35.5	D+
10.	Bascom Ave/Camden Ave*	55.1	E+	46.2	D
11.	SR 85 NB Ramp/Bascom Ave*	15.9	B	15.3	B
12.	SR 85 SB Ramp/Bascom Ave*	15.7	B	19.3	B-
13.	Bascom Ave/Samaritan Dr*	38.0	D+	35.5	D+
14.	Winchester Blvd/Knowles Dr	28.8	C	36.3	D+
15.	Winchester Blvd/SR 85 NB Ramps	11.8	B+	16.7	B
16.	Winchester Blvd/SR 85 SB Ramps	14.6	B	10.3	B+
17.	Winchester Blvd/Albright Way-Courtside Dr	Future intersection			
18.	Winchester Blvd/Wimbledon Dr	14.3	B	15.5	B
19.	Winchester Blvd/Lark Ave	20.7	C+	17.0	B
20.	Lark Ave/SR 17 SB Ramps	27.1	C	31.2	C
21.	Lark Ave/SR 17 NB Ramps	17.3	B	15.6	B
22.	Lark Ave/Los Gatos Blvd*	31.9	C	31.1	C
23.	Winchester Blvd/Daves Ave	27.4	C	20.4	C+
24.	Blossom Hill Rd/Santa Cruz Ave-Winchester Blvd	30.8	C	28.2	C
25.	Santa Cruz Ave/Los Gatos-Saratoga Rd*	39.4	D	38.8	D+
26.	Los Gatos-Saratoga Rd/University Ave	26.5	C	33.7	C-
27.	Los Gatos Blvd/Los Gatos-Saratoga Rd	20.7	C+	22.9	C+
28.	Santa Cruz Ave/Main St	24.9	C	27.2	C

Notes: Delay is measured in average seconds per vehicle; LOS = Level of Service; * = CMP Intersections; **Bold** text = deficient operation; For calculated delays greater than 120 seconds, HCM methodology does not produce an accurate representation of actual conditions. However, calculated delays greater than 120 seconds are reported for comparative purposes and were used to determine the significance of an impact.

TABLE 4.13-6 EXISTING FREEWAY LEVELS OF SERVICE

				Mixed-Flow Lane					HOV Lane				
Freeway	Segment	Direction	Peak Hour	Avg. Speed[a]	# of Lanes	Volume[a]	Density	LOS	Avg. Speed[a]	# of Lanes	Volume[a]	Density	LOS
SR 17	Bear Creek Rd to Saratoga-Los Gatos Rd	NB	AM	36	2.0	4,040	56	E	--	--	--	--	--
			PM	66	2.0	2,640	20	C	--	--	--	--	--
SR 17	Saratoga Los Gatos Rd to Lark Ave	NB	AM	40	2.0	4,160	52	E	--	--	--	--	--
			PM	66	2.0	3,170	24	C	--	--	--	--	--
SR 17	Lark Ave to SR 85	NB	AM	64	2.0	4,230	33	D	--	--	--	--	--
			PM	66	2.0	3,040	23	C	--	--	--	--	--
SR 17	SR 85 to San Tomas Expressway/Camden Ave	NB	AM	52	3.0	6,560	42	D	--	--	--	--	--
			PM	66	3.0	3,960	20	C	--	--	--	--	--
SR 17	San Tomas Expressway/ Camden Ave to Hamilton Ave	NB	AM	25	3.0	5,400	**72**	**F**	--	--	--	--	--
			PM	66	3.0	4,160	21	C	--	--	--	--	--
SR 17	Hamilton Ave to I-280	NB	AM	23	3.4	5,250	**76**	**F**	--	--	--	--	--
			PM	65	3.4	5,660	29	C	--	--	--	--	--
SR 85	SR 87 to Almaden Expressway	NB	AM	15	2.0	2,940	**98**	**F**	14	1	1,420	**101**	**F**
			PM	66	2.0	3,440	26	C	70	1	700	10	A
SR 85	Almaden Expressway to Camden Ave	NB	AM	23	2.0	3,550	**77**	**F**	24	1	1,800	**75**	**F**
			PM	64	2.0	4,100	32	D	70	1	840	12	B
SR 85	Camden Ave to Union Ave	NB	AM	22	2.0	3,440	**78**	**F**	35	1	2,030	58	E
			PM	65	2.0	3,770	29	D	70	1	560	8	A

TABLE 4.13-6 EXISTING FREEWAY LEVELS OF SERVICE

				Mixed-Flow Lane					HOV Lane				
Freeway	Segment	Direction	Peak Hour	Avg. Speed[a]	# of Lanes	Volume[a]	Density	LOS	Avg. Speed[a]	# of Lanes	Volume[a]	Density	LOS
SR 85	Union Ave to Bascom Ave	NB	AM	19	2.0	3,230	**85**	**F**	21	1	1,680	**80**	**F**
			PM	66	2.0	3,040	23	C	70	1	420	6	A
SR 85	Bascom Ave to SR 17	NB	AM	11	2.0	2,450	**111**	**F**	18	1	1,590	**88**	**F**
			PM	66	2.0	3,170	24	C	70	1	490	7	A
SR 85	SR 17 to Winchester Blvd	NB	AM	19	2.0	3,270	**86**	**F**	13	1	1,330	**102**	**F**
			PM	66	2.0	2,910	22	C	70	1	980	14	B
SR 85	Winchester Blvd to Saratoga Ave	NB	AM	25	2.0	3,650	**73**	**F**	43	1	2,110	49	E
			PM	66	2.0	3,170	30	D	70	1	490	7	A
SR 85	Saratoga Ave to Saratoga-Sunnyvale Rd	NB	AM	46	2.0	4,330	47	E	45	1	2,160	47	E
			PM	66	2.0	2,910	22	C	70	1	420	6	A
SR 85	Saratoga-Sunnyvale Rd to Stevens Creek Blvd	NB	AM	19	2.3	3,200	**84**	**F**	47	1	2,170	46	D
			PM	66	2.3	2,910	22	C	70	1	350	5	A
SR 85	Stevens Creek Blvd to I-280	NB	AM	66	2.0	2,640	20	C	52	1	2,190	42	D
			PM	67	2.0	2,400	18	C	70	1	420	6	A
SR 85	I-280 to Stevens Creek Blvd	SB	AM	67	3.0	288	18	B	67	1	610	9	A
			PM	26	3.0	4,440	**71**	**F**	60	1	2,400	40	D
SR 85	Stevens Creek Blvd to Saratoga-Sunnyvale Rd	SB	AM	66	2.0	2,640	20	C	67	1	410	6	A
			PM	24	2.0	3,010	**94**	**F**	70	1	2,100	30	D

TABLE 4.13-6 EXISTING FREEWAY LEVELS OF SERVICE

				Mixed-Flow Lane					HOV Lane				
Freeway	Segment	Direction	Peak Hour	Avg. Speed[a]	# of Lanes	Volume[a]	Density	LOS	Avg. Speed[a]	# of Lanes	Volume[a]	Density	LOS
SR 85	Saratoga-Sunnyvale Rd to Saratoga Ave	SB	AM	66	2.0	2,780	21	C	67	1	270	4	A
			PM	24	2.0	3,600	**75**	**F**	70	1	1,820	26	C
SR 85	Saratoga Ave to Winchester Blvd	SB	AM	66	2.0	3,170	24	C	67	1	470	11	A
			PM	39	2.0	4,140	53	E	70	1	1,960	28	D
SR 85	Winchester Blvd to SR 17	SB	AM	66	2.0	2,640	20	C	67	1	540	8	A
			PM	35	2.0	4,060	58	E	70	1	1,680	24	C
SR 85	SR 17 to Bascom Ave	SB	AM	67	2.0	1,600	12	B	67	1	470	7	A
			PM	18	2.0	3,170	**88**	**F**	70	1	2,030	29	D
SR 85	Bascom Ave to Union Ave	SB	AM	66	2.0	3,170	24	C	67	1	470	7	A
			PM	14	2.0	2,800	**100**	**F**	70	1	2,240	32	D
SR 85	Union Ave to Camden Ave	SB	AM	66	2.0	2,780	21	C	67	1	340	5	A
			PM	37	2.0	4,070	55	E	70	1	2,310	33	D
SR 85	Camden Ave to Almaden Expressway	SB	AM	66	2.0	3,170	24	C	67	1	610	9	A
			PM	48	2.0	4,320	45	D	70	1	1,890	27	D
SR 85	Almaden Expressway to SR 87	SB	AM	67	2.0	2,270	17	C	67	1	880	13	C
			PM	66	2.0	3,170	24	C	70	1	1,260	18	B
SR 17	I-280 to Hamilton Ave	SB	AM	66	3.0	4,360	22	C	--	--	--	--	--
			PM	61	3.0	6,590	36	D	--	--	--	--	--

TABLE 4.13-6 EXISTING FREEWAY LEVELS OF SERVICE

				Mixed-Flow Lane					HOV Lane				
Freeway	Segment	Direction	Peak Hour	Avg. Speed[a]	# of Lanes	Volume[a]	Density	LOS	Avg. Speed[a]	# of Lanes	Volume[a]	Density	LOS
SR 17	Hamilton Ave to San Tomas Expressway/Camden Ave	SB	AM	67	3.4	4,070	18	B	--	--	--	--	--
			PM	66	3.4	5,170	23	C	--	--	--	--	--
SR 17	San Tomas Expressway/Camden Ave to SR 85	SB	AM	66	3.0	3,960	20	C	--	--	--	--	--
			PM	66	3.0	4,360	22	C	--	--	--	--	--
SR 17	SR 85 to Lark Ave	SB	AM	66	2.0	2,780	21	C	--	--	--	--	--
			PM	50	2.0	4,400	44	D	--	--	--	--	--
SR 17	Lark Ave to Saratoga-Los Gatos Rd	SB	AM	66	2.0	3,440	26	C	--	--	--	--	--
			PM	41	2.0	4,190	51	E	--	--	--	--	--
SR 17	Saratoga Los Gatos Rd to Bear Creek Rd	SB	AM	67	2.0	2,000	15	B	--	--	--	--	--
			PM	62	2.0	4,340	35	D	--	--	--	--	--

Notes: **Bold** indicates segment operating at LOS F conditions
-- = No HOV lane provided on segment
[a] Source: Santa Clara Valley Transportation Authority Congestion Management Program Monitoring Study, 2012.

TABLE 4.13-7 COLLISION ANALYSIS

	Study Intersection	Number of Collisions	Calculated Collision Rate (c/mve)	Statewide Average Collision Rate (c/mve)
1.	San Tomas Expressway/Hamilton Ave*	41	**0.34**	0.27
2.	San Tomas Expressway/Campbell Ave*	23	0.20	0.27
3.	San Tomas Expressway/SR 17 SB Ramps*	0	0.00	0.27
4.	Camden Ave/White Oaks Rd-Curtner Ave*	15	0.12	0.27
5.	Winchester Blvd/West Sunnyoaks Ave	18	**0.26**	0.21
6.	Winchester Blvd/Hacienda Ave	10	0.17	0.27
7.	East Sunnyoaks Ave/Dell Ave	1	0.07	0.18
8.	Hacienda Ave/Dell Ave	4	**0.25**	0.18
9.	Bascom Ave/Curtner Ave*	5	0.14	0.27
10.	Bascom Ave/Camden Ave*	19	0.18	0.27
11.	SR 85 NB Ramp/Bascom Ave*	8	0.15	0.27
12.	SR 85 SB Ramp/Bascom Ave*	5	0.09	0.27
13.	Bascom Ave/Samaritan Dr*	5	0.09	0.27
14.	Winchester Blvd/Knowles Dr	6	0.12	0.27
15.	Winchester Blvd/SR 85 NB Ramps	4	0.08	0.27
16.	Winchester Blvd/SR 85 SB Ramps	2	0.05	0.21
17.	Winchester Blvd/Albright Way-Courtside Dr	0	0.00	0.18
18.	Winchester Blvd/Wimbledon Dr	6	0.11	0.21
19.	Winchester Blvd/Lark Ave	8	0.14	0.21
20.	Lark Ave/SR 17 SB Ramps	13	0.20	0.27
21.	Lark Ave/SR 17 NB Ramps	9	0.14	0.27
22.	Lark Ave/Los Gatos Blvd*	14	0.18	0.27
23.	Winchester Blvd/Daves Ave	0	0.00	0.21
24.	Blossom Hill Rd/Santa Cruz Ave-Winchester Blvd	3	0.10	0.27
25.	Santa Cruz Ave/Los Gatos-Saratoga Rd*	1	0.02	0.27
26.	Los Gatos-Saratoga Rd/University Ave	11	0.18	0.27
27.	Los Gatos Blvd/Los Gatos-Saratoga Rd	1	0.02	0.21
28.	Santa Cruz Ave/Main St	12	**0.56**	0.27

Notes: c/mve = collisions per million vehicles entering
BOLD text indicates calculated collision rates higher than the statewide average.

The majority of the collisions reported at the Winchester Boulevard/West Sunnyoaks Avenue intersection were rear-end type collisions, and most were due to either unsafe speeding or unsafe starting or backing. More than half of the collisions occurred in the southbound direction, near the San Tomas Expressway off-ramp with yield control and less than 100 feet for a vehicle to merge into a through lane on Winchester Boulevard. Winchester Boulevard at West Sunnyoaks Avenue has approach speeds of 35 mph and vehicles leaving San Tomas Expressway were most likely traveling at higher speeds.

Half of the collisions reported at the Hacienda Avenue/Dell Avenue intersection were rear-end type collisions, which is a common type of collision for stop-controlled intersections. The primary collision factor associated with the rear-end collisions was "unsafe speed." As part of the proposed Plan, it is expected that this intersection would be reconfigured, and perhaps signalized, as later discussed. These anticipated modifications would provide an opportunity to improve safety at the intersection.

The majority of the collisions reported at the Santa Cruz Avenue/Main Street intersection were rear-end and sideswipe type collisions. The primary collision factor associated with the rear-end collision was "unsafe speed" and with the sideswipe collision "improper turning." Most of the reported collisions occurred on Main Street, which has permitted left turns.

4.13.2 STANDARDS OF SIGNIFICANCE

According to Appendix G, Environmental Checklist, of the CEQA Guidelines, the proposed Plan would have a significant impact with regard to transportation and traffic, if it would:

Conflict with an applicable plan, ordinance or policy establishing measures of effectiveness for the performance of the circulation system, taking into account all modes of transportation including mass transit and non-motorized travel, and relevant components of the circulation system, including but not limited to intersections, streets, highways and freeways, pedestrian and bicycle paths, and mass transit.

1. Conflict with an applicable congestion management program, including, but not limited to, LOS standards and travel demand measures, or other standards established by the county congestion management agency for designated roads or highways.

2. Substantially increase hazards due to a design feature (e.g., sharp curves or dangerous intersections) or incompatible uses (e.g., farm equipment).

3. Result in inadequate emergency access.

4. Conflict with adopted policies, plans, or programs regarding public transit, bicycle, or pedestrian facilities, or otherwise decrease the performance or safety of such facilities.

5. Result in a change in air traffic patterns, including either an increase in traffic levels or a change in location that results in substantial safety risks.

4.13.2.1 SIGNIFICANCE IMPACT CRITERIA

The following criteria, based on the guidelines from the City of Campbell, City of San Jose, Town of Los Gatos, and VTA were used to determine whether the proposed Project would result in a significant impact to the transportation system.

City of Campbell

Traffic impacts at intersections would be considered significant if:

- The addition of project-generated traffic causes operation of an intersection to deteriorate from an acceptable LOS D or better to LOS E or LOS F; or,
- For intersections where LOS E operation has been established as acceptable, the project condition causes operation to deteriorate from LOS E to LOS F.

City of San Jose

Significant traffic impacts at signalized intersections are defined to occur when the addition of project-generated trips causes one of the following:

- Intersection operations to deteriorate from an acceptable LOS D or better to an unacceptable LOS E or F.
- Critical delay increase of four or more seconds and a V/C ratio increase of 0.01 or more to intersections operating at LOS E or F.
- The V/C ratio increases by 0.01 or more at an intersection operating at an unacceptable LOS E or F when the change in critical delay is negative.

Town of Los Gatos

The Town of Los Gatos has defined LOS D as an acceptable level of service. Traffic impacts at intersections would occur when traffic resulting from the implementation of a project causes:

- Intersection operations to deteriorate by more than one letter grade from LOS A, B or C;
- Intersection operations to deteriorate from LOS D to an unacceptable level (LOS E or LOS F); or,
- Any increase to average delay at an intersection already operating at an unacceptable level.

These guidelines apply to signalized intersections only.

Santa Clara County Valley Transportation Authority

Significant traffic impacts at signalized CMP intersections are defined to occur when the addition of project-generated trips causes one of the following:

- Intersection operations to deteriorate from LOS E or better to LOS F.
- Average control delay for critical movements to increase by four seconds or more and the critical V/C ratio to increase by 0.01 or more for intersections operating at LOS F.

4.13.3 PROJECT TRAFFIC ANALYSIS RESULTS

4.13.3.1 SITE ACCESS

This analysis is based on the following assumptions:

West District

It was assumed that the West District would connect to Winchester Boulevard via full-access (all turning movements permitted) intersections at West Hacienda Avenue and Knowles Drive. Additional limited access (right-turn in and out only) driveways would be provided along Winchester Boulevard .

To the west, the Plan Area would connect to West Hacienda Avenue, Chapman Drive, West Parr Avenue, Division Street and Knowles Drive.

Central and Waterfront Districts

The existing full-access intersections at Winchester Boulevard/East Hacienda Avenue and Winchester Boulevard/Knowles Drive would continue to provide access to the Plan Area. Additionally, access to San Tomas Expressway would continue to be provided via Dell Avenue and East Sunnyoaks Avenue.

The proposed Plan includes an optional additional access point between Vandell Way and Division Street to Winchester Boulevard. This would require creation of a new at-grade railroad crossing, which would require approval from the Rail Crossings Engineering Branch (RCEB) of the California Public Utility Commission (CPUC), the State agency charged with railroad safety. Furthermore, providing a third signalized access point along Winchester Boulevard would have impacts to traffic operations along Winchester Boulevard as well as rail operations (freight and future LRT), and bicycle and pedestrian access. Because of this, the third access point on Winchester Boulevard was not included in this analysis. However, another access point on Winchester Boulevard, generally, would have a potential to relieve some of the proposed Plan-related congestion at Winchester Boulevard/East Hacienda Avenue and Winchester Boulevard/Knowles Drive. If the City decides to pursue this improvement, additional environmental review would be required.

4.13.3.2 PROJECT TRIP GENERATION

The anticipated trip generation for the proposed Project was estimated using standard average rates published by the Institute of Transportation Engineers (ITE) in Trip Generation Manual, 9th Edition, 2012, for the following land uses.

- General Office Building, ITE Land Use # 710
- Shopping Center, ITE Land Use # 820
- General Light Industrial, ITE Land Use # 110
- Apartment, ITE Land Use #220

The Plan Area is currently occupied by land uses including office, retail and service, and light industrial. The proposed Project would remove some of the existing uses at the site; therefore, trips generated by the existing use at the site were estimated by using the ITE standards average rates for "General Office Building," "Shopping Center," and "General Light Industrial" land uses.

The proposed Plan is subdivided into three districts: West, Central and Waterfront. The West District would be located on the west side of Winchester Boulevard and the Central and Waterfront Districts would be located on the east side of Winchester Boulevard. For trip generation purposes, the Central and Waterfront Districts were combined together. The size of each of the proposed components for the West and Central plus Waterfront Districts are shown on Table 4.13-8.

TABLE 4.13-8 DELL AVENUE AREA PLAN LAND USE

Land Use	Gross Size	Existing to be Removed	Net New
Office	2,850,000 sf	558,000 sf	2,292,000 sf
Research & Development/Light Industrial	350,000 sf	498,000 sf	- 148,000 sf
Retail & Services	72,000 sf	52,000 sf	20,000 sf
Residential	300 du	--	300 du

Note: sf = square feet, du = dwelling unit

Internal Capture Trips

The ITE Trip Generation Handbook also includes data and methodologies that can be applied to determine the proportion of internal trips that may occur within a development area that includes a variety of land uses. Internal trips occur within mixed-use developments, and in the case of the proposed Plan, would consist of residents patronizing adjacent retail and restaurant uses as well as employees of nonresidential uses patronizing other nonresidential uses (such as office employees eating at adjacent restaurants). The shopping center land use category in the ITE Trip Generation Manual already accounts for trips that would be made

between the various components of the shopping center. Therefore, for the West District, the internal capture trips were calculated for the interaction between the residential and shopping center uses. For the Central plus Waterfront Districts, the internal capture trips were calculated for the interaction between the office and shopping center uses. The majority of internal capture trips would be made by walking, and the few that would be made by automobile would only travel on-site, so would not affect the adjacent street network.

Pass-by Trips

Some portion of traffic associated with shopping centers (mainly the retail, restaurant uses) is drawn from existing traffic on nearby streets. These vehicle trips are not considered "new," but are instead comprised of drivers who are already driving on the adjacent street system and choose to make an interim stop, and are referred to as "pass-by." An example of a pass-by trip would include a commuter on Winchester Boulevard who works in Campbell and plans to eat out or shop while going back home. These pass-by trips could either be planned stop along the route or an impulsive, unplanned stop to patronize a service that the driver notices along their route.

The percentage of these pass-by trips was developed based on information provided in the Trip Generation Handbook: An ITE Recommended Practice, ITE, 2004. This reference includes pass-by data collected at numerous locations for many land uses, including shopping center. It is anticipated that the proposed retail land uses in the Central and Waterfront Districts would be located further away from Winchester Boulevard and would generally support the existing and new office uses on site. Therefore, pass-by trip reduction was not applied to the Central plus Waterfront District. A pass-by reduction rate was only considered for the West District due to its location on Winchester Boulevard. Based on the available ITE pass-by data for Shopping Centers, a 40 percent PM peak hour pass-by trip reduction rate could be applied to the PM peak hour retail trips generated by the project in the West District. While ITE recommends a 40 percent reduction on pass-by trips for Shopping Centers, the Santa Clara Valley Transportation Authority (VTA) Congestion Management Program Transportation Impact Analysis Guidelines (Section 8.3.2), adopted March 2009, limits pass-by trip reductions to 30 percent. Therefore, a 30 percent reduction was applied to the PM peak hour retail trips (after deducting internally captured trips from retail trips) generated by the project in the West District.

ITE does not publish daily and AM peak hour pass-by reduction rates for a shopping center land use. In general, it is expected that the potential for pass-by trip reduction is less during the AM peak hour as compared to the PM peak hour, when traffic is highest on the adjacent streets. Based on this assumption, a 20 percent pass-by trip reduction rate was considered during the AM peak hour. Midday and early afternoon periods are expected to experience travel characteristics that are more similar to the PM peak hour than the AM peak hour; therefore, for overall daily traffic analysis, a pass-by rate of 25 percent was applied. These pass-by reductions were applied to retail trips after deducting internal capture trips.

Total Trip Generation

After applying the recommended reduction rates and deducting existing trips that would be removed from the site, the proposed Plan is expected to generate an average of 27,471 weekday daily trips, including 3,607 additional trips during the AM peak hour and 3,571 additional trips during the PM peak hour, as summarized in Table 4.13-9.

Trip Distribution

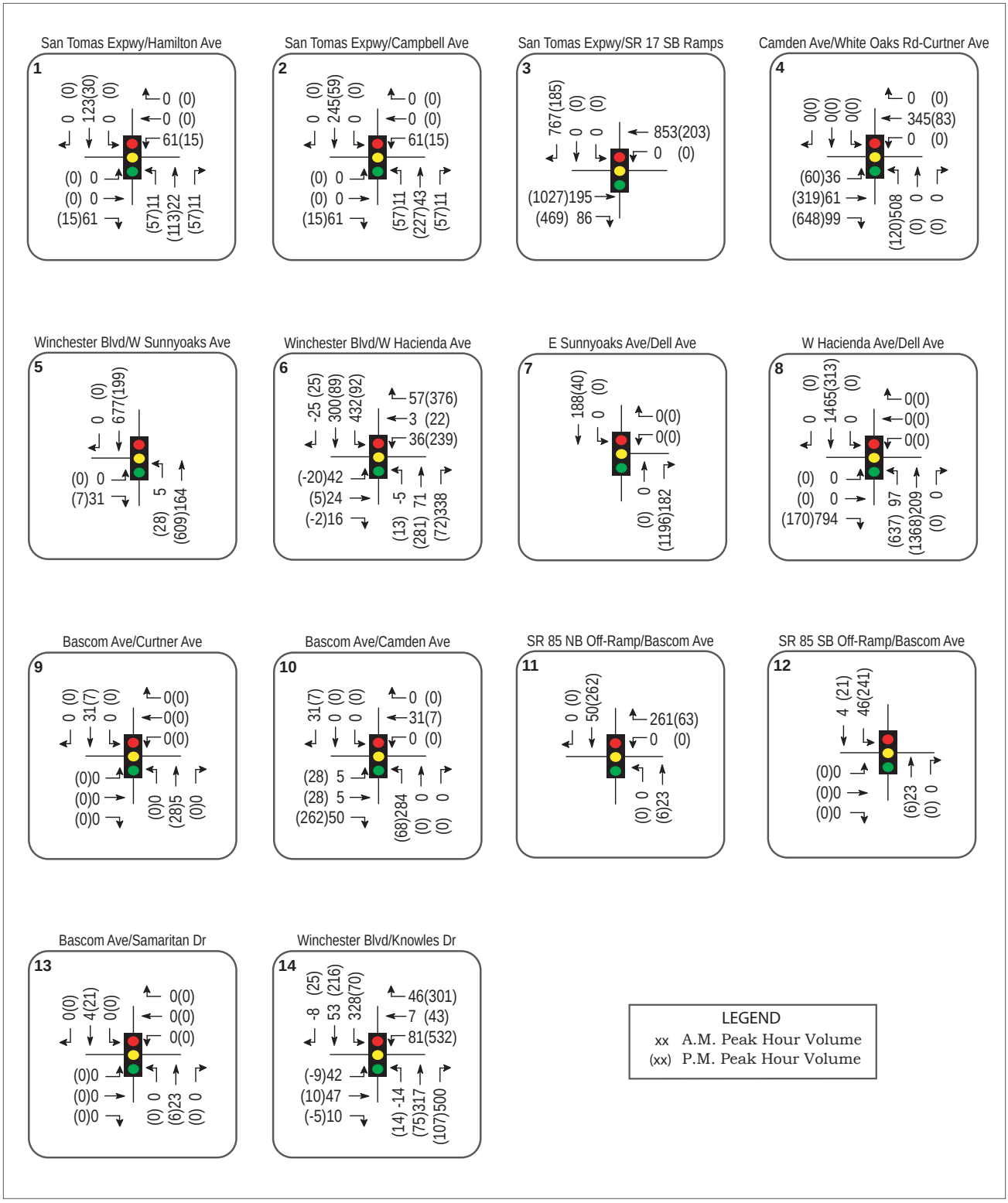
The trip distribution pattern used to allocate new project trips to the street network was determined by reviewing existing turning movements at the study intersections, proposed access to the site, location of likely origins and destinations, and the trip distribution pattern used in the analysis for the Albright Way Development (Traffic Impact Analysis, Hexagon Transportation Consultants, Inc., January 3, 2013). The trip distribution pattern based on the applied assumptions is shown in Table 4.13-10. The distributed Plan-added trips are shown on Figure 4.13-3A and Figure 4.13-3B.

4.13.3.3 TRAFFIC INFUSION ON RESIDENTIAL ENVIRONMENT (TIRE) INDEX

The effect of adding Plan-related traffic on Hacienda Avenue, west of Winchester Boulevard, was evaluated based on the Traffic Infusion on Residential Environment (TIRE) index. The TIRE index is a tool that measures the residents' perception of the effect of increased Average Daily Traffic (ADT) on residential streets. TIRE index values range from 0.0 to 5.0, with 0.0 representing the least effect of traffic on a residential street and 5.0 representing the greatest affect. A TIRE index of 3.0 typically represents the threshold at which the character of a residential street changes. Residential streets with a TIRE index above this mid-range point of 3.0 typically exhibit higher traffic volumes, while streets with a TIRE index below 3.0 are usually more suitable for residential activities.

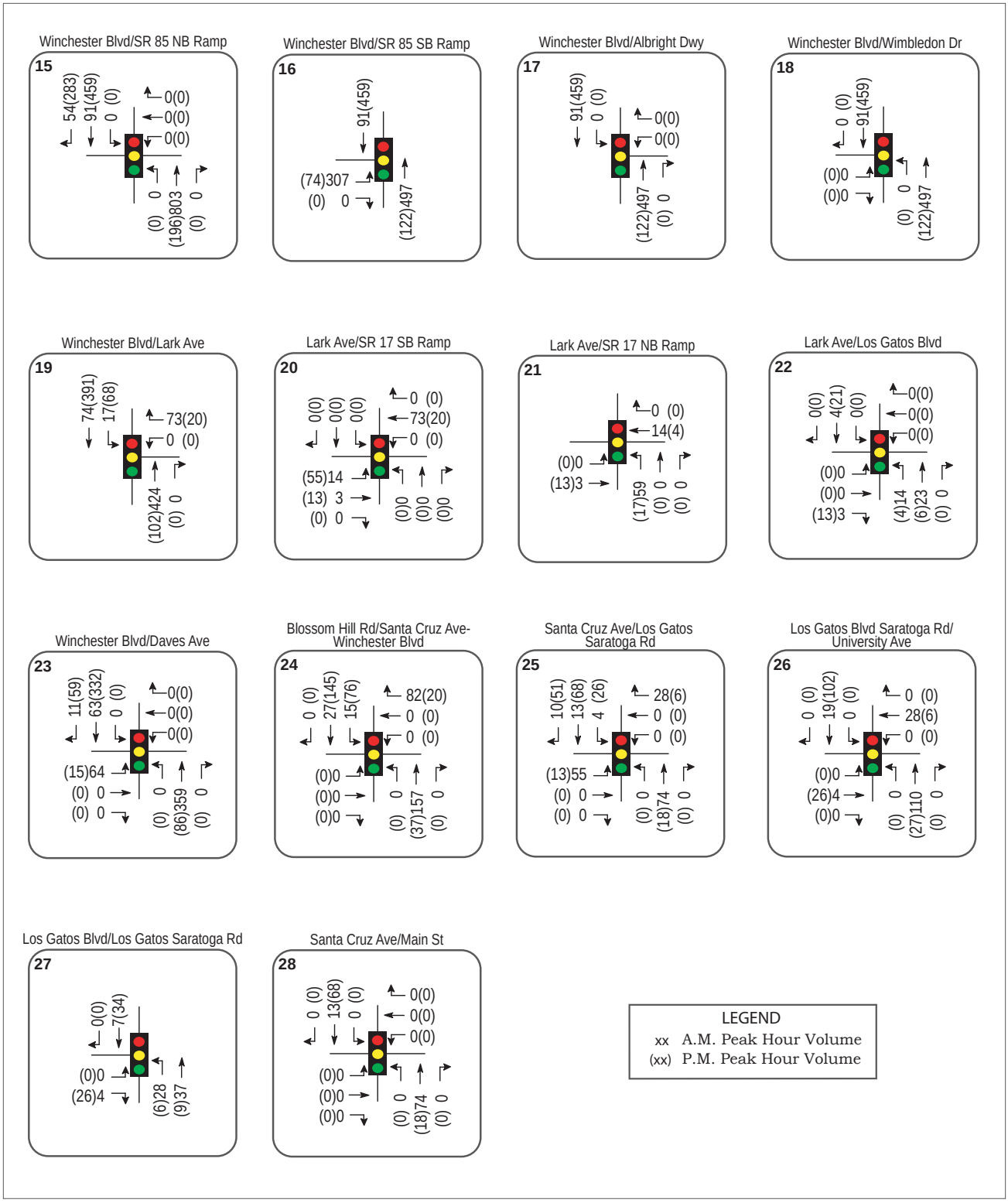
In general, a change in the TIRE index of less than 0.1 would not be noticed by a resident, while a change of 0.1 or more would be noticeable to residents along a residential street. A list of the TIRE indices is provided in Appendix D.

Currently, Hacienda Avenue carries 4,297 vehicles per day in the eastbound direction and 4,231 vehicles per day in the westbound direction. This equates to a TIRE index of 3.6. Based on the existing traffic volumes, an increase of 1,250 vehicles per day in each direction would be necessary to trigger a 0.1 change in the TIRE index. Implementation of the proposed Plan would result in 259 trips being added in the eastbound direction, and 248 trips in the westbound direction. Therefore, the proposed Plan would have no impact on the TIRE index of Hacienda Avenue



Source: W-Trans, 2014.

Figure 4.13-3A
Plan-Generated Traffic Volumes



Source: W-Trans, 2014.

Figure 4.13-3B
Plan-Generated Traffic Volumes

TABLE 4.13-9 TRIP GENERATION

Land Use	Size	Daily Trips	AM Peak Hour Total	AM Peak Hour In	AM Peak Hour Out	PM Peak Hour Total	PM Peak Hour In	PM Peak Hour Out
West District								
Existing Uses to be Removed								
Office	-60 ksf	-662	-94	-82	-12	-89	-15	-74
Retail & Services	-52 ksf	-2,220	-50	-31	-19	-193	-93	-100
Pass-by (retail trips only)		*888*	*13*	*8*	*5*	*77*	*37*	*40*
Subtotal – West District Existing Trips		-1,994	-131	-105	-26	-205	-71	-134
Proposed Uses								
Residential	300 du	1,995	153	31	122	186	121	65
Retail & Services	20 ksf	854	19	12	7	74	36	38
Internal Capture		*-170*	*-4*	*-2*	*-2*	*-16*	*-8*	*-8*
Pass-by (retail trips only)		*-192*	*-3*	*-2*	*-1*	*-19*	*-10*	*-9*
Subtotal – West District Total Trips		2,487	165	39	126	225	139	86
Subtotal – West District Net New Trips		493	34	-66	100	20	68	-48
Central & Waterfront Districts								
Existing Uses to be Removed								
Office	-498 ksf	-5,493	-777	-684	-93	-742	-126	-616
Research & Development/Light Industrial	-498 ksf	-3,471	-458	-403	-55	-483	-58	-425
Subtotal – Central & Waterfront Districts Existing Trips		-8,964	-1,235	-1,087	-148	-1,225	-184	-1,041
Proposed Uses								
Office	2,850 ksf	31,436	4,446	3,912	534	4,247	722	3,525
Research & Development/Light Industrial	350 ksf	2,440	322	283	39	340	41	299
Retail & Services	52 ksf	2,220	50	31	19	193	93	100
Internal Capture		*-154*	*-10*	*-5*	*-5*	*-4*	*-2*	*-2*
Subtotal – Central & Waterfront Districts Total Trips		35,942	4,808	4,221	587	4,776	854	3,922
Subtotal – Central & Waterfront Districts Net New Trips		26,978	3,573	3,134	439	3,551	670	2,881
Net New Plan Area Trips		**27,471**	**3,607**	**3,068**	**539**	**3,571**	**738**	**2,833**

Note: ksf = thousand square feet; du = dwelling unit

TABLE 4.13-10 TRIP DISTRIBUTION

Origin/Destination	Percentage
to/from west via San Tomas Expressway	12%
to/from east via Camden Avenue	1%
to/from north via SR 17	25%
to/from south via SR 17	10%
to/from west via SR 85	10%
to/from east via SR 85	17%
to/from west via West Sunnyoaks Avenue	1%
to/from west via Hacienda Avenue	1%
to/from west via Knowles Drive	2%
to/from north via Winchester Boulevard	5%
to/from south via Winchester Boulevard	6%
to/from southwest via Saratoga Los Gatos Road	6%
to/from north via Bascom Avenue-Los Gatos Boulevard	1%
to/from south via Basom Avenue	3%

4.13.4 ENVIRONMENTAL IMPACT DISCUSSION

Existing Plan Intersection Level of Service

TRAF-1 Implementation of the proposed Plan would cause six intersections to fall below the level of service standard.

With the addition of Plan-generated traffic, one intersection would continue to operate unacceptably, and six additional intersections would change from acceptable to unacceptable operation, as summarized below, with level of service results summarized in Table 4.13-11.

1. San Tomas Expressway/SR 17 Southbound Ramps (AM peak hour)
4. Camden Avenue/White Oaks Road-Curtner Avenue (AM and PM peak hour)
6. Winchester Boulevard/Hacienda Avenue (AM and PM peak hour)

TABLE 4.13-11 EXISTING AND EXISTING PLUS PLAN PEAK HOUR INTERSECTION LEVELS OF SERVICE

		Existing Conditions				Existing plus Plan Conditions			
		AM Peak		PM Peak		AM Peak		PM Peak	
	Study Intersection	Delay	LOS	Delay	LOS	Delay	LOS	Delay	LOS
1.	San Tomas Expressway/Hamilton Ave*	57.5	E+	49.7	D	58	E+	50.9	D
2.	San Tomas Expressway/Campbell Ave*	57.8	E+	70.5	E	64.6	E	76.2	E-
3.	San Tomas Expressway/SR 17 SB Ramps*	**121.2**	**F**	62.5	E	**310.4**	**F**	**162.7**	**F**
4.	Camden Ave/White Oaks Rd-Curtner Ave*	70.0	E	49.2	D	**137.9**	**F**	65.5	E
5.	Winchester Blvd/West Sunnyoaks Ave	22.9	C+	14.1	B	32.0	C-	14.2	B
6.	Winchester Blvd/Hacienda Ave	28.3	C	36	D+	**104.8**	**F**	**110.4**	**F**
7.	East Sunnyoaks Ave/Dell Ave	30.1	D	10.6	B	**98.6**	**F**	**426.4**	**F**
8.	Hacienda Ave/Dell Ave	13.5	B	21.3	C	**928**	**F**	**1733.6**	**F**
9.	Bascom Ave/Curtner Ave*	34.1	C-	35.5	D+	34.3	C-	35.6	D+
10.	Bascom Ave/Camden Ave*	55.1	E+	46.2	D	72.9	E	46.6	D+
11.	SR 85 NB Ramp/Bascom Ave*	15.9	B	15.3	B	20.7	C+	16.2	B
12.	SR 85 SB Ramp/Bascom Ave*	15.7	B	19.3	B-	16.2	B	21.9	C+
13.	Bascom Ave/Samaritan Dr*	38.0	D+	35.5	D+	38	D+	35.4	D+
14.	Winchester Blvd/Knowles Dr	28.8	C	36.3	D+	53.5	D-	**154.2**	**F**
15.	Winchester Blvd/SR 85 NB Ramps	11.8	B+	16.7	B	13.1	B	31.9	C
16.	Winchester Blvd/SR 85 SB Ramps	14.6	B	10.3	B+	51.8	D-	11.2	B+
17.	Winchester Blvd/Albright Way-Courtside Dr	Future intersection				Future intersection			
18.	Winchester Blvd/Wimbledon Dr	14.3	B	15.5	B	13	B	17.9	B
19.	Winchester Blvd/Lark Ave	20.7	C+	17.0	B	28.4	C	16.8	D
20.	Lark Ave/SR 17 SB Ramps	27.1	C	31.2	C	27.2	C	32.5	C-
21.	Lark Ave/SR 17 NB Ramps	17.3	B	15.6	B	18.5	B-	15.9	B
22.	Lark Ave/Los Gatos Blvd*	31.9	C	31.1	C	32	C-	31.2	C
23.	Winchester Blvd/Daves Ave	27.4	C	20.4	C+	28.4	C	25.1	C
24.	Blossom Hill Rd/Santa Cruz Ave-Winchester Blvd	30.8	C	28.2	C	36.4	D+	29.2	C
25.	Santa Cruz Ave/Los Gatos-Saratoga Rd*	39.4	D	38.8	D+	41.3	D	39.9	D
26.	Los Gatos-Saratoga Rd/University Ave	26.5	C	33.7	C-	28.8	C	35.1	D+
27.	Los Gatos Blvd/Los Gatos-Saratoga Rd	20.7	C+	22.9	C+	21.2	C+	23.5	C
28.	Santa Cruz Ave/Main St	24.9	C	27.2	C	24.4	C	27.2	C

Notes: Delay is measured in average seconds per vehicle; LOS = Level of Service; * = CMP Intersections; **Bold** text = deficient operation; For calculated delays greater than 120 seconds, HCM methodology does not produce an accurate representation of actual conditions. However, calculated delays greater than 120 seconds are reported for comparative purposes and were used to determine the significance of an impact.

7. East Sunnyoaks Avenue/Dell Avenue (AM and PM peak hour)
8. Hacienda Avenue/Dell Avenue (AM and PM peak hour)
14. Winchester Boulevard/Knowles Drive (PM peak hour)

As identified in Table 4.13-11, implementation of the proposed Plan would result in a change in service from acceptable to unacceptable LOS for six intersections. The proposed Plan would thus result in a *significant* impact.

Significance Before Mitigation: Significant

Existing Plan Freeway Level of Service

TRAF-2	**Implementation of the proposed Plan would cause freeway segments to fall below the level of service standard.**

Under Background Conditions plus the addition of proposed Plan-generated traffic, mixed-flow lanes on 18 of the 32 directional freeway segments analyzed would operate at an unacceptable LOS F during at least one of the peak hours. Of these 18 segments, 15 were previously identified as unacceptable under Background conditions. Implementation of the proposed Plan would result in a significant impact on 15 of these segments.

For HOV lanes, six of the segments would operate at an unacceptable LOS F during the AM peak hour. Of these six segments, implementation of the proposed Plan would add traffic to five of the six LOS F segments, resulting in potentially *significant* impacts on these five segments. The freeway levels of service results are summarized in Table 4.13-12.

Significance Before Mitigation: Significant.

Hazards

TRAF-3	**Implementation of the proposed Plan would not substantially increase hazards due to a design feature (e.g., sharp curves or dangerous intersection) or incompatible uses (e.g., farm equipment).**

As the proposed Plan gets implemented and roadway modifications are proposed, if at all, such modifications would go through an independent review process by the jurisdiction that controls the respective facility to determine that the proposed modifications conform with design standards and requirements of that jurisdiction. This includes standards for lane widths and roadway geometric features, bicycle and pedestrian facilities, traffic signal configuration, curve radius, sight lines, street lighting, and other elements. For the study facilities, the controlling jurisdictions may include:

TABLE 4.13-12 EXISTING PLUS PLAN FREEWAY LEVELS OF SERVICE

				Mixed-Flow Lane					HOV Lane				
Freeway	Segment	Direction	Peak Hour	Added Volume	Volume[a]	Density	LOS	Significant Impact?	Added Volume	Volume[a]	Density	LOS	Significant Impact?
SR 17	Bear Creek Rd to Saratoga-Los Gatos Rd	NB	AM	307	4,347	**60.4**	**F**	Yes	--	--	--	--	--
			PM	74	2,714	20.6	C	-	--	--	--	--	--
SR 17	Saratoga-Los Gatos Rd to Lark Ave	NB	AM	307	4,467	55.8	E	-	--	--	--	--	--
			PM	74	3,244	24.6	C	-	--	--	--	--	--
SR 17	Lark Ave to SR 85	NB	AM	247	4,477	35	D	-	--	--	--	--	--
			PM	57	3,097	23.5	C	-	--	--	--	--	--
SR 17	SR 85 to San Tomas Expressway/ Camden Ave	NB	AM	508	7,068	45.3	D	-	--	--	--	--	--
			PM	120	4,080	20.6	C	-	--	--	--	--	--
SR 17	San Tomas Expressway/Camden Ave to Hamilton Ave	NB	AM	135	5,535	**73.8**	**F**	Yes	--	--	--	--	--
			PM	708	4,868	24.6	C	-	--	--	--	--	--
SR 17	Hamilton Ave to I-280	NB	AM	135	5,385	**78**	**F**	Yes	--	--	--	--	--
			PM	708	6,368	32.7	D	-	--	--	--	--	--
SR 85	SR 87 to Almaden Expressway	NB	AM	352	3,292	**109.7**	**F**	Yes	170	1,590	**113.6**	**F**	Yes
			PM	104	3,544	26.8	D	-	21	721	10.3	A	-
SR 85	Almaden Expressway to Camden Ave	NB	AM	346	3,896	**84.7**	**F**	Yes	176	1,976	**82.3**	**F**	Yes
			PM	104	4,204	32.8	D	-	21	861	12.3	B	-
SR 85	Camden Ave to Union Ave	NB	AM	328	3,768	**85.6**	**F**	Yes	194	2,224	**63.5**	**F**	Yes
			PM	109	3,879	29.8	D	-	16	576	8.2	A	-
SR 85	Union Ave to Bascom Ave	NB	AM	343	3,573	**94**	**F**	Yes	179	1,859	**88.5**	**F**	Yes
			PM	110	3,150	23.9	C	-	15	435	6.2	A	-

TABLE 4.13-12 EXISTING PLUS PLAN FREEWAY LEVELS OF SERVICE

				Mixed-Flow Lane					HOV Lane				
Freeway	Segment	Direction	Peak Hour	Added Volume	Volume[a]	Density	LOS	Significant Impact?	Added Volume	Volume[a]	Density	LOS	Significant Impact?
SR 85	Bascom Ave to SR 17	NB	AM	158	2,608	**118.5**	**F**	Yes	103	1,693	**94.1**	**F**	Yes
			PM	55	3,225	24.4	C	-	8	498	7.1	A	-
SR 85	SR 17 to Winchester Blvd	NB	AM	0	3,270	**86.1**	**F**	-	0	1,330	**102.3**	**F**	-
			PM	0	2,910	22	C	-	0	980	14	B	-
SR 85	Winchester Blvd to Saratoga Ave	NB	AM	34	3,684	**73.7**	**F**	-	20	2,130	49.5	E	-
			PM	245	3,415	25.9	C	-	38	528	7.5	A	-
SR 85	Saratoga Ave to Saratoga-Sunnyvale Rd	NB	AM	36	4,366	47.5	E	-	18	2,178	48.4	E	-
			PM	247	3,157	23.9	C	-	36	456	6.5	A	-
SR 85	Saratoga-Sunnyvale Rd to Stevens Creek Blvd	NB	AM	32	3,232	**85.1**	**F**	-	22	2,192	46.6	E	-
			PM	253	3,163	24	C	-	30	380	5.4	A	-
SR 85	Stevens Creek Blvd to I-280	NB	AM	30	2,670	20.2	C	-	24	2,214	42.6	D	-
			PM	241	2,641	19.7	C	-	42	462	6.6	A	-
SR 85	I-280 to Stevens Creek Blvd	SB	AM	98	386	2.9	A	-	209	819	12.2	B	-
			PM	48	4,488	**86.3**	**F**	Yes	26	2,426	40.4	D	-
SR 85	Stevens Creek Blvd to Saratoga-Sunnyvale Rd	SB	AM	266	2,906	22	C	-	41	451	6.7	A	-
			PM	44	3,054	**63.6**	**F**	Yes	30	2,130	30.4	D	-
SR 85	Saratoga-Sunnyvale Rd to Saratoga Ave	SB	AM	280	3,060	23.2	C	-	27	297	4.4	A	-
			PM	49	3,649	**76**	**F**	Yes	25	1,845	26.4	D	-
SR 85	Saratoga Ave to Winchester Blvd	SB	AM	267	3,437	26	D	-	40	510	7.6	A	-
			PM	50	4,190	53.7	E	-	24	1,984	28.3	D	-

TABLE 4.13-12 EXISTING PLUS PLAN FREEWAY LEVELS OF SERVICE

				Mixed-Flow Lane					HOV Lane				
Freeway	Segment	Direction	Peak Hour	Added Volume	Volume[a]	Density	LOS	Significant Impact?	Added Volume	Volume[a]	Density	LOS	Significant Impact?
SR 85	Winchester Blvd to SR 17	SB	AM	0	2,640	20	C	-	0	540	8.1	A	-
			PM	0	4,060	**58**	**F**	Yes	0	1,680	24	C	-
SR 85	SR 17 to Bascom Ave	SB	AM	36	1,636	12.2	B	-	10	480	7.2	A	-
			PM	147	3,317	**92.1**	**F**	Yes	94	2,124	30.3	D	-
SR 85	Bascom Ave to Union Ave	SB	AM	80	3,250	24.6	C	-	12	482	7.2	A	-
			PM	268	3,068	**109.6**	**F**	Yes	214	2,454	35.1	D	-
SR 85	Union Ave to Camden Ave	SB	AM	82	2,862	21.7	C	-	10	350	5.2	A	-
			PM	307	4,377	**59.1**	**F**	Yes	175	2,485	35.5	D	-
SR 85	Camden Ave to Almaden Expressway	SB	AM	77	3,247	24.6	C	-	15	625	9.3	A	-
			PM	335	4,655	48.5	E	-	147	2,037	29.1	D	-
SR 85	Almaden Expressway to SR 87	SB	AM	66	2,336	17.4	B	-	26	906	13.5	B	-
			PM	345	3,515	26.6	D	-	137	1,397	20	C	-
SR 17	I-280 to Hamilton Ave	SB	AM	767	5,127	25.9	C	-	--	--	--	--	--
			PM	185	6,775	37	D	-	--	--	--	--	--
SR 17	Hamilton Ave to San Tomas Expressway/Camden Ave	SB	AM	767	4,837	24.1	C	-	--	--	--	--	--
			PM	185	5,355	27	D	-	--	--	--	--	--
SR 17	San Tomas Expressway/Camden Ave to SR 85	SB	AM	86	4,046	20.4	C	-	--	--	--	--	--
			PM	469	4,829	24.4	C	-	--	--	--	--	--
SR 17	SR 85 to Lark Ave	SB	AM	40	2,820	21.4	C	-	--	--	--	--	--
			PM	228	4,628	46.3	E	-	--	--	--	--	--

TABLE 4.13-12 EXISTING PLUS PLAN FREEWAY LEVELS OF SERVICE

				Mixed-Flow Lane					HOV Lane				
Freeway	Segment	Direction	Peak Hour	Added Volume	Volume[a]	Density	LOS	Significant Impact?	Added Volume	Volume[a]	Density	LOS	Significant Impact?
SR 17	Lark Ave to Saratoga-Los Gatos Rd	SB	AM	54	3,494	26.5	D	-	--	--	--	--	--
			PM	283	4,473	54.5	E	-	--	--	--	--	--
SR 17	Saratoga-Los Gatos Rd to Bear Creek Rd	SB	AM	54	2,054	15.3	B	-	--	--	--	--	--
			PM	283	4,623	37.3	D	-	--	--	--	--	--

Notes: Bold indicates segment operating at LOS F conditions; -- = No HOV lane provided on segment
[a] Source: Santa Clara Valley Transportation Authority Congestion Management Program Monitoring Study, 2012.

- City of Campbell
- City of San Jose
- Town of Los Gatos
- County of Santa Clara
- Caltrans

Design plans for intersection or roadway improvements would be reviewed and approved by the respective jurisdiction. If two or more jurisdictions share a facility (for example, the city limits for Campbell and Los Gatos go through the intersection of Winchester Boulevard/Knowles Drive), the two jurisdictions must coordinate to approve any improvements in a way that it satisfies both jurisdictions' standards.

Because any future roadway modifications would be required to conform with these jurisdictions' design standards and requirements, which as described above, focus on enhancing safe auto, bicycle and pedestrian movements, implementation of the proposed Plan would avoid hazards due to design features, and resulting impacts would be *less than significant*.

Significance Before Mitigation: Less than significant.

Emergency Access

TRAF-4	**Implementation of the proposed Plan would not result in inadequate emergency access.**

Because the proposed Plan is a program-level planning effort, it does not directly address project-level design features or building specifications. However, the General Plan includes a strategy (HS-1.1f) that "requires adequate access for emergency vehicles, including minimum street width and vertical clearances", which would help facilitate emergency response. Any new streets or developments that would result from implementation of the proposed Plan would be subject to City engineering standards and the General Plan strategy described above.

Ongoing implementation of the General Plan strategy and the City's engineering standards would result in adequate emergency access being provided in Campbell. Therefore, impacts associated with the implementation of the proposed Plan would be *less than significant*.

Significance Without Mitigation: Less than significant.

Transit, Pedestrians, and Bicycles

TRAF-5	**Implementation of the proposed Plan would not conflict with adopted policies, plans, or programs regarding public transit, bicycle, or pedestrian facilities, or otherwise decrease the performance or safety of such facilities.**

As outlined in the proposed Plan's Vision, two of the key principles are to integrate a network of multi-modal connections and provide improved connectivity to recreational facilities along the Los Gatos Creek. The goal of these connections is to create clear, safe, and direct pathways between the various components of the proposed Plan, as well as the proposed VTA light rail transit station, waterfront promenade, open space, and the existing pedestrian and bicycle network. By creating these pathways, the proposed Plan would improve non-motorized circulation throughout the Plan Area. The proposed development guidelines specify certain scenarios where these connections would need to be incorporated into future developments within the Plan Area. These pathways could also provide access through large developments to reach other key destinations within the Plan area. Additionally, developments which are adjacent to the railroad right-of-way would be required to provide a publicly-accessible, multi-use path located within the railroad right-of-way.

Policies and strategies that are pertinent to the transportation analysis for the proposed Plan are shown in Table 4.13-1. Specific examples include the following:

The proposed Plan is consistent with Caltrans Deputy Directive 64, which requires Caltrans to consider the needs of non-motorized travelers (see Section 4.13.1.1) and Campbell General Plan Policies LUT-1.5, which calls for the City to support the regional transportation system, and LUT-2.1, which calls for the City to encourage the use of alternative transportation such as ridesharing, public transit, walking, and bicycling. For example, the proposed Plan's Vision calls for an integrated network of multi-modal connections to enhance existing roadways with sidewalks and pedestrian amenities, and to create new pedestrian, bicycle, and vehicular facilities to improve connectivity. The purpose of these improvements are to create clear, safe, and direct pathways to the proposed VTA light rail station, and integration into the larger pedestrian network. Also, as noted in the proposed Plan's Vision, as the Plan Area redevelops, new development projects and significant site reconfigurations should seek to establish publicly accessible, privately maintained multi-use (pedestrian and bicycle) paths that facilitate connections to and from Dell Avenue. In addition, new development should incorporate north-south connections linking to the primary east-west connections. New connections will serve several purposes, including breaking up blocks into a more pedestrian-friendly scale, highlighting new architecture by creating open spaces between structures, facilitating pedestrian and bicycle connectivity, connecting key Dell Avenue destinations in a single network, and creating view corridors to better connect Dell Avenue visually to Los Gatos Creek Park. The proposed Plan's Vision also suggests that future development should prioritize access to rail and ponds. This will provide access to the planned light rail station at Winchester Boulevard and Hacienda Avenue and Los Gatos Creek Park. Building setbacks along the existing railroad right-of-way will allow for the establishment of a

north-south trail, providing direct station access. Site design of new development along the ponds will similarly emphasize access to and along Los Gatos Creek Park at specified locations. Existing paths to the Park will be enhanced and at least one new publicly accessible, privately maintained pedestrian/bicycle connection to the Park will be established in coordination with new development.

Bicycle

There are several bicycle improvements in the proposed Plan that are consistent with the Countywide Bicycle Plan as well as Campbell General Plan Strategy LUT-2.1h, which calls for the City to encourage adequate and secure bicycle facilities. Bicycle travel will be prioritized in the Plan Area. Regional and local connections to the Plan Area will be strengthened by improved facilities on Winchester Boulevard and Dell Avenue, as well as connections and signage leading to Los Gatos Creek Trail. Additionally, the new north-south Railway Multi-use Path will provide unimpeded bicycle mobility through the Plan Area. East-west connections will focus on getting bicyclists through the Plan Area and to regional trails in the east. Class I Bicycle Paths, or fully-dedicated, off-street facility separated from vehicular traffic is envisioned in the form of a multi-use path along the east side of the railroad tracks throughout the Plan Area. Class II Bicycle Lanes, or striped bicycle lanes dedicated for bicycle travel within roadways, are envisioned on Winchester Boulevard and Hacienda Avenue. Bicycle lanes on Winchester Boulevard connect the Plan Area to the rest of the city, while bicycle lanes on Hacienda Avenue connects Winchester Boulevard to regional trails in Los Gatos Creek Park. Class III Bicycle Routes, or a street that is specifically designated as a shared route for bicycles and vehicles, are envisioned for Dell Avenue, Knowles Drive, Division Street, and any potential new streets. Class III Bicycle Routes should include enhanced "sharrows" in the Plan Area, with brightly marked shared lane markings prominently featured in the travel lane. Also, in order to further encourage bicycling as a key method of transportation, private development should provide ample bicycle facilities, including racks, lockers, and bicycle-friendly facilities such as shower facilities. Bicycle racks may become more appropriate within public rights-of-way or at critical public nodes as the Plan Area redevelops and demand for bicycle parking facilities increases.

Pedestrian

There are several proposed Plan pedestrian elements that are consistent with Campbell General Plan Strategy LUT-2.1. The proposed Plan notes that pedestrian-friendly design and facilities should be integrated into all aspects of physical planning, public improvements, and private development to ensure that the Plan Area is a walkable office district. All streets in the Plan Area should be either improved with widened sidewalks or completely new sidewalks in places where gaps currently exist. Sidewalk widening on Winchester Boulevard along the west side of the street will extend the pedestrian realm and provide a safer and more comfortable environment for pedestrians, bus shelters, and other features. Development setbacks should be utilized to expand the visual and functional width for pedestrians as new mixed use projects develop. New sidewalks are envisioned on Hacienda Avenue, Dell Avenue, Vandell Way, Division Street, and the north side of Knowles Drive. The sidewalk system should be established throughout the Plan Area to

eliminate existing gaps. Sidewalks should be wide enough to accommodate pedestrians, shade trees in tree wells, and furniture and landscaping features, as well as ensure ADA accessibility.

In order to facilitate improved north-south pedestrian and bicycle travel in the Plan Area, a separated multi-use path along the east side of the railway should be provided. This path will provide connections from the proposed VTA light rail station to other developments in the Plan Area through intersecting streets and pedestrian pathways. The Railway Multi-use Path should be provided with enough width to safely accommodate bicycle and pedestrian flow. The Railway Multi-use Path should be separated from the UPRR right-of-way with attractive fencing or landscaping to discourage pedestrian and bicyclist interaction with the tracks.

Intersection improvements, including curb ramps, high-visibility crosswalks, curb extensions where feasible, special paving, and other features intended to improve pedestrian safety, are recommended for the following intersections:

- Winchester Boulevard/Hacienda Avenue
- Winchester Boulevard/Knowles Drive
- Hacienda Avenue/Dell Avenue
- Division Street/Dell Avenue
- Knowles Drive/Dell Avenue

Additionally, new mid-block crossings with pedestrian bulb-outs are proposed to be added adjacent to pedestrian pathways and other intermittent locations to provide crossing opportunities on long blocks. Special safety features, such as in-ground lighting, signage, and other precautionary measures should be included to alert vehicles of mid-block crossings.

Streets and pathways will be lined with trees where feasible and appropriate to beautify the district and provide pedestrian comfort and shade. On public streets, street trees should be provided in tree wells at the edge of the sidewalks.

As a critical mass of tech companies move in and the Plan Area develops with more services, an integrated wayfinding system should be designed and installed to reflect a unified theme for the Plan Area and facilitate critical pedestrian connections to amenities and other destinations.

Transit

The proposed Plan is consistent with Campbell General Plan Policy LUT-1.5, which calls for the City to support land use planning that complements the regional transportation system, Policy LUT-2.1, which calls for the City to encourage the use of alternative transportation, and Strategy LUT-1.5a, which calls for the City to encourage transit-oriented developments that include a mix of land uses with access to transportation resources.

VTA's current bus service near the Plan Area will continue to provide transit service for the Dell Avenue area for the immediate future. As the development allowed under the proposed Plan occurs, the proposed Plan calls for the City to monitor demand and work with VTA to determine if a bus route providing direct access to the interior portions of the Plan Area along Dell Avenue should be established.

The proposed Plan fully supports the establishment of the light rail station to increase multimodal access and increase the attractiveness of Dell Avenue for high-tech employers and employees. If implemented, the Vasona LRT Extension would provide added transit service to the Plan Area. Both the Hacienda Station and the Vasona Junction Station are located adjacent to the Plan Area. The Hacienda Station would serve northern portions of the Plan Area and the Vasona Junction Station would serve southern portions of the Plan Area. It is estimated that about 90 percent of uses within the Plan Area are to the east of Winchester Boulevard, and the entire Plan Area to the west of Winchester Boulevard would be located within 2,000 feet (about a 10- to 15-minute walk) from the station.

Implementation of the Vasona LRT extension would have the potential to provide Plan Area residents and employees connections to both local and regional transit services without needing to use a car. In addition to connecting to destinations along the LRT line, the LRT would provide connecting transit service to Caltrain at San Jose Diridon Station. As a result of this added connectivity, it is likely that some Plan Area residents and employees would choose to utilize transit who may have otherwise driven a personal vehicle. To account for this shift in mode choice, adjustments to the proposed Plan trip generation have been made, as discussed later in the Trip Generation section.

In the short term, in the absence of light rail or direct bus service, the proposed Plan encourages employers in the Plan Area to work together to establish a shuttle system that provides service to the Winchester Transit Center, where light rail service is currently provided. This is consistent with Campbell General Plan Strategy LUT-1.5e, which calls for the City to encourage major employers to develop shuttle services to connect employment areas with multimodal or regional transit facilities and business districts. Ideal locations for shuttle stops would be along Dell Avenue near Vandell Way, halfway between Dell Avenue and Winchester Boulevard on Knowles Drive, and halfway between Dell Avenue and Winchester Boulevard on Hacienda Avenue.

Significance Without Mitigation: Less than significant.

Air Traffic Patterns

TRAF-6	**Implementation of the proposed Plan would not result in a change in air traffic patterns, including either an increase in traffic levels or a change in location, that results in substantial safety risks.**

The proposed Plan does not affect the location, design, or operation of any of the region's airports. While the new air travel demand potentially generated by development allowed by the proposed Plan has not been estimated, it is not expected to cause any of the region's airports to reach or exceed operational capacity.

Airports in the Bay Area, including San Jose International Airport, San Francisco International Airport, and Oakland International Airport, maintain operational plans to manage existing and projected future demand generated by land use development throughout the region. Because the level of development in the proposed Plan is a fraction of the total development envisioned in the region, this growth is not expected to substantially alter existing or future airport operations, and impact would be *less than significant*.

Significance Without Mitigation: Less than significant.

Parking Analysis

Shortage of parking itself is not considered an environmental impact under CEQA; however, the secondary effects that can result from an under-supply of parking, such as traffic congestion due to drivers searching for scarce available parking spaces, can result in impacts under CEQA. Therefore, the following assessment of the effect of the proposed Plan's parking provisions is provided in this section.

TRAF-7	**Implementation of the proposed Plan would not result in a substantial under-supply of parking that would contribute to excessive vehicle circulation and congestion due to drivers searching for parking.**

The parking requirements for the proposed Plan default to the parking requirements within the City's Municipal Code. As summarized in Table 4.13-13, the City required parking for the combined Central and Waterfront Districts would be 13,802 spaces, and the required supply for the West District would be 888 spaces. For the purpose of this analysis, it was assumed that 25 percent of residential units would be either studio or one-bedroom units, with all other units having two or more bedrooms.

In addition, the proposed Plan contains a provision that would reduce the required number of parking spaces for Core Tech uses within the DAAP-Central and DAAP-Waterfront Districts, to discourage the over-supply of parking which can lead to: higher numbers of auto trips; less walking, biking and transit use; and increased development costs. The proposed Plan would permit new Core Tech developments that are able to demonstrate incorporation of a combination of Transportation Demand Measures (TDM) to reduce parking requirements to as low as 1 parking space per 350 square feet of leasable floor area. Possible TDM strategies include:

- Shuttle Programs
- Carshare
- Employee Transit Programs and Incentives
- Additional Bicycle Parking Facilities above and beyond those required by the City code
- Vanpool and Carpool Programs
- Parking Programs
- Bicycle Incentives
- Bikeshare

TABLE 4.13-13 CITY REQUIRED PARKING BY DISTRICT

Land Use	City Land Use	Size	Required Spaces	Code
Central/Waterfront				
General Office Building	Professional Offices	2,850,000 sf	12,667	1 space for each 225 sf gfa
General Light Industrial	General Industrial	350,000 sf	875	1 space for each 400 sf gfa
Shopping Center	Retail Stores	52,000 sf	260	1 space for each 200 sf gfa
Subotal			13,802	
West				
Shopping Center	Retail Stores	20,000 sf	100	1 space for each 200 sf gfa
Apartment	Multi-Family Dwellings			
	Studio or 1 Bedroom Units	75 du	169	2 covered spaces plus ½ guest space for each unit
	2+ Bedroom Units	225 du	619	2 ½ covered spaces plus ½ guest space for each unit
Subtotal			888	

Note: sf gfa = square feet gross floor area
Source: City of Campbell, Municipal Code, Chapter 21.28

- Telecommuting
- Staggered work schedules
- Charge for Parking

Because projects developed under the proposed Plan would be subject to the parking rates and requirements in the Municipal Code, and would be encouraged to incorporate the parking management strategies outlined in the proposed Plan, the impact with respect to parking would be *less than significant*.

Significance Without Mitigation: Less than significant.

4.13.5 CUMULATIVE IMPACT DISCUSSION

TRAF-8	**Implementation of the proposed Plan, in combination with past, present, and reasonably foreseeable projects, would result in additional cumulatively considerable impacts.**

This section analyzes four cumulative traffic operations scenarios: Background Conditions, Background Plus Plan, Cumulative Conditions, and Cumulative Plus Plan Conditions. These scenarios are described in more detail below.

Background Conditions Traffic Operations

Traffic Volumes

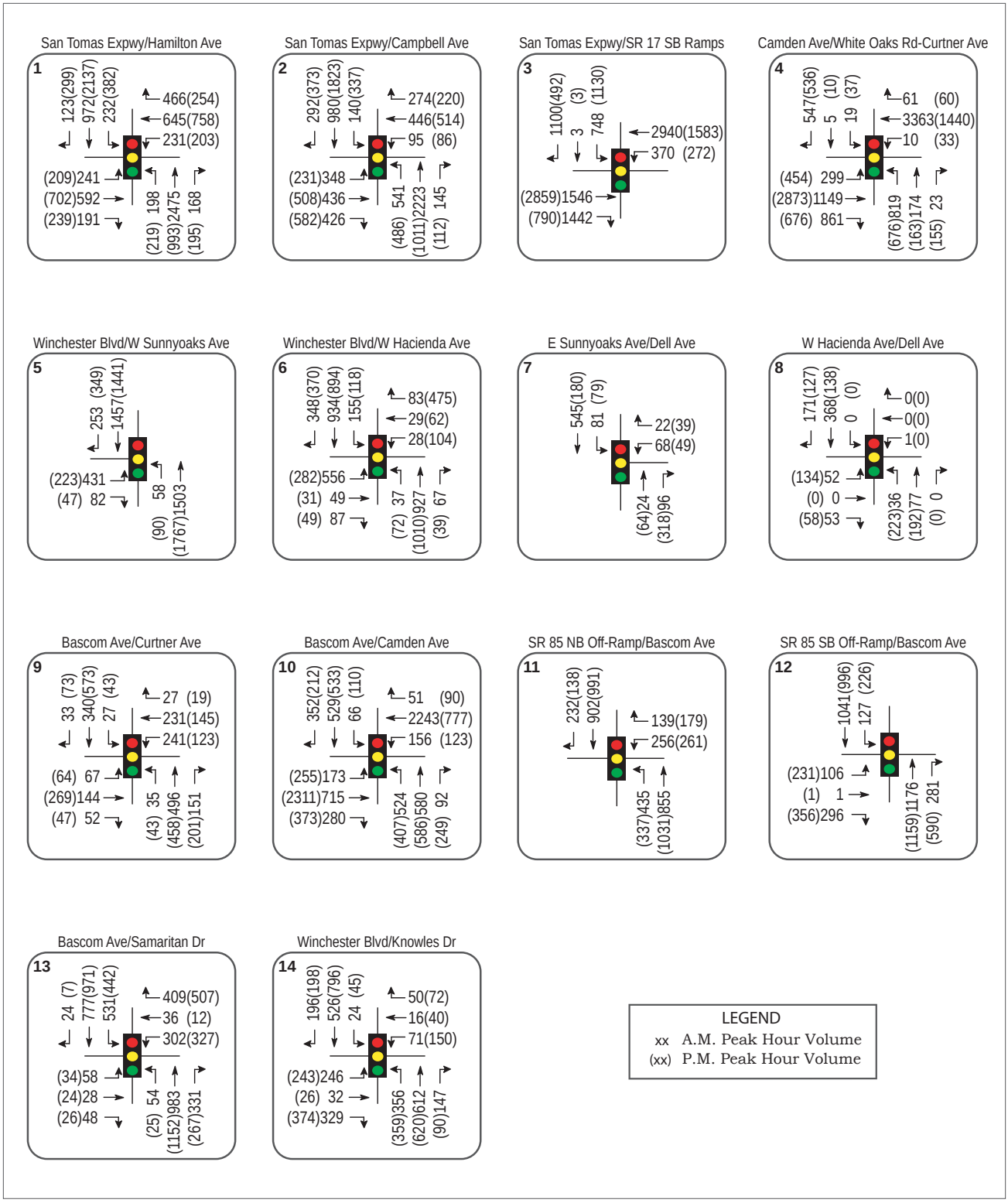
Background Conditions represents a short-term analysis horizon, usually a 3-5 year horizon scenario. The Background scenario includes traffic that would be generated by planned and approved developments within the cities of Campbell, San Jose, and the Town of Los Gatos within the vicinity of the Plan Area. A list of these projects was provided by staff of the three cities, as summarized below:

- Bentley Silicon Valley (620 Blossom Hill Road)
- 146 Gemini Court housing project
- 550 Hubbell Way housing project
- Los Gatos Affordable Housing Overlay Zoning (Knowles Drive and Oak Lane projects)
- Moore Buick GMC Redevelopment (15500 Los Gatos Boulevard)
- 16212 Los Gatos Boulevard Redevelopment
- CVS (15600 Los Gatos Boulevard)
- Hillbrook School (300 Marchmont Drive)
- Twin Oaks Drive project
- 258 Union Avenue housing project
- Albright Way Office Development
- South Bay Honda Housing Project (16213 Los Gatos Boulevard)
- Swanson Ford Mixed Use Development (16005 Los Gatos Boulevard)
- Los Gatos Boulevard/Gateway Medical Office (15400 Los Gatos Boulevard)
- Placer Oaks Housing (Placer Oaks Avenue/Frank Avenue)
- Riviera Terrace Expansion (135 Riviera Drive)
- Highlands of Los Gatos Subdivision (15700 Shady Lane)
- Samaritan Medical Office Building (Samaritan Drive)

Traffic volumes that would be generated by these planned and approved projects was obtained from the traffic impact analyses prepared for the respective projects, as well as traffic volumes provided by the Town of Los Gatos. Near term traffic volumes are shown in Figure 4.13-4A and 4.13-4B.

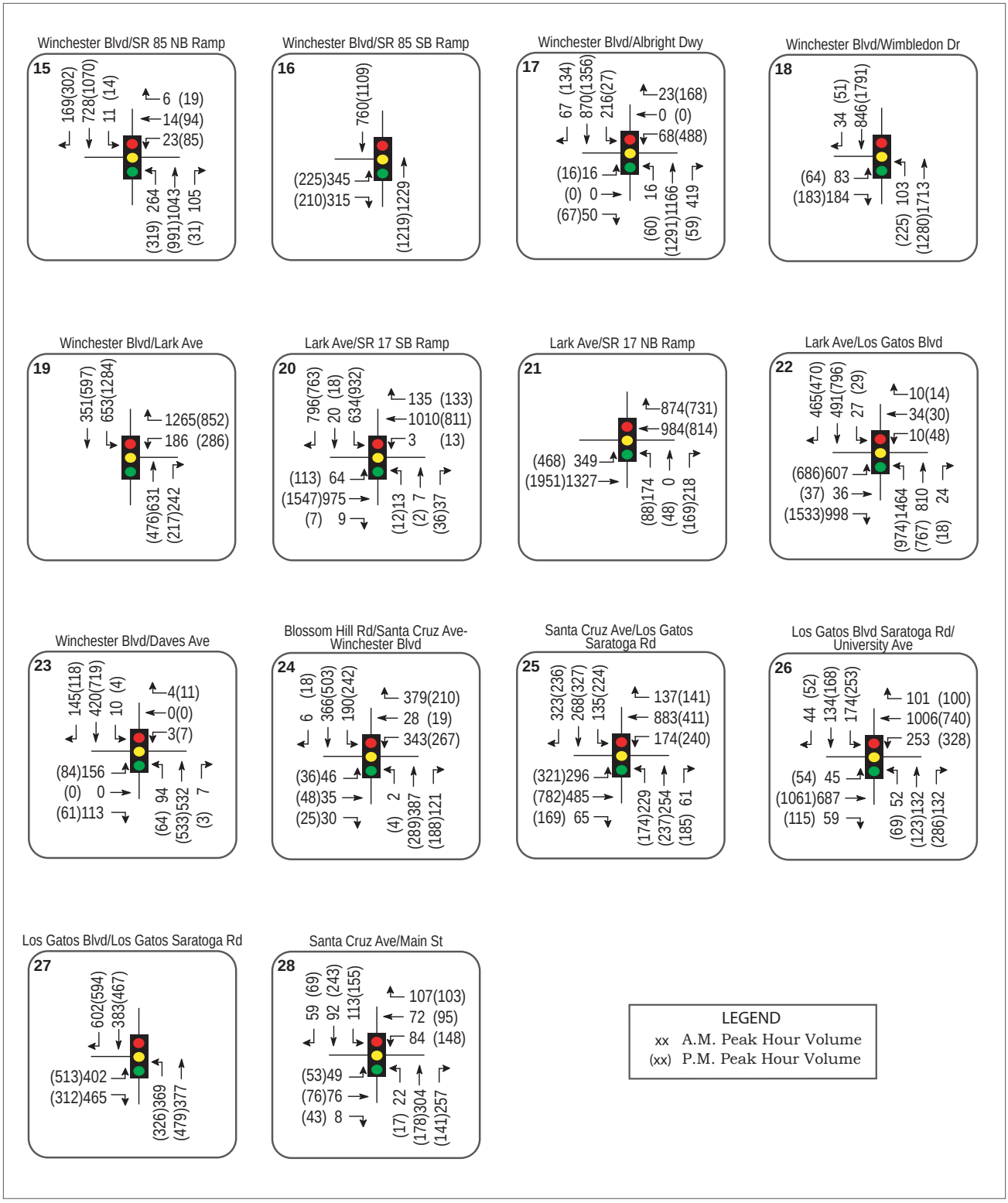
Intersection Improvements

Under the Background Conditions scenario, as well as all subsequent scenarios, the following modifications to the study intersections were assumed to be in place.



Source: W-Trans, 2014.

Figure 4.13-4A
Background Traffic Volumes



Source: W-Trans, 2014.

Figure 4.13-4B
Background Traffic Volumes

- Winchester Boulevard/Albright Way-Courtside Driveway – This is a new signalized intersection that would be created with the development of the Albright development. Lane configuration and traffic volume growth presented in the Albright Traffic Study were applied to this analysis.
- Saratoga Los Gatos Road/University Avenue – At the time of analysis, construction for a Town of Los Gatos Capital Improvement Project was underway to modify this intersection. The improvements include a second southbound left-turn lane, and a dedicated northbound right-turn lane, along with associated traffic signal modification.

Intersection Levels of Service

Under Background Conditions, with the addition of background project traffic to existing traffic volumes, the intersection of San Tomas Expressway/SR 17 Southbound Ramps would continue to operate unacceptably during the AM peak hour. The intersection levels of service are summarized in Table 4.13-14 and the calculations are provided in Appendix D.

Background plus Plan Conditions

Intersection Operations

With the addition of Plan-generated traffic volumes to projected Background Conditions traffic volumes, the intersection of San Tomas Expressway/SR 17 Southbound Ramps is expected to continue to operate unacceptably, and seven additional intersections are projected to begin to operate unacceptably, as summarized below, and in Table 4.13-15.

1. San Tomas Expressway/SR 17 Southbound Ramps (AM and PM peak hour)
4. Camden Avenue/White Oaks Road-Curtner Avenue (AM and PM peak hour)
6. Winchester Boulevard/Hacienda Avenue (AM and PM peak hour)
7. East Sunnyoaks Avenue/Dell Avenue (AM and PM peak hour)
8. Hacienda Avenue/Dell Avenue (AM and PM peak hour)
10. Bascom Avenue/Camden Avenue (AM peak hour)

Cumulative Conditions

Cumulative Conditions includes an analysis of projected traffic volumes for the horizon year of 2040, without the addition of the buildout of the proposed Plan. The VTA maintains a countywide travel demand forecasting model. This model was reviewed to develop growth factors for study intersections, which was applied to existing traffic volumes. Additionally, traffic volumes from the North 40 and Albright projects were added to the Cumulative scenario, as these are large development projects which have not yet been accounted for in the VTA's model.

TABLE 4.13-14 BACKGROUND PEAK HOUR INTERSECTION LEVELS OF SERVICE

		Background Conditions			
		AM Peak		PM Peak	
	Study Intersection	Delay	LOS	Delay	LOS
1.	San Tomas Expressway/Hamilton Ave*	58.1	E+	49.9	D
2.	San Tomas Expressway/Campbell Ave*	58.4	E+	72.7	E
3.	San Tomas Expressway/SR 17 SB Ramps*	**122**	**F**	64.6	E
4.	Camden Ave/White Oaks Rd-Curtner Ave*	71.1	E	49.6	D
5.	Winchester Blvd/West Sunnyoaks Ave	21.1	C+	13.5	B
6.	Winchester Blvd/Hacienda Ave	27.1	C	35	C-
7.	East Sunnyoaks Ave/Dell Ave	21.5	C	9.8	A
8.	Hacienda Ave/Dell Ave	12.1	B	11.9	B
9.	Bascom Ave/Curtner Ave*	34.2	C-	35.6	D+
10.	Bascom Ave/Camden Ave*	58.8	E+	47.9	D
11.	SR 85 NB Ramp/Bascom Ave*	15.7	B	15.3	B
12.	SR 85 SB Ramp/Bascom Ave*	16.2	B	19.6	B-
13.	Bascom Ave/Samaritan Dr*	39.4	D	375	D+
14.	Winchester Blvd/Knowles Dr	29.4	C	33.6	C-
15.	Winchester Blvd/SR 85 NB Ramps	13.7	B	17.3	B
16.	Winchester Blvd/SR 85 SB Ramps	13.2	B	9.7	A
17.	Winchester Blvd/Albright Way-Courtside Dr	10.9	B+	20.3	C+
18.	Winchester Blvd/Wimbledon Dr	13.4	B	18.5	B-
19.	Winchester Blvd/Lark Ave	42.3	D	16.8	B
20.	Lark Ave/SR 17 SB Ramps	28.1	C	39	D+
21.	Lark Ave/SR 17 NB Ramps	18.6	B-	16.5	B
22.	Lark Ave/Los Gatos Blvd*	50.1	D	41.2	D
23.	Winchester Blvd/Daves Ave	27.2	C	20.6	C+
24.	Blossom Hill Rd/Santa Cruz Ave-Winchester Blvd	32.5	C-	29.8	C
25.	Santa Cruz Ave/Los Gatos-Saratoga Rd*	40.5	D	39.5	D
26.	Los Gatos-Saratoga Rd/University Ave	26.8	C	34.1	C-
27.	Los Gatos Blvd/Los Gatos-Saratoga Rd	21.8	C+	24.7	C
28.	Santa Cruz Ave/Main St	25.5	C	27.7	C

Notes: Delay is measured in average seconds per vehicle; LOS = Level of Service; * = CMP Intersections; **Bold** text = deficient operation; For calculated delays greater than 120 seconds, HCM methodology does not produce an accurate representation of actual conditions. However, calculated delays greater than 120 seconds are reported for comparative purposes and were used to determine the significance of an impact.

TABLE 4.13-15 BACKGROUND AND BACKGROUND PLUS PLAN PEAK HOUR INTERSECTION LEVELS OF SERVICE

	Background Conditions				Background plus Plan Conditions			
	AM Peak		PM Peak		AM Peak		PM Peak	
Study Intersection	Delay	LOS	Delay	LOS	Delay	LOS	Delay	LOS
1. San Tomas Expressway/Hamilton Ave*	58.1	E+	49.9	D	58.7	E+	51.1	D-
2. San Tomas Expressway/Campbell Ave*	58.4	E+	72.7	E	65.5	E	78.6	E-
3. San Tomas Expressway/SR 17 SB Ramps*	**122**	**F**	64.6	E	**313.1**	**F**	**166.7**	**F**
4. Camden Ave/White Oaks Rd-Curtner Ave*	71.1	E	49.6	D	**140.1**	**F**	66.8	E
5. Winchester Blvd/West Sunnyoaks Ave	21.1	C+	13.5	B	24.8	C	13.6	B
6. Winchester Blvd/Hacienda Ave	27.1	C	35	C-	79.9	E-	**103.4**	**F**
7. East Sunnyoaks Ave/Dell Ave	21.5	C	9.8	A	**65.3**	**F**	**305.3**	**F**
8. Hacienda Ave/Dell Ave	12.1	B	11.9	B	**809.6**	**F**	**1035.2**	**F**
9. Bascom Ave/Curtner Ave*	34.2	C-	35.6	D+	34.4	C-	35.7	D+
10. Bascom Ave/Camden Ave*	58.8	E+	47.9	D	**81.0**	**F**	48.4	D
11. SR 85 NB Ramp/Bascom Ave*	15.7	B	15.3	B	20.7	C+	16.2	B
12. SR 85 SB Ramp/Bascom Ave*	16.2	B	19.6	B-	16.6	B	23.2	C
13. Bascom Ave/Samaritan Dr*	39.4	D	375	D+	39.4	D	37.4	D+
14. Winchester Blvd/Knowles Dr	29.4	C	33.6	C-	43.2	D	**133.1**	**F**
15. Winchester Blvd/SR 85 NB Ramps	13.7	B	17.3	B	12.4	B	29.7	C
16. Winchester Blvd/SR 85 SB Ramps	13.2	B	9.7	A	22.5	C+	11	B+
17. Winchester Blvd/Albright Way-Courtside Dr	10.9	B+	20.3	C+	11.2	B+	19.7	B-
18. Winchester Blvd/Wimbledon Dr	13.4	B	18.5	B-	14.4	B	31.5	C
19. Winchester Blvd/Lark Ave	42.3	D	16.8	B	**88.9**	**F**	17.2	B
20. Lark Ave/SR 17 SB Ramps	28.1	C	39	D+	28.5	C	40.5	D
21. Lark Ave/SR 17 NB Ramps	18.6	B-	16.5	B	19.8	B-	16.7	B
22. Lark Ave/Los Gatos Blvd*	50.1	D	41.2	D	51.2	D-	42.1	D
23. Winchester Blvd/Daves Ave	27.2	C	20.6	C+	28.6	C	27.9	C

TABLE 4.13-15 BACKGROUND AND BACKGROUND PLUS PLAN PEAK HOUR INTERSECTION LEVELS OF SERVICE

	Background Conditions				Background plus Plan Conditions			
	AM Peak		PM Peak		AM Peak		PM Peak	
Study Intersection	Delay	LOS	Delay	LOS	Delay	LOS	Delay	LOS
24. Blossom Hill Rd/Santa Cruz Ave-Winchester Blvd	32.5	C-	29.8	C	40.4	D	37.3	D+
25. Santa Cruz Ave/Los Gatos-Saratoga Rd*	40.5	D	39.5	D	42.6	D	40.6	D
26. Los Gatos-Saratoga Rd/University Ave	26.8	C	34.1	C-	29	C	35.6	D+
27. Los Gatos Blvd/Los Gatos-Saratoga Rd	21.8	C+	24.7	C	22.3	C+	25.6	C
28. Santa Cruz Ave/Main St	25.5	C	27.7	C	25.1	C	27.9	C

Notes: Delay is measured in average seconds per vehicle; LOS = Level of Service; * = CMP Intersections; **Bold** text = deficient operation; For calculated delays greater than 120 seconds, HCM methodology does not produce an accurate representation of actual conditions. However, calculated delays greater than 120 seconds are reported for comparative purposes and were used to determine the significance of an impact.

Intersection Levels of Service

Under Cumulative Conditions, without the addition of Plan-generated traffic, the following eleven study intersections are expected to operate unacceptably:

1. San Tomas Expressway/Hamilton Avenue (AM and PM peak hour)
2. San Tomas Expressway/Campbell Avenue (AM and PM peak hour)
3. San Tomas Expressway/SR 17 Southbound Ramps (AM and PM peak hour)
4. Camden Avenue/White Oaks Road-Curtner Avenue (AM and PM peak hour)
7. East Sunnyoaks Avenue/Dell Avenue (AM peak hour)
10. Bascom Avenue/Camden Avenue (AM peak hour)
18. Winchester Boulevard/Wimbledon Drive (PM peak hour)
19. Winchester Boulevard/Lark Avenue (AM peak hour)
20. Lark Avenue/SR 17 Southbound Ramps (PM peak hour)
24. Blossom Hill Road/Santa Cruz Avenue-Winchester Boulevard (PM peak hour)
26. Los Gatos Saratoga Road/University Avenue (PM peak hour)

The intersection levels of service are summarized in Table 4.13-16 and the calculations are provided in Appendix D.

Cumulative plus Plan Conditions

Cumulative plus Plan Conditions includes an analysis of projected Cumulative traffic volumes for the horizon year of 2040 plus buildout of the proposed Plan.

Intersection Levels of Service

Under the Cumulative plus Plan Conditions scenario, 18 study intersections would operate at an unacceptable level, including the 11 intersections identified as operating unacceptably under the Cumulative Conditions scenario. Thus, seven additional intersections (as noted by an * below) would operate at an unacceptable level with implementation of the proposed Plan.

1. San Tomas Expressway/Hamilton Avenue (AM and PM peak hour)
2. San Tomas Expressway/Campbell Avenue (AM and PM peak hour)
3. San Tomas Expressway/SR 17 Southbound Ramps (AM and PM peak hour)
4. Camden Avenue/White Oaks Road-Curtner Avenue (AM and PM peak hour)
5. Winchester Boulevard/Sunnyoaks Avenue (AM peak hour)*
6. Winchester Boulevard/Hacienda Avenue (AM and PM peak hour)*
7. East Sunnyoaks Avenue/Dell Avenue (AM and PM peak hour)*[PM]
8. Hacienda Avenue/Dell Avenue (AM and PM peak hour)
10. Bascom Avenue/Camden Avenue (AM peak hour)
14. Winchester Boulevard/Knowles Drive (PM peak hour)*
15. Winchester Boulevard/SR 85 Northbound Ramps (PM peak hour)*
16. Winchester Boulevard/SR 85 Southbound Ramps (AM peak hour)*
18. Winchester Boulevard/Wimbledon Drive (PM peak hour)*
19. Winchester Boulevard/Lark Avenue (AM peak hour)
20. Lark Avenue/SR 17 Southbound Ramps (PM peak hour)
23. Winchester Boulevard/Daves Avenue (PM peak hour)
24. Blossom Hill Road/Santa Cruz Avenue-Winchester Boulevard (AM and PM peak hour)
26. Saratoga Los Gatos Road/University Avenue (PM peak hour)

The intersection levels of service are summarized in Table 4.13-16 and the calculations are provided in Appendix D.

Significance Before Mitigation: Significant.

4.13.6 SUMMARY OF SIGNIFICANT IMPACTS AND MITIGATION MEASURES

The proposed Plan would result in the following significant impacts related to transportation and traffic as outlined below and summarized in Table 4.13-17.

TABLE 4.13-16 CUMULATIVE AND CUMULATIVE PLUS PLAN PEAK HOUR INTERSECTION LEVELS OF SERVICE

		Cumulative Conditions				Cumulative plus Plan Conditions			
		AM Peak		PM Peak		AM Peak		PM Peak	
	Study Intersection	Delay	LOS	Delay	LOS	Delay	LOS	Delay	LOS
1.	San Tomas Expressway/Hamilton Ave*	**128.0**	**F**	**87.7**	**F**	**128.9**	**F**	**94.6**	**F**
2.	San Tomas Expressway/Campbell Ave*	**130.9**	**F**	**158.0**	**F**	**141.9**	**F**	**165.3**	**F**
3.	San Tomas Expressway/SR 17 SB Ramps*	**256.7**	**F**	**158.3**	**F**	**460.8**	**F**	**121.6**	**F**
4.	Camden Ave/White Oaks Rd-Curtner Ave*	**196.0**	**F**	**125.9**	**F**	**276.2**	**F**	**164.1**	**F**
5.	Winchester Blvd/West Sunnyoaks Ave	34.4	C-	16.2	B	**74.2**	**E**	18.6	B-
6.	Winchester Blvd/Hacienda Ave	33.8	C-	64.4	E	**133.1**	**F**	**175.9**	**F**
7.	East Sunnyoaks Ave/Dell Ave	**90.1**	**F**	12.4	B	**177.0**	**F**	**374.9**	**F**
8.	Hacienda Ave/Dell Ave	25.8	D	22.4	C	**948.8**	**F**	**1185.6**	**F**
9.	Bascom Ave/Curtner Ave*	35.0	D+	35.7	D+	35.1	D+	35.6	D+
10.	Bascom Ave/Camden Ave*	**99.0**	**F**	62.5	E	**133.5**	**F**	66.5	E
11.	SR 85 NB Ramp/Bascom Ave*	17.2	B	16.7	B	22.5	C+	18	B
12.	SR 85 SB Ramp/Bascom Ave*	18.5	B-	28.3	C	19.0	B-	40.4	D
13.	Bascom Ave/Samaritan Dr*	46.3	D	73.6	E	46.5	D	73.9	E
14.	Winchester Blvd/Knowles Dr	28.4	C	46.1	D	54.4	D-	**217.7**	**F**
15.	Winchester Blvd/SR 85 NB Ramps	13.3	B	32.9	C-	19.3	B-	**96.8**	**F**
16.	Winchester Blvd/SR 85 SB Ramps	16.2	B	10.8	B+	**66.7**	**E**	13.3	B
17.	Winchester Blvd/Albright Way-Courtside Dr	12.7	B	23.7	C	18.1	B-	32.5	C-
18.	Winchester Blvd/Wimbledon Dr	20.1	C+	**76.2**	**E-**	43.3	D	**116.0**	**F**
19.	Winchester Blvd/Lark Ave	**98.6**	**F**	26.1	C	**156.5**	**F**	30.1	C
20.	Lark Ave/SR 17 SB Ramps	29.1	C	**74.8**	**E**	29.8	C	**77.4**	**E-**
21.	Lark Ave/SR 17 NB Ramps	22.1	C+	19.2	B-	23.8	C	19.5	B-
22.	Lark Ave/Los Gatos Blvd*	74.3	E	70.3	E	75.9	E-	72.3	E
23.	Winchester Blvd/Daves Ave	29.7	C	37.0	D+	34.3	C-	**92.0**	**F**
24.	Blossom Hill Rd/Santa Cruz Ave-Winchester Blvd	47.4	D	**62.0**	**E**	**78.0**	**E-**	**81.0**	**F**
25.	Santa Cruz Ave/Los Gatos-Saratoga Rd*	55.5	E+	49.7	D	63.6	E	53.7	D-
26.	Los Gatos-Saratoga Rd/University Ave	28.9	C	**59.9**	**E+**	31.9	C	**65.0**	**E**
27.	Los Gatos Blvd/Los Gatos-Saratoga Rd	28.1	C	39.1	D	29.6	C	42.2	D
28.	Santa Cruz Ave/Main St	25.7	C	28.3	C	25.5	C	28.6	C

Notes: Delay is measured in average seconds per vehicle; LOS = Level of Service; * = CMP Intersections; **Bold** text = deficient operation; For calculated delays greater than 120 seconds, HCM methodology does not produce an accurate representation of actual conditions. However, calculated delays greater than 120 seconds are reported for comparative purposes and were used to determine the significance of an impact.

TABLE 4.13-17 INTERSECTION IMPACT SUMMARY

	Existing						Background Plus Plan						Cumulative									
	Base LOS		LOS with Plan				Base LOS		LOS with Plan				Base LOS		LOS with Plan							
Intersection	AM	PM	AM	PM	Potentially Significant Impact?	Mit. Measure	AM	PM	AM	PM	Potentially Significant Impact?	Mit. Measure	AM	PM	AM	PM	Potentially Significant Impact?	Mit. Measure	Jurisdiction	Mitigation Physically Infeasible?	Other Agency Approval/ Coordination Needed?	Remains Significant and Unavoidable?
1. San Tomas Expressway/ Hamilton Ave	E+	D	E+	D	No	--	E+	D	E+	D-	No	--	**F**	**F**	**F**	**F**	Yes	TRAF-8h	Campbell/ CMA	Yes	Yes	Yes
2. San Tomas Expressway/ Campbell Ave	E+	E	E	E-	No	--	E+	E	E	E-	No	--	**F**	**F**	**F**	**F**	Yes	TRAF-8i	Campbell/ CMA	Yes	Yes	Yes
3. San Tomas Expressway/SR 17 SB Ramps*	**F**	E	**F**	**F**	Yes	TRAF-1a	**F**	E	**F**	**F**	Yes	TRAF-8a	**F**	**F**	**F**	**F**	Yes	TRAF-8j	Campbell/ CMA	Yes	Yes	Yes
4. Camden Ave/ White Oaks Rd-Curtner Ave	E	D	**F**	E	Yes	TRAF-1b	E	D	**F**	E	Yes	TRAF-8b	**F**	**F**	**F**	**F**	Yes	TRAF-8k	Campbell/ CMA	Yes	Yes	Yes
5. Winchester Blvd/West Sunnyoaks Ave	C+	B	C-	B	No	--	C+	B	C	B	No	--	C-	B	**E**	B-	Yes	TRAF-8l	Campbell	Yes	No	Yes
6. Winchester Blvd/Hacienda Ave	C	D+	**F**	**F**	Yes	TRAF-1c	C	C-	**E-**	**F**	Yes	TRAF-8c	C-	E	**F**	**F**	Yes	TRAF-8m	Campbell	Yes	No	Yes
7. East Sunnyoaks Ave/Dell Ave	D	B	**F**	**F**	Yes	TRAF- 1d	C	A	**F**	**F**	Yes	TRAF-8d	**F**	B	**F**	**F**	Yes	TRAF-8n	Campbell		No	No
8. Hacienda Ave/Dell Ave	B	C	**F**	**F**	Yes	TRAF-1e	B	B	**F**	**F**	Yes	TRAF-8e	D	C	**F**	**F**	Yes	TRAF-8o	Campbell		No	No
9. Bascom Ave/ Curtner Ave	C-	D+	C-	D+	No	--	C-	D+	C-	D+	No	--	D+	D+	D+	D+	No	--	San Jose/ CMA		--	--
10. Bascom Ave/ Camden Ave	E+	D	E	D+	No	--	E+	D	**F**	D	No	--	**F**	E	**F**	E	Yes	TRAF-8p	San Jose/ CMA	Yes	Yes	Yes
11. SR 85 NB Ramp/Bascom Ave	B	B	C+	B	No	--	B	B	C+	B	No	--	B	B	C+	B	No	--	San Jose/ CMA		--	--
12. SR 85 SB Ramp/Bascom Ave	B	B-	B	C+	No	--	B	B-	B	C	No	--	B-	C	B-	D	No	--	San Jose/ CMA		--	--
13. Bascom Ave/ Samaritan Dr	D+	D+	D+	D+	No	--	D	D+	D	D+	No	--	D	E	D	E	No	--	San Jose/ CMA		--	--
14. Winchester Blvd/Knowles Dr	C	D+	D-	**F**	Yes	TRAF-1f	C	C-	D	**F**	Yes	TRAF-8f	C	D	D-	**F**	Yes	TRAF-8q	Campbell/ Los Gatos	Yes	Yes	Yes

TABLE 4.13-17 INTERSECTION IMPACT SUMMARY

Intersection	Existing						Background Plus Plan						Cumulative						Jurisdiction	Mitigation Physically Infeasible?	Other Agency Approval/ Coordination Needed?	Remains Significant and Unavoidable?
	Base LOS		LOS with Plan		Potentially Significant Impact?	Mit. Measure	Base LOS		LOS with Plan		Potentially Significant Impact?	Mit. Measure	Base LOS		LOS with Plan		Potentially Significant Impact?	Mit. Measure				
	AM	PM	AM	PM			AM	PM	AM	PM			AM	PM	AM	PM						
15. Winchester Blvd/SR 85 NB Ramps	B+	B	B	C	No	--	B	B	B	C	No	--	B	C-	B-	**F**	Yes	TRAF-8r	Los Gatos/ Caltrans	Yes	Yes	Yes
16. Winchester Blvd/SR 85 SB Ramps	B	B+	D-	B+	No	--	B	A	C+	B+	No	--	B	B+	**E**	B	Yes	TRAF-8s	Los Gatos/ Caltrans	Yes	Yes	Yes
17. Winchester Blvd/Albright Way-Courtside Dr					No	--	B+	C+	B+	B-	No	--	B	C	B-	C-	No	--	Los Gatos/ Caltrans		--	--
18. Winchester Blvd/Wimbledon Dr	B	B	B	B	No	--	B	B-	B	C	No	--	C+	**E-**	D	**F**	Yes	TRAF-8t	Los Gatos		Yes	Yes
19. Winchester Blvd/Lark Ave	C+	B	C	D	No	--	D	B	**F**	B	Yes	TRAF-8g	**F**	C	**F**	C	Yes	TRAF-8u	Los Gatos		Yes	No
20. Lark Ave/ SR 17 SB Ramps	C	C	C	C-	No	--	C	D+	C	D	No	--	C	**E**	C	**E-**	Yes	TRAF-8v	Los Gatos/ Caltrans		Yes	Yes
21. Lark Ave/ SR 17 NB Ramps	B	B	B-	B	No	--	B-	B	B-	B	No	--	C+	B-	C	B-	No	--	Los Gatos		--	--
22. Lark Ave/ Los Gatos Blvd	C	C	C-	C	No	--	D	D	D-	D	No	--	E	E	E-	E	No	--	Los Gatos/CMA		--	--
23. Winchester Blvd/Daves Ave	C	C+	C	C	No	--	C	C+	C	C	No	--	C	D+	C-	**F**	Yes	TRAF-8w	Los Gatos		Yes	Yes
24. Blossom Hill Rd/Santa Cruz Ave-Winchester Blvd	C	C	D+	C	No	--	C-	C	D	D+	No	--	D	**E**	**E-**	**F**	Yes	TRAF-8x	Los Gatos		Yes	Yes
25. Santa Cruz Ave/Los Gatos-Saratoga Rd	D	D+	D	D	No	--	D	D	D	D	No	--	E+	D	E	D-	No	--	Los Gatos/CMA		--	--
26. Los Gatos-Saratoga Rd/ University Ave	C	C-	C	D+	No	--	C	C-	C	D+	No	--	C	**E+**	C	**E**	Yes	TRAF-8y	Los Gatos		Yes	Yes

TABLE 4.13-17 INTERSECTION IMPACT SUMMARY

	Existing						Background Plus Plan						Cumulative									
	Base LOS		LOS with Plan				Base LOS		LOS with Plan				Base LOS		LOS with Plan							
Intersection	AM	PM	AM	PM	Potentially Significant Impact?	Mit. Measure	AM	PM	AM	PM	Potentially Significant Impact?	Mit. Measure	AM	PM	AM	PM	Potentially Significant Impact?	Mit. Measure	Jurisdiction	Mitigation Physically Infeasible?	Other Agency Approval/ Coordination Needed?	Remains Significant and Unavoidable?
27. Los Gatos Blvd/Los Gatos-Saratoga Rd	C+	C+	C+	C	No	--	C+	C	C+	C	No	--	C	D	C	D	No	--	Los Gatos		--	--
28. Santa Cruz Ave/Main St	C	C	C	C	No	--	C	C	C	C	No	--	C	C	C	C	No	--	Los Gatos		--	--

Source: W-Trans, 2014.

TRAF-1	**Implementation of the proposed Plan would cause seven intersections to fall below the level of service standard.**

Intersection Operations – Existing plus Plan Conditions

Mitigation Measure TRAF-1a: Intersection Improvements – San Tomas Expressway/SR 17 SB Ramps. Under Existing and Existing plus Plan Conditions, this intersection is expected to operate unacceptably. Modifying the intersection to provide two additional southbound right-turn lanes, one additional eastbound right-turn lane and one additional westbound through lane, as well as the necessary receiving lanes and traffic signal modifications would result in acceptable operations. This results in the following lane configuration:

- Southbound: two left-turn lanes, one shared through and left-turn lane, three right-turn lanes
- Eastbound: three through lanes, two right-turn lanes
- Westbound: two left-turn lanes, four through lanes

If this mitigation measure is implemented then the proposed Plan's impact after mitigation would be less than significant. However, the amount of roadway widening required to achieve acceptable operations would require right-of-way acquisition and potential reconstruction of elevated freeway structures. As such, any improvements to this intersection would best be considered, adopted, and implemented as part of regional transportation planning efforts, not as part of an individual project or plan. Additionally, it is noted that San Tomas Expressway is a County-operated route and part of the CMP network, therefore any modifications to the intersection would require coordination and approval from both the County of Santa Clara and VTA. Given these limits on feasibility, including physical constraints and the need for inter-jurisdictional approval, the proposed Plan's impact is *significant and unavoidable*.

Significance After Mitigation: Significant and unavoidable.

Mitigation Measure TRAF-1b: Intersection Improvements – Camden Avenue/White Oaks Road-Curtner Avenue. Under Existing and Existing plus Plan Conditions, this intersection is expected to operate unacceptably. Modifying the intersection to provide one additional northbound left-turn lane, a dedicated southbound through lane and a second eastbound right-turn lane, as well as the necessary receiving lanes and traffic signal modifications would result in acceptable operations. This would result in the following lane configuration:

- Northbound: three left-turn lanes, one through lane, one right-turn lane
- Southbound: one left-turn lane, one through lane, one right-turn lane
- Eastbound: one left-turn lane, three through lanes, two right-turn lanes
- Westbound: one left-turn lane, four through lanes, one shared through and right-turn lane

Additionally, the signal phasing would need to be modified on the northbound and southbound approaches to provide protected left-turn phasing.

With this mitigation measure, the proposed Plan's impact after mitigation would be less than significant. However, the level of roadway widening required to achieve acceptable operations would require right-of-way acquisition, and potential reconstruction of the adjacent SR 17 elevated freeway structures. As such, any improvements to this intersection would best be considered, adopted and implemented as part of regional transportation planning efforts, not as part of an individual development project or plan. Additionally, it is noted that this intersection directly connects to freeway on-ramps, and as such coordination and approval from Caltrans would likely be necessary prior to implementing modifications. Given these constraints and limits on feasibility, including physical constraints and the need for inter-jurisdictional approval, the proposed Plan's impact is *significant and unavoidable*.

Significance After Mitigation: Significant and unavoidable.

Mitigation Measure TRAF-1c: Intersection Improvements – Winchester Boulevard/Hacienda Avenue. Under Existing and Existing plus Plan Conditions, this intersection is expected to operate unacceptably. Modifying the intersection to include a dedicated northbound right-turn lane, a second southbound left-turn lane and reconfiguration of the eastbound and westbound approaches as described below, as well as the necessary receiving lanes and traffic signal modifications would result in acceptable operations. This would result in the following lane configuration:

- Northbound: one left-turn lane, two through lanes, and one right-turn lane
- Southbound: two left-turn lanes, two through lanes, one right-turn lane
- Eastbound: two left-turn lanes, one shared through and right-turn lane
- Westbound: one left-turn lane, one through lane, two right-turn lanes

With this mitigation measure, the proposed Plan's impact after mitigation would be less than significant. However, installation of these modifications would be limited by the presence of the stormwater retention pond located on the southwest corner of the intersection, as well as the railroad tracks located parallel to Winchester Boulevard, to the east of the intersection. Given these limits on feasibility, including physical constraints and the need for inter-jurisdictional approval, the proposed Plan's impact is *significant and unavoidable*.

Significance After Mitigation: Significant and unavoidable.

Mitigation Measure TRAF-1d: Intersection Improvements – East Sunnyoaks Avenue/Dell Avenue. Under Existing plus Plan Conditions, this intersection is expected to operate unacceptably. Signalization of the intersection, which would roughly cost $400,000 per traffic signal, is expected to result in acceptable operations.[5] While a lane configuration was assumed for analysis purposes, it is recommended that a finalized lane configuration be designed as more detailed development plans are created for the area. Since the City does not currently assess transportation impact fees, a direct funding source for this improvement does not exist. Therefore, to fund this improvement, the City should

[5] Spencer, Mark. Principal, Whitlock & Weinberger Transportation, Inc. Personal email communication with Carey Stone, December 9, 2014.

complete a nexus study upon adoption of the proposed Plan to determine the appropriate transportation impact fee. Once the intersection reaches LOS E and the traffic signal warrants are met, as defined by the California Manual of Uniform Traffic Control Devices, the signalization improvements should be implemented. The City should also complete yearly traffic monitoring to determine when the intersection reaches the signalization improvement thresholds. With this mitigation measure, impacts associated with the implementation of the proposed Plan would be *less than significant*.

Significance After Mitigation: Less than significant.

Mitigation Measure TRAF-1e: Intersection Improvements – Hacienda Avenue/Dell Avenue. Under Existing plus Plan Conditions, this intersection is expected to operate unacceptably. Signalization of the intersection (which would roughly cost $400,000 per traffic signal) is expected to result in acceptable operations. While a lane configuration was assumed for analysis purposes, it is recommended that a finalized lane configuration be designed as more detailed development plans are created for the area. Since the City does not currently assess transportation impact fees, a direct funding source for this improvement does not exist. Therefore, to fund this improvement, the City should complete a nexus study upon adoption of the proposed Plan to determine the appropriate transportation impact fee. Once the intersection reaches LOS E and the traffic signal warrants are met, as defined by the California Manual of Uniform Traffic Control Devices, the signalization improvements should be implemented. The City should also complete yearly traffic monitoring to determine when the intersection reaches the signalization improvement thresholds. With this mitigation measure, impacts associated with the implementation of the proposed Plan would be *less than significant*.

Significance After Mitigation: Less than significant.

Mitigation Measure TRAF-1f: Intersection Improvements – Winchester Boulevard/Knowles Drive. Under Existing plus Plan Conditions, this intersection is expected to operate unacceptably. Modifying the westbound approach to have two left-turn lanes, a single through lane, and right-turn lane, as well as the necessary receiving lanes and traffic signal modifications would result in acceptable operations. The modification would result in the following lane configuration:

- Northbound: two left-turn lane, two through lanes, one right-turn lane
- Southbound: one left-turn lane, two though lanes, one right-turn lane
- Eastbound: one left-turn lane, one through lane, one right-turn lane
- Westbound: two left-turn lanes, one through lane, one right-turn lane

With this mitigation measure, the proposed Plan's impact after mitigation would be less than significant. However, installation of these modifications may be limited by the railroad tracks located parallel to Winchester Boulevard, to the east of the intersection. Additionally, it is noted that portions of the intersection fall under the jurisdiction of the Town of Los Gatos, and would therefore require the Town's approval to implement modifications. Therefore, due to limitations on feasibility, including physical

constraints and the need for inter-jurisdictional approvals, the proposed Plan's impact is *significant and unavoidable.*

Significance After Mitigation: Significant and unavoidable.

TRAF-2	**Implementation of the proposed Plan would cause freeway segments to fall below the level of service standard.**

Mitigation Measure TRAF-2: Freeway Operations. Implementation of the proposed Plan would result in 15 freeway mixed-flow segments and five HOV lane segments experiencing an unacceptable increase in volume.

A typical mitigation measure would seek to widen the road to add travel lanes and capacity. However, impacts to freeways would remain significant and unavoidable because these roadways are under the jurisdiction of Caltrans, and depending on location, also VTA, City of San Jose, and/or the Town of Los Gatos, and not under the jurisdiction of the City of Campbell. In addition, freeway improvement projects, which add travel lanes are planned and funded on a regional scale and would be too costly for a single project to be expected to fund. Therefore, due to limitations on feasibility, including physical constraints and the need for inter-jurisdictional approvals, the proposed Plan's impact is *significant and unavoidable.*

Significance After Mitigation: Significant and unavoidable.

TRAF-8	**Implementation of the proposed Plan, in combination with past, present, and reasonably foreseeable projects, would result in additional cumulatively considerable impacts.**

Intersection Operations – Background plus Plan Conditions

Mitigation Measure TRAF-8a: Intersection Improvements – San Tomas Expressway/SR 17 Southbound Ramps. Under Background plus Plan Conditions, this intersection is expected to operate unacceptably. Modifying the intersection to include the following lane configuration, as well as the necessary receiving lanes and traffic signal modifications would result in acceptable operations. This is in addition to the modifications presented in Mitigation Measure TRAF-1a, as noted below.

- Southbound: two left-turn lanes, one shared through and left-turn lane, three right-turn lanes
- Eastbound: five through lanes, two right-turn lanes (two more through lanes than identified in Mitigation Measure TRAF-1a)
- Westbound: two left-turn lanes, five through lanes (one more through lane than identified in Mitigation Measure TRAF-1a)

With this mitigation measure, the proposed Plan's impact after mitigation would be less than significant. However, the level of roadway widening required to achieve acceptable operations would require right-of-way acquisition and potential reconstruction of elevated freeway structures. As such, any improvements to this intersection would best be considered, adopted, and implemented as part of regional transportation planning efforts, not as part of an individual development project or plan. Additionally, it is noted that San Tomas Expressway is a County-operated route and part of the CMP network, therefore any modifications to the intersection would require coordination and approval from both the County of Santa Clara and VTA. Given these limits on feasibility, including physical constraints and the need for inter-jurisdictional approval, the proposed Plan's impact is *significant and unavoidable.*

Significance After Mitigation: Significant and unavoidable.

Mitigation Measure TRAF-8b: Intersection Improvements – Camden Avenue/White Oaks Road-Curtner Avenue. Under Background plus Plan Conditions, this intersection is expected to operate unacceptably. Modifying the intersection to include the following lane configuration, as well as the necessary receiving lanes and traffic signal modifications would result in acceptable operations. This is in addition to modifications recommended in Mitigation Measure TRAF-1b, as noted below.

- Northbound: three left-turn lanes, one through lane, one right-turn lane
- Southbound: one left-turn lane, one through lane, two right-turn lane (one additional right-turn lane than identified in Mitigation Measure TRAF-1b)
- Eastbound: one left-turn lane, three through lanes, two right-turn lanes
- Westbound: one left-turn lane, four through lanes, one shared through, and right-turn lane

Additionally, the signal phasing would need to be modified on the northbound and southbound approaches to provide protected left-turn phasing.

If this mitigation measure is implemented, then the proposed Plan's impact after mitigation would be less than significant. However, the amount of roadway widening required to achieve acceptable operations would require large areas of right-of-way acquisition, and potential reconstruction of adjacent SR 17 elevated freeway structures. As such, any improvements to this intersection would best be considered, adopted, and implemented as part of regional transportation planning efforts, not as part of an individual development project or plan. Additionally, it is noted that this intersection directly connects to freeway on-ramps, and as such coordination and approval from Caltrans would likely be necessary prior to implementing modifications. Given these constraints and limits on feasibility, including physical constraints and the need for inter-jurisdictional approval, the proposed Plan's impact is potential *significant and unavoidable.*

Significance After Mitigation: Significant and unavoidable.

Mitigation Measure TRAF-8c: Intersection Improvements – Winchester Boulevard/Hacienda Avenue. This is identical to Mitigation Measure TRAF-1c identified under the Existing plus Plan scenario. For reference, the mitigation measure is repeated below.

Modifying the intersection to include a dedicated northbound right-turn lane, a second southbound left-turn lane and reconfiguration of the eastbound and westbound approaches as described below, as well as the necessary receiving lanes and traffic signal modifications would result in acceptable operations. This would result in the following lane configuration:

- Northbound: one left-turn lane, two through lanes, one right-turn lane
- Southbound: two left-turn lanes, two through lanes, one right-turn lane
- Eastbound: two left-turn lanes, one shared through, right-turn lane
- Westbound: one left-turn lane, one through lane, two right-turn lanes

With this mitigation measure, the proposed Plan's impact after mitigation would be less than significant. However, installation of these modifications may be limited by the presence of the stormwater retention pond located on the southwest corner of the intersection, as well as the railroad tracks located parallel to Winchester Boulevard, to the east of the intersection. Given these limits on feasibility, including physical constraints and the need for inter-jurisdictional approval from the Santa Clara Valley Water District, VTA and the Union Pacific Railroad, the proposed Plan's impact is *significant and unavoidable.*

Significance After Mitigation: Significant and unavoidable.

Mitigation Measure TRAF-8d: Intersection Improvements – East Sunnyoaks Avenue/Dell Avenue. This is identical to Mitigation Measure TRAF-1d identified under the Existing plus Plan scenario. For reference, the mitigation measure is repeated below.

Under Background plus Plan Conditions, this intersection is expected to operate unacceptably. Signalization of the intersection, which would roughly cost $400,000 per traffic signal, is expected to result in acceptable operations.[6] While a lane configuration was assumed for analysis purposes, it is recommended that a finalized lane configuration be designed as more detailed development plans are created for the area. Since the City does not currently assess transportation impact fees, a direct funding source for this improvement does not exist. Therefore, to fund this improvement, the City should complete a nexus study upon adoption of the proposed Plan to determine the appropriate transportation impact fee. Once the intersection reaches LOS E and the traffic signal warrants are met, as defined by the California Manual of Uniform Traffic Control Devices, the signalization improvements should be implemented. The City should also complete yearly traffic monitoring to determine when the intersection reaches the signalization improvement thresholds. With this mitigation measure, impacts associated with the implementation of the proposed Plan would be *less than significant*.

[6] Spencer, Mark. Principal, Whitlock & Weinberger Transportation, Inc. Personal email communication with Carey Stone, December 9, 2014.

Significance After Mitigation: Less than significant.

Mitigation Measure TRAF-8e: Intersection Improvements – Hacienda Avenue/Dell Avenue. This is identical to Mitigation Measure TRAF-1e identified under the Existing plus Plan scenario. For reference, the mitigation measure is repeated below.

Under Background plus Plan Conditions, this intersection is expected to operate unacceptably. Signalization of the intersection, which would roughly cost $400,000 per traffic signal, is expected to result in acceptable operations.[7] While a lane configuration was assumed for analysis purposes, it is recommended that a finalized lane configuration be designed as more detailed development plans are created for the area. Since the City does not currently assess transportation impact fees, a direct funding source for this improvement does not exist. Therefore, to fund this improvement, the City should complete a nexus study upon adoption of the proposed Plan to determine the appropriate transportation impact fee. Once the intersection reaches LOS E and the traffic signal warrants are met, as defined by the California Manual of Uniform Traffic Control Devices, the signalization improvements should be implemented. The City should also complete yearly traffic monitoring to determine when the intersection reaches the signalization improvement thresholds. With this mitigation measure, impacts associated with the implementation of the proposed Plan would be *less than significant*.

Significance After Mitigation: Less than significant.

Mitigation Measure TRAF-8f: Intersection Improvements – Winchester Boulevard/Knowles Drive. Under Background plus Plan Conditions, this intersection is expected to operate unacceptably. The improvements recommended to achieve acceptable operations are identical to what was identified in Mitigation Measure TRAF-1f, which is copied below for reference.

Modifying the westbound approach to have two left-turn lanes, a single through lane and right-turn lane, as well as the necessary receiving lanes and traffic signal modifications would result in acceptable operations. The modification would result in the following lane configuration:

- Northbound: two left-turn lane, two through lanes, one right-turn lane
- Southbound: one left-turn lane, two though lanes, one right-turn lane
- Eastbound: one left-turn lane, one through lane, one right-turn lane
- Westbound: two left-turn lanes, one through lane, one right-turn lane

With this mitigation measure, the proposed Plan's impact after mitigation would be less than significant. However, installation of these modifications may be limited by the railroad tracks located parallel to Winchester Boulevard, to the east of the intersection. Additionally, it is noted that portions of the intersection fall under the jurisdiction of the Town of Los Gatos, and would therefore require the Town's approval to implement modifications. Therefore, due to limitations on feasibility, including physical

[7] Spencer, Mark. Principal, Whitlock & Weinberger Transportation, Inc. Personal email communication with Carey Stone, December 9, 2014.

constraints and the need for inter-jurisdictional approvals, the proposed Plan's impact is *significant and unavoidable*.

Significance After Mitigation: Significant and unavoidable.

Mitigation Measure TRAF-8g: Intersection Improvements – Winchester Boulevard/Lark Avenue. Under Background plus Plan Conditions, this intersection is expected to operate unacceptably. Modifying the northern leg to have a dedicated receiving lane for the westbound right-turn movement would allow the westbound right-turn movement to be free-flowing, thereby decreasing the overall intersection delay. This is consistent with recommendations made in the Town of Los Gatos 2013 Albright Office Park EIR analysis. The receiving lane on the northern leg would need to be long enough to facilitate a merging maneuver into the continuous northbound through lanes. Based on correspondence with Town of Los Gatos staff, this improvement has been funded and is expected to be implemented in 2015-2016.[8] With this modified intersection configuration, which is scheduled to be implemented independently of the proposed Plan, the proposed Plan's impact would be *less than significant*.

Significance After Mitigation: Less than significant.

Intersection Operations – Cumulative plus Plan Conditions

Mitigation Measure TRAF-8h: Intersection Improvements – San Tomas Expressway/Hamilton Avenue. Under Cumulative plus Plan Conditions, this intersection is expected to operate unacceptably. Modifying the intersection to include the following lane configuration would result in acceptable operations. Northbound: two left-turn lanes, four though lanes (one lane would be HOV only during the AM peak), one right-turn lane (one additional left-turn lane and through lane than the current configuration).

- Southbound: two left-turn lanes, four though lanes (one lane would be HOV only during the PM peak), one right-turn lane (one additional through lane than the current configuration).
- Eastbound: two left-turn lanes, three through lanes, one right-turn lane
- Westbound: two left-turn lanes, three through lanes, one right-turn lane

If this mitigation measure is implemented then the proposed Plan's impact after mitigation would be less than significant. This would require roadway widening, including possible acquisition of right-of way. However, San Tomas Expressway is a County-operated route and part of the CMP network. Therefore, any modifications to the intersection would require coordination and approval from both the County of Santa Clara and VTA.

[8] Pu, Jessy. Traffic Engineer, Parks and Public Works, Town of Los Gatos. Personal email communication with Tony Henderson, W-Trans. November 20, 2014.

Since the improvements would result in the addition of through lanes, it would be necessary that the improvements be implemented on a corridor basis, not just at the study intersection. Additionally, since San Tomas Expressway is a regional route that is expected to experience growth in traffic due to regional development, any improvements to the route are best considered, adopted, and implemented as part of a corridor-wide planning effort, and not practical for any one development project or plan to mitigate. Therefore, due to physical constraints, the need for inter-jurisdictional approvals, and the fact that improvements to the facility are best addressed on a regional planning basis, the proposed Plan's impact is *significant and unavoidable.*

Significance After Mitigation: Significant and unavoidable.

Mitigation Measure TRAF-8i: Intersection Improvements – San Tomas Expressway/Campbell Avenue. Under Cumulative plus Plan Conditions, this intersection is expected to operate unacceptably. Modifying the intersection to include the following lane configuration, as well as the necessary receiving lanes and traffic signal modifications would result in acceptable operations:

- Northbound: two left-turn lanes, four though lanes (one lane would be HOV only during the AM peak), one right-turn lane (this is one additional through lane over existing conditions)
- Southbound: two left-turn lanes, four though lanes (one lane would be HOV only during the PM peak), one right-turn (this is one additional through lane over existing conditions)
- Eastbound: two left-turn lanes, two through lanes, one right-turn lane
- Westbound: two left-turn lanes, one through lane, one shared through and right-turn lane

With this mitigation measure, the proposed Plan's impact after mitigation would be less than significant. However, San Tomas Expressway is a County-operated route and part of the CMP network. Therefore, any modifications to the intersection would require coordination and approval from both the County of Santa Clara and VTA.

Since the improvements would result in the addition of through lanes, it would be necessary that the improvements be implemented on a corridor basis, not just at the study intersection. Additionally, since San Tomas Expressway is a regional route that is expected to experience growth in traffic due to regional development, any improvements to the route are best considered as part of a corridor-wide planning effort, and not practical for any one development plan to mitigate. Therefore, due to physical constraints, the need for inter-jurisdictional approvals, and the fact that improvements to the facility are best addressed on a regional planning basis, the proposed Plan's impact is *significant and unavoidable.*

Significance After Mitigation: Significant and unavoidable.

Mitigation Measure TRAF-8j: Intersection Improvements – San Tomas Expressway/SR 17 Southbound Ramps. Under Cumulative plus Plan Conditions, this intersection is expected to operate unacceptably. Modifying the intersection to include the following lane configuration, as well as the

necessary receiving lanes and traffic signal modifications would result in acceptable operations. This is in addition to the modifications presented in Mitigation Measure TRAF-8a, as noted below.

- Southbound: two left-turn lanes, one shared through and left-turn lane, three right-turn lanes
- Eastbound: eight through lanes, two right-turn lanes (three more through lanes than identified in Mitigation Measure TRAF-8a)
- Westbound: three left-turn lanes, six through lanes(one more left-turn lane and one more through lane than identified in Mitigation Measure TRAF-8a)

If this mitigation measure is implemented, then the proposed Plan's impact after mitigation would be less than significant. However, the level of roadway widening required to achieve acceptable operations would require right-of-way acquisition, and potential reconstruction of elevated freeway structures. Additionally, widening of the scale proposed would need to be completed on a corridor-wide basis, not at an individual intersection. As such, any improvements to this intersection would best be considered, adopted, and implemented as part of regional transportation planning efforts, not as part of an individual development project or plan. Additionally, it is noted that San Tomas Expressway is a County-operated route and part of the CMP network, therefore, any modifications to the intersection would require coordination and approval from both the County of Santa Clara and VTA. Given these limits on feasibility, including physical constraints and the need for inter-jurisdictional approval, the proposed Plan's impact is *significant and unavoidable.*

Significance After Mitigation: Significant and unavoidable.

Mitigation Measure TRAF-8k: Intersection Improvements – Camden Avenue/White Oaks Road-Curtner Avenue. Under Cumulative plus Plan Conditions, this intersection is expected to operate unacceptably. Modifying the intersection to include the following lane configuration, as well as the necessary receiving lanes and traffic signal modifications would result in acceptable operations. These modifications are in addition to what was identified in Mitigation Measure TRAF-8b for Background plus Plan conditions, as noted below.

- Northbound: three left-turn lanes, two through lanes, one right-turn lane (one additional dedicated left-turn lane and one additional dedicated through lane in addition to Mitigation Measure TRAF-8b)
- Southbound: one left-turn lane, one through lane, three right-turn lane (conversion to dedicated left-turn and through lanes, plus two addition right turn lanes compared to Mitigation Measure TRAF-8b)
- Eastbound: three left-turn lanes, four through lanes, one right-turn lane (two additional left-turn lanes compared to Mitigation Measure TRAF-8b)
- Westbound: two left-turn lane, six through lanes, one right-turn lane (one additional left-turn lane and one addition through lane compared to Mitigation Measure TRAF-8b)

If this mitigation measure is implemented then the proposed Plan's impact after mitigation would be less than significant. However, the level of roadway widening required to achieve acceptable operations would require large amounts of right-of-way acquisition, and potential reconstruction of elevated freeway structures. As such, any improvements to this intersection would best be considered, adopted, and implemented as part of regional transportation planning efforts, not as part of an individual development project or plan. Additionally, it is noted that this intersection directly connects to freeway on-ramps, and as such coordination and approval from Caltrans would likely be necessary prior to implementing modifications. Given these constraints and limits on feasibility, including physical constraints and the need for inter-jurisdictional approval, the proposed Plan's impact is *significant and unavoidable.*

Significance After Mitigation: Significant and unavoidable.

Mitigation Measure TRAF-8l: Intersection Improvements – Winchester Boulevard/Sunnyoaks Avenue. Under Cumulative plus Plan Conditions, this intersection is expected to operate unacceptably. Modifying the intersection to include a second eastbound left-turn lane, as well as the necessary traffic signal modifications would result in acceptable operations. This would result in the following lane configuration:

- Northbound: one left-turn lane, three through lanes, one right-turn lane
- Southbound: two through lanes, one right-turn lane
- Eastbound: two left-turn lanes, one right-turn lane

With this mitigation measure, the intersection would operate acceptably. However, widening would be restricted by that fact that there are developments on both sides of West Sunnyoaks Avenue, adjacent to the intersection, thereby requiring acquisition of right-of-way, private property, as well as reconfiguration of access, and potentially loss of buildings and/or parking spaces on these parcels. Because of these limitations, implementation of the mitigation measure is not considered to be feasible. Therefore, the proposed Plan's impact would be *significant and unavoidable*.

Significance After Mitigation: Significant and unavoidable.

Mitigation Measure TRAF-8m: Intersection Improvements – Winchester Boulevard/Hacienda Avenue. This is identical to Mitigation Measure TRAF-1c identified under the Background plus Plan scenario and Mitigation Measure TRAF-8c identified under the Background plus Plan scenario. For reference, the mitigation measure is repeated below.

Modifying the intersection to include a dedicated northbound right-turn lane, a second southbound left-turn lane and reconfiguration of the eastbound and westbound approaches as described below, as well as the necessary receiving lanes and traffic signal modifications would result in acceptable operations. This would result in the following lane configuration:

- Northbound: one left-turn lane, two through lanes, one right-turn lane

- Southbound: two left-turn lanes, two through lanes, one right-turn lane
- Eastbound: two left-turn lanes, one shared through and right-turn lane
- Westbound: one left-turn lane, one through lane, two right-turn lanes

With this mitigation measure, the proposed Plan's impact after mitigation would be less than significant. However, installation of these modifications may be limited by the presence of the stormwater retention pond located on the southwest corner of the intersection, as well as the railroad tracks located parallel to Winchester Boulevard, to the east of the intersection. Given these limits on feasibility, including physical constraints and the need for inter-jurisdictional approval from the Santa Clara Valley Water District, VTA, and the Union Pacific Railroad, the proposed Plan's impact is *significant and unavoidable.*

Significance After Mitigation: Significant and unavoidable.

Mitigation Measure TRAF-8n: Intersection Improvements – East Sunnyoaks Avenue/Dell Avenue. This is identical to Mitigation Measure TRAF-8d identified under the Background plus Plan scenario. For reference, the mitigation measure is repeated below.

Under Cumulative plus Plan Conditions, this intersection is expected to operate unacceptably. Signalization of the intersection, which would roughly cost $400,000 per traffic signal, is expected to result in acceptable operations.[9] While a lane configuration was assumed for analysis purposes, it is recommended that a finalized lane configuration be designed as more detailed development plans are created for the area. Since the City does not currently assess transportation impact fees, a direct funding source for this improvement does not exist. Therefore, to fund this improvement, the City should complete a nexus study upon adoption of the proposed Plan to determine the appropriate transportation impact fee. Once the intersection reaches LOS E and the traffic signal warrants are met, as defined by the California Manual of Uniform Traffic Control Devices, the signalization improvements should be implemented. The City should also complete yearly traffic monitoring to determine when the intersection reaches the signalization improvement thresholds. With this mitigation measure, impacts associated with the implementation of the proposed Plan would be *less than significant*.

Significance After Mitigation: Less than significant.

Mitigation Measure TRAF-8o: Intersection Improvements – Hacienda Avenue/Dell Avenue. This is identical to Mitigation Measure TRAF-8e identified under the Background plus Plan scenario. For reference, the mitigation measure is repeated below.

Under Cumulative plus Plan Conditions, this intersection is expected to operate unacceptably. Signalization of the intersection, which would roughly cost $400,000 per traffic signal, is expected to

[9] Spencer, Mark. Principal, Whitlock & Weinberger Transportation, Inc. Personal email communication with Carey Stone, December 9, 2014.

result in acceptable operations.[10] While a lane configuration was assumed for analysis purposes, it is recommended that a finalized lane configuration be designed as more detailed development plans are created for the area. Since the City does not currently assess transportation impact fees, a direct funding source for this improvement does not exist. Therefore, to fund this improvement, the City should complete a nexus study upon adoption of the proposed Plan to determine the appropriate transportation impact fee. Once the intersection reaches LOS E and the traffic signal warrants are met, as defined by the California Manual of Uniform Traffic Control Devices, the signalization improvements should be implemented. The City should also complete yearly traffic monitoring to determine when the intersection reaches the signalization improvement thresholds. With this mitigation measure, impacts associated with the implementation of the proposed Plan would be *less than significant*.

Significance After Mitigation: Less than significant.

Mitigation Measure TRAF-8p: Intersection Improvements – Bascom Avenue/Camden Avenue . Under Cumulative plus Plan Conditions, this intersection is expected to operate unacceptably. Modifying the intersection to include the following lane configuration, as well as the necessary receiving lanes and traffic signal modifications would result in acceptable operations:

- Northbound: three left-turn lanes, two through lanes, one shared through and right-turn lane
- Southbound: two left-turn lanes, four through lanes, two right-turn lanes (this is an addition of one through lane and two right-turn lanes)
- Eastbound: two left-turn lanes, three through lanes, one right-turn lane (this is an addition of one through lane)
- Westbound: one left-turn lane, three through lanes, one right-turn lane (this is the addition of one right-turn lane)

If this mitigation measure is implemented, then the proposed Plan's impact after mitigation would be less than significant. However, the level of roadway widening required to achieve acceptable operations would require large amounts of right-of-way acquisition, thereby restricting the feasibility of implementing the recommended improvements. Additionally, these are regional routes and as such any improvements to this intersection would best be considered, adopted, and implemented as part of regional transportation planning efforts, not as part of an individual development project. Additionally, it is noted this intersection is under the jurisdiction of the City of San Jose, therefore any modifications to the intersection would require coordination and approval from both the City of San Jose and the Santa Clara VTA. Given the limits on feasibility, including physical constraints, the fact that improvements would be best achieved through a regional planning process and the need for inter-jurisdictional approvals, the proposed Plan's impact is *significant and unavoidable*.

[10] Spencer, Mark. Principal, Whitlock & Weinberger Transportation, Inc. Personal communication with Carey Stone, December 9, 2014.

Significance After Mitigation: Significant and unavoidable.

Mitigation Measure TRAF-8q: Intersection Improvements – Winchester Boulevard/Knowles Drive. Under Cumulative plus Plan Conditions, this intersection is expected to operate unacceptably. The improvements recommended to achieve acceptable operations are identical to what was identified in Mitigation Measure TRAF-8f, which is copied below for reference.

Modifying the westbound approach to have two left-turn lanes, a single through lane and right-turn lane, as well as the necessary receiving lanes and traffic signal modifications would result in acceptable operations. The modification would result in the following lane configuration:

- Northbound: two left-turn lanes, two through lanes, one right-turn lane
- Southbound: one left-turn lane, two though lanes, one right-turn lane
- Eastbound: one left-turn lane, one through lane, one right-turn lane
- Westbound: two left-turn lanes, one through lane, one right-turn lane

With this mitigation measure, the proposed Plan's impact after mitigation would be less than significant. However, installation of these modifications may be limited by the railroad tracks located parallel to Winchester Boulevard to the east of the intersection. Additionally, portions of the intersection fall under the jurisdiction of the Town of Los Gatos, and would therefore require the Town's approval to implement modifications. Therefore, due to limitations on feasibility, including physical constraints and the need for inter-jurisdictional approvals, the proposed Plan's impact is *significant and unavoidable.*

Significance After Mitigation: Significant and unavoidable.

Mitigation Measure TRAF-8r: Intersection Improvements – Winchester Boulevard/SR 85 Northbound Ramps. Under Cumulative plus Plan Conditions, this intersection is expected to operate unacceptably. Installation of a second northbound left-turn lane would result in acceptable operations.

If this mitigation measure is implemented, then the proposed Plan's impact after mitigation would be less than significant. However, installation of these modifications may be limited by the need to acquire right-of-way. Additionally, portions of the intersection fall under the jurisdiction of Caltrans and the Town of Los Gatos, and would therefore require the two agencies' approval to implement modifications. Therefore, due to limitations on feasibility, including physical constraints, the need for right-of-way acquisition, and the need for inter-jurisdictional approvals, the proposed Plan's impact is *significant and unavoidable.*

Significance After Mitigation: Significant and unavoidable.

Mitigation Measure TRAF-8s: Intersection Improvements – Winchester Boulevard/SR 85 Southbound Ramps. Under Cumulative plus Plan Conditions, this intersection is expected to operate unacceptably. Modifying the intersection to include the following lane configuration would result in acceptable operations:

- Northbound: two through lanes
- Southbound: two though lanes
- Eastbound: two left-turn lanes and one right-turn lane (this is a second left-turn lane)

If this mitigation measure is implemented, then the proposed Plan's impact after mitigation would be less than significant. However, installation of these modifications may be limited by the need to acquire right-of-way. Additionally, portions of the intersection fall under the jurisdiction of Caltrans and the Town of Los Gatos, and would therefore require the two agencies' approval to implement modifications. Therefore, due to limitations on feasibility, including physical constraints, the need for right-of-way acquisition, and the need for inter-jurisdictional approvals, the proposed Plan's impact is *significant and unavoidable.*

Significance After Mitigation: Significant and unavoidable.

Mitigation Measure TRAF-8t: Intersection Improvements – Winchester Boulevard/Wimbledon Drive. Under Cumulative plus Plan Conditions, this intersection is expected to operate unacceptably. Modifying the intersection to include the following lane configuration would result in acceptable operations:

- Northbound: one left-turn lane and two through lanes
- Southbound: two through lanes and one right-turn lane (this is an addition of a right-turn lane)
- Eastbound: one left-turn lane and one right-turn lane (these are additional dedicated turn lanes)

With this mitigation measure, the proposed Plan's impact after mitigation would be less than significant. However, the intersection falls under the jurisdiction of the Town of Los Gatos and would, therefore, require the Town's approval to implement modifications. Therefore, it is recommended that the City of Campbell coordinate with the Town of Los Gatos to seek approval for this modification, and subsequently develop a mechanism to implement the modification. With the implementation of this mitigation measure, the proposed Plan's impact would be less than significant. However, due to limitations on feasibility and lack of funding mechanism, the proposed Plan's impact is *significant and unavoidable.*

Significance After Mitigation: Significant and unavoidable.

Mitigation Measure TRAF-8u: Intersection Improvements – Winchester Boulevard/Lark Avenue. Under Cumulative plus Plan Conditions, this intersection is expected to operate unacceptably. The improvements recommended to achieve acceptable operations are identical to what was identified in Mitigation Measure TRAF-8g, which is copied below for reference.

Modifying the northern leg to have a dedicated receiving lane for the westbound right-turn movement. This would allow the westbound right-turn movement to be free-flowing, thereby decreasing the overall intersection delay. This is consistent with recommendations made in the Albright Office Park EIR

analysis. The receiving lane on the northern leg would need to be long enough to facilitate a merging maneuver into the continuous northbound through lanes. Based on correspondence with Town of Los Gatos staff, this improvement has been funded and is expected to be implemented in 2015-2016.[11] With this modified intersection configuration, which is scheduled to be implemented independently of the proposed Plan, the proposed Plan's impact would be *less than significant*.

Significance After Mitigation: Less than significant.

Mitigation Measure TRAF-8v: Intersection Improvements – Lark Avenue/SR 17 Southbound Ramps. Under Cumulative plus Plan Conditions, this intersection is expected to operate unacceptably. Modifying the intersection to add an additional eastbound shared through and right-turn lane would result in acceptable operations. This is consistent with mitigation measures presented in the North 40 Specific Plan EIR analysis. However, at the time of this analysis, funding for this improvement has not been identified, nor is there a scheduled timeline for implementation. If this mitigation measure is implemented, then the proposed Plan's impact after mitigation would be less than significant. The intersection falls under the jurisdiction of the both Town of Los Gatos and Caltrans, and would therefore require both agencies' approvals to implement modifications. Therefore, it is recommended that the City of Campbell coordinate with the Town of Los Gatos and Caltrans to seek approval for this modification, and subsequently develop a funding mechanism to implement the modification. However, due to limitations on feasibility (i.e., lack of funding and unknown timing of the improvement), the proposed Plan's impact on this intersection is *significant and unavoidable*

Significance After Mitigation: Significant and unavoidable.

Mitigation Measure TRAF-8w: Intersection Improvements – Winchester Boulevard/Daves Avenue. Under Cumulative plus Plan Conditions, this intersection is expected to operate unacceptably. Modifying the intersection to include the following lane configuration would result in acceptable operations:

- Northbound: one left-turn lane, one through lane, one shared through and right-turn lane
- Southbound: one left-turn lane, one through lane, one right-turn lane
- Eastbound: one left-turn lane, one shared through and right-turn lane (currently there is a single lane for all movements)
- Westbound: one left-turn lane, one shared through and right-turn lane (currently there is a single lane for all movements)

Additionally, the traffic signal phasing would need to be modified to provide protected phasing on the eastbound and westbound approaches.

[11] Pu, Jessy. Traffic Engineer, Parks and Public Works, Town of Los Gatos. Personal email communication with Tony Henderson, W-Trans. November 20, 2014.

If this mitigation measure is implemented, then the proposed Plan's impact after mitigation would be less than significant. However, installation of these modifications may be limited due to the fact that the westbound approach is a private driveway and modifications would require the approval of the landowner. Installation of this improvement would be further limited by the fact that adjacent development would restrict the necessary roadway widening. Additionally, the intersection falls under the jurisdiction of the Town of Los Gatos, and would therefore require the Town's approval to implement modifications. Therefore, because this improvement is not funded, and due to limitations on feasibility, including physical constraints, the need for private landowner approval, and the need for inter-jurisdictional approval, the proposed Plan's impact is *significant and unavoidable.*

Significance After Mitigation: Significant and unavoidable.

Mitigation Measure TRAF-8x: Intersection Improvements – Blossom Hill Road/Santa Cruz Avenue-Winchester Boulevard. Under Cumulative plus Plan Conditions, this intersection is expected to operate unacceptably. Modifying the intersection to include the following lane configuration, as well as the necessary receiving lanes and traffic signal modifications, would result in acceptable operations:

- Northbound: one left-turn lane, two through lanes, one right-turn lane (this would be an increase of one left-turn lane and one through lane)
- Southbound: one left-turn lane, one through lane, one right-turn lane (this would be an addition of one right-turn lane)
- Eastbound: single shared left-turn, through and right-turn lane
- Westbound: one shared left-turn and through lane, one right-turn lane

If this mitigation measure is implemented, then the proposed Plan's impact after mitigation would be less than significant. However, installation of these modifications may be limited by the fact that adjacent buildings and private development would restrict the ability to widen the roadway without significant right-of-way acquisition. Additionally, the intersection falls under the jurisdiction of the Town of Los Gatos and would, therefore, require the Town's approval to implement modifications. Therefore, due to the lack of funding, limitations on feasibility, including physical constraints, and the need for right-of-way, the proposed Plan's impact is *significant and unavoidable.*

Significance After Mitigation: Significant and unavoidable

Mitigation Measure TRAF-8y: Intersection Improvements – Saratoga Los Gatos Road/University Avenue. Under Cumulative plus Plan Conditions, this intersection is expected to operate unacceptably. Modifying the intersection to provide dedicated right-turn lanes on the northbound, southbound, and eastbound approaches, as well as the necessary traffic signal modifications, would result in acceptable operations. This would result in the following lane configuration:

- Northbound: one left-turn lane, one through lane, one right-turn lane
- Southbound: one left-turn lane, one through lane, one right-turn lane

- Eastbound: one left-turn lane, two through lanes, one right-turn lane
- Westbound: one left-turn lane, two through lanes, one right-turn lane

With this mitigation measure, the proposed Plan's impact after mitigation would be less than significant. However, the intersection falls under the jurisdiction of the Town of Los Gatos and would, therefore, require the Town's approval to implement modifications. Additionally, implementation of the mitigation measure may require acquisition of right-of-way and reconfiguration of adjacent parcels. Therefore, due to the lack of funding, limitations on feasibility, including physical constraints and the need for right-of-way, , the proposed Plan's impact is *significant and unavoidable.*

Significance After Mitigation: Significant and unavoidable.

Transportation Demand Management

Mitigation Measure TRAF-8z: Transportation Demand Management. A partial mitigation measure to reduce impact on study facilities would be the implementation of a Transportation Demand Management (TDM) Program. A TDM would include measures to encourage reductions in vehicle trips. This may include, but not be limited to, subsidization of transit passes, carpool/vanpool matching services, preferential parking for carpool/vanpool vehicles, alternative work schedules, and enhanced pedestrian and bicycle facilities.

Implementation of a TDM Program can result in an incremental decrease in traffic generated by a development. While this decrease in traffic may not be enough to reduce impacts to a less than significant level, any reductions in Plan-generated traffic would be beneficial to congestion, air quality and health. Therefore, it is recommended that a TDM Program be implemented for the proposed Plan as a partial mitigation to reduce, but not fully alleviate, traffic-related impacts.

Significance After Mitigation: Significant and unavoidable.

4.14 UTILITIES AND SERVICE SYSTEMS

This chapter describes the existing utilities and service systems in Campbell and evaluates the potential environmental consequences of implementing the Dell Avenue Area Plan (proposed Plan). Water supply, wastewater, solid waste, and energy conservation are each addressed in separate sections of this chapter. In each section, a summary of the relevant regulatory framework and existing conditions is followed by a discussion of potential impacts and cumulative impacts from the implementation of the proposed Plan. Stormwater, as it relates to both water quality and capacity, is addressed in Chapter 4.8, Hydrology and Water Quality, of this Draft EIR.

4.14.1 WATER SUPPLY

This section describes existing conditions related to water supply and the potential impacts that could result from implementation of the proposed Plan.

4.14.1.1 ENVIRONMENTAL SETTING

Regulatory Framework

This section summarizes key federal, State, regional, and City regulations and policies pertaining to water supply that are applicable to the proposed Plan.

Federal Regulations

Federal Safe Drinking Water Act

The Safe Drinking Water Act authorizes the US Environmental Protection Agency (EPA) to set national standards for drinking water, called the National Primary Drinking Water Regulations, to protect against both naturally occurring and human-made contaminants. These standards set enforceable maximum contaminant levels in drinking water and require all water providers in the United States to treat water to remove contaminants, except for private wells serving fewer than 25 people. In California, the State Department of Health Services conducts most enforcement activities. If a water system does not meet standards, it is the water supplier's responsibility to notify its customers.

State Regulations

California Porter-Cologne Water Quality Control Act

Under the Porter-Cologne Water Quality Control Act, which was passed in California in 1969 and amended in 2013, the State Water Resources Control Board (SWRCB) has authority over State water rights and water quality policy. This Act divided the state into nine regional basins, each under the jurisdiction of a Regional Water Quality Control Board (RWQCB) to oversee water quality on a day-to-day basis at the local and

regional level. RWQCBs engage in a number of water quality functions in their respective regions. RWQCBs regulate all pollutant or nuisance discharges that may affect either surface water or groundwater. Campbell is overseen by the San Francisco Bay RWQCB.

Senate Bill 610 and 221

Senate Bill (SB) 610 and SB 221 amended State law to ensure better coordination between local water supply and land use decisions and confirm that there is an adequate water supply for new development. Both statutes require that detailed information regarding water availability be provided to City and County decision-makers prior to approval of large development projects. The document used to determine compliance with both SB 610 and SB 221 is the Urban Water Management Plan (UWMP) or, if the UWMP does not account for the new development water demand, a separate water supply assessment (WSA) from the water purveyor.

SB 610 requires the preparation of WSA for certain types of projects, as defined by Water Code §10912, that are subject to the California Environmental Quality Act (CEQA). Projects required to prepare a WSA are defined as follows:

- Residential development of more than 500 dwelling units.
- Shopping center or business establishment employing more than 1,000 persons or having more than 500,000 square feet of floor area.
- Hotel or motel, or both, having more than 500 rooms.
- Industrial, manufacturing, or processing plant or industrial park planned to employ more than 1,000 persons, occupying more than 40 acres of land, or having more than 650,000 square feet of floor area.
- Mixed-use project that includes one or more of the projects specific above.
- Project that would demand an amount of water equivalent to, or greater than, the amount of water required for 500 dwelling units.

SB 221 establishes consultation and analysis requirements related to water supply planning for residential subdivisions including more than 500 dwelling units. Written verification by the water supplier that sufficient water is available for the proposed Plan is required before construction begins.

The San Jose Water Company (SJWC) prepared a WSA,[1] in response to a request from the City of Campbell, to determine whether there would be sufficient water supply to serve the projected 2030 development potential associated with the proposed Plan.

[1] SJWC, 2015. Dell Avenue Area Plan Water Supply Assessment, dated January 2015.

Urban Water Management Plan Act

Through the Urban Water Management Planning Act of 1983, the California Water Code requires all urban water suppliers within California to prepare and adopt an UWMP and update it every 5 years. This requirement applies to all suppliers providing water to more than 3,000 customers or supplying more than 3,000 acre-feet (AF)[2] of water annually. The Act is intended to support conservation and efficient use of urban water supplies at the local level. The Act requires that total projected water use be compared to water supply sources over the next 20 years in 5-year increments, that planning occur for single and multiple-dry water years, and that plans include a water recycling analysis that incorporates a description of the wastewater collection and treatment system within the agency's service area along with current and potential recycled water uses.

Groundwater Management Act

The Groundwater Management Act of the California Water Code (Assembly Bill [AB] 3030), signed into law in 1992, provides guidance for existing local agencies to develop voluntary Groundwater Management Plans (GMPs) in State-designated groundwater basins. GMPs can allow agencies to raise revenue to pay for measures influencing the management of the basin, including extraction, recharge, conveyance, facilities' maintenance, and water quality.

Sustainable Groundwater Management Act

On September 16, 2014, Governor Jerry Brown signed into law a three-bill legislative package, composed of AB 1739 (Dickinson), SB 1168 (Pavley), and SB 1319 (Pavley), collectively known as the Sustainable Groundwater Management Act. The Department of Water Resources (DWR) has developed a Strategic Plan for its Sustainable Groundwater Management (SGM) Program. DWR's SGM Program will implement the new and expanded responsibilities identified in the 2014 Sustainable Groundwater Management Act (SGMA). Some of these expanded responsibilities include: (1) developing regulations to revise groundwater basin boundaries; (2) adopting regulations for local agencies to evaluate and implement Groundwater Sustainability Plans (GSPs) and prepare coordination agreements; (3) identifying basins subject to critical conditions of overdraft; (4) identifying water available for groundwater replenishment; and (5) publishing best management practices for the sustainable management of groundwater.

Water Conservation Act of 2009 (Senate Bill X7-7)

New mandatory requirements, per State law (SB-X7-7), mandate the reduction of per capita water use and agricultural water use throughout the State by 20 percent by 2020.

[2] 1 acre-foot is the amount of water required to cover 1 acre of ground (43,560 square feet) to a depth of 1 foot.

Updated Model Landscape Ordinance (Assembly Bill 1881)

The updated Model Landscape Ordinance requires cities and counties to adopt landscape water conservation ordinances by January 31, 2010 or to adopt a different ordinance that is at least as effective in conserving water as the updated Model Ordinance (MO). The City of Campbell adopted Water Efficient Landscape Guidelines on January 1, 2010 to fulfill the requirements of AB 1881.

CALGreen Building Code (Part 11, Title 24, CCR)

On July 17, 2008, the California Building Standards Commission adopted the nation's first green building standards. The California Green Building Standards Code (Part 11, Title 24, known as "CALGreen") was adopted as part of the California Building Standards Code (Title 24, California Code of Regulations [CCR]) to apply to the planning, design, operation, construction, use, and occupancy of every newly constructed building or structure, unless otherwise indicated in the code, throughout the State of California. CALGreen established planning and design standards for sustainable site development including water conservation and requires new buildings to reduce water consumption by 20 percent. The mandatory provisions of the California Green Building Code Standards became effective January 1, 2011. The building efficiency standards are enforced through the local building permit process.

The purpose of CALGreen is to improve public health, safety, and general welfare by enhancing the design and construction of buildings through the use of building concepts having a reduced negative impact or positive environmental impact and encouraging sustainable construction practices in the following categories:

- Planning and design.
- Energy efficiency.
- Water efficiency and conservation.
- Material conservation and resource efficiency.
- Environmental quality.

The California Plumbing Code (Part 5, Title 24, CCR)

The 2010 California Plumbing Code (Part 5, Title 24, CCR) was adopted as part of the California Building Standards Code. The general purpose of the universal code is to prevent disorder in the industry as a result of widely divergent plumbing practices and the use of many different, often conflicting, plumbing codes by local jurisdictions. Among many topics covered in the code are water fixtures, potable and non-potable water systems, and recycled water systems. Water supply and distribution shall comply will all applicable provisions of the current edition of the California Plumbing Code.

Local Regulations

2010 Urban Water Management Plan

In compliance with the SB X7-7 and the Urban Water Management Planning Act, the water service provider for the City of Campbell— the SJWC—adopted their 2010 UWMP in April 2011.

Campbell General Plan 2001

The City's General Plan, adopted in 2001, contains the following policies (Table 4.14-1) related to water supply and quality, which are applicable to the proposed Plan.

TABLE 4.14-1 CITY OF CAMPBELL GENERAL PLAN GOALS, POLICIES, AND STRATEGIES PERTAINING TO WATER SUPPLY AND QUALITY

Goal/Policy/ Strategy Number	Goal/Policy/Strategy Text
Goal CNR-5	*Promote high-quality drinking, surface, and ground water Citywide.*
Policy CNR-5.1	Water Quality Enhancement: Enhance the quality of surface water and groundwater resources and prevent their contamination.
Strategy CNR-5.1a	Regional Water Quality Control Board: Comply with the Regional Water Quality Control Board's regulations and standards to maintain and improve water quality.
Strategy CNR-5.1b	Encourage the San Jose Water Company to repair and upgrade delivery lines as appropriate.
Policy CNR-6	Water Conservation: Encourage residents and businesses to conserve water.
Strategy CNR-6.1	Water Efficient Landscaping Guidelines: Require new development and remodels to follow the City's Water Efficient Landscaping Guidelines.
Policy OSP-9.1	Drainage Facilities: Ensure that drainage facilities convey storm runoff without polluting local watercourses.
Strategy OSP -9.1d	Require new construction to utilize site preparation, grading, and foundation designs for erosion control to prevent sedimentation and contamination of streams.

Existing Conditions

Potable water is provided to Campbell by SJWC. SJWCs service area encompasses 139 square miles, including most of San Jose, most of Cupertino, the entire cities of Campbell, Monte Sereno, Saratoga, the Town of Los Gatos and parts of unincorporated Santa Clara County.

SJWC obtains its water from three sources of potable supply: groundwater, imported treated surface water, and local surface water.

Groundwater[3]

Groundwater comprises just over one third of SJWCs supply total. SJWC has over 100 wells that pump groundwater from the aquifers of the Santa Clara Valley subbasin. These aquifers are recharged naturally by rainfall, and artificially by a series of local reservoirs, percolation ponds, and an injection well.

The Santa Clara Valley Water District (SCVWD) is the agency that manages ground water in Santa Clara County. SJWC has the right to withdraw groundwater from aquifers below properties within its service area boundary when in compliance with the SCVWDs permitting requirements. In Santa Clara County, this right is subject to a groundwater extraction fee levied by SCVWD based on the amount of groundwater pumped into SJWCs distribution system. SJWC draws water from the Santa Clara Valley subbasin (basin) in the north part of Santa Clara County. The basin extends from near Coyote Narrows at Metcalf Road to the County's northern boundary. It is bounded on the west by the Santa Cruz Mountains and on the east by the Diablo Range; these two ranges converge at the Coyote Narrows to form the southern limit of the basin. The basin is 22 miles long and 15 miles wide, with a surface area of 225 square miles. The SJWC 2010 UWMP indicates the groundwater level has been steadily on the rise for the past 40 years in the Santa Clara Valley subbasin.

SJWC generally uses the most economical source of water, which is largely determined by SCVWD groundwater extraction fee rates and contracted water rates.

Purchased Imported Surface Water[4]

In 1981, SJWC entered into a 70-year master contract with SCVWD for the purchase of treated water. About 50 percent of needed water supply is purchased by SJWC under contract from the SCVWD. This water originates from several sources including local reservoirs, the State Water Project (SWP), and the federally funded San Felipe Division of the Central Valley Project (CVP).[5] Imported surface water provided by SCVWD primarily comes from the Sacramento-San Joaquin Delta, the majority of which originates as snowmelt in the Sierras.

The SCVWD owns and operates three separate surface water treatment plants (Penitencia, Rinconada, and Santa Teresa water treatment plants) that are supplied by surface water from local runoff and imported water from the CVP, SWP, and San Francisco Public Utilities Commission (SFPUC). Treated water is delivered to SJWC from the Rinconada treatment plant through a large-diameter high-pressure transmission pipeline.

The Rinconada Water Treatment Plant is the second largest of the SCVWD plants. Completed in 1967 by the Santa Clara County Flood Control and Water Conservation District, the precursor to today's water

[3] San Jose Water Company, 2011. *2010 Urban Water Management Plan (UWMP).*
[4] San Jose Water Company, 2011. *2010 Urban Water Management Plan (UWMP).*
[5] San Jose Water Company, 2011. *2010 Urban Water Management Plan (UWMP).*

district, the plant can treat and deliver up to 80 million gallons of water each day for retailers who supply residential and commercial users in the West Valley, including the Cities of Santa Clara, Campbell, Sunnyvale, Cupertino, Mountain View, and Los Altos and the Towns of Los Gatos and Los Altos Hills.

Local Surface Water[6]

SJWCs remaining source of potable water is surface water runoff from the watersheds of the Santa Cruz Mountains. This amounts to about 10 percent of SJWCs potable water supply, depending on rainfall.

SJWC has "pre-1914 surface water rights" to raw water in Los Gatos Creek and local watersheds in the Santa Cruz Mountains. Prior to 1872, appropriative water rights could be acquired by taking and beneficially using water. In 1914, the California Water Code was adopted and it grandfathered in all existing water entitlements to license holders. SJWC filed for a license in 1947 and was granted license number 10933 in 1976 by the SWRCB to draw 6,240 acre-feet per year (afy) from Los Gatos Creek. SJWC has upgraded the collection and treatment system that draws water from this watershed, which has increased the capacity of this entitlement to approximately 11,200 afy for an average rain year. A series of dams and automated intakes collect the water released from SJWCs lakes. The water is pumped into to SJWCs Montevina water treatment plant for treatment prior to entering the distribution system. SJWCs Saratoga water treatment plant draws water from a local stream that collects water from the nearby Santa Cruz Mountains.

SJWC owns and operates its water distribution system consisting of a pipe network, which lies predominantly beneath the traveled roadway in the public street rights-of-way.

Per Capita Water Use – San Jose Water Company

The Water Conservation Act of 2009 (Senate Bill X7-7) requires water purveyors to demonstrate they are achieving appropriate reductions in water use. This demonstration requires the water suppliers to do the following: determine a base daily per capita water use; determine urban water use targets; compare water use targets to 5-year baseline; and determine interim water use targets.

SJWCs 10-year base rate is 144 gallons per capita per day (gpcd). SJWCs interim urban water use target for 2015 is 134 gpcd. SJWCs urban water use target is 124 gpcd. SJWCs projected water use rate in 2015 is 116 gpcd. SJWCs projected water use rate in 2020 is 111 gpcd.[7]

Water Demand and Supply Projections – San Jose Water Company

Most of SJWCs customers within its 139-square-mile service territory are residential or commercial. SJWC also provides water to industrial, municipal, and private fire services and public fire protection services. SJWCs total demand is the sum of projected metered demand plus 7 percent of that amount for non-

[6] San Jose Water Company, 2011. *2010 Urban Water Management Plan (UWMP)*.
[7] San Jose Water Company, 2011. *2010 Urban Water Management Plan (UWMP)*.

revenue water, which includes authorized unmetered uses for firefighting, main flushing and public use and unauthorized use due to meter reading discrepancies, reservoir cleaning, malfunctioning valves, leakage, and theft. Table 4.14-2 shows the SJWC 2010 UWMP total projected demand to 2035.

TABLE 4.14-2 SJWC TOTAL DEMAND (AFY)

	2010	2015	2020	2025	2030	2035
Customer Metered Demand	122,834	132,254	134,920	137,640	140,415	143,246
Non-Revenue Water	9,024	9,649	9,844	10,042	10,245	10,451
Total System Demand	**131,858**	**141,903**	**144,764**	**147,682**	**150,660**	**153,697**

Note: afy = acre-feet per year.
Source: SJWC 2010 UWMP; and Table 4 (SJWC) of Water Supply Evaluation (Yarne & Associates), May 20, 2014, from Appendix H to the Draft EIR for the Cupertino General Plan Amendment; http://www.cupertinogpa.org/files/managed/Document/212/AppendixH_UtilitiesAndServiceSystemData.pdf.

The projected 2040 demand is estimated to be an increase of 3,037 afy over the 2035 demand (based on the estimated increase from 2030 to 2035) resulting in a total of 156,734 afy. The projected increase in total demand between 2015 and 2040 is 14,831 afy.[8]

The 2010 UWMP indicates SJWC has adequate water supply plans to meet the referenced demand forecasts.

Table 4.14-3 shows the actual amount of water supplied to SJWCs system from each source in 2010 and projections until 2035, as reported in the 2010 UWMP. Projected surface water is based on a long-term average at SJWC. Groundwater and SCVWD Treated Water projections include SJWCs plan to acquire additional water needed for development projects by installing production wells within the distribution system, by purchasing additional treated water from SCVWD, and recycled water from the South Bay Water Recycling Program.[9] The overall long-term strategy for groundwater, as discussed in the 2003 SCVWD Integrated Water Resource Planning Study (IWRP),[10] is to maximize the amount of water available in the groundwater basins to protect against drought and emergencies.[11] SCVWD attempts to maximize use of treated local and imported water when available.

SJWC classifies conservation as an additional source of water, which offsets potable water demand. SJWC projects an increase in conservation through 2035 to over 5,500 afy due to implementation of a more restrictive conservation program. Conservation savings are anticipated to result from increased use of

[8] 156,734 afy minus 141,903 afy equals 14,831 afy; see Table 4.14-2.

[9] San Jose Water Company (SJWC), 2014. SJWC Conservation in the Community, http://www.sjwater.com/for_your_information/save_water_money/conservation_in_the_community/, accessed August 23, 2014.

[10] Santa Clara Valley Water District (SCVWD), 2005. Integrated Water Resources Planning Study 2003, published December 2005. http://www.valleywater.org/Services/WaterSupplyPlanning.aspx.

[11] Santa Clara Valley Water District (SCVWD), 2014. Water Supply Planning, http://www.valleywater.org/Services/WaterSupplyPlanning.aspx , accessed August 23, 2014.

TABLE 4.14-3 CURRENT AND PROJECTED SJWC WATER SUPPLY – INCLUDING CONSERVATION (AFY)

Source	2010	2015	2020	2025	2030	2035
SCVWD Treated Water	64,783	72,636	74,344	76,086	77,864	79,677
SJWC Groundwater	51,107	57,187	58,340	59,516	60,716	61,940
SJWC Surface Water	15,968	12,080	12,080	12,080	12,080	12,080
Total Demand	**131,858**	**141,903**	**144,764**	**147,682**	**150,660**	**153,697**
Recycled Water	1,208	2,556	4,980	5,234	5,501	5,782
Additional Conservation	4,886	5,106	5,300	5,438	5,579	5,579
Total with Conservation	**137,952**	**149,565**	**155,044**	**158,354**	**161,740**	**165,058**

Note: afy = acre-feet per year.
Source: Table 6 of SJWC 2010 UWMP.

ultra-low flush toilets, high-efficiency toilets, low-flow showerheads, water efficient appliances, individual conservation, and reduction in landscape irrigation requirements.[12]

SJWC has an established well replacement program. The program identifies and replaces two wells per year based on numerous criteria, including the well's production and observed water quality problems. The replacement of older wells and optimization of existing wells will allow SJWC to maintain its groundwater supply reliability. SCVWDs policy is to achieve 95 percent reliability of supply during significant water shortages that occur during multiyear droughts. To accomplish this, SJWC can use less groundwater in certain areas or zones to achieve the overall balance, which best meets SCVWDs and SJWCs operational goals.[13]

The SCVWD will continue to work with SJWC and other local water retailers to refine future projections of both treated water and groundwater use to ensure planning efforts are consistent. Groundwater from the basin is a substantial source of water for SJWCs entire service area. In the past 5 years, groundwater has been the source for approximately one-third of SJWCs total supply.[14]

Water Supply Contingency Planning

During a single-dry year, it is unlikely that SCVWD would request a reduction in its retailer's (i.e., SJWCs) water demand. SCVWD maintains carryover storage in its reservoirs, locally stored groundwater reserves, and has access of up to 50,000 afy of drought supplies stored as groundwater in the Semitrophic

[12] San Jose Water Company, 2011. *2010 Urban Water Management Plan (UWMP).*
[13] San Jose Water Company, 2011. *2010 Urban Water Management Plan (UWMP).*
[14] San Jose Water Company, 2011. *2010 Urban Water Management Plan (UWMP).*

Groundwater Bank.[15] According to SCVWDs 2010 UWMP, there will be a 5 percent shortfall in treated water contract deliveries in 2020 and 2025. After this time it is expected that capital improvement projects listed in the Water Master Plan will result in sufficient additional supplies so that contract deliveries can be met during single-dry years. It is assumed that groundwater will provide the necessary supply to meet dry year demands, if purchased water reductions are required.

SJWCs 2010 UWMP indicates supply will continue to meet demand during multiple-dry year events, as projected through 3 years of dry conditions.[16]

Based on historical records in SJWC's service area, as reported in the 2010 UWMP, SJWC would adjust the quantities of each supply source during single or multiple-dry year events. Additional groundwater would supplement the lack of SCVWD treated water and local surface water.

In very long multiple-dry year events (i.e., years 4 to 6), or if there is a significant unanticipated hydrologic event that causes shortages, SJWC would enact the Water Shortage Contingency Plan (WSCP). The new WSCP was written into the 2010 UWMP, and supplants the prior 1992 version. The WSCP describes five stages of water shortage and response actions. SJWC's WSCP has adopted the same water shortage stage levels and response actions as those of the SCVWD. Response actions include voluntary and mandatory conservation measures to achieve demand reductions of up to 20 to 40 percent at Stage 4 and up to 50 percent at Stage 5 (the highest stage) of the WSCP. At Stage 4 of the WSCP, it is estimated that ground water reserves would be 150,000 to 200,000 afy; at Stage 5, projected ground water reserves are below 150,000 afy.

The SCVWD Board of Directors unanimously passed a resolution February 25, 2014 calling for mandatory measures to reach a water use reduction target equal to 20 percent of 2013 water use, through December 31, 2014. Retail water agencies (including SJWC), local municipalities and the county of Santa Clara are recommended to implement mandatory measures as needed to achieve the 20 percent water use reduction target.[17] SJWC conservation rules in effect since March 23, 2014, state no customer shall use utility-supplied water for a long list of non-essential or unauthorized uses, including:

- Use of water for construction purposes, such as consolidation of backfill, dust control, or other uses unless no other source of water or other method can be used.
- Use of water for more than minimal landscaping in connection with any new construction.
- Use of water for watering outside plants and turf areas using a hand-held hose without a positive shut-off valve.

[15] Santa Clara Valley Water District (SCVWD), 2013. Board Agenda Memo; Budget Adjustment for 2012 Water Banking Operations; January 22, 2013. http://cf.valleywater.org/About_Us/Board_of_directors/Board_meetings/_2013_Published_Meetings/MG49261/AS49274/AI49995/DO50113/DO_50113.pdf.

[16] San Jose Water Company, 2011. *2010 Urban Water Management Plan (UWMP)*, page 33.

[17] Association of California Water Agencies. 2014. "How California Water Agencies Are Responding to Record-Dry Conditions," ACWA web page, http://www.acwa.com/content/local-drought-response , accessed September 17, 2014.

- Use of water for decorative fountains or the filling or topping off decorative lakes or ponds. Exceptions are made for those decorative fountains, lakes, or ponds that utilize recycled water.
- Use of water for the filling or refilling of swimming pools.
- Service of water by any restaurant except upon the request of the patron.

Water Supply Assessment, SJWC, 2015

SJWC prepared a Water Supply Assessment (Appendix E) for the proposed Plan in accordance with requirements of California Senate Bill 610 (SB 610) and Senate Bill 221 (SB 221); legislation which requires water retailers to demonstrate whether their water supplies are sufficient for certain proposed subdivisions and large development projects subject to the California Environmental Quality Act.

The WSA describes the relationship between existing and future water supplies and documents SJWC's ability to provide a diverse water supply to match water demands of the proposed Plan under both normal and dry years. Based on SCVWD's UWMP through year 2035 and conservation methods currently employed, the SJWC determined it is able to meet the needs of the Plan Area through at least 2035 for normal and single-dry years. The WSA also states SCVWD has determined that water shortages could occur in the event of an extended 6-year drought period, and are planning to make investments as recommended in the SCVWD Water Supply and Infrastructure Master Plan, such that no greater than 20 percent shortages are expected through year 2035 based on Santa Clara County's historic hydrology. Shortages in multi-year droughts will need to be compensated by consumer conservation.

Due to a severe drought in the State of California since 2013, the amount of imported surface water available has gone down dramatically. Water from the Federal Water Project in 2014 has been available at 50 percent of normal, but water from the State Water Project has had an allocation of only 5 percent. As a result, the SJWC has been relying more heavily on groundwater which has caused the groundwater elevation to decline. However, the WSA concludes that the groundwater elevation will rebound and that the groundwater basin will be replenished. Thus, there will be sufficient water supply to serve the 2030 buildout that is projected to result from implementation of the proposed Plan.

4.14.1.2 STANDARDS OF SIGNIFICANCE

According to Appendix G of the CEQA Guidelines, the proposed Plan would have a significant impact on water service if:

1. There were insufficient water supplies available to serve the Plan from existing entitlements and resources, or if new or expanded entitlements were needed.
2. It would require or result in the construction of new water facilities or expansion of existing facilities, the construction of which would cause significant environmental effects.

4.14.1.2 ENVIRONMENTAL IMPACT DISCUSSION

This section analyzes the proposed Plan's potential impacts and cumulative impacts to water supply and infrastructure.

UTIL-1	**Implementation of the proposed Plan would have sufficient water supplies available to serve the Plan from existing entitlements and resources, and new or expanded entitlements are not needed.**

Water Supply Assessment

A comprehensive water supply plan for the proposed Plan is presented in the WSA, dated January 2015 (Appendix E). A summary of findings in the WSA follows below.

Total water usage for the proposed Plan is estimated at 550.0 afy. However, the existing development, which is being replaced, uses an average of 137.5 afy. Therefore, the estimated net system increase in water demand for the proposed Plan Area is 412.5 afy. This WSA estimate is much less than the overly conservative CalEEMod method, described above, which estimated a net system increase in water demand of 1,898 afy. The WSA estimate of 412.5 afy represents a 0.3 percent increase in system demand when compared to SJWC's 2010 water demand.[18]

SJWC currently has contracts or owns rights to receive water from the following sources:

1. Groundwater – from the Santa Clara Valley Subbasin
2. Imported surface water – from the Santa Clara Valley Water District
3. Local surface water – from Los Gatos Creek and Local Watersheds
4. Recycled water – from South Bay Water Recycling (not currently available within the proposed Plan Area)

Based on SCVWD's UWMP through year 2035 and conservation methods currently employed, there is sufficient water available to supply the proposed Plan Area. Also, the projected water demand for the proposed Plan Area is within normal growth projections for water demand in SJWC's system.[19]

SJWC works closely with SCVWD to manage its demands and imported water needs. After evaluating demands estimated for the proposed Plan Area, the SJWC concludes that sufficient water supply exists to serve the proposed Plan Area.

[18] San Jose Water Company, *Dell Avenue Area Plan Water Supply Assessment*, January 2015, page 5.
[19] San Jose Water Company, *Dell Avenue Area Plan Water Supply Assessment*, January 2015, page 5.

Based on the WSA analysis described above, it can be reasonably concluded that SJWC will have adequate water supplies to meet projected demands associated with the proposed Plan regarding potable water use for normal hydrologic, single-dry year, and multiple-dry year conditions for the 2040 buildout horizon. The following reasons support the conclusion that SJWC will have adequate water supply to support the proposed Plan:

- Adequacy of existing and planned supplies from SCVWD.
- Adequacy of existing and planned supplies of SJWCs groundwater and local surface water.
- Plans to maintain SJWCs existing wells and construct new ones to increase well production capacity.
- Plans to maintain SJWCs local surface water conveyance and treatment systems.

Accordingly, buildout of the proposed Plan would not result in insufficient water supplies from SJWC under normal, single-dry, or multiple-dry years, and new or expanded entitlements would not be needed; thus, impacts would be *less than significant*.

Applicable Regulations:

- The Water Conservation Act of 2009 (Senate Bill SB X7-7)
- 2010 California Plumbing Code that requires water conserving fixtures
- SJWCs and SCVWDs water supply and demand management strategies and water shortage contingency plans identified in the UWMPs
- City of Campbell General Plan

Significance Before Mitigation: Less than significant.

UTIL-2	**Implementation of the proposed Plan would not require or result in the construction of new water facilities or expansion of existing facilities, the construction of which would cause significant environmental effects.**

As discussed in Impact UTIL-1 above, the water demand associated with the proposed Plan would be served with available and planned water supplies provided by SJWC. Future development under the proposed Plan would be located within an already developed urban area and, therefore, would connect to the existing water distribution system. SJWCs distribution system has interties with other water retailers in the San Jose area that serve as another potential supply source. However, in order for SJWC to meet projected supply, the SJWC 2010 UWMP identifies the need for construction of several future water facility projects, including:

- New, higher capacity, replacement groundwater wells are planned in order to meet the demands of planned developments within SJWCs service area. The SJWC UWMP proposes replacing two wells per year.
- Construction of desalination and water recycling projects.

The SCVWD 2010 UWMP also identifies planned or potential new or expanded facilities. In early 2010, the District Board of Directors and the San Jose City Council executed a 40-year long-term agreement with the City of San Jose on the ownership of an advanced recycled water treatment facility, operation and maintenance of recycled water facilities, and future expansion that most effectively meets the needs of the community.[20] Impacts from the construction of new or expanded water production facilities would be project-specific. Any new or expanded water production facilities projects would require permitting and review in accordance with CEQA, which would ensure that any environmental impacts are disclosed and mitigated to the extent possible. This EIR is a programmatic document and does not evaluate the environmental impacts of any project-specific development.

In any case, new or expanded facilities are not anticipated to be necessary as a result of the proposed Plan. As discussed, the January 2015 Dell Avenue Area Plan WSA estimated the proposed Plan would result in a net increase of 412.5 afy which represents a 0.3 percent increase in system demand when compared to SJWC's 2010 water demand. The SJWC could accommodate the potential increased demand from the proposed Plan with the existing water supply, which would not require the construction or expansion of existing water facitilies.[21]

In summary, in accordance with the applicable regulations below, buildout of the proposed Plan would not result in water demand that would require the construction of new water treatment facilities or the expansion of existing facilities, the construction of which would cause significant environmental impacts; thus, impacts would be *less than significant*.

Applicable Regulations:

- The Water Conservation Act of 2009 (Senate Bill SB X7-7)
- 2010 California Plumbing Code that requires water conserving fixtures
- SJWC's and SCVWD's water supply and demand management strategies and water shortage contingency plan identified in the UWMPs

Significance Before Mitigation: Less than significant.

4.14.1.3 CUMULATIVE IMPACTS

This section analyzes potential cumulative impacts to water supply that could occur from the proposed Plan in combination with past, present and other reasonably foreseeable projects in the surrounding area. The geographic scope of this cumulative analysis is the SJWC service area.

[20] SCVWD. 2011. Urban Water Management Plan (2010), Chapter 7.
[21] San Jose Water Company, *Dell Avenue Area Plan Water Supply Assessment*, January 2015, page 5.

UTIL-3	**Implementation of the proposed Plan, in combination with past, present, and reasonably foreseeable projects, would not result in significant cumulative impacts with respect to water supply.**

As discussed in Chapter 4.0, the cumulative projects considered for this analysis include 869,000 square feet of commercial and 269,000 square feet of retail development along with 150 hotel rooms, 73 single-family homes, and 336 multi-family units all within the Town of Los Gatos. While the proposed Plan would contribute to an increased cumulative demand for water supply, the increased demand would not exceed the long-term supply under normal hydrologic circumstances, as discussed above. Additionally, SJWCs 2010 UWMP determined that the water supply will be sufficient to accommodate future demand in the SJWC service areas through 2035 (and 2040, by extrapolation), under normal circumstances. In multiple dry years, with SJWC and SCVWD drought contingency plans in place, any shortages would be managed through demand reductions and other measures such as increased supplemental supplies.

The SCVWDs Comprehensive Water Resources Management Plan outlines the key water resource issues facing Santa Clara County and provides a framework for understanding SCVWDs policies related to water supply, natural flood protection, and water resources stewardship. In addition, with SB X7-7 and the State, county, and local water conservation ordinances in place, all jurisdictions would be required to conserve water use through establishing water efficiency measures. In addition, pursuant to SB 610 and SB 221, WSAs would be prepared for large development projects prior to approval of each project to ensure adequate water supply for new development.

Together, these regulations, policies, and other considerations would ensure that cumulative impacts under the proposed Plan with respect to water supply would be *less than significant*.

Applicable Regulations:

- The Water Conservation Act of 2009 (Senate Bill SB X7-7)
- 2010 California Plumbing Code that requires water conserving fixtures
- CALGreen Building Code (Part 11, Title 24, CCR)
- State Updated Model Water Efficient Landscape Ordinance (Assembly Bill 1881 [2006])
- SCVWD Comprehensive Water Resources Management Plan
- SJWCs and SCVWDs water supply and demand management strategies and water shortage contingency plans identified in the UWMPs

Significance Before Mitigation: Less than significant.

4.14.1.4 Summary of Significant Impacts and Mitigation Measures

The proposed Plan would not result in any significant project-specific or cumulative impacts to water supply and therefore no mitigation measures are required.

4.14.2 WASTEWATER

This section describes existing conditions related to sanitary sewer and the potential impacts that could result from implementation of the proposed Plan.

4.14.2.1 ENVIRONMENTAL SETTING

Regulatory Framework

This section summarizes key federal, State, regional, and local regulations and policies pertaining to wastewater that are applicable to the proposed Plan.

Federal Regulations

Clean Water Act

The Clean Water Act (CWA) regulates the discharge of pollutants into watersheds throughout the nation. Under the CWA, the EPA implements pollution control programs and sets wastewater standards.

National Pollutant Discharge Elimination System

The National Pollutant Discharge Elimination System (NPDES) permit program was established in the CWA to regulate municipal and industrial discharges to surface waters of the United States. Federal NPDES permit regulations have been established for broad categories of discharges, including point-source municipal waste discharges and nonpoint-source stormwater runoff. NPDES permits generally identify effluent and receiving water limits on allowable concentrations and/or mass emissions of pollutants contained in the discharge; set prohibitions on discharges not specifically allowed under the permit; and establish provisions that describe required actions by the discharger, including industrial pretreatment, pollution prevention, self-monitoring, and other activities.

Wastewater discharge is regulated under the NPDES permit program for direct discharges into receiving waters and by the National Pretreatment Program for indirect discharges to a sewage treatment plant.

State Regulations

State Water Resources Control Board

On May 2, 2006, the State Water Resources Control Board (SWRCB) adopted a General Waste Discharge Requirement (Order No. 2006-0003) for all publicly owned sanitary sewer collection systems in California with more than 1 mile of sewer pipe. The order provides a consistent Statewide approach to reducing sanitary sewer overflows (SSOs) by requiring public sewer system operators to take all feasible steps to control the volume of waste discharged into the system, to prevent sanitary sewer waste from entering the

storm sewer system, and to develop a Sewer System Management Plan (SSMP). The General Waste Discharge Requirement also requires that storm sewer overflows be reported to the SWRCB using an online reporting system.

The San Francisco Bay RWQCB is the local division of the SWRCB. The San Francisco Bay RWQCB issues NPDES permits governing discharges from Campbell. NPDES permits allow the RWQCB to collect information on where the waste is disposed, what type of waste is being disposed, and what entity is depositing the wastes. The RWQCB is also charged with conducting inspections of permitted discharges and monitoring permit compliance.

Sanitary District Act of 1923

The Sanitary District Act of 1923 (Health and Safety Code Section 6400 et seq.) authorizes the formation of sanitation districts and enforces the districts to construct, operate, and maintain facilities for the collection, treatment, and disposal of wastewater.[22] The Act was amended in 1949 to allow the districts to also provide solid waste management and disposal services, including refuse transfer and resource recovery. Campbell is within the West Valley Sanitation District (WVSD), which is discussed in further detail below.

Local Regulations

West Valley Sanitation District Ordinance Code

The sewer laterals and mains within the City of Campbell are owned and maintained by the West Valley Sanitation District (WVSD). The West Valley Sanitation District Ordinance Code establishes the standards for discharges to and operation and maintenance of the sewer collection system. The code was established pursuant to the provisions of Section 4766 of the California Health and Safety Code and Section 25126 - 25130 of the California Government Code (Adopted Ord. 46, July 23, 1975; amended by Ord. 130, October 27, 1999).

West Valley Sanitary District Sewer System Management Plan

The WVSD Sewer System Management Plan (SSMP) documents the proper operation and maintenance of WVSDs sanitary sewer system, including capacity management and system audits. The WVSD is one of several sewer systems that feed the San Jose/Santa Clara Water Pollution Control Plant (SJ/SCWPCP) where the wastewater is treated before discharge to the San Francisco Bay. The WVSD SSMP[23] was prepared in compliance with the SWRCB Order 2006-0003: Statewide General Waste Discharge Requirements (GWDR) for Sanitary Sewer Systems, as revised by Order No. WQ 2008-0002.EXEC on February 20, 2008. The GWDR prohibits SSOs, requires reporting of SSOs using the Statewide electronic reporting system, and requires the preparation of an SSMP.

[22] California Health and Safety Code, http://www.leginfo.ca.gov/cgi-bin/calawquery?codesection=hsc, accessed on July 14, 2014.

[23] West Valley Sanitation District (WVSD), 2014. Sewer System Management Plan (SSMP), http://www.westvalleysan.org/documents/engineering/ssmp.

The SSMP is required to be audited every 2 years, per the SWRCB Order No. 2006-0003-DWQ. The 2014 SSMP audit[24] (covering years 2012 and 2013) addresses sewer system capacity management, assessment and evaluation, as well as a capacity assurance plan to ensure that the collection system continues to effectively serve the communities in the WVSD service area. The SSMP and SSMP audit document the resources required to be invested in capital improvement program (CIP) projects and studies. The SSMP audit indicates the WVSD has evaluated the hydraulic deficiencies in the system, established sufficient design criteria, and recommend both short- and long-term capacity enhancement and improvement projects. The audit further indicates the WVSDs CIP establishes a schedule of approximate completion dates for both short- and long-term improvements to reflect current budgetary capabilities and activity accomplishment.

The SSMP is also required by the San Francisco Bay RWQCB. The RWQCB outlines the SSMP requirements in the Sewer System Management Plan Development Guide dated July 2005 in cooperation with the Bay Area Clean Water Agencies (BACWA).

Campbell General Plan 2001

The City's General Plan, adopted in 2001, contains the following policies (Table 4.14-4) related to wastewater collection and treatment, which are applicable to the proposed Plan.

TABLE 4.14-4 CITY OF CAMPBELL GENERAL PLAN GOALS, POLICIES, AND STRATEGIES PERTAINING TO WASTEWATER COLLECTION AND TREATMENT

Goal/Policy/ Strategy Number	Goal/Policy/Strategy Text
Goal OSP-10	*Ensure efficient sewer and wastewater treatment.*
Policy OSP10.1	Sewer and Wastewater Facilities: Ensure that sewer and wastewater facilities meet the needs of Campbell's residents.
Strategy OSP10.1a	West Valley Sanitation District: Continue to participate in the West Valley Sanitation District to provide sanitary sewer collection services for the City.
Strategy OSP10.1b	Adequate Sewage Treatment Capacity: Ensure that new growth does not exceed the availability of adequate sewage treatment capacity or predate the presence of necessary infrastructure.
Strategy OSP10.1c	Monitoring and Maintenance of Infrastructure: Coordinate with the West Valley Sanitation District to provide for the monitoring and maintenance of existing wastewater collection infrastructure.
Goal CNR-7	*Increased water recycling.*
Policy CNR-7.1	Water Recycling: Take part in and promote water recycling efforts.
Strategy CNR-7.1a	Non-potable Water Infrastructure: Encourage the installation of infrastructure within the City for the use of reclaimed water for non-potable uses.
Strategy CNR-7.1b	Water Recycling: Work with the Santa Clara Valley Water District in water recycling efforts.

Source: City of Campbell General Plan, 2001.

[24] West Valley Sanitation District (WVSD), 2014. Sewer System Management Plan (SSMP). Audit, http://www.westvalleysan.org/assets/uploads/docs/ssmp/2014%20SSMP%20Audit.pdf .

Existing Conditions

Sewer service in Campbell and the Plan Area requires a system of pipes and facilities owned and maintained by several entities, including private landowners, the City of Campbell, the WVSD, and the SJ/SCWPCP.

Collection System

Campbell's wastewater collection system includes a network of pipes connecting individual residential and non-residential buildings to a wastewater treatment plant, as discussed below. The sewer pipes are owned and maintained by the WVSD, whose service area encompasses 28.4 square miles. Private landowners own and maintain on-site laterals that connect wastewater to laterals and sewer mains owned and operated by the WVSD. The sewer pipes typically run along City-owned rights-of-way.

The gravity sewer wastewater collection system, owned and maintained by WVSD, serves the populations of the cities of Campbell, Monte Sereno, Town of Los Gatos, portions of the City of Saratoga, and intervening unincorporated portions of the County of Santa Clara. In total there are approximately 44,500 connections serving a population of nearly 108,000 people. The wastewater collection system is comprised of 415 miles of sewer main and 210 miles of sewer lateral primarily located within the public right-of-way (lower lateral). The WVSDs sewer mains range in diameter from 6 to 39 inches, with nearly 90 percent of these lines being 8 inches in diameter or smaller. A majority of the sewer laterals are 4 inches in diameter, while 6-inch laterals are utilized for some commercial and multiple residential properties.[25]

The WVSD SSMP documents the proper operation, maintenance, and capacity management of the sewer system. The WVSD is currently in process of updating the last hydraulic modeling study (2008) to reflect additional flow data and completion of several CIP projects that have addressed capacity issues. The WVSDs CIP is slated to be reviewed and updated based on the updated Hydraulic Model and Risk Prioritization Study to be completed in the Spring of 2015.[26]

The WVSD reportedly has 1.2 mgd available capacity for their customers, which will be allotted on a first-come first-serve basis.[27] According to the WVSD Annual Report (2012-2013), estimated wastewater flow into the system has decreased steadily over the past 10 years by a total of about 10 percent.[28]

Using the CalEEMod model assumptions, as presented on Table 4.14-5, indoor water demand for the *existing* Plan Area is conservatively estimated to be 1.233 mgd. If, for purposes of worst-case analysis, it is conservatively assumed that all of this existing indoor water demand becomes wastewater, then the *existing* Plan Area generates approximately 1.233 mgd of wastewater. The WVSD is planning sewer upgrades in the Plan Area. As shown Figure 4.14-1, the WVSD is planning to make improvements to the existing 24-inch

[25] West Valley Sanitation District (WVSD), 2014. Sewer System Management Plan (SSMP), 2014 SSMP Audit.
[26] West Valley Sanitation District (WVSD), 2014. Sewer System Management Plan (SSMP), 2014 SSMP Audit, page 14.
[27] Aki Honda Snelling, Planning Manager, City of Campbell Community Development Department. Email to Bruce Brubaker, PlaceWorks, September 25, 2013.
[28] http://www.westvalleysan.org/assets/docs/annual_reports/29-7.2012-2013%20Annual%20Report.pdf.

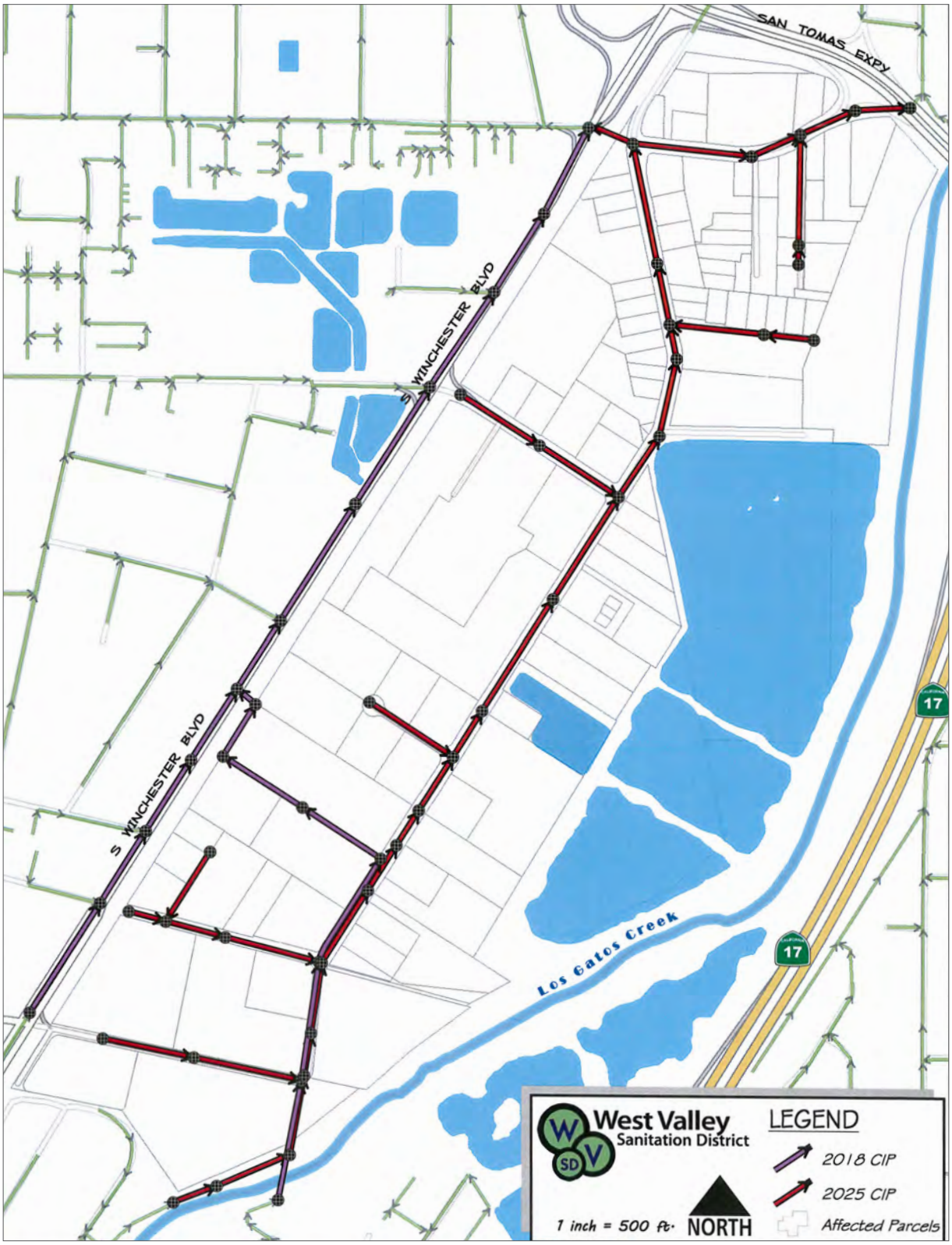


Figure 4.14-1
Planned WVSD Upgrades

TABLE 4.14-5 WATER DEMAND FOR EXISTING LAND USE AND PROPOSED PLAN BY 2040 (CALEEMOD)

	Unit	Indoor Water (gal/year)	Outdoor Water (gal/year)	Total Water (gal/year)
Existing Land Use				
Office	710,000 sf	126,190,961	77,342,847	203,533,808
Retail	56,000 sf	4,148,061	2,542,360	6,690,421
R&D	650,000 sf	319,601,066	0	319,601,066
Single Family	4 units	260,616	164,301	424,918
Multi-Family	0 units	0	0	0
Total (gal/year)		450,200,704	80,049,509	530,250,213
Total (gal/day)		1,233,427	219,314	1,452,740
Proposed Plan Land Use				
Office	3,002,000 sf	533,556,711	327,018,630	860,575,341
Retail	76,000 sf	5,629,512	3,450,346	9,079,857
R&D	502,000 sf	246,830,362	0	246,830,362
Single Family	4 units	260,616	164,301	424,918
Multi-Family	300 units	19,546,208	12,322,609	31,868,817
Total (gal/year)		805,823,408	342,955,886	1,148,779,295
Total (gal/day)		2,207,735	939,605	3,147,341
Net Increase (gal/day)		974,309	720,291	1,694,600

Notes: sf = square feet.

trunk line in the Plan Area. The project is funded for design in fiscal year 2018-2019. WVSD believes that rehabilitation of the existing 24-inch trunk line will be exempt from CEQA review since no capacity upgrades are anticipated to be necessary.[29]

The WVSD sewer financing program, the District Participation Program, provides funds for extension of the WVSD sanitary system to new development.[30] Under the District Participation Program, also known as the Sewer Extension Revolving Fund, or SERF program, WVSD participates with the installer in the costs of extending the sewer, and recovers costs by collection of connection fees from benefiting property owners. Under this program, WVSD designs and constructs the main and lateral sewers and recovers the costs from property owners when they connect to the system.

[29] Personal email communication with Alan Kam, West Valley Sanitation District, November 6, 2014.

[30] West Valley Sanitation District (WVSD), District Participation Program, http://www.westvalleysan.org/sewerpermits/financingprograms.php.

Treatment Plant

The SJ/SCWPCP treats wastewater for several jurisdictions, including Campbell, Los Gatos, Saratoga, Cupertino, Santa Clara, San Jose, and Milpitas. The WVSDs regional interceptor conveys wastewater to the SJ/SCWPCP through the sanitary sewer system of the City of San Jose.[31] In the fiscal year 2012-2013, WVSD collected and conveyed 9.941 mgd of wastewater to the treatment plant, which represents about 10 percent of the plant's average daily treatment flow. According to flow data published in the WVSD Annual Report (2012-2013), Campbell accounts for about 3 percent of the SJ/SCWPCPs total incoming wastewater. The majority of wastewater coming into the plant is from the cities of San Jose and Santa Clara.

According to the SJ/SCWPCP Master Plan, the SJ/SCWPCP has an existing plant rated capacity of 167 mgd during the dry season.[32] Annual average effluent flows in 2012 and 2013 were approximately 94 mgd and 89 mgd, with daily maximum flows of approximately 132 mgd and 108 mgd.[33] In 2008, the average daily flow reportedly was 110 mgd.[34]

The City of San Jose has an NPDES permit from the RWQCB that regulates the SJ/SCWPCP discharges. NPDES Permit No. CA0037842/Waste Discharge Requirement (WDR) Order No. R2 2014-0034 has been effective since 2014. This NPDES permit allows the SJ/SCWPC to treat an average dry weather influent flow of 167 mgd; well above the current average daily flow into the plant.

4.14.2.2 STANDARDS OF SIGNIFICANCE

According to Appendix G, Environmental Checklist, of the CEQA Guidelines, the proposed Plan would have a significant impact on wastewater service if it would:

1. Exceed wastewater treatment requirements of the applicable Regional Water Quality Control Board.
2. Require or result in the construction of new wastewater treatment facilities or expansion of existing facilities, the construction of which could cause significant environmental effects.
3. Result in a determination by the wastewater treatment provider, which serves or may serve the Plan that it does not have adequate capacity to serve the proposed Plan's projected demand in addition to the provider's existing commitments.

[31] City of San Jose, 2014. Sanitary Sewer System, Proposed Capital Improvement Program 2015 – 2019, http://www.sanjoseca.gov/documentcenter/view/29557.

[32] San Jose/Santa Clara Water Pollution Control Plant, 2012. *Final Draft: The Plant Master Plan.*

[33] San Francisco RWQCB, 2014. Tentative Order No. R2-2014-00XX (NPDES No. CA0037842) for San José-Santa Clara Regional Wastewater Facility and Collection Systems (SJ/SCWPCP), Fact Sheet, page F-5.

[34] City of San Jose, 2008. SJ/SCWPCP Master Plan Task No. 4, Project Memorandum No. 1, Existing Regulatory Requirements, page 1, December 23.

4.14.2.3 ENVIRONMENTAL IMPACT DISCUSSION

This section analyzes the proposed Plan's potential impacts and cumulative impacts to wastewater collection and treatment facilities.

UTIL-4	**Implementations of the proposed Plan would not exceed wastewater treatment requirements of the applicable Regional Water Quality Control Board.**

The WVSD sewer collection system directs wastewater to the SJ/SCWPCP. As discussed above, the San Francisco RWQCB established wastewater treatment requirements for the SJ/SCWPCP in an NPDES Permit (Order No. R2-2009-0038), adopted April 8, 2009 and effective June 1, 2009.[35] A new NPDES Permit (Order No R2-2014-0034), with substantially similar requirements, was adopted September 10, 2014 and became effective November 1, 2014.[36] The NPDES Order sets out a framework for compliance and enforcement applicable to operation of the SJ/SCWPCP and its effluent, as well as those contributing influent to the SJ/SCWPCP. This NPDES Order currently allows dry weather discharges of up to 167 mgd with full tertiary treatment, and wet weather discharges of up to 271 mgd with full tertiary treatment.

The SJ/SCWPCP currently treated an average of 110 mgd in 2008, as reported above. Effluent flow rates have been less than that in recent years, also as reported above. If current flow is assumed, conservatively, to be at the higher 2008 rate, the plant has excess dry weather capacity of about 57 mgd (176 – 110 = 57). Using the conservative CalEEMod default assumption that 100 percent of the net increase in indoor water demand for the proposed Plan becomes wastewater, the estimated net increased wastewater generation rate from the proposed Plan at buildout will be 0.974309 mgd (see Table 4.14-5). This increase in wastewater generation would not be significant relative to currently available excess treatment capacity. In addition, the very conservatively estimated wastewater generation for the proposed Plan will be less than the currently estimated excess capacity in the WVSD collection system (1.2 mgd), before planned improvements to the system. This analysis is additionally conservative in that it is likely less than 100 percent of potable water demand becomes wastewater, and the estimated water demand itself does not account for future conservation measures that can be expected to reduce water demand on the order of 20 percent (e.g., per SB X7-7).

As the dischargers named in the NPDES Permit, the cities of San Jose and Santa Clara implement and enforce pretreatment programs for effluent discharged into Artesian Slough, a tributary to Coyote Creek and South San Francisco Bay. The dischargers conduct programs to educate residents, professionals, and business owners about the proper use of their sewer and drainage systems in order to help preserve their own facilities and to help protect the environment.

[35] San Francisco RWQCB NPDES Permit (Order No. R2-2009-0038) for SJ/SCWPCP. http://www.waterboards.ca.gov/rwqcb2/board_info/agendas/2009/april/SJSC_FinalOrder%20-%204-09.pdf.

[36] San Francisco RWQCB NPDES Permit (Order No. R2-2014-0034) for SJ/SCWPCP, http://www.waterboards.ca.gov/sanfranciscobay/board_decisions/adopted_orders/2014/R2-2014-0034.pdf

The WVSD is one of six additional satellite collection systems that discharge into the SJ/SCWPCP. Each satellite collection system is responsible for an ongoing program of maintenance and capital improvements for sewer lines and pump stations within its respective jurisdiction in order to ensure adequate capacity and reliability of the collection system. The responsibilities include managing overflows, controlling infiltration and inflow (I&I) and implementing collection system maintenance.

The SJ/SCWPCP, serving as the Discharger, has an approved pretreatment program, which includes approved local limits as required by the permits. The permit requires the Discharger to evaluate its local limits, such as those established by the WVSD, to ensure compliance with updated effluent limits. These local limits are approved as part of the pretreatment program required by the NPDES Permit. The SJ/SCWPCP is required to monitor the permitted discharges in order to evaluate compliance with permit conditions.

With continued compliance with applicable regulations listed below, projected wastewater generated from potential future development under the proposed Plan would not exceed the wastewater treatment requirements or capacity of the SJ/SCWPCP. Therefore, the wastewater treatment requirements of the San Francisco RWQCB would not be exceeded due to buildout of the proposed Plan, resulting in a *less-than-significant* impact.

Applicable Regulations:

- San Francisco RWQCB NPDES Permit (Order No. R2-2009-0038) for SJ/SCWPCP
- San Francisco RWQCB NPDES Permit (Tentative Order No. R2-2014-XXX) for SJ/SCWPCP
- SWRCB Order No. 2006-0003-DWQ for Statewide General Waste Discharge Requirements for Sanitary Sewer Systems
- SWRCB Order No. WQ 2008-0002-EXEC revising SWRCB Order No. 2006-0003-DWQ
- West Valley Sanitation District Ordinance Code
- West Valley Sanitary District Sewer System Management Plan

Significance Before Mitigation: Less than significant.

UTIL-5	**Implementation of the proposed Plan would not require or result in the construction of new wastewater treatment facilities or expansion of existing facilities, the construction of which could cause significant environmental effects.**

Buildout of the proposed Plan would have a significant impact if it would result in the construction of new wastewater treatment facilities or the expansion of existing facilities, the construction of which would have a significant effect on the environment. As discussed in Impact UTIL-4 above and Impact UTIL-6 below, future wastewater demands from the proposed Plan would not exceed the design or permitted capacity of the wastewater treatment plant serving the proposed Plan (i.e., SJ/SCWPCP).

The proposed Plan would continue to be provided with wastewater collection and treatment services from the WVSD collection system and the SJ/SCWPCP treatment plant. Existing infrastructure would be preserved in place and, if necessary, extensions and/or additions to sewer collection systems would be installed to provide wastewater service to structures proposed by the Plan.

The WVSD is planning sewer upgrades in the Plan Area. As shown Figure 4.14-1, the WVSD is planning to install a 24-inch trunk sewer system in the Plan Area along Winchester Boulevard, between Knowles Avenue and Old Orchard Road, beginning in 2018.[37] In addition, Dell Avenue sewer system upgrades are planned as part of the WVSD's long term (2025) CIP. Building new or extended wastewater pipes or lift stations may be necessary in accordance with the SSMP and related audit and CIP. While new facilities could create environmental effects, impacts from the construction of new or expanded wastewater production facilities would be project-specific. Any new or expanded wastewater production facilities projects would require permitting and review in accordance with CEQA, which would ensure that any environmental impacts are disclosed and mitigated to the extent possible. This EIR is a programmatic document and does not evaluate the environmental impacts of any project-specific development.

Operation and maintenance, including capacity management and system audits, of the WVSD's collection system would be addressed through the WVSD's SSMP, which evaluated the system's capacity and found that most of the system can accommodate existing peak dry weather flow, but that some portions of the system would not be able to handle existing peak wet weather flows.[38] However, none of the system deficiencies are located within the Plan Area.[39] To address existing and future capacity deficiencies, the WVSD maintains a 5-Year CIP and a forecasted 10-year CIP which identify future system upgrades which, as noted above, would undergo separate CEQA review if applicable prior to initiation of the project.

In addition, the General Plan includes goals, policies, and strategies (see Table 4.14-6) that would ensure adequate wastewater collection and treatment facilities are available for the residents of Campbell. Policy OSP10.1 calls for the City to ensure that sewer and wastewater facilities meet the needs of Campbell's residents. Strategy OSP10.1b calls for the City to ensure that new growth does not exceed the availability of adequate sewage treatment capacity or predate the presence of necessary infrastructure.

In summary, the WVSD has planned sewer upgrades in the Plan Area that would take place regardless of future implementation of the proposed Plan. Furthermore, any potential impacts related to implementation of the WVSD planned improvements would be project-specific and will be evaluated under separate environmental review. This Draft EIR is a programmatic document and does not evaluate environmental impacts of any project-specific development. As a result, the impact would be *less than significant*.

Applicable Regulations:

- San Francisco RWQCB NPDES Permit (Order No. R2-2009-0038) for SJ/SCWPCP

[37] West Valley Sanitation District (WVSD), 2014. WVSD Proposed Budget, FY 2014-2015; Appendix A, 2014-2019 CIP, page 1.
[38] West Valley Sanitation District, 2015. *Sewer System Management Plan*, page 3 of 3.
[39] RMC Water and Environment, 2009. West Valley Sanitary District Capacity Analysis Technical Memorandum, pages 3-4.

- San Francisco RWQCB NPDES Permit (Tentative Order No. R2-2014-XXX) for SJ/SCWPCP
- SWRCB Order No. 2006-0003-DWQ for Statewide General Waste Discharge Requirements for Sanitary Sewer Systems
- SWRCB Order No. WQ 2008-0002-EXEC revising SWRCB Order No. 2006-0003-DWQ
- West Valley Sanitation District Ordinance Code
- West Valley Sanitary District Sewer System Management Plan, SSMP Audit, and CIP
- City of Campbell General Plan

Significance Before Mitigation: Less than significant.

UTIL-6	**Implementation of the proposed Plan would not result in a determination by the wastewater treatment provider, which serves, or may serve the Plan, that it does not have adequate capacity to serve the Plan's projected demand in addition to the provider's existing commitments.**

As discussed under Impact UTIL-4 above, the SJ/SCWPCP sewage treatment plant is permitted by the RWQCB to provide treatment of up to 167 mgd average dry weather daily flow (adwf). Currently, the average dry weather flow at the plant is 110 mgd. Thus, the Plant has 57 mgd of unused permitted dry weather flow capacity.

Using the CalEEMod model assumptions, indoor water demand for the proposed Plan is conservatively estimated to be 0.974309 mgd. If, for purposes of worst-case analysis, it is conservatively assumed that all of this increased indoor water demand becomes wastewater, then the proposed Plan will generate an increase of approximately 0.974309 mgd of wastewater. Using the same conservative methodology, as noted under the Existing Conditions section above, the *existing* Plan Area generates approximately 1.233 mgd of wastewater. Thus, the proposed Plan's worst-case estimated *increase* in wastewater flow, plus the worst-case estimated *existing* wastewater flow, together represent less than 4 percent of the excess capacity available at the SJ/SCWPCP.[40]

With continued compliance with applicable regulations listed below, wastewater generated from the proposed Plan would not exceed the permitted capacity of the SJ/SCWPCP treatment plant. Therefore, the proposed Plan would not result in the determination by the wastewater treatment provider that it does not have adequate capacity to serve the proposed Plan's projected demand in addition to SJ/SCWPCPs existing commitments, resulting in a *less-than-significant* impact.

Applicable Regulations:

- San Francisco RWQCB NPDES Permit (Order No. R2-2009-0038) for SJ/SCWPCP
- San Francisco RWQCB NPDES Permit (Tentative Order No. R2-2014-XXX) for SJ/SCWPCP

[40] (0.974 mgd + 1.233 mgd)/57 mgd = 0.039 {or, less than 4 percent}

- SWRCB Order No. 2006-0003-DWQ for Statewide General Waste Discharge Requirements for Sanitary Sewer Systems
- SWRCB Order No. WQ 2008-0002-EXEC revising SWRCB Order No. 2006-0003-DWQ
- West Valley Sanitation District Ordinance Code
- West Valley Sanitary District Sewer System Management Plan.

Significance Before Mitigation: Less than significant.

4.14.2.4 CUMULATIVE IMPACTS

This section analyzes potential impacts related to wastewater treatment that could occur from the proposed Plan in combination with reasonably foreseeable growth within the SJ/SCWPCP service area.

UTIL-7	**Implementation of the proposed Plan, in combination with past, present, and reasonably foreseeable projects, would not result in a significant cumulative impacts with respect to wastewater treatment.**

As discussed in Chapter 4.0, the cumulative projects considered for this analysis include 869,000 square feet of commercial and 269,000 square feet of retail development along with 150 hotel rooms, 73 single-family homes, and 336 multi-family units all within the Town of Los Gatos. Buildout of the proposed Plan would generate a moderate increase in the volume of wastewater delivered for treatment at SJ/SCWPCP. This increase represents less than 2 percent of the available treatment capacity at the SJ/SCWPCP, and it would occur incrementally until the 2040 buildout horizon. The SJ/SCWPCP serves the Plan Area and currently uses less than its design and permitted wastewater treatment capacity. Based on the recent trends of diminishing wastewater treatment demand and the projected population growth in the service area, cumulative wastewater treatment demand over the proposed Plan buildout period is far below the excess capacity of the SJ/SCWPCP. Because the cumulative demand would not substantially impact the existing or planned capacity of the wastewater treatment systems, which have sufficient capacity for wastewater than would be produced by the proposed Plan, the construction of new wastewater treatment facilities would not be necessary.

Additionally, future development in the SJ/SCWPCP service area would be subject to the development review process and would be required to mitigate any effects to wastewater treatment services on a project-by-project basis. Future development would also be required to comply with all applicable regulations and ordinances protecting wastewater treatment services as described in the Regulatory Framework section above.

Wastewater from cumulative projects would be treated according to the wastewater treatment requirements documented in the NPDES permit for the SJ/SCWPCP and enforced by the San Francisco RWQCB.

Therefore, cumulative development combined with the proposed Plan would not exceed wastewater treatment requirements, and cumulative impacts to sanitary wastewater service would be *less than significant*.

Applicable Regulations:

- San Francisco RWQCB NPDES Permit (Order No. R2-2009-0038) for SJ/SCWPCP
- San Francisco RWQCB NPDES Permit (Tentative Order No. R2-2014-XXX) for SJ/SCWPCP
- SWRCB Order No. 2006-0003-DWQ for Statewide General Waste Discharge Requirements for Sanitary Sewer Systems
- SWRCB Order No. WQ 2008-0002-EXEC revising SWRCB Order No. 2006-0003-DWQ
- West Valley Sanitation District Ordinance Code
- West Valley Sanitary District Sewer System Management Plan, SSMP Audit, and CIP

Significance Before Mitigation: Less than significant.

4.14.2.5 SUMMARY OF SIGNIFICANT IMPACTS AND MITIGATION MEASURES

The proposed Plan would not result in any significant project-specific or cumulative impacts to wastewater collection or treatment and therefore no mitigation measures are required.

4.14.3 STORMWATER

This section describes existing conditions related to stormwater and the potential impacts that could result from implementation of the proposed Plan.

4.14.3.1 ENVIRONMENTAL SETTING

Regulatory Framework

This section summarizes key federal, State, regional, and local regulations and policies pertaining to stormwater that are applicable to the proposed Plan.

Federal Regulations

Clean Water Act

Section 402(p) of the CWA establishes a framework for regulating municipal and industrial stormwater discharges under the NPDES Program.[41] On December 8, 1999, the EPA circulated Phase II regulations for

[41] Authorized by the CWA, the permit program controls water pollution by regulating point sources (discrete conveyances such as pipes or human-made ditches) that discharge pollutants into waters of the United States. Individual homes that are connected to a municipal system, use a septic system, or do not have a surface discharge do not need an NPDES permit; however, industrial, municipal, and other facilities must obtain permits if their discharges go directly to surface waters. In most cases, the NPDES permit program is administered by

non-point sources requiring permits for stormwater. Permits are required for discharges from Small Municipal Separate Storm Sewer System (MS4s) operators. In California, the NPDES program is administered by the State (see below).

State Regulations

San Francisco Bay RWQCB

The San Francisco Bay RWQCB issues NPDES permits in Campbell. The NPDES permit is concerned with regulating trash, pollutants of concern, and excessive hydrologic runoff which can carry sediment and cause flooding. The RWQCB is also charged with conducting inspections of permitted discharges and monitoring permit compliance. The SWRCB Construction General Permit requires the development and implementation of a Storm Water Pollution Prevention Plan (SWPPP) for certain types of projects.

Regional Regulations

Municipal Regional Stormwater NPDES Permit

As stated above, pursuant to Section 402 of the CWA and the Porter-Cologne Water Quality Control Act, municipal stormwater discharge in the City of Campbell is subject to the Waste Discharge Requirements (WDRs) of the MS4 Permit (Order Number R2-2009-0074) and NPDES Permit Number CAS612008, as amended by Order Number R2-2011-0083.[42]

Provision C.3 of the MRP addresses post-construction stormwater requirements for new development and redevelopment projects that add and/or replace 10,000 square feet or more of impervious area. Provision C.3 of the MRP also mandates that new development projects that meet certain criteria: 1) incorporate site design, source control, and stormwater treatment measures into the project design; 2) minimize the discharge of pollutants in stormwater runoff and non-stormwater discharge; and 3) prevent increases in runoff flows as compared to pre-development conditions. Low-impact development (LID) methods are the primary mechanisms for implementing such controls.

West Valley Clean Water Program

The West Valley Clean Water Program (WVCWP) was established in 1994 as a collaborative effort between the smaller west valley communities (Campbell, Monte Sereno, Saratoga, and Los Gatos) to implement stormwater pollution control and management efforts. The WVCWP goal is to reduce pollutants in storm drain discharges, comply with MRP regulations and requirements, and maximize the effectiveness of

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authorized states with oversight from the EPA. Summarized from the EPA website, http://water.epa.gov/polwaste/npdes/, accessed on July 25, 2014.

[42] San Francisco Bay Region Municipal Regional Stormwater NPDES Permit, http://www.waterboards.ca.gov/rwqcb2/board_decisions/adopted_orders/2011/R2-2011-0083.pdf

pollution prevention efforts. The SVCWP administers an Urban Runoff Management Plan (URMP) to reduce stormwater pollution, which includes the following specific actions:

- Municipal controls such as storm drain stenciling, storm drain operation and maintenance (O&M), street sweeping, street/public facilities maintenance, and illegal discharge response.
- Construction and development measures including on-site inspections, grading and erosion controls, and educating developers.
- Commercial and industrial facility inspections to prevent wastes from discharging into the storm drain system.
- Public education activities to increase awareness and change behavior.

By agreement with the participating cities and towns, the WVSD charges an additional surcharge from residences and commercial properties to fund the WVCWP. The SVCWP complies with the requirements of the MRP for urban runoff pollution control.

Local Regulations

City of Campbell General Plan

The City of Campbell General Plan contains the goals, strategies, policies, and implementing actions that guide in the overall development of the city. The General Plan goals and policies relevant to hydrology and water quality are listed in Table 4.14-7.

TABLE 4.14-7 CITY OF CAMPBELL GENERAL PLAN GOALS , POLICIES , AND STRATEGIES PERTAINING TO STORMWATER

Goal/Policy/ Strategy Number	Goal/Policy/Strategy Text
Open Space, Parks, and Public Facilities Element – Sewer, Storm Drainage and Wastewater	
Goal OSP-9	*Properly functioning storm drainage system.*
Policy OSP-9.1	Drainage Facilities: Ensure that drainage facilities convey storm runoff without polluting local watercourses.
Strategy OSP-9.1a	Storm Drain Fees: Collect adequate fees to provide for maintenance of storm drainage facilities.
Strategy OSP-9.1b	Regional Storm Drainage Facilities: Cooperate with surrounding jurisdictions and Santa Clara County to provide adequate storm drainage facilities.

Source: City of Campbell General Plan, 2001.

Existing Conditions

The City of Campbell maintains a system of laterals and storm drain pipes that drain runoff into Los Gatos Creek and San Tomas Aquino Creek, which ultimately drain into San Francisco Bay. The storm drains in

Campbell are designed to handle a 5-year storm event.[43] The SCVWD provides regional storm drainage for Santa Clara Valley and maintains the creeks through which rainwater runoff is channeled into San Francisco Bay. The SCVWD also owns and maintains 85 acres of groundwater recharge facilities along Los Gatos Creek within the City of Campbell that recharge the regional groundwater basin.

The Plan Area has an existing network of catch basins and storm drains. Some of the larger storm drains in the Plan Area are shown on Figure 4.8-1 in the Chapter 4.8, Hydrology. As discussed in Chapter 4.8, Hydrology, even with implementation of Low Impact Development (LID) techniques and Best Management Practices (BMPs), the projected residential and non-residential development in the area would likely require additional stormwater infrastructure. Development within the Plan Area most likely would not require significant expansion of the existing stormwater drainage infrastructure, because the majority of the sites involve redevelopment of already developed properties that have an existing storm drainage system with adequate capacity to convey stormwater. Also, new development and redevelopment would be required to comply with the C.3 provisions of the MRP which requires the installation of stormwater treatment measures that detain stormwater on-site for a certain period of time and treat primarily through settling and infiltration. This requirement typically results in lower stormwater flow rates and volumes as compared to existing conditions. Project applicants within the Plan Area would be required to submit a Stormwater Management Plan (SWMP) with building plans, to be reviewed and approved by the City of Campbell's Public Works Department to ensure that stormwater flows from each site would not exceed the capacity of the existing storm drain system, including hydrology and hydraulic calculations.

4.14.3.2 STANDARDS OF SIGNIFICANCE

Implementation of the proposed Plan would have a significant impact related to drainage facilities if it would:

1. Require or result the construction of new storm water drainage facilities or expansion of existing facilities, the construction of which could cause significant environmental effects.
2. Contribute to cumulative stormwater impacts in the area.

4.14.3.3 ENVIRONMENTAL IMPACT DISCUSSION

This section analyzes potential project-specific impacts related to stormwater.

UTIL-8	**Implementation of the proposed Plan would not require the construction of new storm drainage facilities or expansion of existing facilities, the construction of which would cause significant environmental effects.**

The Plan Area is largely developed and almost entirely covered with building roofs, hardscapes, or paved surface parking lots, with the exception of landscaped areas. Additionally, the Plan Area is already served by

[43] A 5-year storm event is a storm event that has a 1 in 5 chance of occurring in any given year.

existing stormwater drainage facilities. Future projects within the Plan Area would be required to comply with the NPDES permit described in Section 4.14.3.1 above. Requirements of the permit are such that stormwater flows associated with the development and/or redevelopment of parcels within the Plan Area will avoid increases to both the rate and total volume of discharge.

However, as discussed in section 4.14.3, it is likely that there would be required improvements to sections of stormwater pipelines to support buildout of the proposed Plan. The construction of these pipeline improvements could lead to soil erosion, sedimentation, noise and vibration, air quality, and biological and cultural resource impacts, as well as aesthetic and land use impacts from new facilities. Such impacts would be project-specific, and would require permitting and review in accordance with CEQA, which would ensure that any environmental impacts are disclosed and mitigated to the extent possible. This EIR is a programmatic document and does not evaluate environmental impacts of any project-specific development. Therefore, impacts would be *less than significant*.

Significance Before Mitigation: Less than significant.

4.14.3.4 CUMULATIVE IMPACTS

UTIL-9	**Implementation of the proposed Plan would not contribute to cumulative stormwater impacts in the area.**

As discussed in Chapter 4.0, the cumulative projects considered for this analysis include 869,000 square feet of commercial and 269,000 square feet of retail development along with 150 hotel rooms, 73 single-family homes, and 336 multi-family units all within the Town of Los Gatos. As discussed under Impact UTIL-8 above, the proposed Plan would require stormwater pipeline improvements, which could create environmental impacts. It is likely that other cumulative projects would require new or expanded stormwater infrastructure, which could cause environmental impacts like those summarized above. However, such impacts would generally be localized, and project-specific measures would mitigate impacts to the extent possible. Therefore, cumulative impacts related to stormwater would be *less than significant*.

Significance Before Mitigation: Less than significant.

4.14.3.5 SUMMARY OF SIGNIFICANT IMPACTS AND MITIGATION MEASURES

The proposed Plan would not result in any significant project-specific or cumulative impacts related to stormwater, and therefore no mitigation measures are required.

4.14.4 SOLID WASTE

This section describes existing conditions related to solid waste and the potential impacts that could result from implementation of the proposed Plan.

4.14.4.1 ENVIRONMENTAL SETTING

Regulatory Framework

This section summarizes State, regional, and local regulations and policies pertaining to solid waste that are applicable to the proposed Plan. There are no federal regulations in regards to solid waste that are applicable to the proposed Plan.

State Regulations

California Integrated Waste Management Act

California's Integrated Waste Management Act of 1989, AB 939,[44] subsequently amended by SB 1016,[45] set a requirement for cities and counties throughout the State to divert 50 percent of all solid waste from landfills by January 1, 2000 through source reduction, recycling, and composting. To help achieve this, the Act required that each city and county to prepare and submit a Source Reduction and Recycling Element. AB 939 also established the goal for all California counties to provide at least 15 years of ongoing landfill capacity.

In 2007, SB 1016 amended AB 939 to establish a per capita disposal measurement system. The per capita disposal measurement system is based on two factors: a jurisdictions reported total disposal of solid waste divided by a jurisdiction's population. The California Integrated Waste Management Board was replaced by the California Department of Resources Recycling and Recovery (CalRecycle) in 2010. CalRecycle sets a target per capita disposal rate for each jurisdiction. Each jurisdiction must submit an annual report to CalRecycle with an update of its progress in implementing diversion programs and its current per capital disposal rate. In 2013, the Statewide residential per capita disposal rate was 4.4 pounds per resident per day, and the Statewide employee per capita disposal rate was 10.2 pounds per employee per day.[46]

In addition, Assembly Bill 341, adopted in 2011, sets a State policy goal of not less than 75 percent of solid waste that is generated to be source reduced, recycled, or composted by the year 2020. CalRecycle was required to submit a report to the legislature by January 1, 2014 outlining the strategy that will be used to achieve this policy goal.

Solid Waste Reuse and Recycling Access Act of 1991

The Solid Waste Reuse and Recycling Access Act requires areas in development projects to be set aside for collecting and loading recyclable materials. The Act required CalRecycle to develop a model ordinance for

[44] Calrecycle, http://www.calrecycle.ca.gov/Laws/Legislation/CalHist/1985to1989.htm, accessed September 24, 2014.

[45] Official California Legislative Information, http://www.leginfo.ca.gov/pub/07-08/bill/sen/sb_1001-1050/sb_1016_bill_20080926_chaptered.html

[46] Calrecycle, California's Statewide Per Resident, Per Employee, and Total Disposal Since 1989, http://www.calrecycle.ca.gov/lgcentral/GoalMeasure/DisposalRate/Graphs/Disposal.htm, accessed July 31, 2014

adoption by any local agency relating to adequate areas for collection and loading of recyclable materials as part of development projects. Local agencies are required to adopt the model, or an ordinance of their own, governing adequate areas in development projects for collection and loading of recyclable materials.

CALGreen Building Code

The California Green Building Standards Code (CALGreen Code) became effective for all projects beginning after January 1, 2011. Section 4.408, Construction Waste Reduction Disposal and Recycling, mandates that, in the absence of a more stringent local ordinance, a minimum of 50 percent of non-hazardous construction and demolition debris must be recycled or salvaged. The Code requires applicants to submit a waste management plan for on-site sorting of construction debris, to the City of Campbell. The plan must:

- Identify the materials to be diverted from disposal by recycling, reuse on the project, or salvage for future use or sale.
- Specify if materials will be sorted on-site or mixed for transportation to a diversion facility.
- Identify the diversion facility where the material collected will be taken.
- Identify construction methods employed to reduce the amount of waste generated.
- Specify that the amount of materials diverted shall be calculated by weight or volume, but not by both.

Global Warming Solutions Act of 2006, Scoping Plan[47]

The California Global Warming Solutions Act of 2006 (also known as AB 32) Scoping Plan, which was adopted by the Air Resources Board (ARB), included a Mandatory Commercial Recycling Measure. The Mandatory Commercial Recycling Measure focuses on diverting commercial waste as a means to reduce GHG emissions, with the goal of reducing GHG emissions by 5 million metric tons of carbon dioxide equivalents ($MTCO_2e$), consistent with the 2020 targets set by AB 32. To achieve the Measure's objective, the commercial sector will need to recycle an additional 2 to 3 million tons of materials annually by the year 2020.

CalRecycle adopted this Measure at its January 17, 2012 Monthly Public Meeting. The regulation was approved by the Office of Administrative Law on May 7, 2012 and became effective immediately. On June 27, 2012, the Governor signed SB 1018, which included an amendment requiring both businesses that generate 4 cubic yards or more of commercial solid waste per week and multi-family residences with five or more units to arrange for recycling services. This requirement became effective on July 1, 2012.

[47] CalRecycle, http://www.calrecycle.ca.gov/Recycle/Commercial/, accessed July 31, 2014.

Local Regulations

Campbell General Plan

The City of Campbell promotes recycling to reduce the amount of solid waste placed in landfills. The General Plan includes goals, policies, and strategies with regards to solid waste collection, recycling and disposal, as summarized in Table 4.14-8.

TABLE 4.14-8 CITY OF CAMPBELL GENERAL PLAN GOALS, POLICIES, AND STRATEGIES PERTAINING TO SOLID WASTE

Goal/Policy/ Strategy Number	Goal/Policy/Strategy Text
Goal CNR-8	*Reduce the generation of solid waste volume throughout the City.*
Policy CNR-8.1	Solid Waste Collection: Ensure adequate solid waste collection services for present and future residents and businesses.
Strategy CNR-8.1a	Solid Waste Collection: Provide adequate solid waste collection for businesses and residences in accordance with State law.
Goal CNR-9	*Maximize source reduction and recycling to reduce the amount of solid waste sent to the landfill and extend the life of the landfill.*
Policy CNR-9.1	Source Reduction and Recycling Efforts: Participate in source reduction and recycling efforts.
Strategy CNR-9.1a through CRN-9.1i	Reduced Solid Waste Disposal Volume: Reduce solid waste disposal volume to meet the State-mandated level through source reduction, recycling, composting and yard waste programs. [multiple strategies]

Campbell Green Building Policies

The City of Campbell has recently adopted the three Green policies as recommended by the Santa Clara County Cities Green Building Collaborative (GBC).[48] The GBC is a subcommittee of the Santa Clara County Cities Association, charged with developing policy intended to promote climate protection strategies and regional reductions in greenhouse gas emissions. GBCs three near-term policy recommendations, adopted by Campbell, include the following:

- Recognizing/adopting the Leadership in Energy and Environmental Design (LEED) and Green Point Rated rating systems as a standard for green building evaluation (this recommendation would not require the development of buildings meeting the LEED or Green Point program standards).
- Require the completion of a "Green Checklist" as part of development applications.
- Require LEED Silver certification for all new or renovated municipal buildings over 5,000 square feet.

The City of Campbell implemented a requirement for the submittal of a green building checklist, beginning July 1, 2008 for single- and multi-family construction. The adoption of this policy emphasizes the City's

[48] US Green Building Council, http://www.usgbc.org/Docs/Archive/General/Docs5420.pdf, accessed on September 24, 2014.

leadership role in encouraging "green" building techniques. It both illustrates Campbell's initiative to limit the environmental impact of municipal facilities and also sets an example for the community at large.

Campbell Municipal Code

Chapter 6.04 of Title 6 (Health and Sanitation) of the Campbell Municipal Code addresses the handling, collection, and disposal of solid waste and recyclable materials. Chapter 6.04 outlines general provisions, which prohibit depositing refuse on private and vacant property and burning garbage on yards or open space, and require access to waste receptacles for garbage collectors. Chapter 6.04 also permits the City Council to enter into collection contract agreements.

Campbell Construction Debris Ordinance

The City's Construction Debris Ordinance (Title 6, Chapter 6.12 of the Campbell Municipal Code) requires that projects equal to or greater than $250,000 in value, 2,000 square feet or greater in new construction or renovation floor area, or 500 square feet or greater in demolition surface area, must divert 50 percent of their recyclable construction and demolition (C&D) debris. Within 30 days after the completion any project applicable to the requirements of the ordinance, the permit holder is required to submit documentation that proves that the diversion requirement has been met.

Existing Conditions

West Valley Collection & Recycling currently provides garbage collection and recycling services to the City of Campbell, including commercial service to businesses within the Plan Area. Collected refuse is brought to the Guadalupe Landfill which is operated by Waste Management. At this time, Waste Management has stated that there are no landfill capacity issues.[49]

Per Capita Disposal Rates

The City of Campbell disposal rate per *resident* in 2012 was 4.0 pounds of solid waste per person per day (ppd), which was below the CalRecycle target of 5.2 ppd per resident. The City disposal rate per *employee* in 2012 was 7.1 ppd, which was below the CalRecycle target rate of 8.3 ppd per employee.[50] The City of Campbell's disposal rates for both residents and employees have been below target rates since 2007.[51]

[49] Wise, Neil, District Operations Manager, Waste Management. Personal communications with Travis Bradley, PlaceWorks, October 7, 2014.

[50] CalRecycle, Jurisdiction Diversion Post 2006, http://www.calrecycle.ca.gov/LGCentral/reports/diversionprogram/JurisdictionDiversionPost2006.aspx , accessed August 26, 2014.

[51] The per capita disposal rate *target* is also known as "the 50 percent equivalent per capita disposal target." It is the amount of disposal Campbell would have had during the 2003 – 2006 base period (designated by CalRecycle) if it had been exactly at a 50 percent diversion rate. It is calculated by CalRecycle using the average base period per capita generation for Campbell (in pounds), then dividing this generation average in half to determine the 50 percent equivalent per capita disposal target. The target is an indicator for comparison with that jurisdiction's annual per capita per day disposal rate beginning with the 2007 program year.

Landfill Disposal Rates

CalRecycle reports that in 2013 a total of 30,072 tons of solid waste from Campbell was disposed at 13 different landfills.[52] Ninety-five percent of Campbell's solid waste in 2013 went to the Guadalupe Sanitary Landfill (28,579 tons). The second highest disposal volume went to Monterey Peninsula Landfill (817 tons, or 2.7 percent). Together, these two landfills, Guadalupe and Monterey, accepted 97.7 percent of the solid waste from Campbell in 2013.

Guadalupe Sanitary Landfill

The Guadalupe Sanitary Landfill is owned and operated by Guadalupe Rubbish Disposal Co, Inc., and is located on a 411-acre site at 15999 Guadalupe Mines Road, San Jose, California. It is a Class III (i.e., municipal solid waste) landfill and features a disposal area of approximately 111 acres. The facility can receive up to 1,300 tons of solid waste for disposal per day, with a maximum permitted capacity of approximately 28.6 million cubic yards. As of 2011, the facility has approximately 11 million cubic yards of remaining capacity, with an estimated closure date of January 1, 2048.[53]

Monterey Peninsula Landfill

The Monterey Peninsula Landfill is owned and operated by the Monterey Regional Waste Management District, and is located at 14201 Del Monte Boulevard, Marina, California. It is a Class III landfill (i.e., municipal solid waste). There are three Units listed by CalRecycle. Unit 01 has 315 acres disposal area. It can receive up to 3,500 tons/day, with a total permitted capacity of 49.7 million cubic yards and an estimated remaining capacity of 48.6 million cubic yards (as of 2004). The estimated closure date for Unit 01 is February 28, 2107.

4.14.4.2 STANDARDS OF SIGNIFICANCE

According to Appendix G, Environmental Checklist, of the CEQA Guidelines, the proposed Plan would have a significant impact on solid waste service if:

1. Implementation of the proposed Plan would not be served by a landfill(s) with sufficient permitted capacity to accommodate the proposed Plan's solid waste disposal needs.
2. Implementation of the proposed Plan would be out of compliance with federal, State, and local statues and regulations related to solid waste.

[52] CalRecycle Jurisdiction Disposal by Facility, http://www.calrecycle.ca.gov/LGCentral/Reports/Viewer.aspx?P=OriginJurisdictionIDs%3d70%26ReportYear%3d2013%26ReportName%3dReportEDRSJurisDisposalByFacility, accessed August 26, 2014.

[53] CalRecycle, "Facility Site summary Details: Guadalupe Sanitary Landfill (43-AN-0015)" http://www.calrecycle.ca.gov/SWFacilities/Directory/43-AN-0015/Detail/, accessed August 26, 2014.

4.14.4.3 ENVIRONMENTAL IMPACT DISCUSSION

This section analyzes potential Plan-specific and cumulative impacts to solid waste disposal services.

UTIL-10	**The proposed Plan would be served by a landfill with sufficient permitted capacity to accommodate the Plan's solid waste disposal needs.**

In Table 4.14-4 of this Draft EIR it is estimated new development associated with the proposed Plan will generate a net increase of 726 residents and 7,394 jobs. For analysis purposes, if solid waste generation is assumed to be the actual 2012 Campbell per capita generation rates of 4.0 ppd for residents and 7.1 ppd for employees, the total solid waste generated by the proposed Plan's residents and workers is estimated to be 55,401 pounds per day, or 27.7 tons per day.[54]

In 2013, CalRecycle reported that more than 97 percent of the City's solid waste disposal waste went to two landfills. Table 4.14-9 compares the maximum daily capacity and estimated closure date for these two facilities.

The estimated solid waste generation rate for the proposed Plan of 27.7 tons per day is approximately 2 percent of the daily capacity of the landfill providing disposal services to most (95 percent) of the City's solid waste (1,300 tons/day for Guadalupe Sanitary Landfill), as shown in Table 4.14-9. Solid waste generated from implementation of the proposed Plan would account for less than 1 percent of the daily capacity at the Monterey Peninsula Landfill. As such, the proposed Plan would have a less-than-significant impact with regard to daily capacity at each of the two main landfill facilities serving the City.

TABLE 4.14-9 LANDFILLS EXISTING DAILY CAPACITY AND ESTIMATED CLOSURE DATE

Landfill Facility	Daily Capacity (tons/day)	Estimated Closure Date
Guadalupe Sanitary Landfill	1,300	1/1/2048
Monterey Peninsula Landfill	3,500	2/28/2107

The two landfills that receive the majority of the City's solid waste are likely to reach their permitted maximum capacities between 2048 and 2107, respectively, as shown in the Table 4.14-9. As such, there is more than adequate landfill capacity for the proposed Plan's solid waste. In addition, there are 13 other landfills that received waste from the City of Campbell in 2013. In the event that one or both of the landfills currently receiving waste from the city was unable to continue in that capacity, it is likely that another landfill would be able to provide capacity.

[54] 726 x 4.0 = 2,904 pounds, plus 10,380 x 7.1 = 73,698 pounds; totaling 76,602 pounds per day, or 38.3 tons per day.

With continued compliance with applicable regulations listed below, leading to increased recycling and waste diversion, anticipated rates of solid waste disposal from the proposed Plan would have a *less-than-significant* impact in regard to permitted landfill capacity.

Applicable Regulations:

- California Integrated Waste Management Act
- Global Warming Solutions Act of 2006, Scoping Plan
- CAL Green Building Code
- City of Campbell Green Building Policies
- City of Campbell Construction and Demolition Debris Ordinance 2008
- City of Campbell General Plan

Significance Before Mitigation: Less than significant.

UTIL-11	**The proposed Plan would comply with federal, State, and local statutes and regulations related to solid waste.**

As discussed above, the City of Campbell has complied with State requirements to reduce the volume of solid waste through recycling and reuse of solid waste. The City's per capita disposal rate is below the target rate established by CalRecycle. The City has established a mandatory Green Building Checklist. The checklist must be submitted with and incorporated into the development plan sets, and any items that are marked on the checklist must then be referenced and detailed in the plans.

The General Plan includes goals, policies, and strategies that promote recycling and conservation, and help ensure adequate waste collection and disposal facilities are available for the residents and workers of Campbell. Together these policies and actions help to ensure that implementation of the proposed Plan is consistent with statutes and regulations related to solid waste.

Therefore, in accordance with the applicable regulations listed below, development of the proposed Plan would comply with applicable statutes and regulations and the impact would be *less than significant*.

Applicable Regulations:

- California Integrated Waste Management Act
- Global Warming Solutions Act of 2006, Scoping Plan
- CAL Green Building Code
- City of Campbell Green Building Policies
- City of Campbell Construction and Demolition Debris Ordinance 2008
- City of Campbell General Plan

Significance Before Mitigation: Less than significant.

4.14.4.4 CUMULATIVE IMPACTS

UTIL-12	**The proposed Plan, in combination with past, present, and reasonably foreseeable development, would result in less than significant impacts with respect to solid waste.**

As discussed in Chapter 4.0, the cumulative projects considered for this analysis include 869,000 square feet of commercial and 269,000 square feet of retail development along with 150 hotel rooms, 73 single-family homes, and 336 multi-family units all within the Town of Los Gatos. The buildout of the proposed Plan will increase the quantity of solid waste for disposal. Although AB 939 established a goal for all California cities to provide at least 15 years of ongoing landfill capacity, growth from other projects within the City, and from other cities in the region, may exceed that which was taken into account when calculating landfill capacity. However, because the two landfill facilities that take approximately 97 percent of the City's solid waste (in 2013) are expected to close between 2048 and 2107, respectively, it is unlikely that Campbell or other jurisdictions that use the same facilities may eventually experience insufficient future landfill capacity to accommodate existing or increased population and employment levels.

In addition, there are 13 landfills that received waste from the City in 2013. If one or more of the two landfills currently receiving 97 percent of the waste were unavailable in the future, it is likely the City's solid waste volume could be increased at one or more of the other landfills that already serve the City.

Therefore, with continued compliance with the applicable regulations listed below, the solid waste related impact of the Plan, in combination with past, present and reasonably foreseeable development, would be *less than significant*.

Applicable Regulations:

- California Integrated Waste Management Act
- Global Warming Solutions Act of 2006, Scoping Plan
- CAL Green Building Code
- City of Campbell Green Building Policies
- City of Campbell Construction and Demolition Debris Ordinance 2008
- City of Campbell General Plan

Significance Before Mitigation: Less than significant.

4.14.4.5 SUMMARY OF SIGNIFICANT IMPACTS AND MITIGATION MEASURES

The proposed Plan would not result in any significant project-specific or cumulative impacts with respect to solid waste and therefore no mitigation measures are required.

4.14.5 ENERGY CONSERVATION

In order to assure that energy implications are considered in project decisions, Appendix F, Energy Conservation, of the CEQA Guidelines, requires that EIRs include a discussion of the potential energy impacts of proposed projects, with particular emphasis on avoiding or reducing inefficient, wasteful, and unnecessary consumption of energy. However, no specific thresholds of significance for potential energy impacts are suggested in the State CEQA Guidelines. This section provides a general description of the regulatory setting addressing existing electric and natural gas services and infrastructure, and supply and demand in Campbell.

4.14.5.1 ENVIRONMENTAL SETTING

Regulatory Framework

Federal Regulations

Energy Independence and Security Act of 2007

Signed into law in December 2007, this Act is an energy policy law that contains provisions designed to increase energy efficiency and the availability of renewable energy. The Act contains provisions for increasing fuel economy standards for cars and light trucks, while establishing new minimum efficiency standards for lighting as well as residential and commercial appliance equipment.

Energy Policy Act of 2005

Passed by Congress in July 2005, the Energy Policy Act includes a comprehensive set of provisions to address energy issues. The Act includes tax incentives for the following: energy conservation improvements in commercial and residential buildings; fossil fuel production and clean coal facilities; and construction and operation of nuclear power plants, among other things. Subsidies are also included for geothermal, wind energy, and other alternative energy producers.

National Energy Policy

Established in 2001 by the National Energy Policy Development Group, this policy is designed to help the private sector and state and local governments promote dependable, affordable, and environmentally sound production and distribution of energy for the future. Key issues addressed by the energy policy are energy conservation, repair and expansion of energy infrastructure, and ways of increasing energy supplies while protecting the environment.

State Regulations

California Public Utilities Commission

In September 2008, the California Public Utilities Commission (CPUC) adopted the Long Term Energy Efficiency Strategic Plan, which provides a framework for energy efficiency in California through the year 2020 and beyond. It articulates a long-term vision, as well as goals for each economic sector, identifying specific near-term, mid-term, and long-term strategies to assist in achieving these goals. This Plan sets forth the following four goals, known as Big Bold Energy Efficiency Strategies, to achieve significant reductions in energy demand:

- All new residential construction in California will be zero net energy by 2020.
- All new commercial construction in California will be zero net energy by 2030.
- Heating, Ventilation and Air Conditioning (HVAC) will be transformed to ensure that its energy performance is optimal for California's climate.
- All eligible low-income customers will be given the opportunity to participate in the low-income energy efficiency program by 2020.

With respect to the commercial sector, the Long Term Energy Efficiency Strategic Plan notes that commercial buildings, which include schools, hospitals, and public buildings, consume more electricity than any other end-use sector in California. The commercial sectors 5 billion-plus square feet of space accounts for 38 percent of the State's power use and over 25 percent of natural gas consumption. Lighting, cooling, refrigeration, and ventilation account for 75 percent of all commercial electric use, while space heating, water heating, and cooking account for over 90 percent of gas use. In 2006, schools and colleges were in the top five facility types for electricity and gas consumption, accounting for approximately 10 percent of the State's electricity and gas use.

The CPUC and the California Energy Commission (CEC) have adopted the following goals to achieve zero net energy (ZNE) levels by 2030 in the commercial sector:

- Goal 1: New construction will increasingly embrace zero net energy performance (including clean, distributed generation), reaching 100 percent penetration of new starts in 2030.
- Goal 2: 50 percent of existing buildings will be retrofit to zero net energy by 2030 through achievement of deep levels of energy efficiency and with the addition of clean distributed generation.
- Goal 3: Transform the commercial lighting market through technological advancement and innovative utility initiatives.

California Building Code (California Code of Regulations, Title 24, Part 6)

Energy conservation standards for new residential and nonresidential buildings were adopted by the California Energy Resources Conservation and Development Commission in June 1977 and revised in 2008 (Title 24, Part 6, of the California Code of Regulations [CCR]). Title 24 requires the design of building shells and building components to conserve energy. The standards are updated periodically to allow for consideration and possible incorporation of new energy efficiency technologies and methods. On May 31, 2012, the CEC adopted the 2013 Building and Energy Efficiency Standards, which went into effect on January 1, 2014. Buildings that are constructed in accordance with the 2013 Building and Energy Efficiency Standards are 25 percent (residential) to 30 percent (nonresidential) more energy efficient than the 2008 standards as a result of better windows, insulation, lighting, ventilation systems, and other features that reduce energy consumption in homes and businesses.

CALGreen Building Code (California Code of Regulations, Title 24, Part 11)

On July 17, 2008, the California Building Standards Commission adopted the nation's first green building standards. The California Green Building Standards Code (Part 11, Title 24, known as "CALGreen") was adopted as part of the California Building Standards Code (Title 24, California Code of Regulations). CALGreen established planning and design standards for sustainable site development, energy efficiency (in excess of the California Energy Code requirements), water conservation, material conservation, and internal air contaminants. The mandatory provisions of the California Green Building Code Standards became effective January 1, 2011. The building efficiency standards are enforced through the local building permit process.

The purpose of CALGreen is to improve public health, safety, and general welfare by enhancing the design and construction of buildings through the use of building concepts having a reduced negative impact or positive environmental impact and encouraging sustainable construction practices in the following categories:

- Planning and design
- Energy efficiency
- Water efficiency and conservation
- Material conservation and resource efficiency
- Environmental quality

The provisions of CALGreen apply to the planning, design, operation, construction, use, and occupancy of every newly constructed building or structure, unless otherwise indicated in this code, throughout the State of California. Compliance with the CALGreen Code is not a substitution for meeting the certification requirements of any green building program. CALGreen requires new buildings to reduce water consumption by 20 percent, divert 50 percent of construction waste from landfills, and install low pollutant-emitting materials.

2006 Appliance Efficiency Regulations

The 2006 Appliance Efficiency Regulations (Title 20, CCR Sections 1601 through 1608) were adopted by the CEC on October 11, 2006, and approved by the California Office of Administrative Law on December 14, 2006. The regulations include standards for both federally regulated appliances and non-federally regulated appliances. Though these regulations are now often viewed as "business-as-usual," they exceed the standards imposed by all other states and they reduce GHG emissions by reducing energy demand.

Governor's Green Building Executive Order (S-20-04)

In 2004, Executive Order (EO) S-20-04 was signed by the Governor, committing the State to take aggressive action to reduce State building electricity usage by retrofitting, building, and operating the most energy and resource-efficient buildings by taking all cost-effective measures described in the Green Building Action Plan for facilities owned, funded or leased by the State and to encourage cities, counties, and schools to do the same. It also calls for State agencies, departments, and other entities under the direct executive authority of the Governor to cooperate in taking measures to reduce grid-based energy purchases for State-owned buildings by 20 percent by 2015, through cost-effective efficiency measures and distributed generation technologies. These measures should include, but are not limited to:

- Designing, constructing and operating all new and renovated State-owned facilities paid for with state funds as "LEED Silver" or higher certified buildings.
- Identifying the most appropriate financing and project delivery mechanisms to achieve these goals.
- Seeking out office space leases in buildings with a EPA Energy Star rating.
- Purchasing or operating Energy Star electrical equipment whenever cost-effective.

State Greenhouse Gas Regulations

The Governor's GHG Reduction EO S-3-05 was signed on June 1, 2005, and set GHG reduction targets for the State. Soon after, Assembly Bill 32, the Global Warming Solutions Act (2006) was passed by the California state legislature on August 31, 2006, to place the State on a course toward reducing its contribution of GHG emissions. In response to AB 32, the California Air Resources Board (CARB) developed a Scoping Plan outlining California's approach to achieving the goal of reducing GHG emissions to 1990 levels by 2020. The final Scoping Plan was adopted by CARB on December 11, 2008. CARB approved the first 5-year Update to the Climate Change Scoping Plan on May 22, 2014, as required by AB 32. For a detailed discussion on these regulations, see Chapter 4.6, Greenhouse Gas Emissions, of this Draft EIR.

Senate Bill X1-2

Signed by Governor Edmund G. Brown, Jr. in 2011, Senate Bill X1-2 codifies the 33 percent by 2020 renewable portfolio standard (RPS) goal established pursuant to the Global Warming Solutions Act of 2006.

This new RPS preempts CARBs 33 percent Renewable Electricity Standard and applies to all electricity retailers in the state including publicly owned utilities, investor-owned utilities, electricity service providers, and community choice aggregators. All of these entities must adopt the new RPS goals of 20 percent of retail sales from renewables by the end of 2013, 25 percent by the end of 2016, and the 33 percent requirement being met by the end of 2020.

Local Regulations

Campbell General Plan 2001

The City's General Plan, adopted in 2001, contains the following policies (Table 4.14-10) related to energy conservation, which are applicable to the proposed Plan.

TABLE 4.14-10 CITY OF CAMPBELL GENERAL PLAN GOALS, POLICIES, AND STRATEGIES PERTAINING TO ENERGY

Goal/Policy/ Strategy Number	Goal/Policy/Strategy Text
Policy LUT-5.7	Industrial Areas: Industrial development should have functional and safe vehicular and pedestrian circulation, good site and architectural design, be sensitive to surrounding uses, connect to public transit, and be energy efficient. New projects should contribute to the positive character of industrial areas and the overall image of the City.
Goal CNR-12	*Promote energy conservation in Campbell.*
Policy CNR-12.2	Advanced Energy Technology and Building Materials: Facilitate the use of advanced energy technology and building materials to create energy-efficient residences and buildings.
Strategy CNR-12.2a	Staff Training: Support staff training opportunities that focus on new technologies that promote energy conservation.
Policy CNR-12.3	Landscaping Requirements: Continue to enforce landscaping requirements that facilitate energy efficient use or conservation.
Strategy CNR-12.3b	Energy Efficient Landscaping: Encourage energy efficient landscaping and preservation of existing shade trees on development sites.
Policy H-3.3	Green Building: Encourage the use of sustainable and green building design in new and existing housing.

Source: City of Campbell General Plan, 2001.

Campbell Green Building Policies

The City of Campbell has adopted the three Green policies as recommended by the Santa Clara County Cities GBC. The GBC is a subcommittee of the Santa Clara County Cities Association, charged with developing policy intended to promote climate protection strategies and regional reductions in greenhouse gas emissions. The City of Campbell's participation in the GBC was part of the Community Development Department's 2007-08 Work Plan to explore alternatives for enhancing green practices. GBCs three near-term policy recommendations, adopted by Campbell, include the following:

- Recognizing/adopting the LEED and GreenPoint Rated rating systems as a standard for green building evaluation (this recommendation would not require the development of buildings meeting the LEED or GreenPoint program standards);
- Require the completion of a "Green Checklist" as part of development applications; and
- Require LEED Silver certification for all new or renovated municipal buildings over 5,000 square feet.

The City of Campbell implemented a requirement for the submittal of a green building checklist, beginning July 1, 2008 for single- and multi-family construction. The adoption of this policy emphasizes the City's leadership role in encouraging "green" building techniques. It both illustrates Campbell's initiative to limit the environmental impact of municipal facilities and also sets an example for the community at large.

Existing Conditions

Pacific Gas and Electric Company (PG&E) provides electricity and natural gas services to Santa Clara County, including the City of Campbell. PG&E is a publicly traded utility company which generates, purchases, and transmits energy under contract with the CPUC. PG&E owns and maintains above and below ground networks of electric and natural gas transmission and distribution facilities throughout the city. Both natural gas and electrical service is available throughout the Plan Area.

PG&Es service territory is 70,000 square miles in area, roughly extending north to south from Eureka to Bakersfield, and east to west from the Sierra Nevada mountain range to the Pacific Ocean.

Electricity

PG&Es total service territory electricity distribution system consists of 141,215 circuit miles of electric distribution lines and 18,616 circuit miles of interconnected transmission lines. PG&E electricity is generated by a combination of sources such as coal-fired power plants, nuclear power plants, and hydro-electric dams, as well as newer sources of energy, such as wind turbines and photovoltaic plants or "solar farms." "The Grid," or bulk electric grid, is a network of high-voltage transmission lines link power plants with the PG&E system. The distribution system, comprised of lower voltage secondary lines, is at the street and neighborhood level, and consists of overhead or underground distribution lines, transformers, and individual service "drops" that connect to the individual customer.[55]

PG&E produces or buys its energy from a number of conventional and renewable generating sources, which travel through PG&Es electric transmission and distribution systems. The power mix PG&E provided to customers in 2012 consisted of non-emitting nuclear generation (21 percent), large hydroelectric facilities (11 percent) and eligible renewable resources (19 percent), such as wind, geothermal, biomass, solar and small hydro. The remaining portion came from natural gas/other (27 percent) and unspecified power (21

[55] Pacific Gas & Electric (PG&E), 2014. Company profile, http://www.pge.com/en/about/company/profile/index.page, accessed September 16, 2014.

percent). Unspecified power refers to electricity that is not traceable to specific generation sources by any auditable contract trail. In addition, PG&E has plans to increase the use of renewable power. For instance, PG&E purchases power from customers that install small scale renewable generators (e.g., wind turbines or photovoltaic cells) up to 1.5 megawatts in size. In 2013, PG&E served 23.8 percent of their retail electricity sales with renewable power.[56]

PG&Es projected annual electricity demand growth between 2012 and 2024 is 1.25 percent.[57]

Natural Gas

PG&Es natural gas (methane) pipe delivery system includes 42,141 miles of distribution pipelines, and 6,438 miles of transportation pipelines. Gas delivered by PG&E originates in gas fields in California, the US Southwest, US Rocky Mountains, and from Canada. Transportation pipelines send natural gas from fields and storage facilities in large pipes under high pressure. The smaller distribution pipelines deliver gas to individual businesses or residences.

PG&E gas transmission pipeline systems serve approximately 4.2 million gas customers in northern and central California. The system is operated under an inspection and monitoring program. The system operates in real time on a 24-hour basis, and includes leak inspections, surveys, and patrols of the pipelines. A new program, the Pipeline 2020 program, aims to modernize critical pipeline infrastructure, expand the use of automatic or remotely-operated shut-off valves, catalyze development of next-generation inspection technologies, develop industry-leading best practices, and enhance public safety partnerships with local communities, public officials, and first responders.[58]

The PG&E gas *transmission* pipeline nearest to the Plan Area is located beneath Winchester Blvd.[59] *Distribution* pipelines are located throughout the City.

Existing Energy Use

A direct measure of existing energy use for the Plan Area is unavailable. Greenhouse gas (GHG) emissions generated by land uses within the proposed Plan provide an indirect measure of energy use, and are used in this EIR to compare energy use of the existing Plan Area versus the proposed Plan Area.

GHG emissions from the existing Plan Area (and for the proposed Plan) were calculated using the California Emissions Estimator Model (CalEEMod), Version 2013.2.2. Transportation emissions are based on trip

[56] California Public Utilities Commission (CPUC), 2014. California Renewables Portfolio Standard (RPS), http://www.cpuc.ca.gov/PUC/energy/Renewables/index.htm, accessed August 4, 2014.

[57] California Energy Commission (CEC), 2013. California Energy Demand 2014-2024 Preliminary Forecast, CEC---200---2013---004---SD---V2.

[58] Pacific Gas & Electric (PG&E), 2014. Natural Gas System, http://www.pge.com/en/safety/systemworks/gas/index.page, accessed September 16, 2014.

[59] Pacific Gas & Electric (PG&E), 2014. Gas Transmission System Map, http://www.pge.com/en/safety/systemworks/gas/transmissionpipelines/index.page , accessed August 4, 2014.

generation provided by W-Trans. As reported in Table 4.6.5 (Chapter 4.6, Greenhouse Gas Emissions), GHG emissions for the existing Plan Area primarily are caused by energy use (37 percent; e.g., natural gas and purchased energy [electricity]) and on-road mobile sources (56 percent). As discussed in Chapter 4.6, the existing GHG emissions for the Plan Area are not enough on their own to impact global climate change. Table 4.6.5 shows the total annual GHG emissions are 20,323 metric tons (MT) of CO2 equivalent (20,323 MTCO2e). Per capita GHG emissions for the existing Plan Area are 5.3 MTCO2e. The existing Plan Area emissions would exceed the BAAQMD per capita performance criteria of 4.6 MTCO2e.

4.14.5.2 STANDARDS OF SIGNIFICANCE

As previously discussed, Appendix F, Energy Conservation, of the CEQA Guidelines, requires a discussion of the potential energy impacts of proposed projects; however, no specific thresholds of significance for potential energy impacts are suggested in the State CEQA Guidelines or are established by the City of Campbell. Therefore, impacts were measured to be significant if the proposed Plan, upon buildout, would result in a substantial increase in natural gas and electrical service demands that would require the new construction of energy supply facilities and transmission infrastructure or capacity enhancing alterations to existing facilities.

4.14.5.3 ENVIRONMENTAL IMPACT DISCUSSION

This section analyzes the proposed Plan's potential impacts and cumulative impacts to electric and natural gas services and infrastructure, supply and demand, and energy conservation.

UTIL-13	**Implementation of the proposed Plan would not result in a substantial increase in natural gas and electrical service demands, and would not require new energy supply facilities and transmission infrastructure or capacity enhancing alterations to existing facilities.**

The proposed Plan, upon buildout, will result in the following total development at the 2040 buildout horizon: 300 residential units, 350,000-square-foot Research & Development (R&D) space, 2,850,000-square-foot Office space, 72,000-square-foot Retail and Services space, 10,380 jobs, and 726 new residents. The proposed increase in development would result in a long-term increase in energy demand, associated primarily with the operation of lighting and space heating/cooling in the added building space. In addition, construction activities associated with development require the use of energy (e.g., electricity and fuel) for various purposes such as the operation of construction equipment and tools, as well as excavation, grading, demolition, and vehicle travel.

As noted above, a direct measure of energy use for the Plan Area is unavailable. Greenhouse gas (GHG) emissions generated by land uses within the Plan Area, which are primarily generated from energy use (natural gas and purchased electricity) and on-road mobile sources, provide an indirect measure of energy

use. As such, GHG emissions are used in this EIR as an indicator of energy use within the existing Plan Area versus from implementation of the proposed Plan.

GHG emissions from construction and operation of the proposed Plan were calculated using the California Emissions Estimator Model (CalEEMod), Version 2013.2.2. As reported in Table 4.6.6 (Chapter 4.6, Greenhouse Gas Emissions) the proposed Plan will result in GHG emissions of 45,868 $MTCO_2e$, a net increase of 25,545 $MTCO_2e$ compared with emissions from the existing Plan Area (20,323 MTCO2e). This represents a 126 percent increase in GHG emissions compared with the existing Plan Area.

Table 4.6.6 shows per capita GHG emissions for the existing Plan Area are 5.3 $MTCO_2e$ compared with 3.8 $MTCO_2e$. This represents a 28 percent decrease in per capita GHG emissions compared with the existing Plan Area. The emissions from the proposed Plan would be less than the BAAQMD per capita efficiency threshold of 4.6 $MTCO_2e$, whereas, the existing Plan Area emissions would exceed the BAAQMD per capita performance criteria.

As discussed in Chapter 4.6, the GHG emissions for the existing or proposed Plan are not enough on their own to impact global climate change. In 2009, California produced 457 million metric tons (MMT) of CO_2e emissions, most of which came from the transportation sector and energy consumption. The proposed Plan Area GHG emissions of 45,868 $MTCO_2e$ represent a very small fraction (0.01 percent) of total GHG emissions for the state.

PG&E serves over 5.4 million electric customer accounts and 4.3 million natural gas customer accounts[60]. The net increase in residents and employees due to the proposed Plan is 8,120. Assuming that each new resident would require a new electric and natural gas account from PG&E, the new accounts would represent a less than 0.2 percent increase in PG&E's electric or gas accounts.

Proposed new development would be constructed using energy efficient modern building materials and construction practices. The new buildings also would use new modern appliances and equipment, and would comply with the current CALGreen Building Code and Campbell Green Building Policies, which requires the use of recycled construction materials, environmentally sustainable building materials, building designs that reduce the amount of energy used in building heating and cooling systems as compared to conventionally built structures, and landscaping that incorporates water-efficient irrigation systems.

In addition, there are several General Plan policies, actions, and strategies that ensure energy conservation is practiced in Campbell. With the implementation of these General Plan Policies and compliance with the CALGreen Building Code and Campbell Green Building Policies, significant energy conservation and savings would be realized in the new development within the Plan Area. Even with the energy saving practices in place, it is possible that new electrical connections, switches and/or transformers might be required to serve new structures and/or handle additional loads in the proposed Plan Area. However, potential environmental impacts from possible new electrical connections/switches/transformers in the

[60] PG&E Company Profile, http://www.pge.com/en/about/company/profile/index.page, accessed May 18, 2015.

proposed Plan Area are not anticipated to be significant and, to the extent they may be necessary, are anticipated infrastructure improvements and part of the proposed Plan. In addition, buildout of the proposed Plan would not significantly increase energy demands in the context of the 70,000-square-mile PG&E service territory for electricity and natural gas generation, transmission, and distribution. As a result, new energy supply facilities and transmission infrastructure, or capacity-enhancing alterations to existing facilities, would not be required. Therefore, with consideration of the applicable regulations listed below, impacts related to energy conservation and utility electrical and gas facilities would be *less than significant*.

Applicable Regulations:

- National Energy Policy Act of 2005
- California (CECs) 2006 Appliance Efficiency Regulations
- California Global Warming Solutions Act of 2006, Scoping Plan
- CAL Green Building Code
- City of Campbell Green Building Policies
- City of Campbell General Plan

Significance Before Mitigation: Less than significant.

4.14.5.4 SUMMARY OF SIGNIFICANT IMPACTS AND MITIGATION MEASURES

The energy discussion above is based on cumulative demand for the PG&E service area. Therefore, a separate cumulative analysis is not necessary. Based on the UTIL-13 impact discussion, the proposed Plan would not result in any significant project-specific or cumulative impacts with respect to energy and therefore no mitigation measures are required.

5. Alternatives to the Proposed Plan

The following discussion is intended to inform the public and decision makers of feasible alternatives to the proposed Plan that would avoid or substantially lessen any significant effects of the Dell Avenue Area Plan (proposed Plan).

The California Environmental Quality Act (CEQA) Guidelines set forth the intent and extent of alternatives analysis to be provided in an EIR. Section 15126.6(a) of the CEQA Guidelines states that:

> *An EIR shall describe a range of reasonable alternatives to the project, or the location of the project, which would feasibly attain most of the basic objectives of the project but would avoid or substantially lessen any of the significant effects of the project, and evaluate the comparative merits of the alternatives. An EIR need not consider every conceivable alternative to a project. Rather it must consider a reasonable range of potentially feasible alternatives that will foster informed decision making and public participation. An EIR is not required to consider alternatives which are infeasible. The lead agency is responsible for selecting a range of project alternatives for examination and must publicly disclose its reasoning for selecting those alternatives. There is no ironclad rule governing the nature or scope of the alternatives to be discussed other than the rule of reason.*

A "No Project" Alternative is required as part of the "reasonable range of alternatives" that could feasibly attain most or all of the project's objectives. Each alternative is analyzed against the significance thresholds considered in Chapter 4, Environmental Evaluation. This chapter assesses whether the impacts of the alternatives would be greater than, less than, or similar to those of the proposed Plan.

The alternatives to the proposed Plan are:

- **No Project Alternative.** Under the No Project Alternative, the proposed Plan would not be adopted, and future development in the Plan Area would continue to be subject to existing policies, regulations, development standards, and land use designations as per the City of Campbell's adopted General Plan and the San Tomas Neighborhood Area Plan. It is projected that this alternative would result in no new housing units, and no immediate increases in office, commercial, or light industrial development. Gradual development or replacement of currently allowed uses would continue take place; however, since the area is largely built-out under existing allowed uses, less development or redevelopment would be expected in the area. In the area east of Winchester Boulevard, uses would remain a combination of primarily office and light industrial. To the west of Winchester Boulevard, uses would remain low-intensity retail, likely with an ongoing emphasis on automotive uses. The No Project Alternative is required as part of the "reasonable range of alternatives," and the purpose of the No Project Alternative is to compare the impacts of implementing the proposed Plan to what would occur

under continued implementation of existing land uses, development standards, and other policies and regulations.

- **Reduced Development Alternative.** Under the Reduced Development Alternative, development would occur consistent with the policies and overarching land use concept of the proposed Plan, with the exception that maximum floor-area ratios (FAR) allowed for new development would be reduced to 0.75 for the DAAP-Central and DAAP-Waterfront areas east of Winchester Boulevard. Under the Reduced Development Alternative, individual development would occur at intensity levels roughly half of what is assumed under the Proposed Plan. Under this alternative, individual developments could take advantage of incentive zoning that would permit FARs up to 1.0, provided that certain community benefits are provided and that the overall development program does not exceed development projections established with an assumption that the overall FAR across the Plan Area would not exceed 0.75. Mixed-use residential/retail uses to the west of Winchester would develop in a manner consistent with the proposed Plan. It is projected that this alternative would result in 300 new housing units, 726 net new residents, 1,146,000 square feet of net new office development, a reduction of about 6,000 square feet in the amount of new retail space, and 3,657 new jobs. The purpose of the Reduced Development Alternative is to explore how potential impacts may be lessened through reductions to both the eventual amount of office space developed and the number of jobs created in the Plan Area.
- **No DAAP-West.** Under the No DAAP-West Alternative, the DAAP would cover only areas east of Winchester Boulevard and areas west of Winchester Boulevard would be removed from the DAAP completely. As such, new development in areas west of Winchester Boulevard would occur consistent with the policies, development standards, and overarching land use concepts adopted under the City's General Plan. Office/retail uses to the east of Winchester would develop in a manner consistent with the proposed Plan. It is projected that this alternative would result in no new housing units, 2,292,000 square feet of new office development, 49,000 square feet of net new retail space, and 7,467 net new jobs. The purpose of the No DAAP-West Alternative is to explore how potential impacts may be lessened by preserving existing uses along the west side of Winchester Boulevard, rather than allowing their conversion to mixed-use residential/pedestrian-oriented retail.

5.1 PURPOSE

The alternatives evaluated in this Draft EIR were developed consistent with Section 15126.6(b) of the CEQA Guidelines, which states that:

> *Because an EIR must identify ways to mitigate or avoid the significant effects that a project may have on the environment (Public Resources Code Section 21002.1), the discussion of alternatives shall focus on alternatives to the project or its location which are capable of avoiding or substantially lessening any significant effects of the project, even if these alternatives would impede to some degree the attainment of the project objectives, or would be more costly.*

5.2 POTENTIALLY SIGNIFICANT IMPACTS

Environmental analysis of the proposed Plan concluded that implementation may result in the following combination of impact levels: less than significant, less than significant with mitigation, and significant and unavoidable. A summarized list of the potential impacts is provided below.

5.2.1 LESS THAN SIGNIFICANT IMPACTS WITHOUT MITIGATION

The impacts that would be less than significant without mitigation include the following:

5.2.1.1 AESTHETICS

- Implementation of the proposed Plan would not have a substantial adverse effect on a scenic vista.
- The proposed Plan would not substantially damage scenic resources, including but not limited to, trees, rock outcroppings, and historic buildings within a State scenic highway.
- The proposed Plan would not substantially degrade the existing visual character or quality of the site and its surroundings.
- The proposed Plan would not create a new source of light or glare which would adversely affect day or nighttime views of the area.
- Implementation of the proposed Plan, in combination with past, present and reasonably foreseeable projects, would not result in significant cumulative impacts with respect to aesthetics.

5.2.1.2 AIR QUALITY

- Implementation of the proposed Plan would not conflict with or obstruct implementation of the applicable air quality plan.
- Implementation of the proposed Plan would not create or expose a substantial number of people to objectionable odors.

5.2.1.3 BIOLOGICAL RESOURCES

- The proposed Plan would not conflict with the provisions of an adopted Habitat Conservation Plan, Natural Community Conservation Plan, or other local, regional, or State habitat conservation plan.
- Implementation of the proposed Plan, in combination with past, present and reasonably foreseeable projects, would not result in significant cumulative impacts with respect to biological resources.

5.2.1.4 CULTURAL RESOURCES

- The proposed Plan would not cause a substantial adverse change in the significance of a historical resource as defined in Section 15064.5.

- The proposed Plan would not disturb human remains, including those interred outside of formal cemeteries.
- The proposed Plan, in combination with past, present, and reasonably foreseeable projects, would result in less than significant cumulative impacts with respect to cultural resources.

5.2.1.5 GEOLOGY, SOILS, AND SEISMICITY

- Implementation of the proposed Plan would not expose people or structures to potential substantial adverse effects, including the risk of loss, injury, or death involving: surface rupture along a known active fault; strong seismic ground shaking; seismic-related ground failure, including liquefaction; and landslides.
- Implementation of the proposed Plan would not result in substantial soil erosion or the loss of topsoil.
- Implementation of the proposed Plan would not result in a significant impact related to development on unstable geologic units and soils or result in on- or off-site landslide, lateral spreading, subsidence, liquefaction, or collapse.
- Implementation of the proposed Plan would not create substantial risks to life or property as a result of its location on expansive soil, as defined Section 1803.5.3 of the California Building Code, creating substantial risks to life or property.
- Implementation of the proposed Plan would not result in impacts associated with the use of septic tanks or alternative wastewater disposal systems where sewers are not available for the disposal of wastewater.
- Implementation of the proposed Plan, in combination with past, present, and reasonably foreseeable projects, would result in less than significant cumulative impacts with respect to geology and soils.

Greenhouse Gas (GHG) Emissions

- Implementation of the proposed Plan would not generate GHG emissions, either directly or indirectly, that may have a significant effect on the environment.
- Implementation of the proposed Plan would not conflict with an applicable plan, policy, or regulation adopted for the purpose of reducing the emissions of GHGs.
- Implementation of the proposed Plan, in combination with past, present, and reasonably foreseeable projects, would not result in significant cumulative impacts with respect to GHG emissions.

5.2.1.6 HAZARDS AND HAZARDOUS MATERIALS

- Implementation of the proposed Plan would not create a significant hazard to the public or the environment through the routine transport, use, or disposal of hazardous materials.
- Implementation of the proposed Plan would create a significant hazard to the public or the environment through reasonably foreseeable upset and accident conditions involving the release of hazardous materials into the environment.

- Implementation of the proposed Plan would not create a significant hazard to the public or the environment by being located on a site, which is included on a list of hazardous materials sites compiled pursuance to Government Code Section 65962.5.
- Implementation of the proposed Plan would not impair implementation of, or physically interfere with, an adopted emergency response plan or emergency evacuation plan.
- Implementation of the proposed Plan, in combination with past, present, and reasonably foreseeable projects, would result in less than significant cumulative impacts with respect to hazards and hazardous materials.

5.2.1.7 HYDROLOGY AND WATER QUALITY

- Implementation of the proposed Plan would not violate any water quality standards or waste discharge requirements
- The proposed Plan would not substantially deplete groundwater supplies or substantially interfere with groundwater recharge.
- The proposed Plan would not substantially alter the existing drainage pattern of the Plan Area, including through the alteration of the course of a stream or river, in a manner, which would result in substantial erosion, siltation, or flooding on- or off-site.
- The proposed Plan would not create or contribute runoff water that would exceed the capacity of existing or planned stormwater drainage systems or provide substantial additional sources of polluted runoff.
- Implementation of the proposed Plan would not otherwise substantially degrade water quality.
- The proposed Plan would not place housing within a 100-year flood hazard area as mapped on a Federal Flood Hazard Boundary or Flood Insurance Rate Map, or other flood hazard delineation map, or place structures that would impede or redirect flood flows within a 100-year flood hazard area.
- The proposed Plan would not expose people or structures to a significant risk of loss, injury, or death involving flooding, including flooding as a result of the failure of a levee or dam.
- The proposed Plan would not be impacted by inundation as a result of a seiche, tsunami, or mudflow.
- The proposed Plan, in combination with past, present, and reasonably foreseeable projects, would result in less than significant cumulative impacts with respect to hydrology and water quality.

5.2.1.8 LAND USE AND PLANNING

- The proposed Plan would not physically divide an established community.
- The proposed Plan would conflict with an applicable land use plan, policy, or regulation adopted for the purpose of avoiding or mitigating an environmental effect.

- The proposed Plan would not conflict with an applicable habitat conservation plan or natural community conservation plan.
- The proposed Plan, in combination with past, present, and reasonably foreseeable projects, would result in less than significant cumulative impacts with respect to land use and planning.

5.2.1.9 NOISE

- Implementation of the proposed Plan would not result in the exposure of persons to or generation of noise levels in excess of standards established in the General Plan or Municipal Code, or applicable standards of other agencies.
- Implementation of the proposed Plan would not result in a substantial permanent increase in ambient noise levels in the Plan Area and vicinity above levels existing without implementation of the Plan.
- Implementation of the proposed Plan would not result in a substantial temporary or periodic increase in ambient noise levels in the Plan Area and vicinity above levels existing without implementation of the Plan.
- Implementation of the proposed Plan would not expose people residing or working in the vicinity of the Plan Area to excessive aircraft noise levels, for a project located within an airport land use plan, or where such a plan has not been adopted, within 2 miles of a public airport or public use airport.
- Implementation of the proposed Plan would not expose people residing or working in the project area to excessive noise levels, for a project within the vicinity of a private airstrip.
- Implementation of the proposed Plan would not contribute to cumulative noise impacts in the area.

5.2.1.10 POPULATION AND HOUSING

- Implementation of the proposed Plan would not induce substantial unexpected population growth, or growth for which inadequate planning has occurred, either directly (for example, by proposing new homes and businesses) or indirectly (for example, through extension of roads or other infrastructure).
- Implementation of the proposed Plan would not displace substantial numbers of existing housing, necessitating the construction of replacement housing elsewhere.
- Implementation of the proposed Plan would not displace substantial numbers of people, necessitating the construction of replacement housing elsewhere.
- Implementation of the proposed Plan would not contribute to cumulative population and housing impacts in the area.

5.2.1.11 PUBLIC SERVICES

- Implementation of the proposed Plan would not result in the provision of or need for new or physically altered fire protection facilities, the construction or operation of which could cause significant environmental impacts.
- Implementation of the proposed Plan, in combination with past, present, and reasonably foreseeable projects, would result in less than significant cumulative impacts with respect to fire protection service.
- Implementation of the proposed Plan would not result in the provision of or need for new or physically altered police protection facilities, the construction or operation of which could cause significant environmental impacts.
- Implementation of the proposed Plan, in combination with past, present, and reasonably foreseeable projects, would result in less than significant cumulative impacts with respect to police protection service.
- The proposed Plan would not result in the provision of or need for new or physically altered school facilities, the construction or operation of which could cause significant environmental impacts.
- The proposed Plan, in combination with past, present, and reasonably foreseeable projects, would result in less than significant cumulative impacts with respect to schools.
- The proposed Plan would not result in the provision of or need for new or physically altered library facilities.
- The proposed Plan, in combination with past, present, and reasonably foreseeable projects, would not result in less than significant cumulative impacts with respect to libraries.
- The proposed Plan would not result in the provision of or need for new or physically altered parks and recreation facilities.
- The proposed Plan would not increase the use of existing neighborhood and regional parks or other recreational facilities, such that substantial physical deterioration of the facility would occur, or be accelerated.
- The proposed Plan would not include or require the construction or expansion of recreational facilities that might have an adverse physical effect on the environment.
- The proposed Plan, in combination with past, present, and reasonably foreseeable projects, would result in less than significant cumulative impacts with respect to parks and recreational facilities.

5.2.1.12 TRANSPORTATION AND TRAFFIC

- Implementation of the proposed Plan would not conflict with an applicable plan, ordinance or policy establishing measures of effectiveness for the performance of the circulation system, taking into account all modes of transportation including mass transit and non-motorized travel and relevant components of

the circulation system, including but not limited to intersections, streets, highways and freeways, pedestrian and bicycle paths, and mass transit.

- Implementation of the proposed Plan would not substantially increase hazards due to a design feature (e.g. sharp curves or dangerous intersection) or incompatible uses (e.g. farm equipment).
- Implementation of the proposed Plan would not result in inadequate emergency access.
- Implementation of the proposed Plan would not conflict with adopted policies, plans, or programs regarding public transit, bicycle, or pedestrian facilities, or otherwise decrease the performance or safety of such facilities.
- Implementation of the proposed Plan would not result in a change in air traffic patterns, including either an increase in traffic levels or a change in location that results in substantial safety risks.
- Implementation of the proposed Plan would not result in a substantial under-supply of parking that would contribute to excessive vehicle circulation and congestion due to drivers searching for parking.

5.2.1.13 UTILITIES AND SERVICE SYSTEMS

- Implementation of the proposed Plan would have sufficient water supplies available to serve the Plan from existing entitlements and resources, and new or expanded entitlements are not needed.
- Implementation of the proposed Plan would not require or result in the construction of new water facilities or expansion of existing facilities, the construction of which would cause significant environmental effects.
- Implementation of the proposed Plan, in combination with past, present, and reasonably foreseeable projects, would not result in significant cumulative impacts with respect to water supply.
- Implementations of the proposed Plan would not exceed wastewater treatment requirements of the applicable Regional Water Quality Control Board (RWQCB).
- Implementation of the proposed Plan would not require or result in the construction of new wastewater treatment facilities or expansion of existing facilities, the construction of which could cause significant environmental effects.
- Implementation of the proposed Plan would not result in a determination by the wastewater treatment provider, which serves, or may serve the Plan, that it does not have adequate capacity to serve the Plan's projected demand in addition to the provider's existing commitments.
- Implementation of the proposed Plan, in combination with past, present, and reasonably foreseeable projects, would not result in a significant cumulative impacts with respect to wastewater treatment.
- Implementation of the proposed Plan would not require the construction of new storm drainage facilities or expansion of existing facilities, the construction of which would cause significant environmental effects.

- Implementation of the proposed Plan would not contribute to cumulative stormwater impacts in the area.
- The proposed Plan would be served by a landfill with sufficient permitted capacity to accommodate the Plan's solid waste disposal needs.
- The proposed Plan would comply with federal, State, and local statutes and regulations related to solid waste.
- The proposed Plan, in combination with past, present, and reasonably foreseeable development, would result in less than significant impacts with respect to solid waste.
- Implementation of the proposed Plan would not result in a substantial increase in natural gas and electrical service demands, and would not require new energy supply facilities and transmission infrastructure or capacity enhancing alterations to existing facilities.

5.2.2 LESS THAN SIGNIFICANT IMPACTS WITH MITIGATION

Impacts that are less than significant with mitigation are more fully described in their respective sections of Chapter 4, Environmental Evaluation. Mitigation measures may be found in the various sections of Chapter 4, as well as in Table 1-1, Summary of Impacts and Mitigation Measures. The impacts that would be potentially significant, but less than significant with mitigation include the following:

5.2.2.1 AIR QUALITY

- Implementation of the proposed Plan would expose sensitive receptors to substantial concentrations of air pollution.
- The proposed Plan would have the potential to expose off-site sensitive receptors to substantial pollutant concentrations from construction activities.
- The Project, in combination with past, present, and reasonably foreseeable projects, could cumulatively contribute to air quality impacts in the San Francisco Bay Area Air Basin to off-site construction community risk hazards.

5.2.2.2 BIOLOGICAL RESOURCES

- The proposed Plan would interfere substantially with the movement of any native, resident, or migratory wildlife corridors, or impede the use of native wildlife nursery sites.
- The proposed Plan would conflict with any local policies or ordinances protecting biological resources, such as a tree preservation policy or ordinance.
- The proposed Plan would have a substantial adverse effect, either directly, or through habitat modifications, on any species identified as a candidate, sensitive, or special status species in local or

regional plans, policies, or regulations, or by the California Department of Fish and Wildlife or U.S. Fish and Wildlife Service.

- The proposed Plan would have a substantial or adverse effect on a riparian habitat or other sensitive natural community identified in local or regional plans, policies, or regulations, or by the California Department of Fish and Wildlife or U.S. Fish and Wildlife Service.
- The proposed Plan would have a substantial or adverse effect on federally protected wetlands as defined by Section 404 of the Clean Water Act (including but not limited to, marsh, vernal pool, coastal, etc.) through direct removal, filling, hydrological interruption, or other means.

5.2.2.3 CULTURAL RESOURCES

- The proposed Plan would have the potential to cause a substantial adverse change in the significance of an archeological resource pursuant to Section 15064.5.
- The proposed Plan would have the potential to directly or indirectly destroy a unique paleontological resource or site, or unique geologic feature.

5.2.2.4 NOISE

- Implementation of the proposed Plan could result in the exposure of persons to or generation of excessive groundborne vibration or groundborne noise levels.

5.2.3 SIGNIFICANT AND UNAVOIDABLE IMPACTS

5.2.3.1 AIR QUALITY

- Implementation of the proposed Plan would violate an air quality standard or contribute substantially to an existing or projected air quality violation.
- Implementation of the proposed Plan would result in a cumulatively considerable net increase of any criteria pollutant for which the project region is in nonattainment under an applicable federal or State ambient air quality standard (including releasing emissions that exceed quantitative thresholds for ozone precursors).
- Implementation of the proposed Plan would cumulatively contribute to air quality impacts in the San Francisco Bay Area Air Basin.

5.2.3.2 TRAFFIC AND TRANSPORTATION

- Implementation of the proposed Plan would conflict with an applicable plan, ordinance or policy establishing measures of effectiveness for the performance of the circulation system, taking into account all modes of transportation including mass transit and non-motorized travel, and relevant components

of the circulation system, including but not limited to intersections, streets, highways and freeways, pedestrian and bicycle paths, and mass transit.

- Implementation of the proposed Plan would conflict with an applicable congestion management program, including, but not limited to, level of service standards and travel demand measures, or other standards established by the county congestion management agency for designated roads or highways.
- Implementation of the proposed Plan, in combination with past, present, and reasonably foreseeable projects, would result in additional cumulatively considerable impacts.

A complete discussion of all specific impacts under the significance criteria level impacts listed above is presented in Chapter 4.13, Transportation and Traffic. The choice of alternatives to the proposed Plan for analysis in this Draft EIR focused on those that would further reduce and avoid the impacts found to be potentially significant, but less than significant with mitigation measures, and(2) significant and unavoidable, as listed above.

5.3 PROJECT OBJECTIVES

As stated above, the range of potential alternatives to the proposed Plan shall include those that could feasibly accomplish most of the basic objectives of the proposed Plan. The proposed Plan includes the land use changes, revised development standards, and new road, pedestrian, and bicycle connections described in detail in Chapter 3, Project Description. The proposed Plan will seek to accomplish the following objectives:

- **A High Tech and Innovation Oriented Business District**: Land uses should encourage the efficient use of land through sustainable development patterns, a mixture of uses, and development intensities that support transit and walking. Ensure uses are compatible with and support a high-tech office environment and discourage the continuance of existing uses that are not consistent with this character. Provide opportunities for small start-ups and incubator businesses within the larger workplace infrastructure. Rehabilitate and improve existing buildings and create avenues for independent cafes and restaurants to operate. The notion of "technology" should be apparent through stunning architecture and a memorable urban environment.
- **Enhanced Open Space and Improved Open Space Access**: Orient and design development to interact with existing ponds and creekside natural areas at Los Gatos Creek Park. Enhance existing trails and create new connections between the Plan Area and Los Gatos Creek Park. Carefully create a central public space around the existing water recharge facility, pending study and coordination with the Santa Clara Valley Water District (SCVWD). Infuse the Plan Area with smaller, functional open spaces in new development that provide places to rest, recreate, and gather. Seek to protect and enhance the natural character of the creek by allowing solar access, creating landscaped building edges, and using appropriate building materials. Transition buildings downward in height approach the waterfront.

- **An Integrated Network of Multi-modal Connections**: Enhance existing roadways with sidewalks and pedestrian amenities, and create new pedestrian, bicycle, and vehicular facilities to improve connectivity. Create clear, safe, and direct pathways to the proposed VTA light rail station, and integrate it into the larger pedestrian network.
- **Environmental and Economic Sustainability**: New development and public improvements should incorporate green design and stormwater management features to reduce stormwater runoff into existing streams and preserve existing infrastructure. New buildings should incorporate sustainable features in their design, including appliances requiring limited water and energy usage and building design that takes advantage of solar access and incorporates reused materials where possible. Encourage new development that will attract strong and growing businesses to Campbell, whose employees will contribute to the local economy, stimulate business, and strengthen the City's economic stance in the region.
- **Improved Design and Character**: Balance modern development styles with the small-town feel of Campbell. Incorporate and protect cherished amenities, including views and open spaces. Create memorable streets, gateways, nodes, plazas, and other new places for gathering and leisure activity. Consider special architectural elements and enhanced landscaping at key locations.
- **Sensitivity to Existing Businesses**: Provide a framework for which new high-tech development can exist harmoniously with existing businesses. Adapt land uses that are inclusive of and that accommodate businesses of traditional sectors and formats. Protect and enhance the physical layout and functionality of existing businesses through protective design standards that are focused on better placemaking and quality of life for current and future employees.
- **Enhanced Lifestyle and Vitality**: Provide amenities and places of activity, commerce, and trade that support a high-tech workplace culture. Ensure these amenities, such as restaurants, cafes, workout and spa facilities, childcare, markets, bars, and recreational uses, are also beneficial to the wider community, bringing an after-work-hours energy to the area.
- **Context-Sensitive Mixed-Use Residential Opportunities**: Support high-quality housing in mixed-use formats (retail and residential) on the west side of Winchester Boulevard, which will create an employment-to-housing synergy and enhance the overall character of the street. Encourage ground floor commercial along Winchester Boulevard to support high-tech industry, and provide neighborhood-serving uses that also cater to the needs of adjoining neighborhoods. Ensure that upper floor residential uses transition in scale toward the San Tomas neighborhood to the west.
- **Increased Private Investment**: Align policies, strategies, and City processes to remove barriers to private investment, leverage funding, and increase the support for positive change in the Dell Avenue area.

5.4 SELECTION OF A REASONABLE RANGE OF ALTERNATIVES

Section 15126.6(c) of the State CEQA Guidelines states:

> *The range of potential alternatives to the proposed Plan shall include those that could feasibly accomplish most of the basic objectives of the project and could avoid or substantially lessen one or more of the significant effects. The EIR should briefly describe the rationale for selecting the alternatives to be discussed. The EIR should also identify any alternatives that were considered by the lead agency but were rejected as infeasible during the scoping process and briefly explain the reasons underlying the lead agency's determination. Additional information explaining the choice of alternatives may be included in the administrative record. Among the factors that may be used to eliminate alternatives from detailed consideration in an EIR are: (i) failure to meet most of the basic project objectives, (ii) infeasibility, or (iii) inability to avoid significant environmental impacts.*

5.4.1 ALTERNATIVES CONSIDERED AND REJECTED AS BEING INFEASIBLE

As described above, Section 15126.6(c) of the State CEQA Guidelines requires EIRs to identify any alternatives that were considered by the lead agency but were rejected as infeasible during the scoping process, and briefly explain the reasons underlying the lead agency's determination. Section 15126.6(c) provides that among the factors that may be used to eliminate alternatives from detailed consideration in an EIR are (i) failure to meet most of the basic project objectives, (ii) infeasibility, or (iii) inability to avoid significant environmental impacts. The following is a discussion of alternatives that were considered and rejected, along with the reasons they were not included in the analysis.

5.4.1.1 LIVE-WORK ALTERNATIVE

Under the Live-Work Alternative, development of the DAAP-West and DAAP-East areas would occur under the policies, standards, and general land use concept of the proposed Plan, with the exception that additional residential mixed-use development would be permitted in a larger portion of the Plan Area, in addition to planned levels of commercial and light industrial development. It is projected that this alternative would result in 1,200 new housing units, 20,000 square feet of new retail development, and 2,292,000 square feet of new office development. This development would generate the following population and employment increases:

- 2,904 new residents
- 50 new retail jobs
- 7,640 new office jobs

By placing additional residential units in proximity to new office space and jobs in the Plan Area, this alternative would reduce per capita vehicle miles traveled (VMT) from new residential, retail, and office uses, and would therefore reduce associated air quality effects, GHG emissions on a per capita basis. The

inclusion of additional housing could also help meet local and regional goals for housing production and affordability. However, such an increase in the number of allowed units and an expansion of the area in which such units could be built would potentially result in absolute increases in traffic, congestion, and resulting noise, and could also result in additional land use conflicts as a result of placing residential uses in closer proximity to office and light industrial uses. This alternative would also place residential units in areas designated for non-residential, industrial uses by the Campbell General Plan, and could potentially result in population growth that exceeds regional projections.

The Live-Work Alternative would result in conflicts with regional growth projections, resulting in the need to undertake amendments to regional plans. Therefore, this alternative was rejected from a detailed analysis because it is considered socially infeasible.

5.4.1.2 SITE DESIGN FLEXIBILITY ALTERNATIVE

Under the Site Design Flexibility Alternative, development of the DAAP-West and DAAP-East areas would occur under the policies and general land use concept of the proposed Plan, with the exception that maximum permitted building heights in the DAAP-East district of the Plan Area would be increased to 135 feet. It is projected that this alternative would result in 300 net new housing units, 20,000 square feet of net new retail development, and 2,292,000 square feet of net new office development. This development would generate the following population and employment increases:

- 726 new residents
- 50 new retail jobs
- 7,640 new office jobs

Increasing the maximum permitted heights in the DAAP-East district would increase the site design flexibility on redeveloped parcels. This flexibility would allow buildings that are more appealing for large tech campuses, and could also be used to reduce certain impacts, potentially including but not limited to aesthetics and/or noise, by limiting building footprints to the optimal portions of redeveloped parcels. However, such increases in height would contravene the citywide height limit of 75 feet, as set forth in Measure N, adopted by Campbell voters in November 1986, and enacted under Ordinance 1641. Revocation of or exceptions to this limit would require citywide voter approval.

This alternative was rejected from a detailed analysis because it is inconsistent with existing City development standards that cannot be changed without political action, and is therefore socially infeasible.

5.4.2 ALTERNATIVES ANALYSIS

In accordance with the CEQA Guidelines, two project alternatives and the comparative merits of the alternatives are discussed below. As previously stated, the alternatives were selected because of their potential to reduce the significant impacts of the proposed Plan related to air quality, biological resources, GHG emissions, noise and transportation and traffic.

The alternatives to be analyzed in comparison to the proposed Plan include:

- No Project Alternative
- Reduced Density Alternative
- No DAAP-West Alternative

5.4.3 ASSUMPTIONS AND METHODOLOGY

The anticipated means for implementation of the alternatives can influence the assessment and/or probability of impacts for those alternatives. For example, a project may have the potential to generate significant impacts, but considerations in project design may also afford the opportunity to avoid or reduce such impacts. The alternatives analysis is presented as a comparative analysis to the proposed Plan. Table 5-1 summarizes the projected buildout for each alternative.

TABLE 5-1 COMPARISON OF PROPOSED PLAN AND ALTERNATIVE BUILDOUT PROJECTIONS (NET NEW DEVELOPMENT)

Alternative	Housing Units	Residents[a]	Retail Square Footage	Retail Jobs[b]	Office Square Footage	Office Jobs[c]	R&D Square Footage	R&D Jobs[d]
Proposed Plan	300	726	20,000	50	2,292,000	7,640	-148,000	-296
No Project Alternative	0	0	0	0	90,500	300	0	0
Reduced Development Alternative	300	726	-6,000[e]	-15	1,146,000	3,820	-74,000	-148
No DAAP-West Alternative	0	0	49,000[e]	123	2,292,000	7,640	-148,000	-296

Notes: All numbers shown are net new.
a. Resident calculation assumes 2.42 persons per household.
b. Retail jobs assume one job per 400 square feet of retail space.
c. Office jobs assume one job per 300 square feet of office space.
d. R&D Jobs assume one job per 500 square feet of R&D space.
e. Under the proposed Plan, all net new retail would be attributable to development in the DAAP-East area, and a net loss of retail would occur in the DAAP-West area. Reducing development potential in the DAAP-East area would result in an overall net loss of retail, while excluding DAAP-West would prevent/exclude from consideration net loss of retail west of Winchester Boulevard.
Source: PlaceWorks, 2014.

The alternatives analysis assumes that all applicable mitigation measures proposed for the proposed Plan would apply to each alternative. The following analysis compares the potential significant environmental impacts of the two alternatives with those of the Plan-related impacts for each of the environmental topics analyzed in detail in Chapter 4, Environmental Evaluation, of this Draft EIR. The impacts of each alternative are classified as greater, less, or essentially similar to (or comparable to) the level of impacts associated with the proposed Plan.

Table 5-2 summarizes the relative impacts of each of the alternatives compared to the proposed Plan.

TABLE 5-2 COMPARISON OF PROPOSED ALTERNATIVE IMPACTS

Topic	Proposed Plan	No Project Alternative	Reduced Development Alternative	No DAAP-West
Aesthetics	LTS	=	=	=
Air Quality	LTS/M/SU	+	=	=
Biological Resources	LTS/M	+	+	+
Cultural Resources	LTS/M	+	+	+
Geology and Soils	LTS	=	+	+
Greenhouse Gas Emissions	LTS	—	=	—
Hazards and Hazardous Materials	LTS	+	+	+
Hydrology and Water Quality	LTS	-	=	=
Land Use and Planning	LTS/M	=	=	=
Noise	LTS/M	=	=	=
Population and Housing	LTS	=	=	=
Public Services and Recreation	LTS	=	=	=
Transportation and Traffic	LTS/M/SU	++	+	+
Utilities and Service Systems	LTS	+	+	+

LTS = Less Than Significant
LTS/M = Less Than Significant with Mitigation
LTS/M/SU = Less Than Significant with Mitigation and/or Significant and Unavoidable
++ Substantially reduced impact in comparison to the proposed Plan
+ Slightly reduced impact in comparison to the proposed Plan
= Similar impacts in comparison to the proposed Plan
- Slightly greater impact in comparison to the proposed Plan
— Substantially greater impact in comparison to the proposed Plan

5.5 NO PROJECT ALTERNATIVE

5.5.1 PRINCIPAL CHARACTERISTICS

Under the No Project Alternative, the proposed Plan would not be adopted, and future development in the Plan Area would continue to be subject to existing policies, regulations, and land use designations as per the City of Campbell's General Plan.

It is projected that this alternative would result in no new housing units, no net new retail development, and no net new office development because the Plan Area is already developed. It is assumed that there will be rehabilitation or changes of use over the 2040 buildout horizon. However, these changes are not expected to result in new net growth.

Under the No Project Alternative, the General Plan and Zoning Ordinance would not need to be amended to ensure consistency with the proposed Plan, and the public capital improvements specifically called for by the proposed Plan would not be implemented. In particular:

- The districts established by the proposed Plan would not be incorporated into the General Plan.
- The height and density standards proposed for each district would not be incorporated into the General Plan or Zoning Ordinance.
- The General Plan would not be amended to include land use designations that are consistent with the proposed Plan.
- The General Plan's programs and policies would not be updated to ensure consistency with the principles, concepts, and vision in the proposed Plan.
- The Zoning Ordinance would not be amended to ensure consistency with the principles, concepts, vision, standards, and guidelines in the proposed Plan.
- The City's official Zoning Map would not be amended to ensure consistency with the proposed Plan.
- Intersection improvements and street reconfigurations, including new "gateways;" streetscape improvements, including new sidewalks; street lighting and furniture; infrastructure improvements related to stormwater management; recreational amenities, such as a proposed promenade on the east side of the Plan Area; and other similar improvements would not be implemented.

5.5.2 IMPACT DISCUSSION

The No Project Alternative would have the following impacts relative to the proposed Plan.

5.5.2.1 AESTHETICS

Section 4.1, Aesthetics, finds that the proposed Plan would result in less than significant impacts to aesthetics.

The proposed Plan and the No Project Alternative would have comparable impacts with regard to scenic views and vistas. As described in Section 4.1, the Campbell General Plan does not identify any scenic viewpoints within the Plan Area; however, for the purpose of the proposed Plan, the EIR describes the following scenic vistas:

- Southward views along Dell Avenue and Winchester Boulevard of the foothills and ridgelines of the Santa Cruz Mountains.
- Near-field views from the Los Gatos Creek Trail and the roads immediately adjacent to Santa Clara County's percolation ponds.

Under the proposed Plan, development could potentially block or otherwise adversely affect these views, although not formally protected by City ordinance or policy, including through new buildings of up 75 feet in height along Dell Avenue and up to 45 feet in height along the west side of Winchester Boulevard. Under the land use designations of the current General Plan, maximum building heights are 45 feet along Dell Avenue and 75 feet along Winchester Boulevard. Given existing conditions, which include relatively flat topography, existing structures, and large trees, the views identified above are already largely obscured. Structures with the potential to block views could be constructed under the development standards of both the proposed Plan and the continuation of the existing Zoning Code under the No Project Alternative. Additionally, compliance with City policies and regulations regarding aesthetics, including Site and Architectural Review processes, would serve to ensure that new developments under the proposed Plan or any limited redevelopment under the No Project Alternative do not have substantial adverse effects on scenic views or vistas. Therefore, in this respect, the proposed Plan and the No Project Alternative would result in comparable less than significant impacts.

There are no State-designated scenic highways in the vicinity of the Plan Area. Therefore, no impact to scenic resources visible from a State Scenic Highway would occur with the implementation of either the proposed Plan or the No Project Alternative. Therefore, in this respect, the proposed Plan and the No Project Alternative would result in comparable impacts.

With regard to the degradation of existing visual character, comparable impacts would occur under implementation of either the proposed Plan or the No Project Alternative; however, implementation of the proposed Plan could potentially serve to improve the visual character of the Plan Area. In the portions of the Plan Area to both the east and west of Winchester Boulevard, the current visual character is not particularly unique or distinguished, with no architecture or landscaping that would be regarded as noteworthy. The No Project Alternative would continue existing land uses, development standards, and other policies and regulations related to aesthetics, thereby preserving the existing character of these areas. Any future development under the proposed Plan or the No Project Alternative would be required to comply with existing General Plan policies and development standards that serve to protect and enhance aesthetic character. The proposed Plan would also allow new structures and uses that would be subject to additional policies that would emphasize pedestrian-oriented development, improved streetscapes, and greater connectivity. Encouraging new development that complied with both new and existing policies would serve to enhance the visual character of the Plan Area. Although the creation of new mixed-use residential along the west side of Winchester Boulevard could lead to potential visual impacts on adjacent residences, the setback, step-back, and screening requirements included in the proposed Plan would serve to prevent or substantially lessen such visual impacts to adjacent residences. In some cases, such as where existing structures are immediately adjacent to the property line, views from adjacent residences may be improved under the proposed Plan versus the No Project Alternative, which would serve to preserve current uses. Therefore, in this respect, the proposed Plan and the No Project Alternative would result in comparable less than significant impacts.

Under implementation of either the proposed Plan or the No Project Alternative, impacts related to new sources of light or glare would be less than significant. In either case, new developments would be required to comply with the standards set forth in Section 21.16.060 of the Municipal Code regarding restriction on new sources of light and glare. Additionally, the Campbell General Plan contains policies to reduce impacts from excessive lighting and glare, including light overflow to adjacent properties. These policies and regulations would apply to development under either the proposed Plan or the No Project Alternative. Therefore, in this respect, the proposed Plan and the No Project Alternative would result in comparable less than significant impacts.

Given these considerations, the potential aesthetic impacts under the No Project Alternative would be substantially *similar* to those under the proposed Plan.

5.5.2.2 AIR QUALITY

Section 4.2, Air Quality, found that under implementation of the proposed Plan, less than significant impacts would occur under two standards of significance (AIR-1 and AIR 5), with significant impacts occurring under four standards of significance (AIR-2,3, 4, and 6). Significant Impact AIR-4 would be mitigated to a level of less than significant through Mitigation Measure AIR-4a; however, significant Impacts AIR-2, 3, and 6 would remain significant and unavoidable.

Implementation of either the proposed Plan or the No Project Alternative would not conflict with or obstruct implementation of the applicable air quality plan. Implementation of the proposed Plan would not violate the ambient air quality standards (AAQS) of the 2010 Bay Area Clean Air Plan, in part since residential and employment growth anticipated under the proposed Plan would be consistent with regional growth projections. The No Project Alternative, since it would result in lower population and employment growth, would therefore also comply with the AAQS. Adherence to BAAQMD regulations would ensure that new sources of TACs do not expose populations to significant health risk. Adherence to Mitigation Measure AQ-4 would ensure that the proposed Plan would reduce population exposure and protect public health consistent with the 2010 Bay Area Clean Air Plan. Under the No Project Alternative, no new sensitive uses would be developed since this alternative does not include residential units. As discussed in Section 4.6, implementation of the proposed Plan would not result in significant impacts with regard to GHG emissions, and compliance with local and State regulations would further ensure that the proposed Plan is consistent with 2010 Bay Area Clean Air Plan goals relating to GHG emissions and climate change. Although the No Project Alternative would not incorporate the policies and programs of the proposed Plan that would be consistent with the applicable control measures of the air quality management plans (AQMPs), this alternative would involve not taking any action and leaving in place existing policies and plans that were subject to previous analyses with respect to air quality. Furthermore, the No Project Alternative would not disrupt or hinder any AQMP control measures. Similarly, with regard to projections for VMT, population, and employment, since the No Project Alternative would continue existing land uses, it would not conflict with regional projections, which have already accounted for existing land use designations and levels of development. Therefore, neither the proposed Plan nor the No Project Alternative would conflict with or

obstruct implementation of the applicable air quality plan, and comparable less than significant impacts would occur in this regard under the No Project Alternative.

Implementation of either the proposed Plan or the No Project Alternative would potentially violate an air quality standard or contribute substantially to an existing or projected air quality violation. Due to the SFBAAB's nonattainment status for ozone and PM and the cumulative impacts of growth on air quality, long-range plans (including the proposed Plan or continuation of existing conditions under the No Project Alternative) almost always have significant, unavoidable adverse air quality impacts. With regard to operational emissions, as discussed in Section 4.2, buildout of the proposed Plan would generate a substantial increase in criteria air pollutant emissions that exceeds the BAAQMD regional significance thresholds (ROG, NO_x, and PM_{10}). Although the No Project Alternative would result in lower levels of criteria air pollutant emissions than the proposed Plan, it would still potentially result in a violation of the ROG regional significance threshold due to the continuing operation of existing commercial and industrial uses within the Plan Area, as illustrated in the existing conditions analysis in Section 4.2, Table 4.2-8. Nevertheless, implementation of the No Project Alternative would potentially avoid multiple other air quality violations that could occur under the proposed Plan. As discussed in Section 4.2, even with implementation of Mitigation Measures AQ-2a through AQ-2c, air quality impacts would remain significant and unavoidable. Therefore, implementation of either the proposed Plan or the No Project Alternative could result in violations of air quality standards or contributions to existing violations; however, since the No Project Alternative would serve to reduce the number and/or degree of such violations, the impacts would represent a substantial improvement over the proposed Plan.

Implementation of either the proposed Plan or the No Project Alternative would result in a cumulatively considerable net increase of any criteria pollutant for which the project region is in nonattainment under an applicable federal or State ambient air quality standard. The San Francisco Bay Area Air Basin (SFBAAB) is currently designated a nonattainment area for California and National O_3, California and National $PM_{2.5}$, and California PM_{10} AAQS. Any project that produces a significant regional air quality impact in an area that is in nonattainment adds to the cumulative impact. As discussed previously and in Section 4.2, both the proposed Plan and the No Project Alternative would have the potential to contribute to violations of air quality standards through continued and increased pollutant emissions. Although neither the proposed Plan nor the No Project Alternative would conflict with the 2010 Bay Area Clean Air Plan, they would both generate a substantial increase in criteria air pollutant emissions from construction and operational activities. Consequently, cumulative regional air quality impacts are also significant. As discussed in Section 4.2, even with implementation of Mitigation Measures AQ-2a through AQ-2c, this impact would remain significant and unavoidable. Therefore, since implementation of either the proposed Plan or the No Project Alternative would result in a cumulatively considerable net increase of certain criteria pollutants, impacts would be comparable and significant.

Implementation of either the proposed Plan or the No Project Alternative would expose sensitive receptors to substantial concentrations of air pollution. Areas of vehicle congestion have the potential to create pockets of CO, called hotspots. Under existing and future vehicle emission rates, a project would have to

increase traffic volumes at a single intersection by more than 44,000 vehicles per hour—or 24,000 vehicles per hour where vertical and/or horizontal mixing is substantially limited—in order to generate a significant CO impact.[1] The No Project Alternative would result in fewer vehicle trips and less traffic than the proposed Plan, since it would not generate net new jobs. Thus, neither the proposed Plan nor the No Project Alternative would increase traffic volumes at affected intersections by more than 44,000 vehicles per hour or 24,000 vehicles per hour in areas prone to CO hotspots. Therefore, neither the proposed Plan nor the No Project Alternative would have the potential to substantially increase CO hotspots at intersections in the Plan Area and vicinity. As discussed in Section 4.2, the proposed Plan would also not create new major sources of Toxic Air Contaminants (TACs). Since the No Project Alternative would include similar types of commercial/industrial land uses, it would likewise not create any new major sources of TACs. However, the proposed Plan would introduce new sensitive land uses near existing sources of TACs. Future projects containing sensitive receptors within 1,000 feet of major sources of TACs would need to ensure that they could achieve BAAQMD's performance standards. With application of Mitigation Measure AQ-4a under the proposed Plan, developments containing sensitive receptors would be required to conduct additional study to establish that levels of pollution from TACs do not exceed acceptable levels. Although the No Project Alternative would not implement this mitigation measure, the No Project Alternative would not include the development of any sensitive receptors. Therefore, since implementation of either the proposed Plan or the No Project Alternative would not expose sensitive receptors to substantial concentrations of air pollution, impacts would be comparable and less than significant.

Implementation of either the proposed Plan or the No Project Alternative would not create or expose a substantial number of people to objectionable odors. As discussed in Section 4.2, no existing sources within the Plan Area are currently considered to generate nuisance odors. Buildout of the proposed Plan would result in conversion of the auto-repair facilities west of Winchester Boulevard to residential uses, which would further reduce the potential of odor complaints from painting/coating operations. Although the No Project Alternative would be less likely to result in replacement of these uses, as previously stated, they are not currently considered sources of nuisance odors. Implementation of either the proposed Plan or the No Project Alternative would not involve land uses that generate substantial odors such as from composting, green waste, and recycling operations; food processing; chemical manufacturing; and painting/coating operations. Furthermore, BAAQMD Regulation 7, Odorous Substances, requires abatement of any nuisance generating an odor complaint. Therefore, because existing sources of odors are required to comply with BAAQMD Regulation 7, impacts in this regard would be comparable and less than significant under implementation of either alternative.

As described above, regional air quality impacts were identified as significant under implementation of either the proposed Plan or the No Project Alternative; therefore, in combination with past, present, and reasonably foreseeable projects, both the proposed Plan and the No Project Alternative would result in a significant cumulative impact with respect to air quality, even with implementation of applicable regulations

[1] Bay Area Air Quality Management District (BAAQMD), 2011 (Revised), *CEQA Air Quality Guidelines*.

as well as mitigation measures described in Section 4.2. Therefore, cumulative air quality impacts would be comparable and significant under either alternative.

Both the proposed Plan and the No Project Alternative would result in significant impacts with regard to air quality. Although the decreased potential for residential and employment growth under the No Project Alternative would result in lower air quality impacts in certain respects, this alternative would also fail to concentrate new residential and employment uses in transit-accessible areas that are already urbanized. Neither the proposed Plan nor the No Project Alternative could avoid or mitigate all impacts, and the performance of the No Project Alternative is mixed when compared to the proposed Plan. Overall, the No Project Alternative would have *similar* impacts with regard to Air Quality as compared to the proposed Plan.

5.5.2.3 BIOLOGICAL RESOURCES

Section 4.3, Biological Resources, found that under implementation of the proposed Plan, less than significant impacts would occur under four standards of significance (BIO-4, 6, and 7), with significant impacts occurring under three standards of significance (BIO-1, 2,3, and 5). All three of these significant impacts would be mitigated to a level of less than significant through Mitigation Measures BIO-1, 2, 3, and 5.

With regard to substantial adverse effects to special-status species, potential impacts could occur under implementation of either the proposed Plan or the No Project Alternative; however, given the development that is anticipated to occur under the proposed Plan, it would result in a greater potential for such impacts. Although the Plan Area is already mostly built out with urbanized land uses, remaining trees, landscaped areas, and structures could provide habitat for special-status species. Birds, including species such as Cooper's hawk, could use such areas for nesting, dispersal, and other functions. Mitigation Measure BIO-1 would serve to address these potential impacts by requiring: pre-construction surveys for nests and special-status species; cessation of nearby construction activities in the event that special-status species or active nests are discovered; and potential protection and construction work exclusion zones for active nests. However, under the No Project Alternative, potential disturbance would be more limited. Therefore, the No Project Alternative would result in decreased potential for impacts to special-status species.

With regard to substantial adverse effects on riparian habitat or other sensitive natural communities, although the Plan Area is already mostly built out with urbanized land uses and does not itself include any riparian or sensitive habitat areas, future development in the Plan Area could have indirect impacts on such areas, including those that occur adjacent to the Plan Area, along Los Gatos Creek. Given that the total area of development and/or impervious surfaces is anticipated to be roughly equivalent under the proposed Plan or the No Project Alternative, the potential for indirect impacts would be roughly equivalent. The Campbell General Plan includes specific policies relating to the preservation of riparian corridors, development near riparian corridors, coordination with the SCVWD, and use of native plantings. Compliance with applicable local, State, and federal regulations would serve to reduce impacts to sensitive habitat. Additionally, Mitigation Measure BIO-2 would serve to further reduce potential indirect impacts by requiring native

plantings be used to reduce potential for invasive species and runoff of fertilizers, pesticides, and herbicides. Additionally, as discussed in Section 4.8, Hydrology and Water Quality, redevelopment under the proposed Plan would likely result in decreased stormwater and pollutant runoff relative to existing conditions, through implementation of vegetative swales and water-efficient landscaping required by other regulations. Therefore, neither the proposed Plan nor the No Project Alternative would cause significant impacts in this respect, resulting in roughly equivalent potential for indirect pollutant-related impacts to riparian and sensitive habitat.

As discussed above, although implementation of the proposed Plan could have indirect effects on adjacent wetlands, such effects would be avoided or reduced through compliance with General Plan policies, including those related to runoff, drainage facilities, and construction practices, as well as through implementation of stormwater best management practices (BMPs) during construction and operation of new developments. As discussed in Section 4.8, Hydrology and Water Quality, the proposed Plan is not anticipated to result in significant impacts with respect of water quality, erosion, or siltation—any of which could have indirect impacts on wetlands. Nevertheless, outside of the Plan Area boundary, the proposed Plan incorporates recommended, though not required, construction of new pedestrian crossings over the engineered channel adjacent to the Plan Area. The construction of these crossings could impact federally protected wetlands; however, the planning and construction of pedestrian crossings would be subject to relevant permit processes, mitigation requirements, and fee payments, and would also be subject to independent CEQA review. Since creation of these crossings could take place under the proposed Plan, impacts in this regard would be greater under the proposed Plan. Implementation of Mitigation Measures BIO-2 and BIO-3 under the proposed Plan would serve to reduce associated impacts to less than significant. Therefore, indirect impacts to wetlands would be similar under both the proposed Plan and the No Project Alternative. Neither the proposed Plan nor the No Project Alternative would be anticipated to interfere substantially with wildlife movements, corridors, or nursery sites. As discussed above, the Plan Area is highly urbanized, and there are no wildlife corridors or nursery sites within the Plan Area. Wildlife species common to urban and suburban habitat could be displaced where existing structures are demolished and landscaping is removed as part of future development, but these species are relatively abundant, and adapted to human disturbance. Although neither the proposed Plan nor the No Project Alternative is anticipated to result in significant impacts in this respect, the proposed Plan is more likely to result in development that would include new landscaping features that could provide wildlife habitat or movement corridors.

The No Project Alternative would not conflict with local policies or ordinances protecting biological resources, or with adopted Habitat Conservation Plan, Natural Community Conservation Plan, or other conservation plans. While the proposed Plan could conflict with General Plan Policy CNR-3.1, Mitigation Measure BIO-4 would reduce this to a less than significant level. Therefore, implementation of either alternative would be undertaken in compliance with applicable local, regional, and State policies and regulations—including Campbell's Protected Tree Ordinance under Chapter 21.32 of the Campbell Municipal Code. The Plan Area includes a small portion of the Study Area for the Santa Clara Valley Habitat Plan (SCVHP), specifically the SCVWD desilting ponds immediately adjacent to Dell Avenue. Neither the proposed Plan nor the No Project Alternative would permit new structures on this site, and SCVWD would

continue to maintain the desilting ponds following the provisions of the SCVHP. Under the proposed Plan, additional pedestrian crossings may be constructed over Los Gatos Creek. Since the No Project Alternative does not include the proposed pedestrian crossings, it would not conflict with General Plan Policy CNR-3.1 and would result in decreased potential for conflicting with local policies.

No significant cumulative impacts with respect to biological resources would result from implementation of either the proposed Plan or the No Project Alternative. The potential impacts of proposed development on biological resources tend to be site-specific, and the overall cumulative effects would largely depend on the degree to which significant vegetation and wildlife resources are protected on a particular site. Nevertheless, development can contribute to fragmentation or incremental reduction of wildlife habitat, particularly for birds and larger mammals. However, given that the entirety of the Plan Area is urbanized and/or has been subject to human disturbance, the potential for site-specific or cumulative impacts is minimal. As described above, compliance with local, State, and federal regulations, including policies of the Campbell General Plan, as well as implementation of applicable mitigation measures, would serve to reduce direct and indirect impacts to less than significant levels, thus precluding cumulative impacts. Therefore, under implementation of either the proposed Plan or the No Project Alternative, impacts in this respect would be comparable and less than significant.

Given these considerations, biological impacts under the No Project Alternative would represent a *slight improvement* compared to those under the proposed Plan because as noted above, fewer potential impacts to special status species would occur under the No Project Alternative.

5.5.2.4 CULTURAL RESOURCES

Section 4.4, Cultural Resources, found that under implementation of the proposed Plan, significant impacts could occur under two standards of significance (CULT- 2 and 3), with less than significant impacts occurring under CULT-1, CULT-4, and CULT-5, Cumulative Impacts. All of the potentially significant impacts would be mitigated to a level of less than significant through Mitigation Measures CULT-2 and 3.

Development under either the proposed Plan or the No Project Alternative would have the potential to result in substantial adverse changes in the significance of historical resources, archaeological resources, and/or unique paleontological resources or geologic features. It is also possible that development could potentially disturb human remains, including those interred outside of formal cemeteries. Historical resources encompass both architectural and archeological resources; however, the Plan Area does not include any known structures that would meet historical criteria. Although there are no known cultural resources in the Plan Area, it is possible that archaeological, paleontological, or geologic resources could be present underground, in either open or developed areas. Potential impacts to such resources would be reduced to a level of less than significant through implementation of Mitigation Measures CULT-2 and 3. In the event significant cultural resources were discovered, these measures would require construction personnel to cease activities, contact appropriate experts and officials, and take other appropriate steps to protect and preserve those resources, whether those resources are preserved on-site or moved off-site.

Additionally, Section 4.4 finds that applicable regulations, procedures, and policies would ensure that any human remains discovered during construction allowed by either the proposed Plan or the no Project Alternative would be handled appropriately. The more limited development that could occur under the No Project alternative would remain subject to existing regulations related to protection/preservation of cultural resources. Given that impacts to cultural resources are usually site specific, that the Plan Area is located within and is itself a highly urbanized area, and since potential impacts would be mitigated, no cumulative impacts would result.

Therefore, given that the potential for disturbance is substantially lower under the No Project Alternative, potential impacts would be *slightly lower* compared to those under the proposed Plan.

5.5.2.5 GEOLOGY AND SOILS

Section 4.5, Geology, Soils, and Seismicity, found that under implementation of the proposed Plan, adherence to existing regulations and policies would ensure that impacts under all six standards of significance would be less than significant.

Neither the proposed Plan nor the No Project Alternative would result in the exposure of people or structures to substantial adverse effects relating to seismic risks, including surface rupture, strong ground shaking, ground failure (including liquefaction), or landslides. Since the Plan Area does not contain any known faults and associated Alquist-Priolo zones, the risk of surface rupture in the area is regarded as minimal. Nevertheless, earthquakes along nearby faults could result in "very strong" ground shaking or liquefaction in the Plan Area. Since the topography of the Plan Area is mostly flat, seismically induced landslides are not likely. Despite these seismic risks, adherence to local and State regulations and policies would reduce the risk to people and structures to a less-than-significant level. However, given that the number of employees and residents in the Plan Area would not increase under the No Project Alternative, its implementation would result in lower impacts as fewer people would be subject to seismic risks in the Plan Area.

The Campbell General Plan and Campbell Municipal Code Section 21.18.130 Seismic and Geologic Hazards, would require future developments to evaluate and incorporate appropriate site-preparation and construction techniques to protect structures and their occupants during seismic events. Municipal Code Section 21.18.130 requires development projects both adhere to the uniform and California Building Code (CBC), and undertake geotechnical studies, as appropriate per official geological hazards maps used by the City. The recommendations of such geotechnical studies become the standards of review and must therefore be incorporated into proposed developments. Since these policies would apply irrespective of whether the proposed Plan or the No Project Alternative were implemented, impacts related to seismic risks would be comparable and less than significant.

Neither the proposed Plan nor the No Project Alternative would result in substantial soil erosion or the loss of topsoil. Future development would be required to comply with existing regulations, including grading erosion control measures specified in the California Building Code, Appendix J, Grading. Campbell

Municipal Code Section 21.18.130 and Section 18.04.010 require compliance with the California Building Code. Therefore, impacts to soil erosion and loss of topsoil would be comparable and less than significant under implementation of either the proposed Plan or the No Project Alternative.

Neither the proposed Plan nor the No Project Alternative would result in a significant impact related to development on unstable geologic units and soils or result in on- or off-site landslide, lateral spreading, subsidence, liquefaction, or collapse. Certain portions of the Plan Area, most notably those nearest to Los Gatos Creek, may be at risk of liquefaction or other ground failure. Nevertheless, as discussed above, Campbell Municipal Code Section 21.18.130, would require developments to evaluate and incorporate appropriate site-preparation and construction techniques to protect structures and their occupants from geological and soils-related hazards. Compliance with the Municipal Code under either alternative would thus reduce this impact to a level of less than significant. However, since there is a higher chance for redevelopment of the Plan Area under the proposed Plan, there would be a greater likelihood that any unstable geologic units or soils could be stabilized compared to the No Project Alternative. Therefore, impacts resulting from unstable geological units would be slightly improved under the proposed Plan compared to the No Project Alternative.

Neither the proposed Plan nor the No Project Alternative would result in a significant impact related to expansive soils. Although expansive soils could potentially be present in the Plan Area, available information does not indicate that such is the case. If a particular development site were shown to have expansive soils, compliance with the California Building Code, as mandated by Campbell Municipal Code Section 21.18.130 and Section 18.04.010, would require proposed developments to evaluate and incorporate appropriate site-preparation and construction techniques to address hazards related to expansive soils. (Chapter 18 of the California Building Code contains standards and construction techniques related to expansive soils.) Compliance with the Municipal Code and California Building Code under either alternative would thus reduce this impact to a level of less than significant. Therefore, impacts resulting from expansive soils would be comparable and less than significant under implementation of either the proposed Plan or the No Project Alternative.

Construction allowed by either the proposed Plan or the No Project Alternative would not require the use of septic tanks or alternative wastewater disposal systems. Wastewater would be discharged into the existing public sanitary sewer system in the Plan Area, which is serviced by the West Valley Sanitation District. As such, there would be no impact from development at sites where soils may not be capable of supporting the use of septic tanks or alternative wastewater disposal systems. Therefore, impacts resulting from septic tanks or alternative wastewater disposal systems would be comparable and less than significant under implementation of either the proposed Plan or the No Project Alternative.

No significant cumulative impacts with respect to geology, soils, or seismicity would result from implementation of either the proposed Plan or the No Project Alternative. Potential impacts related to seismic, geologic, and soils hazards, as well as septic tanks and alternative waste disposal, are all site specific and do not contribute to cumulative effects. With regard to erosion and loss of top soil, neither the

proposed Plan nor the No Project Alternative would result in impacts that would contribute to a cumulative effect. As described above, compliance with local, State, and federal regulations, including policies of the Campbell General Plan, would serve to reduce erosion and soil loss impacts to less than significant levels, thus precluding cumulative impacts. Therefore, implementation of either the proposed Plan or the Reduced Density Alternative would result in comparable less than significant impacts in this respect.

Given these considerations, the potential geologic impacts under the No Project Alternative would be substantially *similar* to those under the proposed Plan.

5.5.2.6 GREENHOUSE GAS EMISSIONS

Section 4.6, Greenhouse Gas Emissions, found that under implementation of the proposed Plan, less than significant impacts would occur with respect to all impact criteria, including generation of GHG emissions; conflicts with applicable plans, policies, or regulations; and cumulative impacts. An individual project on its own does not generate enough GHG emissions to influence global climate change; therefore, analysis of GHG emissions inherently considers a project's contribution to a cumulative environmental impact, and no further cumulative analysis is required.

Implementation of the proposed Plan would not directly or indirectly generate GHG emissions that would have a significant effect on the environment; however, implementation of the No Project Alternative could result in generation of GHG emissions that exceed efficiency targets set by the Bay Area Air Quality Management District (BAAQMD). GHG emissions from future construction activities within the Plan Area are not subject to any thresholds of significance, and represent one-time, short-term emissions. Therefore, these emissions are assumed to not significantly contribute to the GHG emissions impacts under either the proposed Plan or the No Project Alternative. As shown in Table 4.6-5, the net increase of GHG emissions generated by the operational phase of the proposed Plan would exceed BAAQMD's bright-line standards of significance of 1,100 $MTCO_2e$; therefore, GHG emissions impacts are evaluated based on the Project efficiency. As identified in Table 4.6-5, the proposed Plan would not exceed the BAAQMD performance criterion of 4.6 $MTCO_2e$/SP. Furthermore, the proposed Plan would result in an improved efficiency compared to existing conditions. Consequently, GHG emissions impacts of the No Project Alternative are deemed greater than those of the Proposed Plan, since implementation of this alternative would perpetuate existing conditions.

As discussed in Section 4.6, the proposed Plan would comply with applicable plans, policies and regulations for the purpose of reducing GHGs; however, the No Project Alternative would likely conflict with key components of Association of Bay Area Government's (ABAG) and Metropolitan Transportation Commission's (MTC) Plan Bay Area. The two GHG reduction plans that are applicable to the Plan Area are the California Air Resource Board (CARB) Scoping Plan and ABAG/MTC's Plan Bay Area. Both the proposed Plan and the No Project Alternative would be consistent with CARB's scoping plan, since the majority of its provisions are reflected in State and local regulations and programs, with which future developments must comply. For example, new development in the Plan Area would be subject to the

requirements of Title 24, California's building energy efficiency standards, as well as the City of Campbell's Water Efficient Landscape Ordinance (WELO). With regard to Plan Bay Area, however, the No Project Alternative would not be in compliance with its vision of concentrating housing and employment growth in mixed-use areas accessible to transit.

Impacts under the No Project Alternative would thus be *slightly increased* compared to those under the proposed Plan.

5.5.2.7 HAZARDS AND HAZARDOUS MATERIALS

Section 4.7, Hazards and Hazardous Materials, found that under implementation of the proposed Plan, adherence to existing regulations and policies would ensure that impacts under four of the nine standards of significance (HAZ-1, 2, 4, 7, and 9) would be less than significant; there would be no impact under standards of significance HAZ-3,5, 6, and 8.

Implementation of either the proposed Plan or No Project Alternative would not create a significant hazard to the public or the environment through the routine transport, use, or disposal of hazardous materials. Neither the proposed Plan nor the No Project Alternative includes changes to regulatory standards for handling, transport, storage, use, disposal, or disruption of hazardous materials. Although implementation of either the proposed Plan or the No Project Alternative could involve use of commercially available hazardous materials (e.g., fuels, solvents, paints, and some consumer electronics) for construction projects, as well as generation of small amounts of hazardous waste from allowed use, the waste would be handled in accordance with applicable federal, State, and local laws, policies, and regulations, as described in Section 4.7.1.1, Regulatory Framework. The Plan Area currently contains, and the proposed Plan would allow, office, research and development/light industrial, retail and commercial, and residential land uses. The No Project Alternative would allow all of these uses, except residential. Since industrial and commercial uses are included under either alternative, it is therefore possible that future development could generate significant quantities of hazardous materials. However, in either case, the City of Campbell, the Santa Clara County Department of Environmental Health's Hazardous Materials Compliance Division (SCCHMCD), and Santa Clara County Fire Department (SCCFD) would regulate the transport, generation, use, and/or disposal of hazardous materials within the Plan Area, related to either construction or business operations. In addition, the General Plan contains policies and strategies that further ensure that new development would not create a significant hazard to the public or the environment through the routine transport, use, or disposal of hazardous materials. However, under the No Project Alternative, fewer people would be exposed to the transportation and use of hazardous materials. Therefore, while impacts in this respect would be less than significant, they would be slightly lower under the No Project Alternative.

Implementation of either the proposed Plan or No Project Alternative would not create a significant hazard to the public or the environment through reasonably foreseeable upset and accident conditions involving the release of hazardous materials into the environment. Both the proposed Plan and the No Project Alternative would allow new development, including office, research and development/light industrial, and retail and

services within the Plan Area; the proposed Plan would allow residential in addition to these uses. Compliance with existing laws, regulations, policies, and procedures would ensure future development allowed by the proposed Plan or the No Project Alternative would not create a significant hazard to the public or the environment through reasonably foreseeable upset and accident conditions involving the release of hazardous materials into the environment. As described in Section 4.7, these include applicable federal, State, and local laws and regulations regarding handling of these materials; the General Plan policies listed under Impact HAZ-1; and the Stormwater Pollution Prevention Plan and Best Management Practices required for the proposed Plan. However, under the No Project Alternative, fewer people would be exposed to the potential of risk of upset or accidental release and use of hazardous materials. Therefore, while impacts in this respect would be less than significant, they would be slightly lower under the No Project Alternative.

Implementation of either the proposed Plan or No Project Alternative would not create a significant hazard to the public or the environment by being located on a site that is included on a list of hazardous materials sites compiled pursuance to Government Code Section 65962.5. As discussed in Section 4.7, five sites within the Plan Area and one additional site in near proximity to the Plan Area were identified on lists compiled pursuant to Government Code Section 65962.5. In addition, several sites with Leaking Underground Storage Tanks (LUSTs) were identified in the near vicinity of the Plan Area. Based on available information contained variously in the EnviroStor and GeoTracker government databases, as also summarized in Section 4.7.1.2, none of the listed sites appear to create a significant hazard to the public or the environment. In addition, the General Plan contains strategies to address future development on identified hazardous materials sites. Under either the proposed Plan or the No Project Alternative, compliance with applicable federal, State, and local laws and regulations regarding hazardous material sites, as discussed in Section 4.7, would ensure future development would not create a significant hazard to the public or the environment. However, given the higher redevelopment potential under the proposed Plan, there is, thus, greater potential for the hazardous sites to be remediated. Therefore, the proposed Plan would represent a slight improvement over the No Project Alternative in this respect.

Implementation of either the proposed Plan or No Project Alternative would not impair implementation of, or physically interfere with, an adopted emergency response plan or emergency evacuation plan. As discussed in Section 4.7, no physical components of the proposed Plan would interfere with the ability to implement emergency response or evacuation, including provisions of the City of Campbell's Emergency Operations Plan. Since the No Project Alternative would not undertake these new physical components, it would have no impact upon existing conditions related to emergency response. Consistent with provisions of the 2013 California Fire Code (CFC) and the 2013 CBC, future developments under either the proposed Plan or the No Project Alternative will include fire and emergency access through all phases of construction and operation, and would be required to incorporate building and life safety measures that serve to facilitate emergency response. Therefore, impacts related to emergency response and evacuation would be less than significant and comparable under implementation of either the proposed Plan or the No Project Alternative.

Given the fact that future development under the proposed Plan would increase the number of employees and residents within the Plan Area, thereby potentially exposing more people to hazardous materials, impacts under the No Project Alternative would therefore be *slightly reduced* compared to the proposed Plan.

5.5.2.8 HYDROLOGY AND WATER QUALITY

Section 4.8, Hydrology and Water Quality, found that under implementation of the proposed Plan, adherence to existing regulations and policies would ensure that impacts under all nine standards of significance would be less than significant.

Development under either the proposed Plan or the No Project Alternative could result in changes to developed areas and impervious surfaces that could affect drainage patterns, runoff, and pollutant levels; but impacts under either alternative are anticipated to be less than significant. Under the proposed Plan or the No Project Alternative, new developments would be subject to requirements for increased open space and stormwater retention features to reduce drainage and pollutant runoff. Under either the proposed Plan or the No Project Alternative, landscaping would be required to comply with the City of Campbell Water Efficient Landscape Ordinance, which would further serve to reduce runoff of water and pollutants. Under either alternative, construction activities within the Plan Area would be required to comply with applicable local, State, and federal requirements to control sedimentation, erosion, and hazardous materials contamination of runoff during construction. Following construction, development operations would be governed by local and regional requirements regarding site design, source control, and treatment measures to manage water quality in stormwater runoff. Required compliance with these measures would render any potential construction and operational impacts to water quality less than significant under either alternative. Nevertheless, since the No Project Alternative would not result in the implementation of new stormwater retention methods, it would result in a slightly increase potential for water quality impacts.

Under implementation of either the proposed Plan or the No Project Alternative, less than significant impacts would occur with respect to depletion of groundwater supplies or substantial interference with groundwater recharge. Future development within the Plan Area could result in an increase in impervious surfaces, which would reduce infiltration and could lead to reduced groundwater recharge. However, as previously described, future development would be located on sites that have already been developed and currently have a high percentage of impervious surfaces. Implementation of the proposed Plan would also result in the incorporation of higher open space standards and new stormwater retention features with the potential to increase infiltration and recharge of groundwater supplies. Although buildout under the proposed Plan could lead to higher demand for water and subsequent increases in groundwater pumping, SCVWD's 2010 Urban Water Management Plan (UWMP) and the San Jose Water Company's 2010 UWMP indicate that there is a sufficient supply of water through 2035 even for multiple dry years.[2] Therefore, with respect to groundwater supply and recharge, the impacts of the proposed Plan versus the no Project Alternative would be mixed.

[2] Santa Clara Valley Water District, 2010, *Urban Water Management Plan*.

Under implementation of either the proposed Plan or the No Project Alternative, less than significant impacts would occur with respect to substantial alterations of existing drainage patterns. Under either alternative, nearly all of the future development sites would be located in areas that are already developed or paved, and new development on these sites would not create a substantial increase in the area of impervious surfaces. All new development and redevelopment projects would be required by local and regional regulations to implement construction phase BMPs, post-construction design measures that encourage infiltration in pervious areas, and post-construction source control measures to help prevent erosion and siltation due to stormwater runoff. With implementation of locally and regionally mandated erosion and sediment control measures and regulatory provisions to limit runoff for new development and redevelopment sites, development allowed by either the proposed Plan or the No Project Alternative would not result in significant increases in erosion and sedimentation or contribute to on-site or off-site flooding. Therefore, impacts in this respect would be comparable and less than significant under either the proposed Plan or the No Project Alternative.

Under implementation of either the proposed Plan or the No Project Alternative, an increase in impervious surfaces could result in an increase in stormwater runoff that could exceed the capacity of existing or planned stormwater drainage systems; however, compliance with applicable local, regional, and federal regulations would serve to ensure that impacts remain less than significant. Such compliance would be mandatory irrespective of which alternative is selected. Although regional and local regulations and policies would apply irrespective of which alternative is chosen, as noted previously, the No Project Alternative would not incorporate the proposed Plan's new requirements for open space and stormwater retention features that would serve to decrease runoff. Therefore, the potential for impacts to stormwater capacity would be greater under the No Project Alternative.

Implementation of either the proposed Plan or the No Project Alternative would not result in significant impacts related to substantial degradation of water quality. As required by City and County stormwater management guidelines, BMPs would be required for development projects allowed under both the proposed Plan and the No Project Alternative during both construction and operation of future projects. These BMPs would control and prevent the release of sediment, debris, and other pollutants into the storm drain system. Additional requirements include the incorporation of site design, source control, and treatment control measures to treat and control runoff before it enters the storm drain system. Although regional and local regulations and policies would apply irrespective of which alternative is chosen, as noted previously, the No Project Alternative would not incorporate the proposed Plan's new requirements for open space and stormwater retention features that would serve to decrease runoff. Therefore, the potential for substantial degradation of water quality would be greater under the No Project Alternative.

Implementation of either the proposed Plan or the No Project Alternative would not result in impacts relating to placing housing within a 100-year flood hazard area. The Plan Area is outside the 100-year floodplain, with the exception of a very small portion of the southeast corner of the site. However, no housing would be placed within a 100-year flood hazard area and there would thus be no impact associated

with either the proposed Plan or the No Project Alternative. Therefore, under either the proposed Plan or the No Project Alternative, housing-related flood impacts would be comparable and less than significant.

Implementation of either the proposed Plan or the No Project Alternative would not result in significant impacts related to exposure of people or structures to a significant risk of loss, injury, or death involving flooding, including flooding as a result of the failure of a levee or dam. Although portions of the Plan Area lie within the potential inundation zones of several nearby dams, dam inundation zones are based on the highly unlikely scenario of a total catastrophic dam failure occurring in a very short period of time. The City of Campbell and Santa Clara County have never been impacted by a major dam failure, and existing State and local regulations address the potential for flood hazards as a result of dam failure. However, under the No Project Alternative, fewer people would be exposed to the potential of risk of dam inundation. Therefore, while impacts in this respect would be less than significant, they would be slightly lower under the No Project Alternative.

Implementation of either the proposed Plan or the No Project Alternative would not result in significant impacts related to seiche, tsunami, or mudflow. Although the Plan Area lies downstream of significant lakes and reservoirs and is located adjacent to percolation ponds, the Bay Area has not been adversely affected by seiches, despite its history of seismic activity.[3] Absent of catastrophic dam failure, seiches in upstream reservoirs would be unlikely to result in significant downstream flooding, and the adjacent percolation ponds include steep sides and typically low water levels that would generally preclude significant seiches. The Plan Area is not located within the limits of an existing or historical landslide or debris flow zone, according to the ABAG mapping site.[4] In addition, the Plan Area is not within a tsunami inundation zone.[5] Given that implementation of neither the proposed Plan nor the No Project Alternative would result in significant risks from tsunami, seiche, or mudflow, the impacts would be comparable and less than significant.

No significant cumulative impacts with respect to hydrology or water quality would result from implementation of either the proposed Plan or the No Project Alternative. As described above, compliance with local, regional, and federal regulations related to development construction and operations would serve to reduce hydrological and water quality impacts to less than significant levels. These regulations are crafted to ensure overall water quality in local and regional waterways; therefore, comprehensive compliance with these policies serves to prevent cumulative impacts. Given these considerations, the cumulative impacts would be comparable and less than significant under implementation of either the proposed Plan or the No Project Alternative.

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[3] US Army Corps of Engineers, San Francisco District, Port of Oakland, 2000, *Oakland Harbor Navigation Improvement (-50 foot) Project SCH No. 97072051 Final Environmental Impact Statement/Report*.

[4] Association of Bay Area Governments (ABAG), 2014. *Landslide Maps and Information.* Accessed on August 27, 2014 at http://quake.abag.ca.gov/landslides/.

[5] ABAG, 2014. *Interactive Tsunami Inundation Map.* Accessed on August 27, 2014 at http://gis.abag.ca.gov/website/Hazards/?hlyr=tsunami.

Neither the proposed Plan nor the No Project Alternative would result in significant hydrology or water quality impacts; however, the No Project Alternative would result in fewer opportunities to improve stormwater management techniques, compared to the proposed Plan. Therefore, impacts under the No Project Alternative would thus be *slightly increased* compared to those under the proposed Plan.

5.5.2.9 LAND USE AND PLANNING

Section 4.9, Land Use and Planning, found that under implementation of the proposed Plan, less than significant impacts would occur under all four standards of significance (LAND-1,2, 3, and 4).

Neither the proposed Plan nor the No Project Alternative would physically divide an established community. The Plan Area as a whole, except for its western portion, is physically separated from surrounding neighborhoods by roadways and natural features that serve as existing physical barriers between the Plan Area and nearby areas. These existing barriers would remain under either the proposed Plan or the No Project Alternative; however, under the proposed Plan some of these existing barriers could be partly overcome, such as through new roadway connections and the creation of a promenade to better integrate the Plan Area with adjacent waterways. Development and design standards under the proposed Plan would serve to ensure that new mixed-use development along Winchester Boulevard would not create new physical barriers between the Plan Area and surrounding neighborhoods; therefore, these potential impacts would not differ substantially from those under the No Project Alternative. Furthermore, neither the proposed Plan nor the No Project Alternative call for physical structures or features that would divide the established communities within the Plan Area. Given these considerations, impacts to physical separation would be somewhat ameliorated under the proposed Plan, as compared to the No Project Alternative.

Implementation of the No Project Alternative would have no impacts with regard to conflicts with existing city-level land use plans, policies, or regulations, whereas implementation of the proposed Plan would result in potential impacts in this regard. Since the No Project Alternative would by definition continue existing policies and land uses, no conflict would occur at the local level. As discussed in Section 4.9, the proposed Plan is consistent with the overall policy framework of the General Plan, and the proposed Plan itself incorporates a General Plan amendment to further ensure consistency. Additionally, the proposed Plan was found to be consistent with Campbell's Municipal Code, Streetscape Standards, Housing Element, and Guidelines and Standards for Land Uses Near Streams. The proposed Plan was found to be consistent with the San Tomas Area Neighborhood Plan (STANP). Although a portion of the Plan Area would also fall into the area covered by the STANP, the parcels involved are excepted from the STANP due to their zoning designation and due to their location. The proposed Plan was also found to be consistent with Plan Bay Area, since it would concentrate new housing and jobs in and near a designated PDA and anticipated transit station. The No Project Alternative would be less consistent with Plan Bay Area, since it would leave existing land uses in place, thereby discouraging job and residential growth in an area expected to be served by future transit. Given the fact that the proposed Plan is in conflict with the STANP, the No Project Alternative is considered a slight improvement compared to the proposed Plan.

Neither the proposed Plan nor the No Project Alternative would conflict with an applicable Habitat Conservation Plan (HCP). The SCVHP study area encompasses a small portion of the Plan Area, the SCVWD's desilting ponds. Implementation of either the proposed Plan or the No Project Alternative would not trigger construction of new buildings or structures on the SCVWD's desilting ponds. In addition, the SCVWD would continue to maintain the desilting ponds following the provisions of the SCVHP. As discussed above, neither the proposed Plan nor the No Project Alternative would conflict with any applicable land use plans, policies, or regulations, as amended for consistency. Neither alternative would physically divide an existing community, nor would they conflict with an adopted conservation plan. No other cumulative projects are located in the immediate Plan Area vicinity that would, in combination with the proposed Plan or No Project Alternative, divide a surrounding neighborhood or create a policy conflict. Therefore, under implementation of the proposed Plan or the No Project Alternative, cumulative land use and planning impacts would be comparable.

Neither the proposed Plan nor the No Project Alternative would result in significant impacts with regard to land use and planning; therefore, impacts would be considered *similar*.

5.5.2.10 NOISE

Section 4.10, Noise, found that under implementation of the proposed Plan, less than significant impacts would occur under six standards of significance (NOISE-1, 3, 4, 5, 6, and 7), with significant impacts occurring under one standard of significance (NOISE-2). This significant impact would be mitigated to a level of less than significant through Mitigation Measure NOISE-2.

Neither the proposed Plan nor the No Project Alternative would result in the generation of excessive noise or the exposure of sensitive receptors to noise in excess of applicable standards or regulations. Under implementation of the proposed Plan, new residential uses would be required to adhere to applicable State and local standards for interior and exterior noise levels; the No Project Alternative would not include any new residential uses that would be subject to such standards. Both the proposed Plan and the No Project Alternative would continue to permit land uses with similar potential to generate excessive noise, and in both cases, existing regulations, including General Plan policies and Municipal Code provisions, would continue to apply, thereby ensuring that excessive noise is not generated. Given these considerations, impacts relating to the generation or reception of excessive noise would be comparable and less than significant under implementation of either the proposed Plan or the No Project Alternative.

Implementation of either the proposed Plan or the No Project Alternative would have the potential to expose persons to or generate excessive vibration or groundborne noise. Between the proposed Plan and the No Project Alternative, allowed land uses and future construction activities would have a similar potential to result in excessive vibration. However, in the case of the proposed Plan, implementation of Mitigation Measure NOISE-2 would serve to reduce this impact to a less-than-significant level, whereas under the No Project Alternative, this mitigation measure would not be in place for future construction.

Given these considerations, impacts regarding vibration and groundborne noise would be somewhat ameliorated under the proposed Plan, as compared to the No Project Alternative.

Under implementation of either the proposed Plan or the No Project Alternative, impacts related to substantial permanent increases to ambient noise levels would be less than significant. Between the proposed Plan and the No Project Alternative, allowed land uses would have a similar potential to result in excessive generation of noise, and in neither case would operations-related noise from land uses be anticipated to result in substantial permanent increases to ambient noise levels. Section 4.10 found that implementation of the proposed Plan would not result in substantial increases to ambient noise as a result of increased traffic. Given that the anticipated amount of traffic would be even lower under the No Project Alternative than under the proposed Plan, traffic-related substantial permanent increases to ambient noise levels would not be expected in either case. Therefore, under implementation of the proposed Plan or the No Project Alternative, noise impacts relating to substantial permanent increases to ambient noise levels would be comparable and less than significant.

With adherence to applicable regulations, impacts related to substantial temporary or periodic increases to ambient noise levels would be less than significant under implementation of either the proposed Plan or the No Project Alternative. Construction noise varies considerably based on site conditions, the distance to sensitive receptors, and the equipment used. Nevertheless, through adherence to relevant provisions of the Campbell Municipal Code, including limitations on construction hours and City discretion to regulate specific construction activities, such impacts would be reduced to a level of less than significant. Therefore, under implementation of the proposed Plan or the No Project Alternative, noise impacts relating to substantial temporary or periodic increases to ambient noise levels would be comparable and less than significant.

Since the Plan Area is not located in close proximity to a public use airport, a private use airport or airstrip, or a heliport, less than significant impacts or no impacts would occur in this respect under either the proposed Plan or the No Project Alternative. With regard to cumulative noise impacts, the measurement and regulation of noise inherently includes cumulative assessment since various sources of sound combine to create the overall noise level at any particular location. Similarly, projected permanent increases ambient noise levels incorporated projected traffic volumes that accounted for regional growth. Therefore, under implementation of the proposed Plan or the No Project Alternative, cumulative noise impacts would be comparable at a level of less than significant.

Given these considerations, under implementation of either the proposed Plan or the No Project Alternative, impacts related to excessive noise and vibration would be *comparable* and less than significant.

5.5.2.11 POPULATION AND HOUSING

Section 4.11, Population and Housing, found that under implementation of the proposed Plan, less than significant impacts would occur under all four standards of significance.

Implementation of either the proposed Plan or the No Project Alternative would not induce substantial unexpected population growth or growth for which inadequate planning has occurred. As discussed in Section 4.11, anticipated future development under the proposed Plan would result in 726 new residents and 7,394 net new jobs. These increases in jobs and residents are consistent with planned population increases for Campbell within Priority Development Areas (PDAs) established by ABAG/MTC pursuant to Plan Bay Area. Under the No Project Alternative, there would be no potential for residential growth and greatly reduced potential for employment growth within the Plan Area. Therefore, impacts related to unanticipated or unplanned growth would be less than significant and comparable under implementation of either the proposed Plan or the No Project Alternative.

Implementation of either the proposed Plan or the No Project Alternative would not result in the displacement of substantial numbers of existing housing or people. Future development allowed by the proposed Plan would result in a net gain of 300 housing units and would not displace existing housing or people through redevelopment. Under the No Project Alternative, any development or redevelopment under existing land uses and intensities would also not displace existing housing or people. Therefore, under implementation of either the proposed Plan or the No Project Alternative, impacts in these respects would be comparable and less than significant.

Implementation of either the proposed Plan or the No Project Alternative would not result in significant cumulative impacts with regard to population and housing in the area. As discussed in Section 4.11, the cumulative population increase from the proposed Plan and nearby projects in Los Gatos would be 1,611, which is less than 14 percent of ABAG anticipated population increase of 11,938, for Campbell and Los Gatos from 2010 to 2040. Under the No Project Alternative, residential growth would not occur in the Plan Area, resulting in even lower cumulative growth. Therefore, cumulative population growth would not exceed planned levels under either the proposed Plan or the No Project Alternative. As discussed in Section 4.11, cumulative projects, including the proposed Plan, would generate a total of 10,408 new jobs within Campbell and Los Gatos. Given that ABAG projects an additional 13,260 jobs will be added in Campbell and Los Gatos between 2010 and 2040, cumulative projects, including the proposed Plan, would be within the total projected job growth by 2040. Under the No Project Alternative, potential for employment growth within the Plan Area would be substantially reduced, resulting in even lower cumulative growth. Therefore, under either the proposed Plan or the No Project Alternative cumulative impacts with respect to unexpected population growth would be comparable and less than significant.

Neither the proposed Plan nor the No Project Alternative would result in significant impacts related to Population and Housing. Therefore, potential impacts under the No Project Alternative would be *similar* to those under the proposed Plan.

5.5.2.12 PUBLIC SERVICES AND RECREATION

Section 4.12, Public Services and Recreation, found that under implementation of the proposed Plan, adherence to existing policies and programs would ensure that impacts under all twelve standards of significance would be less than significant.

Implementation of either the proposed Plan or the No Project Alternative would not result in impacts or cumulative impacts arising from the provision of or need for new or physically altered fire protection facilities. The SCCFD has confirmed that the existing facilities, equipment, and staffing levels would be adequate to accommodate growth allowed by the proposed Plan.[6] The cumulative setting for fire protection services takes into account growth allowed by the proposed Plan, in combination with growth projected by the ABAG in the service area of the SCCFD, which includes the cities of Campbell, Los Altos, Monte Sereno, and Saratoga, and towns of Los Altos Hills and Los Gatos. Given that employment and residential growth potential would be lower under the No Project Alternative, fire service needs and potential for attendant impacts would thereby be reduced. Compliance with the State and local regulations, in conjunction with SCCFD's planning processes, would ensure that future growth allowed by either the proposed Plan or the No Project Alternative would result in comparable less than significant impacts and cumulative impacts in this respect.

Implementation of either the proposed Plan or the No Project Alternative would not result in impacts or cumulative impacts arising from the provision of or need for new or physically altered police protection facilities. The Campbell Police Department (CPD) has confirmed that future development allowed by the proposed Plan would not result in the need for expansion or addition of facilities.[7] The cumulative setting for police protection services takes into account growth allowed by the proposed Plan, in combination with cumulative projects in Campbell (see Table 4-1). Given that employment and residential growth potential would be lower under the No Project Alternative, police service needs and the potential for attendant impacts would thereby be reduced. Based on confirmation by the Campbell Police Department, along with compliance with the General Plan policies discussed in Section 4.12, future growth allowed by either the proposed Plan or the No Project Alternative would result in comparable less than significant impacts and cumulative impacts in this respect.

Implementation of either the proposed Plan or the No Project Alternative would not result in impacts or cumulative impacts arising from the provision of or need for new or physically altered school facilities. As discussed in Section 4.12, the payment of school fees is deemed to fully mitigate the impacts of new development on school facilities, per California Government Code Section 65995. Additionally, given that no residential growth is anticipated under the No Project Alternative, it would result in an even lower potential impact to schools or school facilities. Cumulative projects would add new students to the CUSD

[6] Stocksick, Debbie, Operations Captain, Santa Clara County Fire Department. Personal communication with Travis Bradley, PlaceWorks, July 29,2014.

[7] Cefalu, Joe. Captain, City of Campbell Police Department. Personal email communications with Travis Bradley, PlaceWorks, July 28, 2014.

and CUHSD in addition to those generated by development allowed by the proposed Plan or the No Project Alternative, which could result in the need for new or expanded school facilities. However, these cumulative projects would also be subject to the school mitigation fees discussed above. Therefore, implementation of either the proposed Plan or the No Project Alternative would result in comparable, less than significant impacts and cumulative impacts related to the Campbell Union School District (CUSD) and the Campbell Union High School District (CUHSD).

Implementation of either the proposed Plan or the No Project Alternative would not result in impacts or cumulative impacts arising from the provision of or need for new or physically altered library facilities. As discussed in Section 4.12, buildout allowed by the proposed Plan would occur over the 2040 buildout horizon, which would result in a gradual increase in demand for library services. Given that the increased use of the library facilities would be gradual, the additional new library users in the Plan Area would not likely cause or accelerate the need for facility expansion.[8] Additionally, given that no residential growth is anticipated under the No Project Alternative, it would result in an even lower potential impact to library facilities. With regard to cumulative impacts, future growth within the Santa Clara County Library District (SCCLD) will increase the demand for library services and facilities. The Santa Clara County Library Strategic Plan accounts for the entire SCCLD service area and provides a basis for analyzing the most efficient allocation of funds both for the district as a whole as well as among the different libraries in the SCCLD service area. This would not only allow for adequate funding to satisfy demand at the Campbell Community Library, but would also ensure that surrounding libraries are adequate to fulfill demand, which in turn would reduce the demand at the Campbell Community Library by reducing deficiencies at surrounding facilities. Overall, compliance with General Plan policies related to library services and coordination with the SCCLD would avoid the need for new or physically altered library facilities. Therefore, implementation of either the proposed Plan or the No Project Alternative would result in comparable, less than significant impacts and cumulative impacts related to library facilities.

Implementation of either the proposed Plan or the No Project Alternative would not result in impacts or cumulative impacts arising from the provision of or need for new or physically altered park and recreation facilities. As discussed in Section 4.12, development allowed by the proposed Plan could bring 726 new residents to the city, thereby increasing use of existing parkland. Adding 726 new residents to the city's existing population, the City of Campbell would still be in compliance with the adopted City standard with a parkland ratio of 6.3 acres parkland per 1,000 residents.[9] Therefore, the creation of additional parkland acreage would not be required to serve development allowed by the proposed Plan. Additionally, given that lessened employment growth and no residential growth are anticipated under the No Project Alternative, it would result in an even lower potential for impacts to park and recreation facilities. Future development under either the proposed Plan or the No Project Alternative would be required to comply with requirements for developers to pay impact fees to maintain existing parks and recreation facilities, as well as

[8] Griffen, Chuck, Financial and Administrative Services Manager, Personal Communications with Travis Bradley, PlaceWorks, July 23, 2014.

[9] 40,027 existing population + 726 new residents = 40,753 new population. 258 acres / 40,753 population x 1,000 residents = 6.3 acres per 1,000 residents

requirements for residential developments to dedicate parklands or pay in-lieu fees to accommodate and offset their fair share of impacts to parklands. Therefore, implementation of either the proposed Plan or the No Project Alternative would result in comparable, less than significant impacts and cumulative impacts related to new or physically altered park and recreation facilities.

Implementation of either the proposed Plan or the No Project Alternative would not result in impacts or cumulative impacts arising from increased use of existing neighborhood and regional parks or other recreational facilities, such that substantial physical deterioration of the facility would occur, or be accelerated. As discussed in Section 4.12, an increase to population would occur as result of development allowed by the proposed Plan, thereby increasing the use of existing neighborhood and regional parks or other recreational facilities. However, developers would be required to pay impact fees to mitigate potential impacts to existing parklands and recreation facilities. The payment of fees would serve to mitigate impacts to existing parklands and recreation facilities as a result of growth allowed by the proposed Plan. New development allowed by the proposed Plan may also include the development of on-site open space that could help to offset or reduce potential use of existing parkland. Given that lessened employment growth and no residential growth are anticipated under the No Project Alternative, it would result in an even lower potential for impacts to park and recreation facilities. Future development under either the proposed Plan or the No Project Alternative would be required to comply with requirements for developers to pay impact fees to maintain existing parks and recreation facilities, as well as requirements for residential developments to dedicate parklands or pay in-lieu fees to accommodate and offset their fair share of impacts to parklands. Therefore, implementation of either the proposed Plan or the No Project Alternative would result in comparable, less than significant impacts and cumulative impacts related to physical deterioration of park or recreation facilities.

Implementation of either the proposed Plan or the No Project Alternative would not result in impacts or cumulative impacts arising from inclusion or required construction or expansion of recreational facilities. As discussed above, the City currently meets its adopted standard of providing 4 acres of parkland per 1,000 residents, and would continue to meet this standard with development allowed by the proposed Plan. New development allowed by the proposed Plan may also include the development of on-site open space that could help to offset or reduce potential use of existing parkland. Given that lessened employment growth and no residential growth are anticipated under the No Project Alternative, it would result in an even lower potential for impacts to park and recreation facilities. Future development under either the proposed Plan or the No Project Alternative would be required to comply with requirements for developers to pay impact fees to maintain existing parks and recreation facilities, as well as requirements for residential developments to dedicate parklands or pay in-lieu fees to accommodate and offset their fair share of impacts to parklands. Therefore, implementation of either the proposed Plan or the No Project Alternative would result in comparable, less than significant impacts and cumulative impacts related to inclusion or required construction or expansion of recreation facilities.

Neither the proposed Plan nor the No Project Alternative would result in significant impacts related to provision of public services. Therefore, potential impacts under the No Project Alternative would be *similar* to those under the proposed Plan.

5.5.2.13 TRANSPORTATION AND TRAFFIC

Section 4.13, Transportation and Traffic, found that under implementation of the proposed Plan, less-than-significant impacts would occur under five standards of significance (TRAF-3 through TRAF-7) , with significant impacts occurring under three standards of significance (TRAF-1, TRAF-2, and TRAF-8). With implementation of Mitigation Measures TRAF-1a through TRAF 1-f and TRAF 8a through TRAF-8z, impacts under these three thresholds would remain significant and unavoidable.

Implementation of either the proposed Plan or the No Project Alternative would not conflict with an applicable plan, ordinance, or policy establishing measures of effectiveness for the performance of the circulation system with respect to alternative forms of transportation. The proposed Plan would include circulation and pedestrian improvements that would be consistent with local and regional goals regarding transportation alternatives. Since the No Project Alternative would continue existing land uses, connectivity, and applicable plans, it would not result in direct actions that conflict with alternative transportation goals. Nevertheless, since the No Project Alternative would not include new mechanisms to create transit connections or bicycle or pedestrian infrastructure, it would not serve to help implement these goals. Therefore, in this respect, impacts under the No Project Alternative, although less than significant, would represent a slight deterioration from the proposed Plan.

Table 5-3 summarizes the intersection impacts of the proposed Plan and the alternatives to the proposed Plan. No Project Alternative conditions are analyzed in Chapter 4.13 as Cumulative I conditions. As shown in Table 5-3, the No Project Alternative would result in less-than-significant impacts for the following seven intersections that would operate at unacceptable levels under the proposed Plan:

5. Winchester Boulevard/Sunnyoaks Avenue (AM peak hour)
6. Winchester Boulevard/Hacienda Avenue (AM and PM peak hour)
8. Hacienda Avenue/Dell Avenue (AM and PM peak hour)
14. Winchester Boulevard/Knowles Drive (PM peak hour)
15. Winchester Boulevard/SR 85 Northbound Ramps (PM peak hour)
16. Winchester Boulevard/SR 85 Southbound Ramps (AM peak hour)
23. Winchester Boulevard/Daves Avenue (PM peak hour)

Although, in comparison to operations under the proposed Plan, the No Project Alternative would improve operations at the intersections listed above, the No Project Alternative would result in deficient operations at 10 intersections. Therefore, although the No Project Alternative would result in improved traffic impacts, the alternative would not avoid all of the significant and unavoidable impacts of the proposed Plan and would represent a slight improvement over proposed Plan conditions.

TABLE 5-3 COMPARISON OF PROPOSED PLAN AND ALTERNATIVE INTERSECTION IMPACTS

	Significant Impact before Mitigation? (Yes/No)			
Intersection	Proposed Plan	No Project Alternative	Reduced Development Alternative	No DAAP-West
1. San Tomas Expressway/Hamilton Ave	Yes	Yes	Yes	Yes
2. San Tomas Expressway/Campbell Ave	Yes	Yes	Yes	Yes
3. San Tomas Expressway/SR 17 SB Ramps	Yes	Yes	Yes	Yes
4. Camden Ave/White Oaks Rd-Curtner Ave	Yes	Yes	Yes	Yes
5. Winchester Blvd/West Sunnyoaks Ave	Yes	**No**	**No**	Yes
6. Winchester Blvd/Hacienda Ave	Yes	**No**	Yes	Yes
7. East Sunnyoaks Ave/Dell Ave	Yes*	Yes*	Yes*	Yes*
8. Hacienda Ave/Dell Ave	Yes*	**No**	Yes*	Yes*
9. Bascom Ave/Curtner Ave	No	No	No	No
10. Bascom Ave/Camden Ave	Yes	Yes	Yes	Yes
11. SR 85 NB Ramp/Bascom Ave	No	No	No	No
12. SR 85 SB Ramp/Bascom Ave	No	No	No	No
13. Bascom Ave/Samaritan Dr	No	No	No	No
14. Winchester Blvd/Knowles Dr	Yes	**No**	Yes	Yes
15. Winchester Blvd/SR 85 NB Ramps	Yes	**No**	Yes	Yes
16. Winchester Blvd/SR 85 SB Ramps	Yes	**No**	**No**	Yes
17. Winchester Blvd/Albright Way-Courtside Dr	No	No	No	No
18. Winchester Blvd/Wimbledon Dr	Yes	Yes	Yes	Yes
19. Winchester Blvd/Lark Ave	Yes*	Yes*	Yes*	Yes*
20. Lark Ave/SR 17 SB Ramps	Yes	Yes	Yes	Yes
21. Lark Ave/SR 17 NB Ramps	No	No	No	No
22. Lark Ave/Los Gatos Blvd	No	No	No	No
23. Winchester Blvd/Daves Ave	Yes	**No**	Yes	Yes
24. Blossom Hill Rd/Santa Cruz Ave-Winchester Blvd	Yes	Yes	Yes	Yes
25. Santa Cruz Ave/Los Gatos-Saratoga Rd	No	No	No	No
26. Los Gatos-Saratoga Rd/University Ave	Yes	Yes	Yes	Yes
27. Los Gatos Blvd/Los Gatos-Saratoga Rd	No	No	No	No
28. Santa Cruz Ave/Main St	No	No	No	No

BOLD = Alternative would operate at acceptable levels for an intersections operating at unacceptable levels under the proposed Plan.
* = Significant impact would be reduced to less-than-significant level with mitigation.
Source: W-Trans, 2014.

Implementation of either the proposed Plan or the No Project Alternative would not substantially increase hazards due to a design feature or result in inadequate emergency access. When roadway modifications are proposed under either the proposed Plan or the No Project Alternative, such modifications would need to go through an independent review process to determine that the modifications conform with design standards and requirements. Thus, as long as all applicable design standards requirements are followed, implementation of either the proposed Plan or the No Project Alternative would result in comparable less than significant impacts in these respects.

Implementation of either the proposed Plan or the No Project Alternative would not result in changes to air traffic patterns or a substantial under-supply of parking. The proposed Plan does not affect the location, design, or operation of any of the region's airports. While the new air travel demand potentially generated by development allowed by the proposed Plan has not been estimated, it is not expected to cause any of the region's airports to reach or exceed operational capacity. Since the No Project Alternative would not feature any net increase in residents or workers in the area, it would also not impact area air traffic. Projects developed under the proposed Plan or limited redevelopment occurring under the No Project Alternative would be subject to the parking rates and requirements in the Municipal Code. Projects under the proposed Plan would be encouraged to incorporate the parking management strategies outlined in the Plan. Therefore, the impact with respect to parking would be less than significant and comparable under either the proposed Plan or the No Project Alternative.

Overall, the No Project Alternative would result in *a slight improvement* in comparison to the proposed Plan.

5.5.2.14 UTILITIES AND SERVICE SYSTEMS

Section 4.14, Utilities and Service Systems, found that under implementation of the proposed Plan, less than significant impacts would occur under all 13 standards of significance.

Under implementation of either the proposed Plan or the No Project Alternative, sufficient water supplies would be available from existing entitlements. As discussed in Section 4.14, the San Jose Water Company's (SJWC) Water Supply Assessment (WSA) concluded there will be adequate water supplies to meet projected increased demands associated with development under the proposed Plan. The SJWC has supply flexibility in meeting the increase in water demand projected under the proposed Plan, due to its variety of available water supply sources, ongoing coordination with the SCVWD, increasing water conservation efforts, and water supply contingency planning. Since the No Project Alternative would result in reduced residential and employment growth in the Plan Area, adequate water supplies would likewise exist for this alternative. Given that water demand would be lower under the No Project Alternative, the impact on water resources would be a slight improvement compared to the proposed Plan.

Implementation of neither the proposed Plan nor the No Project Alternative would require or result in the construction of new water facilities or expansion of existing facilities. As discussed above, the water demand associated with the proposed Plan would be served with available and planned water supplies provided by SJWC. Thus, any facility construction or expansion would be included in the UWMPs adopted by the SJWC

and the SCVWD. Planned construction and expansion projects would be the responsibility of the SJWC or the SCVWD at the time they are proposed, and potential impacts would be subject to independent environmental review. Additionally, as discussed in Section 4.14, future development under the proposed Plan or the No Project Alternative would be located within an already developed urban area and, therefore, would connect to the existing water distribution system. Given any future construction/expansion of water infrastructure would be the responsibility of SJWC/SCVWD, comparable less than significant impacts would occur under either the proposed Plan or the No Project Alternative.

Implementation of either the proposed Plan or the No Project Alternative would not result in cumulative impacts to the water supply. While development under the proposed Plan would contribute to an increased cumulative demand for water supply, the increased demand would not exceed the long-term supply under normal hydrologic circumstances, as discussed above. Additionally, SJWCs 2010 UWMP determined that the water supply will be sufficient to accommodate future demand in the SJWC service areas through 2035 (and 2040, by extrapolation), under normal conditions and during dry conditions, with appropriate conservation measures. Since the No Project Alternative would result in decreased potential for residential and employment growth, impacts with respect to water supply under this alternative would also be less than significant. With additional adherence with applicable local, regional, and State regulations, policies, and other considerations, cumulative impacts with respect to water supply would be comparable and less than significant under the proposed Plan or the No Project Alternative.

Implementation of either the proposed Plan or the No Project Alternative would not exceed wastewater treatment requirements of the applicable RWQCB. As discussed in Section 4.14, increases in wastewater generation associated with buildout of the proposed Plan would not be significant relative to currently available excess treatment capacity. In addition, the very conservatively estimated wastewater generation for the proposed Plan will be less than the currently estimated excess capacity in the West Valley Sanitation District (WVSD) collection system, even before planned improvements to the system. Additionally, with continued compliance with applicable regulations, projected wastewater generated from potential future development under the proposed Plan would not exceed the wastewater treatment requirements or capacity of the San Jose/Santa Clara Water Pollution Control Plant (SJ/SCWPCP). Given that the No Project Alternative would result in reduced potential residential and employment growth, demands on sanitary systems would be even less than under the proposed Plan, also resulting in a less-than-significant impact. Therefore, with regard to exceeding wastewater treatment requirements, comparable less than significant impacts would occur under either the proposed Plan or the No Project Alternative.

Implementation of either the proposed Plan or the No Project Alternative would not require or result in the construction of new wastewater treatment facilities or expansion of existing facilities. As discussed above and in Section 4.14, future wastewater demands from development under either the proposed Plan or the No Project Alternative would not exceed the design or permitted capacity of the wastewater treatment plant serving the proposed Plan. Development under the proposed Plan or the No Project Alternative would continue to be provided with wastewater collection and treatment services from the WVSD collection system and the SJ/SCWPCP treatment plant. Existing infrastructure would be preserved in place

and, if necessary, extensions and/or additions to sewer collection systems would be installed to provide wastewater service to structures proposed by the Plan. As discussed in Section 4.14, although creation of new or expanded sanitary system infrastructure could create environmental effects, compliance with applicable regulations and standard conditions of approval would serve to mitigate any potential adverse physical effects of these activities. Impacts from any future construction or expansion of wastewater facilities would be project-specific, and would require permitting and review in accordance with CEQA, which would ensure that any environmental impacts are disclosed and mitigated to the extent possible. Given that the No Project Alternative would result in reduced potential residential and employment growth, demands on sanitary systems would be even less than under the proposed Plan, making construction or expansion of facilities less likely, and therefore also resulting in a less-than-significant impact. Therefore, with regard to the need to construct or expand wastewater facilities, comparable less than significant impacts would occur under either the proposed Plan or the No Project Alternative.

Implementation of either the proposed Plan or the No Project Alternative would not result in a determination by the wastewater treatment provider that it does not have adequate capacity to serve the Plan's projected demand in addition to the provider's existing commitments. As discussed in Section 4.14, the proposed Plan's worst-case estimated increase in wastewater flow represents less than 2 percent of the excess capacity available at the SJ/SCWPCP. Additionally, with continued compliance with applicable regulations listed below, wastewater generated from the proposed Plan would not exceed the permitted capacity of the SJ/SCWPCP treatment plant. As discussed above, the No Project Alternative would result in decreased potential for residential and employment growth, which would reduce potential future generation of wastewater. Therefore, in this respect, implementation of either the proposed Plan or the No Project Alternative would result in comparable less than significant impacts relating to capacity determinations by the wastewater treatment provider.

Implementation of either the proposed Plan or the No Project Alternative, in combination with past, present, and reasonably foreseeable projects, would not result in significant cumulative impacts with respect to wastewater treatment. As discussed in Section 4.14, buildout of the proposed Plan would generate a moderate 2 percent increase in the volume of wastewater delivered for treatment at SJ/SCWPCP, and this increase would occur incrementally until the 2040 buildout horizon. Based on the recent trends of diminishing wastewater treatment demand and the projected population growth in the service area, cumulative wastewater treatment demand over the proposed Plan buildout period is far below the excess capacity of the SJ/SCWPCP. Because the cumulative demand would not substantially impact the existing or planned capacity of the wastewater treatment systems, which have sufficient capacity for wastewater than would be produced by the proposed Plan, the construction of new wastewater treatment facilities would not be necessary. As discussed above, the No Project Alternative would result in decreased potential for residential and employment growth, which would reduce potential future generation of wastewater. Therefore, implementation of either the proposed Plan or the No Project Alternative would result in comparable less than significant cumulative impacts relating to wastewater treatment.

Implementation of the proposed Plan would require construction of new storm drainage facilities to accommodate future development; however, all storm water retention and conveyance facilities would be constructed in compliance with federal, State, and local regulations, including metering of flow, and would therefore not result in cumulative impacts related to storm drainage. The Plan Area is largely developed and almost entirely covered with building roofs, hardscapes, or paved surface parking lots, with the exception of landscaped areas. Additionally, the Plan Area is already served by existing storm drainage facilities. Given that the No Project Alternative would result in decreased potential for residential and employment growth, there would be no increased need to expand or construct storm drainage facilities beyond that which would occur under the proposed Plan. Moreover, environmental impacts resulting from individual projects related to expansion or construction of stormwater drainage would be project-specific, and would require permitting and review in accordance with CEQA, which would ensure that any environmental impacts are disclosed and mitigated to the extent possible. Impacts related to provision of storm drainage facilities are typically localized, since the purpose of such systems is to convey stormwater to nearby waterways or floodways. In the case of the Plan Area, storm drainage facilities would convey water to nearby percolation ponds and Los Gatos Creek. As discussed above and in Section 4.11-8, Hydrology and Water Quality, neither the proposed Plan nor the No Project Alternative is anticipated to result in significant increases in stormwater runoff with the potential to affect storm drainage facilities beyond the Plan Area. Therefore, implementation of either the proposed Plan or the No Project Alternative would result in comparable less than significant project-specific or cumulative impacts relating to storm drainage facilities.

Under implementation of either the proposed Plan or the No Project Alternative, future development would be served by a landfill with sufficient permitted capacity to accommodate anticipated solid waste disposal needs. As discussed in Section 4.14, solid waste generated from implementation of the proposed Plan would account for less than 1 percent of the daily capacity at the Monterey Peninsula Landfill. Given that the No Project Alternative would result in reduced potential residential and employment growth, the need for landfill capacity would be reduced under the No Project Alternative. As such, implementation of the proposed Plan or the No Project Alternative would have comparable less than significant impacts with regard to daily capacity at each of the two main landfill facilities serving the city. The two landfills that receive the majority of the city's solid waste are likely to reach their permitted maximum capacities between 2048 and 2107, respectively, as shown in the Table 4.14-8. As such, there is more than adequate landfill capacity for the solid waste generated by implementation of either the proposed Plan or the No Project Alternative. In addition, there are 13 other landfills that received waste from the city in 2013. In the event that one or both of the landfills currently receiving waste from the city was unable to continue in that capacity, it is likely that another landfill would be able to provide capacity. Additionally, with continued compliance with applicable regulations leading to increased recycling and waste diversion, anticipated rates of solid waste disposal from the proposed Plan or the No Project Alternative would likely decrease, further diminishing impacts in regard to permitted landfill capacity. Therefore, implementation of either the proposed Plan or the No Project Alternative would result in comparable less than significant impacts relating to solid waste disposal.

Implementation of either the proposed Plan or the No Project Alternative would comply with federal, State, and local statutes and regulations related to solid waste. As discussed in Section 4.14, the City of Campbell has complied with State requirements to reduce the volume of solid waste through recycling and reuse of solid waste. The General Plan includes goals, policies, and strategies that promote recycling and conservation, and help ensure adequate waste collection and disposal facilities are available for the residents and workers of Campbell. Together these policies and actions help to ensure that implementation of either the proposed Plan or the No Project Alternative would be consistent with statutes and regulations related to solid waste, and would thus result in comparable less than significant impacts in this regard.

Implementation of either the proposed Plan or the No Project Alternative, in combination with past, present, and reasonably foreseeable development, would not result significant cumulative impacts with respect to solid waste. The buildout of the proposed Plan will increase the quantity of solid waste for disposal. Since the two landfill facilities that take approximately 97 percent of the city's solid waste (in 2013) are not expected to close until between 2048 and 2107, respectively, it is unlikely that Campbell or other jurisdictions that use the same facilities will eventually experience insufficient future landfill capacity to accommodate existing or increased population and employment levels before the horizon year of the proposed Plan. Given that the No Project Alternative would result in reduced potential residential and employment growth, the need for landfill capacity would be reduced under the No Project Alternative, further diminishing potential cumulative impacts. In addition, there are 13 landfills that received waste from the city in 2013. If one or more of the two landfills currently receiving 97 percent of the waste were unavailable in the future, it is likely the city's solid waste volume could be increased at one or more of the other landfills that already serve the city. Therefore, with continued compliance with applicable regulations, implementation of the proposed Plan or the No Project Alternative, in combination with past, present and reasonably foreseeable development, would result in comparable less than significant impacts with respect to cumulative solid waste disposal impacts.

Implementation of either the proposed Plan or the No Project Alternative would not result in a substantial increase in natural gas and electrical service demands, and would not require new energy supply facilities and transmission infrastructure or capacity enhancing alterations to existing facilities. Under both the proposed Plan and the No Project Alternative, proposed new development would be constructed using energy efficient modern building materials and construction practices. With the implementation of these General Plan Policies and compliance with the CALGreen Building Code and Campbell Green Building Policies, significant energy conservation and savings would be realized in any new development within the Plan Area. Even with the energy saving practices in place, it is possible that new electrical connections, switches and/or transformers might be required to serve new structures and/or handle additional loads in the Plan Area under either the proposed Plan or No Project Alternative. Potential environmental impacts from possible new electrical connections, switches, and/or transformers in the Plan Area are not anticipated to be significant and, to the extent such upgrades may be necessary, their environmental impacts would be evaluated individually, consistent with any overarching improvement plans adopted by energy providers. Given that the No Project Alternative would result in reduced potential residential and employment growth, the need for new electrical or natural gas infrastructure would be reduced under the No Project Alternative,

further diminishing the potential for impacts. In addition, buildout of the proposed Plan or the No Project Alternative would not significantly increase energy demands in the context of the entire PG&E service territory for electricity and natural gas generation, transmission and distribution. As a result, new energy supply facilities and transmission infrastructure, or capacity-enhancing alterations to existing facilities, would not be required as a direct result of the proposed Plan or the No Project Alternative. Therefore, implementation of either the proposed Plan or the No Project Alternative would result in comparable less than significant impacts relating to gas and electrical service demands.

Given these considerations, because the No Project Alternative would not include increases to jobs or residents in the Plan Area, demand on Utilities and Service Systems would be reduced and impacts would therefore represent a *slight improvement* compared to the proposed Plan.

5.6 REDUCED DEVELOPMENT ALTERNATIVE

5.6.1 PRINCIPAL CHARACTERISTICS

Under the Reduced Development Alternative, development would occur consistent with the policies and overarching land use concept of the proposed Plan, with the exception that maximum floor-area ratios (FAR) allowed for new development would be reduced to 0.75 for the DAAP-Central and DAAP-Waterfront areas east of Winchester Boulevard. Under the Reduced Development Alternative, individual development would occur at intensity levels roughly half of what is assumed under the proposed Plan. Under this alternative, individual developments could take advantage of incentive zoning that would permit FARs up to 1.0, provided that certain community benefits are provided and that the overall development program does not exceed development projections established with an assumption that the overall FAR across the Plan Area would not exceed 0.75. Mixed-use residential/retail uses to the west of Winchester would develop in a manner consistent with the proposed Plan. It is projected that this alternative would result in 300 new housing units, 726 net new residents, 1,146,000 square feet of net new office development, a reduction of approximately 6,000 square feet of net retail space, and 3,657 new jobs. The purpose of the Reduced Development Alternative is to explore how potential impacts may be lessened through reductions to both the eventual amount of office space developed and the number of jobs created in the Plan Area. As shown in Table 5-1, this development would generate the following population and employment increases:

- 300 new residents
- -15 net retail jobs
- 3,820 new office jobs
- -148 net R&D jobs
- 3,657 total net jobs

5.6.2 IMPACT DISCUSSION

The Reduced Development Alternative would have the following impacts relative to the proposed Plan.

5.6.2.1 AESTHETICS

Section 4.1, Aesthetics, finds that the proposed Plan would result in less than significant impacts to aesthetics.

The proposed Plan and the Reduced Development Alternative would have comparable impacts with regard to scenic views and vistas. As described in Section 4.1, the Campbell General Plan does not identify any scenic viewpoints within the Plan Area; however, for the purpose of the proposed Plan, the EIR describes the following scenic vistas:

- Southward views along Dell Avenue and Winchester Boulevard of the foothills and ridgelines of the Santa Cruz Mountains.
- Near-field views from the Los Gatos Creek Trail and the roads immediately adjacent to Santa Clara County's percolation ponds.

Under the proposed Plan, development could potentially block or otherwise adversely affect these views, although not formally protected by City ordinance or policy, including through new buildings of up 75 feet in height along Dell Avenue and up to 45 feet in height along the west side of Winchester Boulevard. Under the land use designations of the Campbell General Plan, maximum building heights are 45 feet along Dell Avenue and 75 feet along Winchester Boulevard. Given existing conditions, which include relatively flat topography, existing structures, and large trees, the views identified above are already largely obscured. Structures with the potential to block views could be constructed under the development standards of both the proposed Plan and the Reduced Development Alternative. Although the Reduced Development Alternative would include reduced overall FARs and development capacity, most new structures are still anticipated to be located near or along Dell Avenue. Additionally, irrespective of whether the proposed Plan or the Reduced Development Alternative were implemented, compliance with City policies and regulations regarding aesthetics, including Site and Architectural Review processes, would serve to ensure that new developments do not have substantial adverse effects on scenic views or vistas. Therefore, in this respect, the proposed Plan and the Reduced Development Alternative would result in comparable less than significant impacts.

There are no State-designated scenic highways in the vicinity of the Plan Area. Therefore, no impact to scenic resources visible from a State Scenic Highway would occur with the implementation of either the proposed Plan or the Reduced Development Alternative. Therefore, in this respect, the proposed Plan and the Reduced Development Alternative would result in comparable impacts.

With regard to the degradation of existing visual character, comparable impacts would occur under implementation of either the proposed Plan or the Reduced Development Alternative. In the portions of the Plan Area to both the east and west of Winchester Boulevard, the current visual character is not particularly unique or distinguished, with no architecture or landscaping that would be regarded as noteworthy. The Reduced Development Alternative would adopt the same land uses, policies, and regulations related to aesthetics, with the exception of lower overall FAR. Any future development under the proposed Plan or the Reduced Development Alternative would be required to comply with existing General Plan policies and development standards that serve to protect and enhance aesthetic character. The proposed Plan and the Reduced Development Alternative would also allow new structures and uses that would be subject to additional policies that would emphasize pedestrian-oriented development, improved streetscapes, and greater connectivity. Encouraging new development that complied with both new and existing policies would serve to enhance the visual character of the Plan Area. Although the creation of new mixed-use residential along the west side of Winchester Boulevard could lead to potential visual impacts on adjacent residences, the setback, step-back, and screening requirements included in the proposed Plan and Reduced Development Alternative would serve to prevent or substantially lessen such visual impacts to adjacent residences. In some cases, such as where existing structures are immediately adjacent to the property line, views from adjacent residences may be improved under the proposed Plan or the Reduced Development Alternative. Therefore, in this respect, the proposed Plan and the Reduced Development Alternative would result in comparable less than significant impacts.

Under implementation of either the proposed Plan or the Reduced Development Alternative, impacts related to new sources of light or glare would be less than significant. In either case, new developments would be required to comply with the standards set forth in Section 21.16.060 of the Municipal Code regarding restriction on new sources of light and glare. Additionally, the Campbell General Plan contains policies to reduce impacts from excessive lighting and glare, including light overflow to adjacent properties. These policies and regulations would apply to development under either the proposed Plan or the Reduced Development Alternative. Therefore, in this respect, the proposed Plan and the Reduced Development Alternative would result in comparable less than significant impacts.

Given these considerations, the potential aesthetic impacts under the Reduced Development Alternative would be substantially *similar* to those under the proposed Plan.

5.6.2.2 AIR QUALITY

Section 4.2, Air Quality, found that under implementation of the proposed Plan, less than significant impacts would occur under two standards of significance (AIR-1 and AIR 5) , with significant impacts occurring under four standards of significance (AIR-2,3, 4, and 6). Significant impact AIR-4 would be mitigated to a level of less than significant through Mitigation Measure AIR-4a; however, significant Impacts AIR-2, 3, and 6 would remain significant and unavoidable.

Implementation of either the proposed Plan or the Reduced Development Alternative would not conflict with or obstruct implementation of the applicable air quality plan. Implementation of the proposed Plan would not violate the ambient air quality standards (AAQS) of the 2010 Bay Area Clean Air Plan, in part since residential and employment growth anticipated under the proposed Plan would be consistent with regional growth projections. The Reduced Development Alternative, since it would result in lower employment growth would therefore also comply with the AAQS. Adherence to BAAQMD regulations would ensure that new sources of TACs do not expose populations to significant health risk. Adherence to Mitigation Measure AQ-4 would ensure that the proposed Plan would reduce population exposure and protect public health consistent with the 2010 Bay Area Clean Air Plan. As discussed in Section 4.6, implementation of the proposed Plan would not result in significant impacts with regard to GHG emissions, and compliance with local and State regulations would further ensure that the proposed Plan is consistent with 2010 Bay Area Clean Air Plan goals relating to GHG emissions and climate change. The Reduced Development Alternative would incorporate the same policies and programs of the proposed Plan that would be consistent with the applicable control measures of the AQMPs. Furthermore, the Reduced Development Alternative would not disrupt or hinder any AQMP control measures. With regard to projections for VMT, population, and employment, since the Reduced Development Alternative would implement the same general land uses and policies as the proposed Plan (albeit with lower potential employment growth), it would not conflict with regional projections. Therefore, neither the proposed Plan nor the Reduced Development Alternative would conflict with or obstruct implementation of the applicable air quality plan, and comparable less than significant impacts would occur in this regard.

Implementation of either the proposed Plan or the Reduced Development Alternative would potentially violate an air quality standard or contribute substantially to an existing or projected air quality violation. Due to the SFBAAB's nonattainment status for ozone and PM and the cumulative impacts of growth on air quality, long-range plans (including the proposed Plan or the Reduced Development Alternative) almost always have significant, unavoidable adverse air quality impacts. With regard to operational emissions, as discussed in Section 4.2, buildout of the proposed Plan would generate a substantial increase in criteria air pollutant emissions that exceeds the BAAQMD regional significance thresholds (ROG, NO_x, and PM_{10}). Although the Reduced Development Alternative would result in lower levels of criteria air pollutant emissions than the proposed Plan, it would still potentially result in violations of regional air standards, as illustrated in the existing conditions analysis in Section 4.2, Table 4.2-8. As discussed in Section 4.2, even with implementation of Mitigation Measures AQ-2a through AQ-2c, this impact would remain significant and unavoidable. Therefore, implementation of either the proposed Plan or the Reduced Development Alternative could result violation of air quality standards or contributions to existing violations; however, since the Reduced Development Alternative would serve to reduce the number and/or degree of such violations, the impacts would represent a slight improvement over the proposed Plan.

Implementation of either the proposed Plan or the Reduced Development Alternative would result in a cumulatively considerable net increase of any criteria pollutant for which the project region is in nonattainment under an applicable federal or State ambient air quality standard. The San Francisco Bay Area Air Basin (SFBAAB) is currently designated a nonattainment area for California and National O_3, California

and National $PM_{2.5}$, and California PM_{10} AAQS. Any project that produces a significant regional air quality impact in an area that is in nonattainment adds to the cumulative impact. As discussed previously and in Section 4.2, both the proposed Plan and the Reduced Development Alternative would have the potential to contribute to violations of air quality standards through continued and increased pollutant emissions. Although neither the proposed Plan nor the Reduced Development Alternative would conflict with the 2010 Bay Area Clean Air Plan, they would both generate a substantial increase in criteria air pollutant emissions from construction and operational activities. Consequently, cumulative regional air quality impacts are also significant. As discussed in Section 4.2, even with implementation of Mitigation Measures AQ-2a through AQ-2c, this impact would remain significant and unavoidable. Therefore, since implementation of either the proposed Plan or the Reduced Development Alternative would result in a cumulatively considerable net increase of certain criteria pollutants, impacts would be comparable and significant.

Implementation of either the proposed Plan or the Reduced Development Alternative would expose sensitive receptors to substantial concentrations of air pollution. Areas of vehicle congestion have the potential to create pockets of CO, called hotspots. Under existing and future vehicle emission rates, a project would have to increase traffic volumes at a single intersection by more than 44,000 vehicles per hour—or 24,000 vehicles per hour where vertical and/or horizontal mixing is substantially limited—in order to generate a significant CO impact.[10] The Reduced Development Alternative would result in fewer vehicle trips and less traffic than the proposed Plan, since it would generate fewer new jobs. Thus, neither the proposed Plan nor the Reduced Development Alternative would increase traffic volumes at affected intersections by more than 44,000 vehicles per hour or 24,000 vehicles per hour in areas prone to CO hotspots. Therefore, neither the proposed Plan nor the Reduced Development Alternative would have the potential to substantially increase CO hotspots at intersections in the Plan Area and vicinity. As discussed in Section 4.2, the proposed Plan would also not create new major sources of Toxic Air Contaminants (TACs). Since the Reduced Development Alternative would include similar types of commercial/industrial land uses, it would likewise not create any new major sources of TACs. However, both the proposed Plan and the Reduced Development Alternative would introduce new sensitive land uses near existing sources of TACs. Future projects containing sensitive receptors within 1,000 feet of major sources of TACs would need to ensure that they could achieve BAAQMD's performance standards. With application of Mitigation Measure AQ-4a under the proposed Plan or the Reduced Development Alternative, developments containing sensitive receptors would be required to conduct additional study to establish that levels of pollution from TACs do not exceed acceptable levels. Therefore, since implementation of either the proposed Plan or the Reduced Development Alternative would not expose sensitive receptors to substantial concentrations of air pollution, impacts would be comparable and less than significant.

Implementation of either the proposed Plan or the Reduced Development Alternative would not create or expose a substantial number of people to objectionable odors. As discussed in Section 4.2, no existing sources within the Plan Area are currently considered to generate nuisance odors. Buildout of the proposed

[10] Bay Area Air Quality Management District (BAAQMD), 2011 (Revised), *CEQA Air Quality Guidelines*.

Plan or the Reduced Development Alternative would result in conversion of the auto-repair facilities west of Winchester Boulevard to residential uses, which would further reduce the potential of odor complaints from painting/coating operations. Implementation of either the proposed Plan or the Reduced Development Alternative would not involve land uses that generate substantial odors such as from composting, green waste, and recycling operations; food processing; chemical manufacturing; and painting/coating operations. Furthermore, BAAQMD Regulation 7, Odorous Substances, requires abatement of any nuisance generating an odor complaint. Therefore, because existing sources of odors are required to comply with BAAQMD Regulation 7, impacts in this regard would be comparable and less than significant under implementation of either alternative.

As described above, regional air quality impacts were identified as significant under implementation of either the proposed Plan or the Reduced Development Alternative; therefore, in combination with past, present, and reasonably foreseeable projects, both the proposed Plan and the Reduced Development Alternative would result in a significant cumulative impact with respect to air quality, even with implementation of applicable regulations as well as mitigation measures described in Section 4.2. Therefore, cumulative air quality impacts would be comparable and significant under either alternative.

Both the proposed Plan and the Reduced Development Alternative would result in significant impacts with regard to air quality. Although the decreased potential for employment growth under the Reduced Development Alternative would result in lower air quality impacts in certain respects, this would be insufficient to prevent these impacts. Neither the proposed Plan nor the Reduced Development Alternative could avoid or mitigate all impacts. Therefore, the Reduced Development Alternative would have *similar* impacts with regard to Air Quality as compared to the proposed Plan.

5.6.2.3 BIOLOGICAL RESOURCES

Section 4.3, Biological Resources, found that under implementation of the proposed Plan, less than significant impacts would occur under four standards of significance (BIO-4, 6, and 7), with significant impacts occurring under three standards of significance (BIO-1, 2, 3, and 5). All three of these significant impacts would be mitigated to a level of less than significant through Mitigation Measures BIO-1, 2, 3, and 5.

With regard to substantial adverse effects to special-status species, potential impacts could occur under implementation of either the proposed Plan or the Reduced Development Alternative; however, given the larger amount of development that is anticipated to occur under the proposed Plan, it would result in a greater potential for such impacts. Although the Plan Area is already mostly built out with urbanized land uses, remaining trees, landscaped areas, and structures could provide habitat for special-status species. Birds, including species such as Cooper's hawk, could use such areas for nesting, dispersal, and other functions. Mitigation Measure BIO-1 would serve to address these potential impacts by requiring: pre-construction surveys for nests and special-status species; cessation of nearby construction activities in the event that special-status species or active nests are discovered; and potential protection and construction work

exclusion zones for active nests. Through implementation of Mitigation Measure BIO-1 under either the proposed Plan or the Reduced Development Alternative, the impact would be reduced to a level of less than significant. Nevertheless, since implementation of the Reduced Development Alternative would result in lesser amounts of development, it would result in reduced potential for impacts to special-status species compared to the proposed Plan.

With regard to substantial adverse effects on riparian habitat or other sensitive natural communities, although the Plan Area is already mostly built out with urbanized land uses and does not itself include any riparian or sensitive habitat areas, future development in the Plan Area could have indirect impacts on such areas, including those that occur adjacent to the Plan Area, along Los Gatos Creek. Given that the total area of development and/or impervious or disturbed surfaces is anticipated to be roughly equivalent under the proposed Plan or the Reduced Development Alternative, the potential for indirect impacts would be roughly equivalent. The Campbell General Plan includes specific policies relating to the preservation of riparian corridors, development near riparian corridors, coordination with the SCVWD, and use of native plantings. Compliance with applicable local, State, and federal regulations would serve to reduce impacts to sensitive habitat. Additionally, Mitigation Measure BIO-2 would serve to further reduce potential indirect impacts by requiring native plantings be used to reduce potential for invasive species and runoff of fertilizers, pesticides, and herbicides. Additionally, as discussed in Section 4.8, Hydrology and Water Quality, redevelopment under the proposed Plan would likely result in decreased stormwater and pollutant runoff relative to existing conditions, through implementation of vegetative swales and water-efficient landscaping required by other regulations. Therefore, implementation of either the proposed Plan or the Reduced Development Alternative would result in roughly equivalent less than significant impacts in this respect.

As discussed above, although implementation of the proposed Plan or the Reduced Development Alternative could have indirect effects on adjacent wetlands, such effects would be avoided or reduced through compliance with General Plan policies, including those related to runoff, drainage facilities, and construction practices, as well as through implementation of stormwater best management practices (BMPs) during construction and operation of new developments. As discussed in Section 4.8, Hydrology and Water Quality, the proposed Plan is not anticipated to result in significant impacts with respect of water quality, erosion, or siltation—any of which could have indirect impacts on wetlands. Nevertheless, outside of the Plan Area boundary, the proposed Plan and the Reduced Development Alternative incorporate recommended construction of new pedestrian crossings across the engineered channel that runs adjacent to the Plan Area. The construction of these crossings could impact federally protected wetlands; however, the planning and construction of the pedestrian crossings would be subject to relevant permit processes, mitigation requirements, and fee payments, and would also be subject to independent CEQA review. Since creation of these crossings could take place under either the proposed Plan or the Reduced Development Alternative, and since construction of these crossings would be subject to independent reviews, impacts in this regard would be comparable under the two alternatives. Moreover, implementation of Mitigation Measures BIO-2 and BIO-3 under the proposed Plan or the Reduced Development Alternative would serve to reduce associated impacts to less than significant. Therefore, indirect impacts to wetlands would be similar under both the proposed Plan and the Reduced Development Alternative.

Neither the proposed Plan nor the Reduced Development Alternative would be anticipated to interfere substantially with wildlife movements, corridors, or nursery sites. As discussed above, the Plan Area is highly urbanized, and there are no wildlife corridors or nursery sites within the Plan Area. Wildlife species common to urban and suburban habitat could be displaced where existing structures are demolished and landscaping is removed as part of future development, but these species are relatively abundant, and adapted to human disturbance. Additionally, both the proposed Plan and the Reduced Development Alternative would result in development that would include new landscaping features and open space areas that could provide wildlife habitat or movement corridors. Therefore implementation of either the proposed Plan or the Reduced Development Alternative would result in comparable less than significant impacts in this respect.

Neither the proposed Plan nor the Reduced Development Alternative would conflict with local ordinances protecting biological resources, or with adopted Habitat Conservation Plan, Natural Community Conservation Plan, or other conservation plans. However, both the proposed Plan and the Reduced Development Alternative could conflict with General Plan Policy CNR-3.1. Implementation of either alternative would be undertaken in compliance with applicable local, regional, and State policies and regulations—including Campbell's Protected Tree Ordinance under Chapter 21.32 of the Campbell Municipal Code. The Plan Area includes a small portion of the Study Area for the SCVHP, specifically the SCVWD desilting ponds immediately adjacent to Dell Avenue. Neither the proposed Plan nor the Reduced Development Alternative would permit new structures on this site, and SCVWD would continue to maintain the desilting ponds following the provisions of the SCVHP. Under either the proposed Plan or the Reduced Development Alternative, two pedestrian crossings may be constructed over the engineered channel that runs adjacent to the Plan Area, which could conflict with General Plan Policy CNR-3.1, requiring the preservation of riparian habitat. Mitigation Measure BIO-5 would serve to address these potential impacts by requiring Best Management Practices to avoid and protect riparian habitat. Through implementation of Mitigation Measure BIO-5 under either the proposed Plan or the Reduced Development Alternative, the impact would be reduced to a level of less than significant. Therefore implementation of either the proposed Plan or the Reduced Development Alternative would result in comparable less than significant impacts in this respect.

No significant cumulative impacts with respect to biological resources would result from implementation of either the proposed Plan or the Reduced Development Alternative. The potential impacts of proposed development on biological resources tend to be site-specific, and the overall cumulative effects would largely depend on the degree to which significant vegetation and wildlife resources are protected on a particular site. Nevertheless, development can contribute to fragmentation or incremental reduction of wildlife habitat, particularly for birds and larger mammals. However, given that the entirety of Plan Area is urbanized and/or has been subject to human disturbance, the potential for site-specific or cumulative impacts is minimal. As described above, compliance with local, State, and federal regulations, including policies of the Campbell General Plan, as well as implementation of applicable mitigation measures, would serve to reduce direct and indirect impacts to less than significant levels, thus precluding cumulative

impacts. Therefore, under implementation of either the proposed Plan or the Reduced Development Alternative, impacts in this respect would be comparable and less than significant.

Given these considerations, biological impacts under the Reduced Development Alternative would represent a *slight improvement* compared to those under the proposed Plan.

5.6.2.4 CULTURAL RESOURCES

Section 4.4, Cultural Resources, found that under implementation of the proposed Plan, significant impacts could occur under two standards of significance (CULT-2 and CULT-3), with less than significant impacts occurring under CULT-1, CULT-4, and CULT-5, Cumulative Impacts. All of the potentially significant impacts would be mitigated to a level of less than significant through Mitigation Measures CULT-2 and 3.

Development under either the proposed Plan or the Reduced Development Alternative would have the potential to result in substantial adverse changes in the significance of historical resources, archaeological resources, and/or unique paleontological resources or geologic features. It is also possible that development could potentially disturb human remains, including those interred outside of formal cemeteries. Historical resources encompass both architectural and archeological resources; however, the Plan Area does not include any known structures that would meet historical criteria. Although there are no known cultural resources in the Plan Area, it is possible that archaeological, paleontological, or geologic resources could be present underground, in either open or developed areas. Potential impacts to such resources would be reduced to a level of less than significant through implementation of Mitigation Measures CULT-2 and 3. In the event significant cultural resources were discovered, these measures would require construction personnel to cease activities, contact appropriate experts and officials, and take other appropriate steps to protect and preserve those resources, whether those resources are preserved on-site or moved off-site. Additionally, Section 4.4 finds that applicable regulations, procedures, and policies would ensure that any human remains discovered during construction allowed by either the proposed Plan or the Reduced Development Alternative would be handled appropriately. Given that impacts to cultural resources are usually site specific, that the Plan Area is located within and is itself a highly urbanized area, and since potential impacts would be mitigated, no cumulative impacts would result.

Therefore, given that the potential for disturbance is substantially lower under the Reduced Development Alternative, potential impacts would be *slightly reduced* compared to those under the proposed Plan.

5.6.2.5 GEOLOGY AND SOILS

Section 4.5, Geology, Soils, and Seismicity, found that under implementation of the proposed Plan, adherence to existing regulations and policies would ensure that impacts under all six standards of significance would be less than significant.

Neither the proposed Plan nor the Reduced Development Alternative would result in the exposure of people or structures to substantial adverse effects relating to seismic risks, including surface rupture, strong

ground shaking, ground failure (including liquefaction), or landslides. Since the Plan Area does not contain any known faults and associated Alquist-Priolo zones, the risk of surface rupture in the area is regarded as minimal. Nevertheless, earthquakes along nearby faults could result in "very strong" ground shaking or liquefaction in the Plan Area. Since the topography of the Plan Area is mostly flat, seismically induced landslides are not likely. Despite these seismic risks, adherence to local and State regulations and policies would reduce the risk to people and structures to a less-than-significant level. However, given that the increase in the number of employees and residents in the Plan Area would be lower under the Reduced Development Alternative, its implementation would result in lower impacts as fewer people would be subject to seismic risks in the Plan Area.

The Campbell General Plan and Campbell Municipal Code Section 21.18.130, Seismic and Geologic Hazards, would require future developments to evaluate and incorporate appropriate site-preparation and construction techniques to protect structures and their occupants during seismic events. Municipal Code Section 21.18.130 requires development projects both adhere to the uniform and CBC, and undertake geotechnical studies, as appropriate per official geological hazards maps used by the City. The recommendations of such geotechnical studies become the standards of review and must therefore be incorporated into proposed developments. Since these policies would apply irrespective of whether the proposed Plan or the Reduced Development Alternative were implemented, impacts related to seismic risks would be comparable and less than significant.

Neither the proposed Plan nor the Reduced Development Alternative would result in substantial soil erosion or the loss of topsoil. Future development would be required to comply with existing regulations, including grading erosion control measures specified in the California Building Code, Appendix J, Grading. Campbell Municipal Code Section 21.18.130 and Section 18.04.010 require compliance with the California Building Code. Therefore, impacts to soil erosion and loss of topsoil would be comparable and less than significant under implementation of either the proposed Plan or the Reduced Development Alternative.

Neither the proposed Plan nor the Reduced Development Alternative would result in a significant impact related to development on unstable geologic units and soils or result in on- or off-site landslide, lateral spreading, subsidence, liquefaction, or collapse. Certain portions of the Plan Area, most notably those nearest to Los Gatos Creek, may be at risk of liquefaction or other ground failure. Nevertheless, as discussed above, Campbell Municipal Code Section 21.18.130, would require developments to evaluate and incorporate appropriate site-preparation and construction techniques to protect structures and their occupants from geological and soils-related hazards. Compliance with the Municipal Code under either alternative would thus reduce this impact to a level of less than significant. Therefore, impacts resulting from unstable geological units would be comparable and less than significant under implementation of either the proposed Plan or the Reduced Development Alternative.

Neither the proposed Plan nor the Reduced Development Alternative would result in a significant impact related to expansive soils. Although expansive soils could potentially be present in the Plan Area, available information does not indicate that such is the case. If a particular development site were shown to have

expansive soils, compliance with the California Building Code, as mandated by Campbell Municipal Code Section 21.18.130 and Section 18.04.010, would require proposed developments to evaluate and incorporate appropriate site-preparation and construction techniques to address hazards related to expansive soils. (Chapter 18 of the California Building Code contains standards and construction techniques related to expansive soils.) Compliance with the Municipal Code and California Building Code under either alternative would thus reduce this impact to a level of less than significant. Therefore, impacts resulting from expansive soils would be comparable and less than significant under implementation of either the proposed Plan or the Reduced Development Alternative.

Construction allowed by either the proposed Plan or the Reduced Development Alternative would not require the use of septic tanks or alternative wastewater disposal systems. Wastewater would be discharged into the existing public sanitary sewer system in the Plan Area, which is serviced by the West Valley Sanitation District. As such, there would be no impact from development at sites where soils may not be capable of supporting the use of septic tanks or alternative wastewater disposal systems. Therefore, impacts resulting from septic tanks or alternative wastewater disposal systems would be comparable and less than significant under implementation of either the proposed Plan or the Reduced Development Alternative.

No significant cumulative impacts with respect to geology, soils, or seismicity would result from implementation of either the proposed Plan or the Reduced Development Alternative. Potential impacts related to seismic, geologic, and soils hazards, as well as septic tanks and alternative waste disposal, are all site specific and do not contribute to cumulative effects. With regard to erosion and loss of top soil, neither the proposed Plan nor the Reduced Development Alternative would result in impacts that would contribute to a cumulative effect. As described above, compliance with local, State, and federal regulations, including policies of the Campbell General Plan, would serve to reduce erosion and soil loss impacts to less than significant levels, thus precluding cumulative impacts. Therefore, implementation of either the proposed Plan or the Reduced Development Alternative would result in comparable less than significant impacts in this respect.

Given the fact that future development under the Reduced Development Alternative would reduce the number of employees and residents within the Plan Area, thereby exposing fewer people to seismic hazards impacts under the Reduced Development Alternative would represent a *slight improvement* compared to those under the proposed Plan.

5.6.2.6 GREENHOUSE GAS EMISSIONS

Section 4.6, Greenhouse Gas Emissions, found that under implementation of the proposed Plan, less than significant impacts would occur with respect to all impact criteria, including generation of GHG emissions; conflicts with applicable plans, policies, or regulations; and cumulative impacts. An individual project on its own does not generate enough GHG emissions to influence global climate change; therefore, analysis of GHG emissions inherently considers a project's contribution to a cumulative environmental impact, and no further cumulative analysis is required.

Implementation of the proposed Plan or the Reduced Development Alternative would not directly or indirectly generate GHG emissions that would have a significant effect on the environment. GHG emissions from future construction activities within the Plan Area are not subject to any thresholds of significance, and represent one-time, short-term emissions. Therefore, these emissions are assumed to not significantly contribute to the GHG emissions impacts under either the proposed Plan or the Reduced Development Alternative. As shown in Table 4.6-5, the net increase of GHG emissions generated by the operational phase of the proposed Plan would exceed BAAQMD's bright-line standards of significance of 1,100 $MTCO_2e$; therefore, GHG emissions impacts are evaluated based on the Project efficiency. As identified in Table 4.6-5, the proposed Plan would not exceed the BAAQMD performance criterion of 4.6 $MTCO_2e/SP$. Furthermore, the proposed Plan would result in an improved efficiency compared to existing conditions. Since the Reduced Development Alternative would include the same policies and programs related to alternative transportation, increased connectivity, and open space, among others, it would be likely to achieve similar efficiency levels to the proposed Plan.

As discussed in Section 4.6, the proposed Plan would comply with applicable plans, policies and regulations for the purpose of reducing GHGs; since the Reduced Development Alternative would include the same policies and overarching land uses as the proposed Plan, it would likewise comply with these regional plans. The two GHG reduction plans that are applicable to the Plan Area are the CARB Scoping Plan and ABAG/MTC's Plan Bay Area. Both the proposed Plan and the Reduced Development Alternative would be consistent with CARB's scoping plan, since the majority of its provisions are reflected in State and local regulations and programs, with which future developments must comply. For example, new development in the Plan Area would be subject to the requirements of Title 24, California's building energy efficiency standards, as well as the City of Campbell's WELO. Given these considerations, impacts under the Reduced Development Alternative would be substantially *similar* to those under the proposed Plan with respect to GHG emissions.

5.6.2.7 HAZARDS AND HAZARDOUS MATERIALS

Section 4.7, Hazards and Hazardous Materials, found that under implementation of the proposed Plan, adherence to existing regulations and policies would ensure that impacts under four of the nine standards of significance (HAZ-1, 2, 4, 7, and 9) would be less than significant; there would be no impact under standards of significance HAZ-3,5, 6, and 8.

Implementation of either the proposed Plan or Reduced Development Alternative would not create a significant hazard to the public or the environment through the routine transport, use, or disposal of hazardous materials. Neither the proposed Plan nor the Reduced Development Alternative includes changes to regulatory standards for handling, transport, storage, use, disposal, or disruption of hazardous materials. Although implementation of either the proposed Plan or the Reduced Development Alternative could involve use of commercially available hazardous materials (e.g., fuels, solvents, paints, and some consumer electronics) for construction projects, as well as generation of small amounts of hazardous waste from allowed use, the waste would be handled in accordance with applicable federal, State, and local laws,

policies, and regulations, as described in Section 4.7.1.1, Regulatory Framework. The Plan Area currently contains, and the proposed Plan and Reduced Development Alternative would allow, office, research and development/light industrial, retail and commercial, and residential land uses. Since industrial and commercial uses are included under either alternative, it is therefore possible that future development could generate significant quantities of hazardous materials. However, in either case, the City of Campbell, the SCCHMCD, and SCCFD would regulate the transport, generation, use, and/or disposal of hazardous materials within the Plan Area, related to either construction or business operations. In addition, the General Plan contains policies and strategies that further ensure that new development would not create a significant hazard to the public or the environment through the routine transport, use, or disposal of hazardous materials. However, under the Reduced Development Alternative, fewer people would be exposed to the transportation and use of hazardous materials. Therefore, while impacts in this respect would be less than significant, they would be slightly lower under the Reduced Development Alternative.

Implementation of either the proposed Plan or Reduced Development Alternative would not create a significant hazard to the public or the environment through reasonably foreseeable upset and accident conditions involving the release of hazardous materials into the environment. Both the proposed Plan and the Reduced Development Alternative would allow new development, including office, research and development/light industrial, residential, and retail and services within the Plan Area. Compliance with existing laws, regulations, policies, and procedures would ensure future development allowed by the proposed Plan or the Reduced Development Alternative would not create a significant hazard to the public or the environment through reasonably foreseeable upset and accident conditions involving the release of hazardous materials into the environment. As described in Section 4.7, these include applicable federal, State, and local laws and regulations regarding handling of these materials; the General Plan policies listed under Impact HAZ-1; and required Stormwater Pollution Prevention Plan and Best Management Practices. However, under the Reduced Development Alternative, fewer people would be exposed to the potential of risk of upset or accidental release and use of hazardous materials. Therefore, while impacts in this respect would be less than significant, they would be slightly lower under the Reduced Development Alternative.

Implementation of either the proposed Plan or Reduced Development Alternative would not create a significant hazard to the public or the environment by being located on a site, which is included on a list of hazardous materials sites compiled pursuance to Government Code Section 65962.5. As discussed in Section 4.7, five sites within the Plan Area and one additional site in near proximity to the Plan Area were identified on lists compiled pursuant to Government Code Section 65962.5. In addition, several sites with LUSTs were identified in the near vicinity of the Plan Area. Based on available information contained variously in the EnviroStor and GeoTracker government databases, as also summarized in Section 4.7.1.2, none of the listed sites appear to create a significant hazard to the public or the environment. In addition, the General Plan contains strategies to address future development on identified hazardous materials sites. Under either the proposed Plan or the Reduced Development Alternative, compliance with applicable federal, State, and local laws and regulations regarding hazardous material sites, as discussed in Section 4.7, would ensure future development would not create a significant hazard to the public or the environment, resulting in comparable less than significant impacts.

Implementation of either the proposed Plan or Reduced Development Alternative would not impair implementation of, or physically interfere with, an adopted emergency response plan or emergency evacuation plan. As discussed in Section 4.7, no physical components of the proposed Plan would interfere with the ability to implement emergency response or evacuation, including provisions of the City of Campbell's Emergency Operations Plan. Since the Reduced Development Alternative would undertake the same new physical components, it would also have a less-than-significant impact upon existing conditions related to emergency response. Consistent with provisions of the 2013 CFC and the 2013 CBC, future developments under either the proposed Plan or the Reduced Development Alternative would include fire and emergency access through all phases of construction and operation, and would be required to incorporate building and life safety measures that serve to facilitate emergency response. Therefore, impacts related to emergency response and evacuation would be less than significant and comparable under implementation of either the proposed Plan or the Reduced Development Alternative.

Given that future development would be lessened under the Reduced Development Alternative, decreasing the number of new employees and potential exposure to hazardous materials within the Plan Area, impacts under the Reduced Development Alternative would therefore be *slightly reduced* compared to the proposed Plan.

5.6.2.8 HYDROLOGY AND WATER QUALITY

Section 4.8, Hydrology and Water Quality, found that under implementation of the proposed Plan, adherence to existing regulations and policies would ensure that impacts under all nine standards of significance would be less than significant.

Development under either the proposed Plan or the Reduced Development Alternative could result in changes to developed areas and impervious surfaces that could affect drainage patterns, runoff, and pollutant levels; but impacts under either alternative are anticipated to be less than significant. Under the proposed Plan and the Reduced Development Alternative, new developments would be subject to requirements for increased open space and stormwater retention features to reduce drainage and pollutant runoff. Under either the proposed Plan or the Reduced Development Alternative, landscaping would be required to comply with the City of Campbell Water Efficient Landscape Ordinance, which would further serve to reduce runoff of water and pollutants. Under either alternative, construction activities within the Plan Area would be required to comply with applicable local, State, and federal requirements to control sedimentation, erosion, and hazardous materials contamination of runoff during construction. Following construction, development operations would be governed by local and regional requirements regarding site design, source control, and treatment measures to manage water quality in stormwater runoff. Required compliance with these measures would ensure that any potential construction and operational impacts to water quality would be comparable and less than significant under either alternative.

Under implementation of either the proposed Plan or the Reduced Development Alternative, less than significant impacts would occur with respect to depletion of groundwater supplies or substantial

interference with groundwater recharge. Future development within the Plan Area could result in an increase in impervious surfaces, which would reduce infiltration and could lead to reduced groundwater recharge. However, as previously described, future development would be located on sites that have already been developed and currently have a high percentage of impervious surfaces. Implementation of the proposed Plan or the Reduced Development Alternative would also result in the incorporation of higher open space standards and new stormwater retention features with the potential to increase infiltration and recharge of groundwater supplies. Although buildout under the proposed Plan or the Reduced Development Alternative could lead to higher demand for water and subsequent increases in groundwater pumping, SCVWD's 2010 UWMP and the San Jose Water Company's 2010 UWMP indicate that there is a sufficient supply of water through 2035 even for multiple dry years.[11] Therefore, with respect to groundwater supply and recharge, the impacts of the proposed Plan versus the Reduced Development Alternative would be comparable and less than significant.

Under implementation of either the proposed Plan or the Reduced Development Alternative, less than significant impacts would occur with respect to substantial alterations of existing drainage patterns. Under either alternative, nearly all of the future development site would be located in areas that are already developed or paved, and new development on these sites would not create a substantial increase in the area of impervious surfaces. All new development and redevelopment projects would be required by local and regional regulations to implement construction phase BMPs, post-construction design measures that encourage infiltration in pervious areas, and post-construction source control measures to help prevent erosion and siltation due to stormwater runoff. With implementation of locally and regionally mandated erosion and sediment control measures and regulatory provisions to limit runoff for new development and redevelopment sites, development allowed by either the proposed Plan or the Reduced Development Alternative would not result in significant increases in erosion and sedimentation or contribute to on-site or off-site flooding. Therefore, impacts in this respect would be comparable and less than significant under either the proposed Plan or the Reduced Development Alternative.

Under implementation of either the proposed Plan or the Reduced Development Alternative, an increase in impervious surfaces could result in an increase in stormwater runoff that could exceed the capacity of existing or planned stormwater drainage systems; however, compliance with applicable local, regional, and federal regulations would serve to ensure that impacts remain less than significant. Such compliance would be mandatory irrespective of which alternative is selected. Therefore, under implementation of either the proposed Plan or the Reduced Development Alternative, impacts to stormwater capacity would be comparable and less than significant.

Implementation of either the proposed Plan or the Reduced Development Alternative would not result in significant impacts related to substantial degradation of water quality. As required by City and County stormwater management guidelines, BMPs would be required for development projects allowed under both the proposed Plan and the Reduced Development Alternative during both construction and operation of

[11] Santa Clara Valley Water District, 2010, *Urban Water Management Plan*.

future projects. These BMPs would control and prevent the release of sediment, debris, and other pollutants into the storm drain system. Additional requirements include the incorporation of site design, source control, and treatment control measures to treat and control runoff before it enters the storm drain system. Therefore, under implementation of either the proposed Plan or the Reduced Development Alternative, impacts related to degradation of water quality would be comparable and less than significant.

Implementation of either the proposed Plan or the Reduced Development Alternative would not result in impacts relating to placing housing within a 100-year flood hazard area. The Plan Area is outside the 100-year floodplain, with the exception of a very small portion of the southeast corner of the site, which is within the 100-year floodplain associated with the Los Gatos Creek. However, no housing would be placed within a 100-year flood hazard area and there would thus be no impact associated with either the proposed Plan or the Reduced Development Alternative. Therefore, under either the proposed Plan or the Reduced Development Alternative, housing-related flood impacts would be comparable and less than significant.

Implementation of either the proposed Plan or the Reduced Development Alternative would not result in significant impacts related to exposure of people or structures to a significant risk of loss, injury, or death involving flooding, including flooding as a result of the failure of a levee or dam. Although portions of the Plan Area lie within the potential inundation zones of several nearby dams, dam inundation zones are based on the highly unlikely scenario of a total catastrophic dam failure occurring in a very short period of time. The City of Campbell and Santa Clara County have never been impacted by a major dam failure, and existing State and local regulations address the potential for flood hazards as a result of dam failure. However, under the Reduced Development Alternative, fewer people would be exposed to the potential of risk of dam inundation. Therefore, while impacts in this respect would be less than significant, they would be slightly lower under the Reduced Development Alternative.

Implementation of either the proposed Plan or the Reduced Development Alternative would not result in significant impacts related to seiche, tsunami, or mudflow. Although the Plan Area lies downstream of significant lakes and reservoirs and is located adjacent to percolation ponds, the Bay Area has not been adversely affected by seiches, despite its history of seismic activity.[12] Absent of catastrophic dam failure, seiches in upstream reservoirs would be unlikely to result in significant downstream flooding, and the adjacent percolation ponds include steep sides and typically low water levels that would generally preclude significant seiches. The Plan Area is not located within the limits of an existing or historical landslide or debris flow zone, according to the ABAG mapping site.[13] In addition, the Plan Area is not within a tsunami inundation zone.[14] Given that implementation of neither the proposed Plan nor the Reduced Development Alternative would result in significant risks from tsunami, seiche, or mudflow, the impacts would be comparable and less than significant.

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[12] US Army Corps of Engineers, San Francisco District, Port of Oakland, 2000, *Oakland Harbor Navigation Improvement (-50 foot) Project SCH No. 97072051 Final Environmental Impact Statement/Report*.

[13] Association of Bay Area Governments (ABAG), 2014. *Landslide Maps and Information.* Accessed on August 27, 2014 at http://quake.abag.ca.gov/landslides/.

[14] ABAG, 2014. *Interactive Tsunami Inundation Map.* Accessed on August 27, 2014 at http://gis.abag.ca.gov/website/Hazards/?hlyr=tsunami.

No significant cumulative impacts with respect to hydrology or water quality would result from implementation of either the proposed Plan or the Reduced Development Alternative. As described above, compliance with local, regional, and federal regulations related to development construction and operations would serve to reduce hydrological and water quality impacts to less than significant levels. These regulations are crafted to ensure overall water quality in local and regional waterways; therefore, comprehensive compliance with these policies serves to prevent cumulative impacts. Given these considerations, the cumulative impacts would be comparable and less than significant under implementation of either the proposed Plan or the Reduced Development Alternative.

Given these considerations, neither the proposed Plan nor the Reduced Development Alternative would result in significant hydrology or water quality impacts. Therefore, impacts under the Reduced Development Alternative would be considered *similar* to those under the proposed Plan.

5.6.2.9 LAND USE AND PLANNING

Section 4.9, Land Use and Planning, found that under implementation of the proposed Plan, less than significant impacts would occur under all four standards of significance (LAND-1,2, 3, and 4).

Neither the proposed Plan nor the Reduced Development Alternative would physically divide an established community. The Plan Area as a whole, except for its western portion, is physically separated from surrounding neighborhoods by roadways and natural features that serve as an existing physical barrier between the Plan Area and nearby areas. These existing barriers would remain under either the proposed Plan or the Reduced Development Alternative. Additionally, under the proposed Plan or the Reduced Development Alternative, some of these existing barriers could be partly overcome, such as through new roadway connections and the creation of a promenade to better integrate the Plan Area with adjacent waterways. Development and design standards under either alternative would serve to ensure that new mixed-use development would not create new physical barriers between the Plan Area and surrounding neighborhoods. Furthermore, neither the proposed Plan nor the No Project Alterative call for physical structures or features that would divide the established communities within the Plan Area. Therefore, under implementation of either the proposed Plan or the Reduced Development Alternative, impacts in this respect would be comparable and less than significant.

Implementation of the proposed Plan or the Reduced Development Alternative would not conflict with existing city-level land use plans, policies, or regulations. As discussed in Section 4.9, the proposed Plan is consistent with the overall policy framework of the General Plan, and the proposed Plan itself incorporates a General Plan amendment to further ensure consistency. Additionally, the proposed Plan was found to be consistent with Campbell's Municipal Code, Streetscape Standards, Housing Element, and Guidelines and Standards for Land Uses near Streams. The proposed Plan was found to be consistent with the STANP and the Reduced Development Alternative would also be consistent with the STANP. Although a portion of the Plan Area would also fall into the area covered by the STANP, the parcels involved are exempted from the STANP due to their zoning designation and due to their location. The proposed Plan was also found to be

consistent with Plan Bay Area, since it would concentrate new housing and jobs in and near a designated PDA and anticipated transit station. Since the Reduced Development Alternative would achieve the same goals, it too would be consistent with Plan Bay Area. Both the proposed Plan and the Reduced Development Alternative would be entirely consistent upon adoption of relevant general and area plan amendments. Therefore, under implementation of either the proposed Plan or the Reduced Development Alternative, impacts in this respect would be comparable and less than significant.

Neither the proposed Plan nor the Reduced Development Alternative would conflict with an applicable HCP. The SCVHP study area encompasses a small portion of the Plan Area, the SCVWD's desilting ponds. Implementation of either the proposed Plan or the Reduced Development Alternative would not trigger construction of new buildings or structures on the SCVWD's desilting ponds. In addition, the SCVWD would continue to maintain the desilting ponds following the provisions of the SCVHP.

As discussed above, neither the proposed Plan nor the Reduced Development Alternative would conflict with any applicable land use plans, policies, or regulations, as amended for consistency. In addition, neither alternative would physically divide an existing community, nor would they conflict with an adopted conservation plan. No other cumulative projects are located in the immediate Plan Area vicinity that would, in combination with the proposed Plan or Reduced Development Alternative, divide a surrounding neighborhood or create a policy conflict. Therefore, under implementation of the proposed Plan or the Reduced Development Alternative, cumulative land use and planning impacts would be comparable.

Given these considerations, under implementation of either the proposed Plan or the Reduced Development Alternative, impacts related to land use and planning would be considered *similar*.

5.6.2.10 NOISE

Section 4.10, Noise, found that under implementation of the proposed Plan, less than significant impacts would occur under six standards of significance (NOISE-1, 3, 4, 5, 6, and 7), with significant impacts occurring under one standard of significance (NOISE-2). This significant impact would be mitigated to a level of less than significant through Mitigation Measure NOISE-2.

Neither the proposed Plan nor the Reduced Development Alternative would result in the generation of excessive noise or the exposure of sensitive receptors to noise in excess of applicable standards or regulations. Under implementation of the proposed Plan or the Reduced Development Alternative, new residential uses would be required to adhere to applicable State and local standards for interior and exterior noise levels. Both the proposed Plan and the Reduced Development Alternative would continue to permit land uses with similar potential to generate excessive noise, and in both cases, existing regulations, including General Plan policies and Municipal Code provisions, would continue to apply, thereby ensuring that excessive noise is not generated. Given these considerations, impacts relating to the generation or reception of excessive noise would be comparable and less than significant under implementation of either the proposed Plan or the Reduced Development Alternative.

Implementation of either the proposed Plan or the Reduced Development Alternative would have the potential to expose persons to or generate excessive vibration or groundborne noise. Between the proposed Plan and the Reduced Development Alternative, allowed land uses and future construction activities would have a similar potential to result in excessive vibration. However, in both cases, implementation of Mitigation Measure NOISE-2 would serve to reduce this impact to a less-than-significant level. Therefore, under implementation of either the proposed Plan or the No Project Alternative, impacts regarding vibration and groundborne noise would be comparable and less than significant.

Under implementation of the either the proposed Plan or the Reduced Development Alternative, impacts related to substantial permanent increases to ambient noise levels would be less than significant. Between the proposed Plan and the Reduced Development Alternative, allowed land uses would have a similar potential to result in excessive generation of noise, and in neither case would operations-related noise from land uses be anticipated to result in substantial permanent increases to ambient noise levels. Section 4.10 found that implementation of the proposed Plan would not result in substantial increases to ambient noise as a result of increased traffic. Given that the anticipated amount of traffic would be even lower under the Reduced Development Alternative than under the proposed Plan, traffic-related substantial permanent increases to ambient noise levels would not be expected in either case. Therefore, under implementation of the proposed Plan or the Reduced Development Alternative, noise impacts relating to substantial permanent increases to ambient noise levels would be comparable and less than significant.

With adherence to applicable regulations, impacts related to substantial temporary or periodic increases to ambient noise levels would be less than significant under implementation of either the proposed Plan or the Reduced Development Alternative. Construction noise varies considerably based on site conditions, the distance to sensitive receptors, and the equipment used. Nevertheless, through adherence to relevant provisions of the Campbell Municipal Code, including limitations on construction hours and City discretion to regulate specific construction activities, such impacts would be reduced to a level of less than significant. Therefore, under implementation of the proposed Plan or the Reduced Development Alternative, noise impacts relating to substantial temporary or periodic increases to ambient noise levels would be comparable and less than significant.

Since the Plan Area is not located in close proximity to a public use airport, a private use airport or airstrip, or a heliport, less than significant impacts or no impacts would occur in this respect under either the proposed Plan or the Reduced Development Alternative. With regard to cumulative noise impacts, the measurement and regulation of noise inherently includes cumulative assessment since various sources of sound combine to create the overall noise level at any particular location. Similarly, projected permanent increases ambient noise levels incorporated projected traffic volumes that accounted for regional growth. Therefore, under implementation of the proposed Plan or the Reduced Development Alternative, cumulative noise impacts would be comparable at a level of less than significant.

Given these considerations, under implementation of either the proposed Plan or the Reduced Development Alternative, impacts related to excessive noise and vibration would be *comparable* and less than significant.

5.6.2.11 POPULATION AND HOUSING

Section 4.11, Population and Housing, found that under implementation of the proposed Plan, less than significant impacts would occur under all four standards of significance.

Implementation of either the proposed Plan or the Reduced Development Alternative would not induce substantial unexpected population growth or growth for which inadequate planning has occurred. As discussed in Section 4.11, anticipated future development under the proposed Plan would result in 726 new residents and 7,394 net new jobs. These increases in jobs and residents are consistent with planned population increases for Campbell within Priority Development Areas (PDAs) established by ABAG/MTC pursuant to Plan Bay Area. Under the Reduced Development Alternative, there would be equivalent potential for residential growth and reduced potential for employment growth within the Plan Area. Therefore, impacts related to unanticipated or unplanned growth would be less than significant and comparable under implementation of either the proposed Plan or the Reduced Development Alternative.

Implementation of either the proposed Plan or the Reduced Development Alternative would not result in the displacement of substantial numbers of existing housing or people. Future development allowed by the proposed Plan or the Reduced Development Alternative would result in a net gain of 300 housing units and would not displace existing housing or people through redevelopment. Therefore, under implementation of either the proposed Plan or the Reduced Development Alternative, impacts in these respects would be comparable and less than significant.

Implementation of either the proposed Plan or the Reduced Development Alternative would not result in significant cumulative impacts with regard to population and housing in the area. As discussed in Section 4.11, the cumulative population increase from the proposed Plan and nearby projects in Los Gatos would be 1,611, which is less than 14 percent of ABAG anticipated population increase of 11,938, for Campbell and Los Gatos from 2010 to 2040. Under the Reduced Development Alternative, residential growth in the Plan Area would occur at the same level as under the proposed Plan, resulting in equivalent cumulative growth. Therefore, cumulative population growth would not exceed planned levels under either the proposed Plan or the Reduced Development Alternative. As discussed in Section 4.11, cumulative projects, including the proposed Plan would generate a total of 10,408 new jobs within Campbell and Los Gatos. Given that ABAG projects an additional 13,260 jobs will be added in Campbell and Los Gatos between 2010 and 2040, cumulative projects, including the proposed Plan, would be within the total projected job growth by 2040. Under the Reduced Development Alternative, potential for employment growth within the Plan Area would be substantially reduced, resulting in even lower cumulative growth. Therefore, under either the proposed Plan or the Reduced Development Alternative cumulative impacts with respect to unexpected population growth would be comparable and less than significant.

Neither the proposed Plan nor the Reduced Development Alternative would result in significant impacts related to Population and Housing. Therefore, potential impacts under the Reduced Development Alternative would be *similar* to those under the proposed Plan.

5.6.2.12 PUBLIC SERVICES AND RECREATION

Section 4.12, Public Services and Recreation, found that under implementation of the proposed Plan, adherence to existing policies and programs would ensure that impacts under all twelve standards of significance would be less than significant.

Implementation of either the proposed Plan or the Reduced Development Alternative would not result in impacts or cumulative impacts arising from the provision of or need for new or physically altered fire protection facilities. The SCCFD has confirmed that the existing facilities, equipment, and staffing levels would be adequate to accommodate growth allowed by the proposed Plan.[15] The cumulative setting for fire protection services takes into account growth allowed by the proposed Plan, in combination with growth projected by ABAG in the service area of the SCCFD, which includes the cities of Campbell, Los Altos, Monte Sereno, and Saratoga, and towns of Los Altos Hills and Los Gatos. Given that employment growth potential would be lower under the Reduced Development Alternative and residential growth potential would be the same, fire service needs and any potential for attendant impacts would thereby be reduced. Compliance with the State and local regulations, in conjunction with SCCFD's planning processes, would ensure that future growth allowed by either the proposed Plan or the Reduced Development Alternative would result in comparable less than significant impacts and cumulative impacts in this respect.

Implementation of either the proposed Plan or the Reduced Development Alternative would not result in impacts or cumulative impacts arising from the provision of or need for new or physically altered police protection facilities. The CPD has confirmed that future development allowed by the proposed Plan would not result in the need for expansion or addition of facilities.[16] The cumulative setting for police protection services takes into account growth allowed by the proposed Plan, in combination with cumulative projects in Campbell (see Table 4-1). Given that employment growth potential would be lower and residential growth potential would be equivalent under the Reduced Development Alternative, police service needs and the potential for attendant impacts would thereby be reduced. Based on confirmation by the Campbell Police Department, along with compliance with the General Plan policies discussed in Section 4.12, future growth allowed by either the proposed Plan or the Reduced Development Alternative would result in comparable less than significant impacts and cumulative impacts in this respect.

Implementation of either the proposed Plan or the Reduced Development Alternative would not result in impacts or cumulative impacts arising from the provision of or need for new or physically altered school

[15] Stocksick, Debbie, Operations Captain, Santa Clara County Fire Department. Personal communication with Travis Bradley, PlaceWorks, July 29,2014.

[16] Cefalu, Joe, Captain, City of Campbell Police Department. Personal email communications with Travis Bradley, PlaceWorks, July 28, 2014

facilities. As discussed in Section 4.12, the payment of school fees is deemed to fully mitigate the impacts of new development on school facilities, per California Government Code Section 65995. Cumulative projects would add new students to the CUSD and CUHSD in addition to those generated by development allowed by the proposed Plan or the Reduced Development Alternative, which could result in the need for new or expanded school facilities. However, these cumulative projects would also be subject to the school mitigation fees discussed above. Therefore, implementation of either the proposed Plan or the Reduced Development Alternative would result in comparable, less than significant impacts and cumulative impacts related to the Campbell Union School District (CUSD) and the Campbell Union High School District (CUHSD).

Implementation of either the proposed Plan or the Reduced Development Alternative would not result in impacts or cumulative impacts arising from the provision of or need for new or physically altered library facilities. As discussed in Section 4.12, buildout allowed by the proposed Plan would occur over the 2040 buildout horizon, which would result in a gradual increase in demand for library services. Given that the increased use of the library facilities would be gradual, the additional new library users in the Plan Area would not likely cause or accelerate the need for facility expansion.[17] With regard to cumulative impacts, future growth within the SCCLD will increase the demand for library services and facilities. The Santa Clara County Library Strategic Plan accounts for the entire SCCLD service area and provides a basis for analyzing the most efficient allocation of funds both for the district as a whole as well as among the different libraries in the SCCLD service area. This would not only allow for adequate funding to satisfy demand at the Campbell Community Library, but would also ensure that surrounding libraries are adequate to fulfill demand, which in turn would reduce the demand at the Campbell Community Library by reducing deficiencies at surrounding facilities. Overall, compliance with General Plan policies related to library services and coordination with the SCCLD would avoid the need for new or physically altered library facilities. Therefore, implementation of either the proposed Plan or the Reduced Development Alternative would result in comparable, less than significant impacts and cumulative impacts related to library facilities.

Implementation of either the proposed Plan or the Reduced Development Alternative would not result in impacts or cumulative impacts arising from the provision of or need for new or physically altered park and recreation facilities. As discussed in Section 4.12, development allowed by the proposed Plan could bring 726 new residents to the city, thereby increasing use of existing parkland. Adding 726 new residents to the city's existing population, the City of Campbell would still be in compliance with the adopted City standard with a parkland ratio of 6.3 acres parkland per 1,000 residents.[18] Therefore, the creation of additional parkland acreage would not be required to serve development allowed by the proposed Plan or the Reduced Development Alternative. Additionally, given that lessened employment growth and equivalent residential growth are anticipated under the Reduced Development Alternative, it would result in an somewhat lower potential for impacts to park and recreation facilities. Future development under either the proposed Plan

[17] Griffen, Chuck, Financial and Administrative Services Manager, Personal Communications with Travis Bradley, PlaceWorks, July 23, 2014.

[18] 40,027 existing population + 726 new residents = 40,753 new population. 258 acres / 40,753 population x 1,000 residents = 6.3 acres per 1,000 residents

or the Reduced Development Alternative would be required to comply with requirements for developers to pay impact fees to maintain existing parks and recreation facilities, as well as requirements for residential developments to dedicate parklands or pay in-lieu fees to accommodate and offset their fair share of impacts to parklands. Therefore, implementation of either the proposed Plan or the Reduced Development Alternative would result in comparable less than significant impacts and cumulative impacts related to new or physically altered park and recreation facilities.

Implementation of either the proposed Plan or the Reduced Development Alternative would not result in impacts or cumulative impacts arising from increased use of existing neighborhood and regional parks or other recreational facilities, such that substantial physical deterioration of the facility would occur, or be accelerated. As discussed in Section 4.12, an increase to population would occur as result of development allowed by the proposed Plan, thereby increasing the use of existing neighborhood and regional parks or other recreational facilities. However, under either the proposed Plan or the Reduced Development Alternative developers would be required to pay impact fees to mitigate potential impacts to existing parklands and recreation facilities as a result of growth allowed by either alternative. New development allowed by the either alternative may also include the development of on-site open space that could help to offset or reduce potential use of existing parkland. Given that lessened employment growth and equivalent residential growth are anticipated under the Reduced Development Alternative, it would result in a somewhat lower potential for impacts to park and recreation facilities. Future development under either the proposed Plan or the Reduced Development Alternative would be required to comply with requirements for developers to pay impact fees to maintain existing parks and recreation facilities, as well as requirements for residential developments to dedicate parklands or pay in-lieu fees to accommodate and offset their fair share of impacts to parklands. Therefore, implementation of either the proposed Plan or the Reduced Development Alternative would result in comparable less than significant impacts and cumulative impacts related to physical deterioration of park or recreation facilities.

Implementation of either the proposed Plan or the Reduced Development Alternative would not result in impacts or cumulative impacts arising from inclusion or required construction or expansion of recreational facilities. As discussed above, the City currently meets its adopted standard of providing 4 acres of parkland per 1,000 residents, and would continue to meet this standard with development allowed by the proposed Plan. New development allowed by the proposed Plan or the Reduced Development Alternative may also include the development of on-site open space that could help to off-set or reduce potential use of existing parkland. Given that lessened employment growth and equivalent residential growth are anticipated under the Reduced Development Alternative, it would result in a somewhat lower potential for impacts to park and recreation facilities. Future development under either the proposed Plan or the Reduced Development Alternative would be required to comply with requirements for developers to pay impact fees to maintain existing parks and recreation facilities, as well as requirements for residential developments to dedicate parklands or pay in-lieu fees to accommodate and offset their fair share of impacts to parklands. Therefore, implementation of either the proposed Plan or the Reduced Development Alternative would result in comparable, less than significant impacts and cumulative impacts related to inclusion or required construction or expansion of recreation facilities.

Neither the proposed Plan nor the Reduced Development Alternative would result in significant impacts related to provision of public services. Therefore, potential impacts under the Reduced Development Alternative would be *similar* to those under the proposed Plan.

5.6.2.13 TRANSPORTATION AND TRAFFIC

As described in Section 4.13, implementation of the proposed Plan would result in less-than-significant impacts under five standards of significance (TRAF-3 through TRAF-7) and significant and unavoidable impacts under three standards of significance (TRAF-1, TRAF-2, and TRAF-8).

Implementation of either the proposed Plan or the Reduced Development Alternative would not conflict with an applicable plan, ordinance or policy establishing measures of effectiveness for the performance of the circulation system with respect to alternative forms of transportation. The proposed Plan and the Reduced Development Alternative would include circulation and pedestrian improvements that would be consistent with local and regional goals regarding transportation alternatives by serving to improve the pedestrian realm and increase connectivity and bicycle and transit access. Therefore, in this respect, impacts under implementation of either the proposed Plan or the Reduced Development Alternative impacts would be comparable and less than significant.

Table 5-3 summarizes the intersection impacts of the proposed Plan and the alternatives to the proposed Plan. As shown in Table 5-3, the Reduced Development Alternative would result in less-than-significant impacts for the following two intersections that would operate at unacceptable levels under the proposed Plan:

5. Winchester Boulevard/Sunnyoaks Avenue (AM peak hour)
16. Winchester Boulevard/SR 85 Southbound Ramps (AM peak hour)

Although, in comparison to operations under the proposed Plan, the Reduced Development Alternative would improve operations at the intersections listed above, the Reduced Development Alternative would result in deficient operations at 16 intersections. The following is a summary of how the proposed mitigation measure would differ from those presented in Section 4.13, Transportation and Traffic. As shown below, 13 of the 16 intersection impacts would be potentially significant and unavoidable.

- **Intersection 1: San Tomas Expressway/Hamilton Avenue**. No change in previously proposed mitigation measure. Based on constraints identified in Section 4.13, the impact would be potentially significant and unavoidable.
- **Intersection 2: San Tomas Expressway/Campbell Ave**. No change in previously proposed mitigation measure. Based on constraints identified in Section 4.13, the impact would be potentially significant and unavoidable.
- **Intersection 3: San Tomas Expressway/SR 17 SB Ramps**. The mitigation measure would be reduced as follows:

  - Southbound: no reduction
  - Eastbound: seven, rather than eight, through lanes, and two right-turn lanes
  - Westbound: no reduction

  Based on constraints identified in Section 4.13, the impact would be potentially significant and unavoidable.

- **Intersection 4: Camden Ave/White Oaks Rd-Curtner Ave**. The mitigation measure would be reduced as follows:
  - Northbound: no reduction
  - Southbound: no reduction
  - Eastbound: no reduction
  - Westbound: two left-turn lanes; five, rather than six, through lanes; and one right-turn lane

  Based on constraints identified in Section 4.13, the impact would be potentially significant and unavoidable.

- **Intersection 6: Winchester Blvd/Hacienda Ave**. The mitigation measure would be reduced as follows:
  - Northbound: no reduction
  - Southbound: one, rather than two, left-turn lanes; two through lanes; and one right-turn lane
  - Eastbound: no reduction
  - Westbound: no reduction

  Based on constraints identified in Section 4.13, the impact would be potentially significant and unavoidable.

- **Intersection 7: East Sunnyoaks Ave/Dell Ave**. No change in previously proposed mitigation measure. With implementation of the mitigation measure identified in Section 4.13, the impact would be less than significant.

- **Intersection 8: Hacienda Ave/Dell Ave**. No change in previously proposed mitigation measure. With implementation of the mitigation measure identified in Section 4.13, the impact would be less than significant.

- **Intersection 10: Bascom Ave/Camden Ave**. The mitigation measure would be reduced as follows:
  - Northbound: no reduction
  - Southbound: two left-turn lanes; three, rather than four, through lanes; two right-turn lanes
  - Eastbound: no reduction
  - Westbound: no reduction

  Based on constraints identified in Section 4.13, the impact would be potentially significant and unavoidable.

- **Intersection 14: Winchester Blvd/Knowles Dr**. The mitigation measure would be reduced as follows:
  - Northbound: no reduction
  - Southbound: no reduction
  - Eastbound: no reduction
  - Westbound: two left-turn lanes; and one shared through/right-turn lane, rather than one through lane and one right-turn lane

  Based on constraints identified in Section 4.13, the impact would be potentially significant and unavoidable.
- **Intersection 15: Winchester Blvd/SR 85 NB Ramps**. No change in previously proposed mitigation measure. Based on constraints identified in Section 4.13, the impact would be potentially significant and unavoidable.
- **Intersection 18: Winchester Blvd/Wimbledon Dr**. No change in previously proposed mitigation measure. With implementation of the mitigation measure identified in Section 4.13, the impact would be significant and unavoidable.
- **Intersection 19: Winchester Blvd/Lark Ave**. No change in previously proposed mitigation measure. With implementation of the mitigation measure identified in Section 4.13, the impact would be less than significant.
- **Intersection 20: Lark Ave/SR 17 SB Ramps**. No change in previously proposed mitigation measure. With implementation of the mitigation measure identified in Section 4.13, the impact would be significant and unavoidable.
- **Intersection 23: Winchester Blvd/Daves Ave**. No change in previously proposed mitigation measure. Based on constraints identified in Section 4.13, the impact would be potentially significant and unavoidable.
- **Intersection 24: Blossom Hill Rd/Santa Cruz Ave-Winchester Blvd**. No change in previously proposed mitigation measure. Based on constraints identified in Section 4.13, the impact would be potentially significant and unavoidable.
- **Intersection 26: Los Gatos-Saratoga Rd/University Ave**. The mitigation measure would be modified as follows:
  - Northbound: no change from the mitigation measure
  - Southbound: no change from existing conditions
  - Eastbound: no change from existing conditions
  - Westbound: no change from existing conditions

Based on constraints identified in Section 4.13, the impact would be potentially significant and unavoidable.

Although the Reduced Development Alternative would result in improved traffic impacts, the alternative would not avoid all of the significant and unavoidable impacts of the proposed Plan and would represent a slight improvement over proposed Plan conditions.

Implementation of either the proposed Plan or the Reduced Development Alternative would not substantially increase hazards due to a design feature or result in inadequate emergency access. When roadway modifications are proposed under either the proposed Plan or the Reduced Development Alternative, such modifications would need to go through an independent review process to determine that the modifications conform with design standards and requirements. Thus, as long as all applicable design standards are requirements are followed, implementation of either the proposed Plan or the Reduced Development Alternative would result in comparable less than significant impacts in these respects.

Implementation of either the proposed Plan or the Reduced Development Alternative would not result in changes to air traffic patterns or a substantial under-supply of parking. The proposed Plan does not affect the location, design, or operation of any of the region's airports. While the new air travel demand potentially generated by development allowed by the proposed Plan has not been estimated, it is not expected to cause any of the region's airports to reach or exceed operational capacity. Since the Reduced Development Alternative would feature a lower net increase in workers in the area, it would also not impact area air traffic. Projects developed under the proposed Plan or Reduced Development Alternative would be subject to the parking rates and requirements in the Municipal Code. Projects under the proposed Plan would be encouraged to incorporate the parking management strategies outlined in the Plan. Therefore, the impact with respect to parking would be less than significant and comparable under either the proposed Plan or the Reduced Development Alternative.

Overall, the Reduced Development Alternative would result in a *slight improvement* in comparison to the proposed Plan.

5.6.2.14 UTILITIES AND SERVICE SYSTEMS

Section 4.14, Utilities and Service Systems, found that under implementation of the proposed Plan, less than significant impacts would occur under all 13 standards of significance.

Under implementation of either the proposed Plan or the Reduced Development Alternative, sufficient water supplies would be available from existing entitlements. As discussed in Section 4.14, the SJWC's WSA concluded there will be adequate water supplies to meet projected increased demands associated with development under the proposed Plan, using conservative assumptions regarding potable water use for normal hydrologic, single-dry year, and multiple-dry year conditions. The SJWC has supply flexibility in meeting the increase in water demand projected under the proposed Plan, due to its variety of available water supply sources, ongoing coordination with the SCVWD, increasing water conservation efforts, and

water supply contingency planning. Since the Reduced Development Alternative would result in equivalent residential and reduced employment growth in the Plan Area, adequate water supplies would likewise exist for this alternative. Given that water demand would be lower under the Reduced Development Alternative, the impact on water resources would be a slight improvement compared to the proposed Plan.

Implementation of neither the proposed Plan nor the Reduced Development Alternative would require or result in the construction of new water facilities or expansion of existing facilities. As discussed above, the water demand associated with the proposed Plan would be served with available and planned water supplies provided by SJWC. Thus, any facility construction or expansion would be included in the UWMPs adopted by the SJWC and the SCVWD. Planned construction and expansion projects would be the responsibility of the SJWC or the SCVWD at the time they are proposed, and potential impacts would be subject to independent environmental review. Additionally, as discussed in Section 4.14, future development under the proposed Plan or the Reduced Development Alternative would be located within an already developed urban area and, therefore, would connect to the existing water distribution system. Given any future construction/expansion of water infrastructure would be the responsibility of SJWC/SCVWD, comparable less than significant impacts would occur under either the proposed Plan or the Reduced Development Alternative.

Implementation of either the proposed Plan or the Reduced Development Alternative would not result in cumulative impacts to the water supply. While development under the proposed Plan or the Reduced Development Alternative would contribute to an increased cumulative demand for water supply, the increased demand would not exceed the long-term supply under normal hydrologic circumstances, as discussed above. Additionally, SJWCs 2010 UWMP determined that the water supply will be sufficient to accommodate future demand in the SJWC service areas through 2035 (and 2040, by extrapolation), under normal conditions and during dry conditions, with appropriate conservation measures. Since the Reduced Development Alternative would result in equivalent potential for residential growth and decreased potential for employment growth, impacts with respect to water supply under this alternative would also be less than significant. With additional adherence with applicable local, regional, and State regulations, policies, and other considerations, cumulative impacts with respect to water supply would be comparable and less than significant under the proposed Plan or the Reduced Development Alternative.

Implementation of either the proposed Plan or the Reduced Development Alternative would not exceed wastewater treatment requirements of the applicable RWQCB. As discussed in Section 4.14, increases in wastewater generation associated with buildout of the proposed Plan would not be significant relative to currently available excess treatment capacity. In addition, the very conservatively estimated wastewater generation for the proposed Plan will be less than the currently estimated excess capacity in the WVSD collection system, even before planned improvements to the system. Additionally, with continued compliance with applicable regulations, projected wastewater generated from potential future development under the proposed Plan would not exceed the wastewater treatment requirements or capacity of the SJ/SCWPCP. Given that the Reduced Development Alternative would result in equivalent potential residential growth and reduced potential employment growth, demands on sanitary systems would be even

less than under the proposed Plan, also resulting in a less-than-significant impact. Therefore, with regard to exceeding wastewater treatment requirements, comparable less than significant impacts would occur under either the proposed Plan or the Reduced Development Alternative.

Implementation of either the proposed Plan or the Reduced Development Alternative would not require or result in the construction of new wastewater treatment facilities or expansion of existing facilities. As discussed above and in Section 4.14, future wastewater demands from development under either the proposed Plan or the Reduced Development Alternative would not exceed the design or permitted capacity of the wastewater treatment plant serving the proposed Plan. Development under the proposed Plan or the Reduced Development Alternative would continue to be provided with wastewater collection and treatment services from the WVSD collection system and the SJ/SCWPCP treatment plant. Existing infrastructure would be preserved in place and, if necessary, extensions and/or additions to sewer collection systems would be installed to provide wastewater service to structures proposed by the proposed Plan. As discussed in Section 4.14, although creation of new or expanded sanitary system infrastructure could create environmental effects, compliance with applicable regulations and standard conditions of approval would serve to mitigate any potential adverse physical effects of these activities. Impacts from any future construction or expansion of wastewater facilities would be project-specific, and would require permitting and review in accordance with CEQA, which would ensure that any environmental impacts are disclosed and mitigated to the extent possible. Given that the Reduced Development Alternative would result in equivalent potential for residential growth and reduced potential for employment growth, demands on sanitary systems would be even less than under the proposed Plan, making construction or expansion of facilities less likely, and therefore also resulting in a less-than-significant impact. Therefore, with regard to the need to construct or expand wastewater facilities, comparable less than significant impacts would occur under either the proposed Plan or the Reduced Development Alternative.

Implementation of either the proposed Plan or the Reduced Development Alternative would not result in a determination by the wastewater treatment provider that it does not have adequate capacity to serve the proposed Plan's projected demand in addition to the provider's existing commitments. As discussed in Section 4.14, the proposed Plan's worst-case estimated increase in wastewater flow represents less than 2 percent of the excess capacity available at the SJ/SCWPCP. Additionally, with continued compliance with applicable regulations listed below, wastewater generated from the proposed Plan or the Reduced Development Alternative would not exceed the permitted capacity of the SJ/SCWPCP treatment plant. As discussed above, the Reduced Development Alternative would result in decreased potential for employment growth and equivalent potential for residential growth, which would reduce potential future generation of wastewater. Therefore, in this respect, implementation of either the proposed Plan or the Reduced Development Alternative would result in comparable less than significant impacts relating to capacity determinations by the wastewater treatment provider.

Implementation of either the proposed Plan or the Reduced Development Alternative, in combination with past, present, and reasonably foreseeable projects, would not result in significant cumulative impacts with respect to wastewater treatment. As discussed in Section 4.14, buildout of the proposed Plan would

generate a moderate 2 percent increase in the volume of wastewater delivered for treatment at SJ/SCWPCP, and this increase would occur incrementally until the 2040 buildout horizon. Based on the recent trends of diminishing wastewater treatment demand and the projected population growth in the service area, cumulative wastewater treatment demand over the proposed Plan buildout period is far below the excess capacity of the SJ/SCWPCP. Because the cumulative demand would not substantially impact the existing or planned capacity of the wastewater treatment systems, which have sufficient capacity for wastewater than would be produced by the proposed Plan, the construction of new wastewater treatment facilities would not be necessary. As discussed above, the Reduced Development Alternative would result in equivalent potential for residential growth and reduced potential for employment growth, which would reduce potential future generation of wastewater. Therefore, implementation of either the proposed Plan or the Reduced Development Alternative would result in comparable less than significant cumulative impacts relating to wastewater treatment.

Implementation of the proposed Plan or the Reduced Development Alternative would require construction of new storm drainage facilities or expansion of existing facilities to accommodate future development; however, all storm water retention and conveyance facilities would be constructed in compliance with federal, State, and local regulations, including metering of flow, and would therefore not result in cumulative impacts related to storm drainage. The Plan Area is largely developed and almost entirely covered with building roofs, hardscapes, or paved surface parking lots, with the exception of landscaped areas. Additionally, the Plan Area is already served by existing storm drainage facilities. Given that the Reduced Development Alternative would result in equivalent potential residential growth and decreased potential employment growth, there would be no increased need to expand or construct storm drainage facilities above that of the proposed Plan. Moreover, environmental impacts resulting from individual projects related to the expansion or construction of stormwater drainage would be project-specific, and would require permitting and review in accordance with CEQA, which would ensure that any environmental impacts are disclosed and mitigated to the extent possible. Impacts related to provision of storm drainage facilities are typically localized, since the purpose of such systems is to convey stormwater to nearby waterways or floodways. In the case of the Plan Area, storm drainage facilities would convey water to nearby percolation ponds and Los Gatos Creek. As discussed above and in Section 4.11-8, Hydrology and Water Quality, neither the proposed Plan nor the Reduced Development Alternative is anticipated to result in significant increases in stormwater runoff with the potential to affect storm drainage facilities beyond the Plan Area. Therefore, implementation of either the proposed Plan or the Reduced Development Alternative would result in comparable less than significant project-specific or cumulative impacts relating to storm drainage facilities.

Under implementation of either the proposed Plan or the Reduced Development Alternative, future development would be served by a landfill with sufficient permitted capacity to accommodate anticipated solid waste disposal needs. As discussed in Section 4.14, solid waste generated from implementation of the proposed Plan would account for less than 1 percent of the daily capacity at the Monterey Peninsula Landfill. Given that the Reduced Development Alternative would result in equivalent potential residential growth and decreased potential employment growth, the need for landfill capacity would be decreased

under the Reduced Development Alternative. As such, implementation of the proposed Plan or the Reduced Development Alternative would have comparable less than significant impacts with regard to daily capacity at each of the two main landfill facilities serving the city. The two landfills that receive the majority of the city's solid waste are likely to reach their permitted maximum capacities between 2048 and 2107, respectively, as shown in the Table 4.14-8. As such, there is more than adequate landfill capacity for the solid waste generated by implementation of either the proposed Plan or the Reduced Development Alternative. In addition, there are 13 other landfills that received waste from the city in 2013. In the event that one or both of the landfills currently receiving waste from the city was unable to continue in that capacity, it is likely that another landfill would be able to provide capacity. Additionally, with continued compliance with applicable regulations leading to increased recycling and waste diversion, anticipated rates of solid waste disposal from the proposed Plan or the Reduced Development Alternative would likely decrease, further diminishing impacts in regard to permitted landfill capacity. Therefore, implementation of either the proposed Plan or the Reduced Development Alternative would result in comparable less than significant impacts relating to solid waste disposal.

Implementation of either the proposed Plan or the Reduced Development Alternative would comply with federal, State, and local statutes and regulations related to solid waste. As discussed in Section 4.14, the City of Campbell has complied with State requirements to reduce the volume of solid waste through recycling and reuse of solid waste. The General Plan includes goals, policies, and strategies that promote recycling and conservation, and help ensure adequate waste collection and disposal facilities are available for the residents and workers of Campbell. Together, these policies and actions help to ensure that implementation of either the proposed Plan or the Reduced Development Alternative would be consistent with statutes and regulations related to solid waste, and would thus result in comparable less than significant impacts in this regard.

Implementation of either the proposed Plan or the Reduced Development Alternative, in combination with past, present, and reasonably foreseeable development, would not result significant cumulative impacts with respect to solid waste. The buildout of the proposed Plan will increase the quantity of solid waste for disposal. Since the two landfill facilities that take approximately 97 percent of the city's solid waste (in 2013) are not expected to close until between 2048 and 2107, respectively, it is unlikely that Campbell or other jurisdictions that use the same facilities will eventually experience insufficient future landfill capacity to accommodate existing or increased population and employment levels before the horizon year of the proposed Plan. Given that the Reduced Development Alternative would result in equivalent potential residential growth and reduced potential employment growth, the need for landfill capacity would be decreased under the Reduced Development Alternative, further diminishing potential cumulative impacts. In addition, there are 13 landfills that received waste from the city in 2013. If one or more of the two landfills currently receiving 97 percent of the waste were unavailable in the future, it is likely the city's solid waste volume could be increased at one or more of the other landfills that already serve the city. Therefore, with continued compliance with applicable regulations, implementation of the proposed Plan or the Reduced Development Alternative, in combination with past, present and reasonably foreseeable

development, would result in comparable less than significant impacts with respect to cumulative solid waste disposal impacts.

Implementation of either the proposed Plan or the Reduced Development Alternative would not result in a substantial increase in natural gas and electrical service demands, and would not require new energy supply facilities and transmission infrastructure or capacity enhancing alterations to existing facilities. Under both the proposed Plan and the Reduced Development Alternative, proposed new development would be constructed using energy efficient modern building materials and construction practices. With the implementation of these General Plan Policies and compliance with the CALGreen Building Code and Campbell Green Building Policies, significant energy conservation and savings would be realized in any new development within the Plan Area. Even with the energy saving practices in place, it is possible that new electrical connections, switches and/or transformers might be required to serve new structures and/or handle additional loads in the Plan Area under either the proposed Plan or Reduced Development Alternative. Potential environmental impacts from possible new electrical connections, switches, and/or transformers in the Plan Area are not anticipated to be significant and, to the extent such upgrades may be necessary, their environmental impacts would be evaluated individually, consistent with any overarching improvement plans adopted by energy providers. Given that the Reduced Development Alternative would result in equivalent potential residential growth and reduced potential employment growth, the need for new electrical or natural gas infrastructure would be decreased under the Reduced Development Alternative, further diminishing the potential for impacts. In addition, buildout of the proposed Plan or the Reduced Development Alternative would not significantly increase energy demands in the context of the entire PG&E service territory for electricity and natural gas generation, transmission and distribution. As a result, new energy supply facilities and transmission infrastructure, or capacity-enhancing alterations to existing facilities, would not be required as a direct result of the proposed Plan or the Reduced Development Alternative. Therefore, implementation of either the proposed Plan or the Reduced Development Alternative would result in comparable less than significant impacts relating to gas and electrical service demands.

Given these considerations, because the Reduced Development Alternative would include lesser increases to jobs in the Plan Area, demand on Utilities and Service Systems would be reduced and impacts would therefore represent a *slight improvement* compared to the proposed Plan.

5.7 NO DAAP-WEST ALTERNATIVE

5.7.1 PRINCIPAL CHARACTERISTICS

Under the No DAAP-West Alternative, the DAAP would cover only areas east of Winchester Boulevard, and areas west of Winchester Boulevard would be removed from the DAAP completely. As such, new development in areas west of Winchester Boulevard would occur consistent with the policies, development standards, and overarching land use concepts adopted under the City's General Plan. Office/retail uses to the east of Winchester would develop in a manner consistent with the proposed Plan. It is projected that this

alternative would result in no new housing units, 2,292,000 square feet of new office development, 49,000 square feet of net new retail space, and 7,467 net new jobs. The purpose of the No DAAP-West Alternative is to explore how potential impacts may be lessened by preserving existing uses along the west side of Winchester Boulevard, rather than allowing their conversion to mixed-use residential/pedestrian-oriented retail. As shown in Table 5-1, this development would generate the following population and employment increases:

- 0 new residents
- 123 new retail jobs
- 7,640 new office jobs
- -296 net R&D jobs
- 7,467 total net jobs

5.7.2 IMPACT DISCUSSION

The No DAAP-West Alternative would have the following impacts relative to the proposed Plan.

5.7.2.1 AESTHETICS

Section 4.1, Aesthetics, finds that the proposed Plan would result in less than significant impacts to aesthetics.

The proposed Plan and the No DAAP-West Alternative would have comparable impacts with regard to scenic views and vistas. As described in Section 4.1, the Campbell General Plan does not identify any scenic viewpoints within the Plan Area; however, for the purpose of the proposed Plan, the EIR describes the following scenic vistas:

- Southward views along Dell Avenue and Winchester Boulevard of the foothills and ridgelines of the Santa Cruz Mountains.
- Near-field views from the Los Gatos Creek Trail and the roads immediately adjacent to Santa Clara County's percolation ponds.

Under the proposed Plan, development could potentially block or otherwise adversely affect these views, including through new buildings of up 75 feet in height along Dell Avenue and up to 45 feet in height along the west side of Winchester Boulevard. Under the land use designations of the Campbell General Plan, maximum building heights are 45 feet along Dell Avenue and 75 feet along Winchester Boulevard. Given existing conditions, which include relatively flat topography, existing structures, and large trees, the views identified above are already largely obscured. Structures with the potential to block views could be constructed under the development standards of both the proposed Plan and the No DAAP-West Alternative. Although the No DAAP-West Alternative would no longer include the potential for new mixed-used development west of Winchester Boulevard, most new structures are still anticipated to be located near or along Dell Avenue and improvements along the west side of Winchester Boulevard would include

turnover of auto-service uses to commercial services at intensities permitted under the Campbell General Plan. Additionally, irrespective of whether the proposed Plan or the No DAAP-West Alternative were implemented, compliance with City policies and regulations regarding aesthetics, including Site and Architectural Review processes, would serve to ensure that new developments do not have substantial adverse effects on scenic views or vistas. Nevertheless, because the No DAAP-West Alternative would serve to limit redevelopment, these impacts would be reduced. Therefore, in this respect, the No DAAP-West Alternative would result in slightly reduced impacts compared to the proposed Plan.

There are no State-designated scenic highways in the vicinity of the Plan Area. Therefore, no impact to scenic resources visible from a State Scenic Highway would occur with the implementation of either the proposed Plan or the No DAAP-West Alternative. Therefore, in this respect, the proposed Plan and the No DAAP-West Alternative would result in comparable impacts.

With regard to the degradation of existing visual character, comparable impacts would occur under implementation of either the proposed Plan or the No DAAP-West Alternative. In the portions of the Plan Area to both the east and west of Winchester Boulevard, the current visual character is not particularly unique or distinguished, with no architecture or landscaping that would be regarded as noteworthy. The No DAAP-West Alternative would adopt the same land uses, policies, and regulations related to aesthetics, with the exception that areas west of Winchester Boulevard would no longer be included and mixed-use would no longer be planned for these locations. Any future development under the proposed Plan or the No DAAP-West Alternative would be required to comply with existing General Plan policies and development standards that serve to protect and enhance aesthetic character. The proposed Plan and the No DAAP-West Alternative would also allow new structures and uses that would be subject to additional policies that would emphasize pedestrian-oriented development, improved streetscapes, and greater connectivity. Encouraging new development that complied with both new and existing policies would serve to enhance the visual character of the Plan Area. Although the No DAAP-West Alternative would not allow creation of new mixed-use residential along the west side of Winchester Boulevard, the existing General Commercial (C-2) Zoning designation permits buildings up to 75 feet which could lead to potential visual impacts on adjacent residences should this area redevelop at higher land use intensities. Therefore, the No DAAP-West Alternative has the potential to degrade the existing visual character of the adjacent residential neighborhood since there are not provisions and design guidelines that require buffers between single family residences and building floor stepbacks. Therefore, in this respect, the proposed Plan would represent a slight improvement over the No DAAP-West Alternative.

Under implementation of either the proposed Plan or the No DAAP-West Alternative, impacts related to new sources of light or glare would be less than significant. In either case, new developments would be required to comply with the standards set forth in Section 21.16.060 of the Municipal Code regarding restriction on new sources of light and glare. Additionally, the Campbell General Plan contains policies to reduce impacts from excessive lighting and glare, including light overflow to adjacent properties. These policies and regulations would apply to development under either the proposed Plan or the No DAAP-West Alternative. Therefore, in this respect, the proposed Plan and the No DAAP-West Alternative would result

in comparable less than significant impacts. Given these considerations, the potential aesthetic impacts under the No DAAP-West Alternative would be substantially s*imilar* compared to those under the proposed Plan.

5.7.2.2 AIR QUALITY

Section 4.2, Air Quality, found that under implementation of the proposed Plan, less than significant impacts would occur under two standards of significance (AIR-1 and AIR 5) , with significant impacts occurring under four standards of significance (AIR-2,3, 4, and 6). Significant Impact AIR-4 would be mitigated to a level of less than significant through Mitigation Measure AIR-4a; however, significant Impacts AIR-2, 3, and 6 would remain significant and unavoidable.

Implementation of either the proposed Plan or the No DAAP-West Alternative would not conflict with or obstruct implementation of the applicable air quality plan. Implementation of the proposed Plan would not violate the ambient air quality standards (AAQS) of the 2010 Bay Area Clean Air Plan, in part since residential and employment growth anticipated under the proposed Plan would be consistent with regional growth projections. The No DAAP-West Alternative, since it would result in lower residential growth and roughly equivalent employment growth would therefore also comply with the AAQS. Adherence to BAAQMD regulations would ensure that new sources of TACs do not expose populations to significant health risk. Adherence to Mitigation Measure AQ-4 would ensure that the proposed Plan would reduce population exposure and protect public health consistent with the 2010 Bay Area Clean Air Plan. As discussed in Section 4.6, implementation of the proposed Plan would not result in significant impacts with regard to GHG emissions, and compliance with local and State regulations would further ensure that the proposed Plan is consistent with 2010 Bay Area Clean Air Plan goals relating to GHG emissions and climate change. The No DAAP-West Alternative would incorporate the same policies and programs of the proposed Plan that would be consistent with the applicable control measures of the AQMPs. Furthermore, the No DAAP-West Alternative would not disrupt or hinder any AQMP control measures. With regard to projections for VMT, Population, and Employment, since the No DAAP-West Alternative would implement the same general land uses and policies as the proposed Plan (albeit with no potential for residential growth), it would not result in conflicts with regional projections. Therefore, neither the proposed Plan nor the No DAAP-West Alternative would conflict with or obstruct implementation of the applicable air quality plan, and comparable less than significant impacts would occur in this regard.

Implementation of either the proposed Plan or the No DAAP-West Alternative would potentially violate an air quality standard or contribute substantially to an existing or projected air quality violation. Due to the SFBAAB's nonattainment status for ozone and PM and the cumulative impacts of growth on air quality, long-range plans (including the proposed Plan or the No DAAP-West Alternative) almost always have significant, unavoidable adverse air quality impacts. With regard to operational emissions, as discussed in Section 4.2, buildout of the proposed Plan would generate a substantial increase in criteria air pollutant emissions that exceeds the BAAQMD regional significance thresholds (ROG, NO_x, and PM_{10}). Although the No DAAP-West Alternative would result in lower levels of criteria air pollutant emissions than the proposed Plan, it would still potentially result in violations of regional air standards, as illustrated in the existing conditions

analysis in Section 4.2, Table 4.2-8. As discussed in Section 4.2, even with implementation of Mitigation Measures AQ-2a through AQ-2c, this impact would remain significant and unavoidable. Therefore, implementation of either the proposed Plan or the DAAP-West Alternative could result violation of air quality standards or contributions to existing violations; however, since the No DAAP-West Alternative would serve to reduce the number and/or degree of such violations, the impacts would represent a slight improvement over the proposed Plan.

Implementation of either the proposed Plan or the No DAAP-West Alternative would result in a cumulatively considerable net increase of any criteria pollutant for which the project region is in nonattainment under an applicable federal or State ambient air quality standard. The San Francisco Bay Area Air Basin (SFBAAB) is currently designated a nonattainment area for California and National O_3, California and National $PM_{2.5}$, and California PM_{10} AAQS. Any project that produces a significant regional air quality impact in an area that is in nonattainment adds to the cumulative impact. As discussed previously and in Section 4.2, both the proposed Plan and the No DAAP-West Alternative would have the potential to contribute to violations of air quality standards through continued and increased pollutant emissions. Although neither the proposed Plan nor the No DAAP-West Alternative would conflict with the 2010 Bay Area Clean Air Plan, they would both generate a substantial increase in criteria air pollutant emissions from construction and operational activities. Consequently, cumulative regional air quality impacts are also significant. As discussed in Section 4.2, even with implementation of Mitigation Measures AQ-2a through AQ-2c, this impact would remain significant and unavoidable. Therefore, since implementation of either the proposed Plan or the No DAAP-West Alternative would result in a cumulatively considerable net increase of certain criteria pollutants, impacts would be comparable and significant.

Implementation of either the proposed Plan or the No DAAP-West Alternative would expose sensitive receptors to substantial concentrations of air pollution. Areas of vehicle congestion have the potential to create pockets of CO, called hotspots. Under existing and future vehicle emission rates, a project would have to increase traffic volumes at a single intersection by more than 44,000 vehicles per hour—or 24,000 vehicles per hour where vertical and/or horizontal mixing is substantially limited—in order to generate a significant CO impact.[19] The No DAAP-West Alternative would result in fewer vehicle trips and less traffic than the proposed Plan, since it would generate fewer new residents and would exclude the DAAP-West area. Thus, neither the proposed Plan nor the No DAAP-West Alternative would increase traffic volumes at affected intersections by more than 44,000 vehicles per hour or 24,000 vehicles per hour in areas prone to CO hotspots. Therefore, neither the proposed Plan nor the No DAAP-West Alternative would have the potential to substantially increase CO hotspots at intersections in the Plan Area and vicinity. As discussed in Section 4.2, the proposed Plan would also not create new major sources of Toxic Air Contaminants (TACs). Since the No DAAP-West Alternative would include similar types of commercial/industrial land uses, it would likewise not create any new major sources of TACs. The proposed Plan would introduce new sensitive land uses near existing sources of TACs, whereas the No DAAP-West Alternative would generally not to do so, since it excludes residential uses. Future projects containing sensitive receptors within 1,000 feet of

[19] Bay Area Air Quality Management District (BAAQMD), 2011 (Revised), *CEQA Air Quality Guidelines*.

major sources of TACs would need to ensure that they could achieve BAAQMD's performance standards. With application of Mitigation Measure AQ-4a under the proposed Plan or the No DAAP-West Alternative, developments containing sensitive receptors would be required to conduct additional study to establish that levels of pollution from TACs do not exceed acceptable levels. Therefore, since implementation of either the proposed Plan or the No DAAP-West Alternative would not expose sensitive receptors to substantial concentrations of air pollution, impacts would be comparable and less than significant.

Implementation of either the proposed Plan or the No DAAP-West Alternative would not create or expose a substantial number of people to objectionable odors. As discussed in Section 4.2, no existing sources within the Plan Area are currently considered to generate nuisance odors. Buildout of the proposed Plan would result in conversion of the auto-repair facilities west of Winchester Boulevard to residential uses, which would further reduce the potential of odor complaints from painting/coating operations. Implementation of either the proposed Plan or the No DAAP-West Alternative would not involve land uses that generate substantial odors such as from composting, green waste, and recycling operations; food processing; chemical manufacturing; and painting/coating operations. The No DAAP-West Alternative would continue existing uses along Winchester that have the potential to produce objectionable odors; however, BAAQMD Regulation 7, Odorous Substances, requires abatement of any nuisance generating an odor complaint. Therefore, because existing sources of odors are required to comply with BAAQMD Regulation 7, impacts in this regard would be comparable and less than significant under implementation of either alternative.

As described above, regional air quality impacts were identified as significant under implementation of either the proposed Plan or the No DAAP-West Alternative; therefore, in combination with past, present, and reasonably foreseeable projects, both the proposed Plan and the No DAAP-West Alternative would result in a significant cumulative impact with respect to air quality, even with implementation of applicable regulations as well as mitigation measures described in Section 4.2. Therefore, cumulative air quality impacts would be comparable and significant under either alternative.

Both the proposed Plan and the No DAAP-West Alternative would result in significant impacts with regard to air quality. Although the decreased potential for residential growth under the No DAAP-West Alternative would result in lower air quality impacts in certain respects, this would be insufficient to prevent these impacts. Additionally, failing to co-locate new residential and employment growth would be contrary to regional land-use strategies to reduce air pollution and GHG emissions. Overall, neither the proposed Plan nor the No DAAP-West Alternative could avoid or mitigate all air quality impacts. Therefore, the No DAAP-West Alternative would have substantially *similar* impacts with regard to Air Quality as compared to the proposed Plan.

5.7.2.3 BIOLOGICAL RESOURCES

Section 4.3, Biological Resources, found that under implementation of the proposed Plan, less than significant impacts would occur under four standards of significance (BIO-4, 6, and 7) , with significant impacts occurring under three standards of significance (BIO-1, 2, 3, and 5). All three of these significant

impacts would be mitigated to a level of less than significant through Mitigation Measures BIO-1, 2, 3, and 5.

With regard to substantial adverse effects to special-status species, potential impacts could occur under implementation of either the proposed Plan or the No DAAP-West Alternative. Although the Plan Area is already mostly built out with urbanized land uses, remaining trees, landscaped areas, and structures could provide habitat for special-status species. Birds, including species such as Cooper's hawk, could use such areas for nesting, dispersal, and other functions. Mitigation Measure BIO-1 would serve to address these potential impacts by requiring: pre-construction surveys for nests and special-status species; cessation of nearby construction activities in the event that special-status species or active nests are discovered; and potential protection and construction work exclusion zones for active nests. Through implementation of Mitigation Measure BIO-1 under either the proposed Plan or the No DAAP-West Alternative, the impact would be reduced to a level of less than significant. Nevertheless, since implementation of the No DAAP-West Alternative would result in lesser amounts of development, it would result in reduced potential for impacts to special-status species compared to the proposed Plan.

With regard to substantial adverse effects on riparian habitat or other sensitive natural communities, although the Plan Area is already mostly built out with urbanized land uses and does not itself include any riparian or sensitive habitat areas, future development in the Plan Area could have indirect impacts on such areas, including those that occur adjacent to the Plan Area, along Los Gatos Creek. Given that the total area of development and/or impervious or disturbed surfaces is anticipated to be roughly equivalent under the proposed Plan or the No DAAP-West Alternative, the potential for indirect impacts would be roughly equivalent. The Campbell General Plan includes specific policies relating to the preservation of riparian corridors, development near riparian corridors, coordination with the SCVWD, and use of native plantings. Compliance with applicable local, State, and federal regulations would serve to reduce impacts to sensitive habitat. Additionally, Mitigation Measure BIO-2 would serve to further reduce potential indirect impacts by requiring native plantings be used to reduce potential for invasive species and runoff of fertilizers, pesticides, and herbicides. Additionally, as discussed in Section 4.8, Hydrology and Water Quality, redevelopment under the proposed Plan would likely serve to decrease stormwater and pollutant runoff relative to existing conditions, through implementation of vegetative swales and water-efficient landscaping required by other regulations. Therefore, implementation of either the proposed Plan or the No DAAP-West Alternative would result in roughly equivalent less than significant impacts in this respect.

As discussed above, although implementation of the proposed Plan or the No DAAP-West Alternative could have indirect effects on adjacent wetlands, such effects would be avoided or reduced through compliance with General Plan policies, including those related to runoff, drainage facilities, and construction practices, as well as through implementation of stormwater best management practices (BMPs) during construction and operation of new developments. As discussed in Section 4.8, Hydrology and Water Quality, the proposed Plan is not anticipated to result in significant impacts with respect of water quality, erosion, or siltation—any of which could have indirect impacts on wetlands. Nevertheless, outside of the Plan Area boundary, the proposed Plan and the No DAAP-West Alternative incorporate recommended construction of

new pedestrian crossings that would cross the engineered channel that runs adjacent to the Plan Area. The construction of these crossings could impact federally protected wetlands; however, the planning and construction of the pedestrian crossings would be subject to relevant permit processes, mitigation requirements, and fee payments, and would also be subject to independent CEQA review. Since creation of these crossings could take place under either the proposed Plan or the No DAAP-West Alternative, and since construction of these crossings would be subject to independent reviews, impacts in this regard would be comparable under the two alternatives. Moreover, implementation of Mitigation Measures BIO-2 and BIO-3 under the proposed Plan or the No DAAP-West Alternative would serve to reduce associated impacts to less than significant. Therefore, indirect impacts to wetlands would be similar under both the proposed Plan and the No DAAP-West Alternative.

Neither the proposed Plan nor the No DAAP-West Alternative would be anticipated to interfere substantially with wildlife movements, corridors, or nursery sites. As discussed above, the Plan Area is highly urbanized, and there are no wildlife corridors or nursery sites within the Plan Area. Wildlife species common to urban and suburban habitat could be displaced where existing structures are demolished and landscaping is removed as part of future development, but these species are relatively abundant, and adapted to human disturbance. Additionally, both the proposed Plan and the No DAAP-West Alternative would result in development that would include new landscaping features and open space areas that could provide wildlife habitat or movement corridors. Therefore implementation of either the proposed Plan or the No DAAP-West Alternative would result in comparable less than significant impacts in this respect.

Neither the proposed Plan nor the No DAAP-West Alternative would conflict with ordinances protecting biological resources, or with an adopted Habitat Conservation Plan, Natural Community Conservation Plan, or other conservation plans. However, both the proposed Plan and the No DAAP-West Alternative could conflict with General Plan Policy CNR-3.1. Implementation of either alternative would be undertaken in compliance with applicable local, regional, and State policies and regulations—including Campbell's Protected Tree Ordinance under Chapter 21.32 of the Campbell Municipal Code. The Plan Area includes a small portion of the Study Area for the SCVHP, specifically the SCVWD desilting ponds immediately adjacent to Dell Avenue. Neither the proposed Plan nor the No DAAP-West Alternative would permit new structures on this site, and SCVWD would continue to maintain the desilting ponds following the provisions of the SCVHP. Under either the proposed Plan or the No DAAP-West Alternative, additional pedestrian crossings may be constructed over the engineered channel that runs adjacent to the Plan Area which could conflict with General Plan Policy CNR-3.1 which requires the preservation of riparian habitat. Mitigation Measure BIO-4 would serve to address these potential impacts by requiring Best Management Practices to avoid and protect riparian habitat. Through implementation of Mitigation Measure BIO-5 under either the proposed Plan or the Reduced Development Alternative, the impact would be reduced to a level of less than significant. Therefore implementation of either the proposed Plan or the Reduced Development Alternative would result in comparable less than significant impacts in this respect. Therefore, under implementation of either the proposed Plan or the No DAAP-West Alternative, impacts in this respect would be comparable and less than significant.

No significant cumulative impacts with respect to biological resources would result from implementation of either the proposed Plan or the No DAAP-West Alternative. The potential impacts of proposed development on biological resources tend to be site-specific, and the overall cumulative effects would largely depend on the degree to which significant vegetation and wildlife resources are protected on a particular site. Nevertheless, development can contribute to fragmentation or incremental reduction of wildlife habitat, particularly for birds and larger mammals. However, given that the entirety of Plan Area is urbanized and/or has been subject to human disturbance, the potential for site-specific or cumulative impacts is minimal. As described above, compliance with local, State, and federal regulations, including policies of the Campbell General Plan, as well as implementation of applicable mitigation measures, would serve to reduce direct and indirect impacts to less than significant levels, thus precluding cumulative impacts. Therefore, under implementation of either the proposed Plan or the No DAAP-West Alternative, impacts in this respect would be comparable and less than significant.

Given these considerations, biological impacts under the No DAAP-West Alternative would represent a *slight improvement* compared to those under the proposed Plan.

5.7.2.4 CULTURAL RESOURCES

Section 4.4, Cultural Resources, found that under implementation of the proposed Plan, significant impacts could occur under two standards of significance (CULT-2 and CULT-3), with less than significant impacts occurring under CULT-1, CULT-4, CULT-5, Cumulative Impacts. All of the potentially significant impacts would be mitigated to a level of less than significant through Mitigation Measures CULT-2 and 3.

Development under either the proposed Plan or the No DAAP-West Alternative would have the potential to result in substantial adverse changes in the significance of historical resources, archaeological resources, and/or unique paleontological resources or geologic features. It is also possible that development could potentially disturb human remains, including those interred outside of formal cemeteries. Historical resources encompass both architectural and archeological resources; however, the Plan Area does not include any known structures that would meet historical criteria. Although there are no known cultural resources in the Plan Area, it is possible that archaeological, paleontological, or geologic resources could be present underground, in either open or developed areas. Potential impacts to such resources would be reduced to a level of less than significant through implementation of Mitigation Measures CULT-2 and 3. In the event significant cultural resources were discovered, these measures would require construction personnel to cease activities, contact appropriate experts and officials, and take other appropriate steps to protect and preserve those resources, whether those resources are preserved on-site or moved off-site. Additionally, Section 4.4 finds that applicable regulations, procedures, and policies would ensure that any human remains discovered during construction allowed by either the proposed Plan or the No DAAP-West Alternative would be handled appropriately. Given that impacts to cultural resources are usually site specific, that the Plan Area is located within and is itself a highly urbanized area, and since potential impacts would be mitigated, no cumulative impacts would result.

Therefore, given that the potential for disturbance is substantially lower under the No DAAP-West Alternative, potential impacts would be *slightly reduced* compared to those under the proposed Plan.

5.7.2.5 GEOLOGY AND SOILS

Section 4.5, Geology, Soils, and Seismicity, found that under implementation of the proposed Plan, adherence to existing regulations and policies would ensure that impacts under all six standards of significance would be less than significant.

Neither the proposed Plan nor the No DAAP-West Alternative would result in the exposure of people or structures to substantial adverse effects relating to seismic risks, including surface rupture, strong ground shaking, ground failure (including liquefaction), or landslides. Since the Plan Area does not contain any known faults and associated Alquist-Priolo zones, the risk of surface rupture in the area is regarded as minimal. Nevertheless, earthquakes along nearby faults could result in "very strong" ground shaking or liquefaction in the Plan Area. Since the topography of the Plan Area is mostly flat, seismically-induced landslides are not likely. Despite these seismic risks, adherence to local and State regulations and policies would reduce the risk to people and structures to a less-than-significant level. However, given that the increase in the number of new residents in the Plan Area would be lower under the No DAAP-West Alternative, its implementation would result in lower impacts, as fewer people would be subject to seismic risks in the Plan Area.

The Campbell General Plan and Campbell Municipal Code Section 21.18.130, Seismic and Geologic Hazards, would require future developments to evaluate and incorporate appropriate site-preparation and construction techniques to protect structures and their occupants during seismic events. Municipal Code Section 21.18.130 requires development projects both adhere to the uniform and CBC, and undertake geotechnical studies, as appropriate per official geological hazards maps used by the city. The recommendations of such geotechnical studies become the standards of review and must therefore be incorporated into proposed developments. Since these policies would apply irrespective of whether the proposed Plan or the No DAAP-West Alternative were implemented, impacts related to seismic risks would be comparable and less than significant.

Neither the proposed Plan nor the No DAAP-West Alternative would result in substantial soil erosion or the loss of topsoil. Future development would be required to comply with existing regulations, including grading erosion control measures specified in the California Building Code, Appendix J, Grading. Campbell Municipal Code Section 21.18.130 and Section 18.04.010 require compliance with the California Building Code. Therefore, impacts to soil erosion and loss of topsoil would be comparable and less than significant under implementation of either the proposed Plan or the No DAAP-West Alternative.

Neither the proposed Plan nor the No DAAP-West Alternative would result in a significant impact related to development on unstable geologic units and soils or result in on- or off-site landslide, lateral spreading, subsidence, liquefaction, or collapse. Certain portions of the Plan Area, most notably those nearest to Los Gatos Creek, may be at risk of liquefaction or other ground failure. Nevertheless, as discussed above,

Campbell Municipal Code Section 21.18.130, would require developments to evaluate and incorporate appropriate site-preparation and construction techniques to protect structures and their occupants from geological and soils-related hazards. Compliance with the Municipal Code under either alternative would thus reduce this impact to a level of less than significant. Therefore, impacts resulting from unstable geological units would be comparable and less than significant under implementation of either the proposed Plan or the No DAAP-West Alternative.

Neither the proposed Plan nor the No DAAP-West Alternative would result in a significant impact related to expansive soils. Although expansive soils could potentially be present in the Plan Area, available information does not indicate that such is the case. If a particular development site were shown to have expansive soils, compliance with the California Building Code, as mandated by Campbell Municipal Code Section 21.18.130 and Section 18.04.010, would require proposed developments to evaluate and incorporate appropriate site-preparation and construction techniques to address hazards related to expansive soils. (Chapter 18 of the California Building Code contains standards and construction techniques related to expansive soils.) Compliance with the Municipal Code and California Building Code under either alternative would thus reduce this impact to a level of less than significant. Therefore, impacts resulting from expansive soils would be comparable and less than significant under implementation of either the proposed Plan or the No DAAP-West Alternative.

Construction allowed by either the proposed Plan or the No DAAP-West Alternative would not require the use of septic tanks or alternative wastewater disposal systems. Wastewater would be discharged into the existing public sanitary sewer system in the Plan Area, which is serviced by the West Valley Sanitation District. As such, there would be no impact from development at sites where soils may not be capable of supporting the use of septic tanks or alternative wastewater disposal systems. Therefore, impacts resulting from septic tanks or alternative wastewater disposal systems would be comparable and less than significant under implementation of either the proposed Plan or the No DAAP-West Alternative.

No significant cumulative impacts with respect to geology, soils, or seismicity would result from implementation of either the proposed Plan or the No DAAP-West Alternative. Potential impacts related to seismic, geologic, and soils hazards, as well as septic tanks and alternative waste disposal, are all site specific and do not contribute to cumulative effects. With regard to erosion and loss of top soil, neither the proposed Plan nor the No DAAP-West Alternative would result in impacts that would contribute to a cumulative effect. As described above, compliance with local, State, and federal regulations, including policies of the Campbell General Plan, would serve to reduce erosion and soil loss impacts to less than significant levels, thus precluding cumulative impacts. Therefore, implementation of either the proposed Plan or the No DAAP-West Alternative would result in comparable less than significant impacts in this respect.

Given the fact that future development under the No DAAP-West Alternative would reduce the increase in the number of employees and residents within the Plan Area, thereby exposing fewer people to seismic

hazards, impacts under the No DAAP-West Alternative would represent a *slight improvement* compared to those under the proposed Plan.

5.7.2.6 GREENHOUSE GAS EMISSIONS

Section 4.6, Greenhouse Gas Emissions, found that under implementation of the proposed Plan, less than significant impacts would occur with respect to all impact criteria, including generation of GHG emissions; conflicts with applicable plans, policies, or regulations; and cumulative impacts. An individual project on its own does not generate enough GHG emissions to influence global climate change; therefore, analysis of GHG emissions inherently considers a project's contribution to a cumulative environmental impact, and no further cumulative analysis is required.

Implementation of the proposed Plan or the No DAAP-West Alternative would not directly or indirectly generate GHG emissions that would have a significant effect on the environment. GHG emissions from future construction activities within the Plan Area are not subject to any thresholds of significance, and represent one-time, short-term emissions. Therefore, these emissions are assumed to not significantly contribute to the GHG emissions impacts under either the proposed Plan or the No DAAP-West Alternative. As shown in Table 4.6-5, the net increase of GHG emissions generated by the operational phase of the proposed Plan would exceed BAAQMD's bright-line standards of significance of 1,100 $MTCO_2e$; therefore, GHG emissions impacts are evaluated based on the Project efficiency. As identified in Table 4.6-5, the proposed Plan would not exceed the BAAQMD performance criterion of 4.6 $MTCO_2e/SP$. Furthermore, the proposed Plan would result in an improved efficiency compared to existing conditions. Since the No DAAP-West Alternative would include the same policies and programs related to alternative transportation, increased connectivity, and open space, among others, it would be likely to achieve similar efficiency levels to the proposed Plan.

As discussed in Section 4.6, the proposed Plan would comply with applicable plans, policies and regulations for the purpose of reducing GHGs; however, although the No DAAP-West Alternative would include the same policies and programs as the proposed Plan, it would not locate new housing near transit and new jobs, and would thus be less compliant with these regional plans. The two GHG reduction plans that are applicable to the Plan Area are the CARB Scoping Plan and ABAG/MTC's Plan Bay Area. Both the proposed Plan and the No DAAP-West Alternative would be consistent with CARB's scoping plan, since the majority of its provisions are reflected in State and local regulations and programs, with which future developments must comply. For example, new development in the Plan Area would be subject to the requirements of Title 24, California's building energy efficiency standards, as well as the City of Campbell's WELO.

Given these considerations, impacts with respect to GHG emissions under the No DAAP-West Alternative would represent a *slight deterioration* compared to those under the proposed Plan.

5.7.2.7 HAZARDS AND HAZARDOUS MATERIALS

Section 4.7, Hazards and Hazardous Materials, found that under implementation of the proposed Plan, adherence to existing regulations and policies would ensure that impacts under four of the nine standards of significance (HAZ-1, 2, 4, 7, and 9) would be less than significant; there would be no impact under standards of significance HAZ-3,5, 6, and 8.

Implementation of either the proposed Plan or No DAAP-West Alternative would not create a significant hazard to the public or the environment through the routine transport, use, or disposal of hazardous materials. Neither the proposed Plan nor the No DAAP-West Alternative includes changes to regulatory standards for handling, transport, storage, use, disposal, or disruption of hazardous materials. Although implementation of the proposed Plan or the No DAAP-West Alternative could involve use of commercially available hazardous materials (e.g., fuels, solvents, paints, and some consumer electronics) for construction projects, as well as generation of small amounts of hazardous waste from allowed use, the waste would be handled in accordance with applicable federal, State, and local laws, policies, and regulations, as described in Section 4.7.1.1, Regulatory Framework. The Plan Area currently contains, and the proposed Plan and No DAAP-West Alternative would allow, office, research and development/light industrial, retail and commercial land uses. Since industrial and commercial uses are included under either alternative, it is therefore possible that future development could generate significant quantities of hazardous materials. However, in either case, the City of Campbell, the SCCHMCD, and SCCFD would regulate the transport, generation, use, and/or disposal of hazardous materials within the Plan Area, related to either construction or business operations. In addition, the General Plan contains policies and strategies that further ensure that new development would not create a significant hazard to the public or the environment through the routine transport, use, or disposal of hazardous materials. However, under No DAAP-West Alternative, fewer people would be exposed to the transportation and use of hazardous materials. Therefore, while impacts in this respect would be less than significant, they would be slightly lower under the No DAAP-West Alternative.

Implementation of either the proposed Plan or No DAAP-West Alternative would not create a significant hazard to the public or the environment through reasonably foreseeable upset and accident conditions involving the release of hazardous materials into the environment. Both the proposed Plan and the No DAAP-West Alternative would allow new development, including office, research and development/light industrial, and retail and services within the Plan Area. Compliance with existing laws, regulations, policies, and procedures would ensure future development allowed by the proposed Plan or the No DAAP-West Alternative would not create a significant hazard to the public or the environment through reasonably foreseeable upset and accident conditions involving the release of hazardous materials into the environment. As described in Section 4.7, these include applicable federal, State, and local laws and regulations regarding handling of these materials; the General Plan policies listed under Impact HAZ-1; and required Stormwater Pollution Prevention Plan and Best Management Practices However, under the No DAAP-West Alternative, fewer people would be exposed to the potential of risk of upset or accidental release and use of hazardous

materials. Therefore, while impacts in this respect would be less than significant, they would be slightly lower under the No DAAP-West Alternative.

Implementation of either the proposed Plan or No DAAP-West Alternative would not create a significant hazard to the public or the environment by being located on a site, which is included on a list of hazardous materials sites compiled pursuance to Government Code Section 65962.5. As discussed in Section 4.7, five sites within the Plan Area and one additional site in near proximity to the Plan Area were identified on lists compiled pursuant to Government Code Section 65962.5. In addition, several sites with LUSTs were identified in the near vicinity of the Plan Area. Based on available information contained variously in the EnviroStor and GeoTracker government databases, as also summarized in Section 4.7.1.2, none of the listed sites appear to create a significant hazard to the public or the environment. In addition, the General Plan contains strategies to address future development on identified hazardous materials sites. Under either the proposed Plan or the No DAAP-West Alternative, compliance with applicable federal, State, and local laws and regulations regarding hazardous material sites, as discussed in Section 4.7, would ensure future development would not create a significant hazard to the public or the environment, resulting in comparable less than significant impacts.

Implementation of either the proposed Plan or No DAAP-West Alternative would not impair implementation of, or physically interfere with, an adopted emergency response plan or emergency evacuation plan. As discussed in Section 4.7, no physical components of the proposed Plan would interfere with the ability to implement emergency response or evacuation, including provisions of the City of Campbell's Emergency Operations Plan. Since the No DAAP-West Alternative would undertake the same new physical components, with the exception of areas to the west of Winchester Boulevard, it would also have a less-than-significant impact upon existing conditions related to emergency response. Consistent with provisions of the 2013 CFC and the 2013 CBC, future developments under either the proposed Plan or the No DAAP-West Alternative will include fire and emergency access through all phases of construction and operation, and would be required to incorporate building and life safety measures that serve to facilitate emergency response. Therefore, impacts related to emergency response and evacuation would be less than significant and comparable under implementation of either the proposed Plan or the No DAAP-West Alternative.

Given that future development would be lessened under the No DAAP-West Alternative, decreasing the number of new residents and potential exposure to hazardous materials within the Plan Area, impacts under the No DAAP-West Alternative would therefore be *slightly reduced* compared to the proposed Plan.

5.7.2.8 HYDROLOGY AND WATER QUALITY

Section 4.8, Hydrology and Water Quality, found that under implementation of the proposed Plan, adherence to existing regulations and policies would ensure that impacts under all nine standards of significance would be less than significant.

Development under either the proposed Plan or the No DAAP-West Alternative could result in changes to developed areas and impervious surfaces that could affect drainage patterns, runoff, and pollutant levels; but impacts under either alternative are anticipated to be less than significant. Under the proposed Plan and the No DAAP-West Alternative, new developments would be subject to requirements for increased open space and stormwater retention features to reduce drainage and pollutant runoff. Under either the proposed Plan or the No DAAP-West Alternative, landscaping would be required to comply with the City of Campbell Water Efficient Landscape Ordinance, which would further serve to reduce runoff of water and pollutants. Under either alternative, construction activities within the Plan Area would be required to comply with applicable local, State, and federal requirements to control sedimentation, erosion, and hazardous materials contamination of runoff during construction. Following construction, development operations would be governed by local and regional requirements regarding site design, source control, and treatment measures to manage water quality in stormwater runoff. Required compliance with these measures would ensure that any potential construction and operational impacts to water quality would be comparable and less than significant under either alternative.

Under implementation of either the proposed Plan or the No DAAP-West Alternative, less than significant impacts would occur with respect to depletion of groundwater supplies or substantial interference with groundwater recharge. Future development within the Plan Area could result in an increase in impervious surfaces, which would reduce infiltration and could lead to reduced groundwater recharge. However, as previously described, future development would be located on sites that have already been developed and currently have a high percentage of impervious surfaces. Implementation of the proposed Plan or the No DAAP-West Alternative would also result in the incorporation of higher open space standards and new stormwater retention features with the potential to increase infiltration and recharge of groundwater supplies. Although buildout under the proposed Plan or the No DAAP-West Alternative could lead to higher demand for water and subsequent increases in groundwater pumping, SCVWD's 2010 UWMP and the San Jose Water Company's 2010 UWMP indicate that there is a sufficient supply of water through 2035 even for multiple dry years.[20] Therefore, with respect to groundwater supply and recharge, the impacts of the proposed Plan versus the No DAAP-West Alternative would be comparable and less than significant.

Under implementation of either the proposed Plan or the No DAAP-West Alternative, less than significant impacts would occur with respect to substantial alterations of existing drainage patterns. Under either alternative, nearly all of the future development site would be located in areas that are already developed or paved, and new development on these sites would not create a substantial increase in the area of impervious surfaces. All new development and redevelopment projects would be required by local and regional regulations to implement construction phase BMPs, post-construction design measures that encourage infiltration in pervious areas, and post-construction source control measures to help prevent erosion and siltation due to stormwater runoff. With implementation of locally and regionally mandated erosion and sediment control measures and regulatory provisions to limit runoff for new development and redevelopment sites, development allowed by either the proposed Plan or the No DAAP-West Alternative

[20] Santa Clara Valley Water District, 2010, *Urban Water Management Plan*.

would not result in significant increases in erosion and sedimentation or contribute to on-site or off-site flooding. Therefore, impacts in this respect would be comparable and less than significant under either the proposed Plan or the No DAAP-West Alternative.

Under implementation of either the proposed Plan or the No DAAP-West Alternative, an increase in impervious surfaces could result in an increase in stormwater runoff that could exceed the capacity of existing or planned stormwater drainage systems; however, compliance with applicable local, regional, and federal regulations would serve to ensure that impacts remain less than significant. Such compliance would be mandatory irrespective of which alternative is selected. Therefore, under implementation of either the proposed Plan or the No DAAP-West Alternative, impacts to stormwater capacity would be comparable and less than significant.

Implementation of either the proposed Plan or the No DAAP-West Alternative would not result in significant impacts related to substantial degradation of water quality. As required by City and County stormwater management guidelines, BMPs would be required for development projects allowed under both the proposed Plan and the No DAAP-West Alternative during both construction and operation of future projects. These BMPs would control and prevent the release of sediment, debris, and other pollutants into the storm drain system. Additional requirements include the incorporation of site design, source control, and treatment control measures to treat and control runoff before it enters the storm drain system. Therefore, under implementation of either the proposed Plan or the No DAAP-West Alternative, impacts related to degradation of water quality would be comparable and less than significant.

Implementation of either the proposed Plan or the No DAAP-West Alternative would not result in impacts relating to placing housing within a 100-year flood hazard area. The Plan Area is outside the 100-year floodplain, with the exception of a very small portion of the southeast corner of the site. However, no housing would be placed within a 100-year flood hazard area and there would thus be no impact associated with either the proposed Plan or the No DAAP-West Alternative. Therefore, under either the proposed Plan or the No DAAP-West Alternative, housing-related flood impacts would be comparable and less than significant.

Implementation of either the proposed Plan or the No DAAP-West Alternative would not result in significant impacts related to exposure of people or structures to a significant risk of loss, injury, or death involving flooding, including flooding as a result of the failure of a levee or dam. Although portions of the Plan Area lie within the potential inundation zones of several nearby dams, dam inundation zones are based on the highly unlikely scenario of a total catastrophic dam failure occurring in a very short period of time. The City of Campbell and Santa Clara County have never been impacted by a major dam failure, and existing State and local regulations address the potential for flood hazards as a result of dam failure. However, under the No DAAP-West Alternative, fewer people would be exposed to the potential of risk of dam inundation. Therefore, while impacts in this respect would be less than significant, they would be slightly lower under the No DAAP-West Alternative.

Implementation of either the proposed Plan or the No DAAP-West Alternative would not result in significant impacts related to seiche, tsunami, or mudflow. Although the Plan Area lies downstream of significant lakes and reservoirs and is located adjacent to percolation ponds, the Bay Area has not been adversely affected by seiches, despite its history of seismic activity.[21] Absent of catastrophic dam failure, seiches in upstream reservoirs would be unlikely to result in significant downstream flooding, and the adjacent percolation ponds include steep sides and typically low water levels that would generally preclude significant seiches. The Plan Area is not located within the limits of an existing or historical landslide or debris flow zone, according to the ABAG mapping site.[22] In addition, the Plan Area is not within a tsunami inundation zone.[23] Given that implementation of neither the proposed Plan nor the No DAAP-West Alternative would result in significant risks from tsunami, seiche, or mudflow, the impacts would be comparable and less than significant.

No significant cumulative impacts with respect to hydrology or water quality would result from implementation of either the proposed Plan or the No DAAP-West Alternative. As described above, compliance with local, regional, and federal regulations related to development construction and operations would serve to reduce hydrological and water quality impacts to less than significant levels. These regulations are crafted to ensure overall water quality in local and regional waterways; therefore, comprehensive compliance with these policies serves to prevent cumulative impacts. Given these considerations, the cumulative impacts would be comparable and less than significant under implementation of either the proposed Plan or the No DAAP-West Alternative.

Given these considerations, neither the proposed Plan nor the No DAAP-West Alternative would result in significant hydrology or water quality impacts. Therefore, impacts under the No DAAP-West Alternative would be considered a *similar* to those under the proposed Plan.

5.7.2.9 LAND USE AND PLANNING

Section 4.9, Land Use and Planning, found that under implementation of the proposed Plan, less than significant impacts would occur under all four standards of significance (LAND-1,3, and 4).

Neither the proposed Plan nor the No DAAP-West Alternative would physically divide an established community. The Plan Area as a whole, except for its western portion, is physically separated from surrounding neighborhoods by roadways and natural features that serve as existing physical barrier between the Plan Area and nearby areas. These existing barriers would remain under either the proposed Plan or the No DAAP-West Alternative. Additionally, under the proposed Plan or the No DAAP-West Alternative, some of these existing barriers could be partly overcome, such as through new roadway connections and the

[21] US Army Corps of Engineers, San Francisco District, Port of Oakland, 2000, *Oakland Harbor Navigation Improvement (-50 foot) Project SCH No. 97072051 Final Environmental Impact Statement/Report*.

[22] Association of Bay Area Governments (ABAG), 2014. *Landslide Maps and Information.* Accessed on August 27, 2014 at http://quake.abag.ca.gov/landslides/.

[23] ABAG, 2014. *Interactive Tsunami Inundation Map.* Accessed on August 27, 2014 at http://gis.abag.ca.gov/website/Hazards/?hlyr=tsunami.

creation of a promenade to better integrate the Plan Area with adjacent waterways. Development and design standards under either alternative would serve to ensure that new development would not create new physical barriers between the Plan Area and surrounding neighborhoods. Furthermore, neither the proposed Plan nor the No Project Alterative call for physical structures or features that would divide the established communities within the Plan Area. Therefore, under implementation of either the proposed Plan or the No DAAP-West Alternative, impacts in this respect would be comparable and less than significant.

Implementation of the proposed Plan would result in potential, but limited impacts with regard to conflicts with existing city-level land use plans, policies, or regulations; however, by excluding the DAAP-West area, the No DAAP-West Alternative would avoid this impact. As discussed in Section 4.9, the proposed Plan is consistent with the overall policy framework of the General Plan, and the proposed Plan itself incorporates a General Plan amendment to further ensure consistency. Additionally, the proposed Plan was found to be consistent with Campbell's Municipal Code, Streetscape Standards, Housing Element, and Guidelines and Standards for Land Uses Near Streams. The proposed Plan was found to be consistent with the STANP and the No DAAP-West would also be consistent with the STANP. Although a portion of the proposed Plan would also fall into the area covered by the STANP, the parcels involved are excepted from the STANP due to their zoning designation and are excepted from the STANP due to their location. The No DAAP-West Alternative would not include the areas to the West of Winchester Boulevard and consistency with the STANP would thus not be relevant. The proposed Plan was also found to be consistent with Plan Bay Area, since it would concentrate new housing and jobs in and near a designated PDA and anticipated transit station. Since the No DAAP-West Alternative would achieve the same goals, it too would be consistent with Plan Bay Area. With adoption of the necessary amendments called for by mitigation measures under the proposed Plan or without such adoption in the case of the No DAAP-West Alternative, both the proposed Plan and the No DAAP-West Alternative would be entirely consistent with relevant general and specific plans. Therefore, under implementation of either the proposed Plan or the No DAAP-West Alternative, impacts in this respect would be comparable and less than significant.

Neither the proposed Plan nor the No DAAP-West Alternative would conflict with an applicable HCP. The SCVHP study area encompasses a small portion of the Plan Area, the SCVWD's desilting ponds. Implementation of either the proposed Plan or the No DAAP-West Alternative would not trigger construction of new buildings or structures on the SCVWD's desilting ponds. In addition, the SCVWD would continue to maintain the desilting ponds following the provisions of the SCVHP.

As discussed above, neither the proposed Plan nor the No DAAP-West Alternative would overtly conflict with any applicable land use plans, policies, or regulations, as amended for consistency. In addition, neither alternative would physically divide an existing community, nor would they conflict with an adopted conservation plan. No other cumulative projects are located in the immediate Plan Area vicinity that would, in combination with the proposed Plan or No DAAP-West Alternative, divide a surrounding neighborhood or create a policy conflict. Therefore, under implementation of the proposed Plan or the No DAAP-West Alternative, cumulative land use and planning impacts would be comparable.

Given these considerations, under implementation of either the proposed Plan or the No DAAP-West Alternative, impacts related to land use and planning would be considered *similar*.

5.7.2.10 NOISE

Section 4.10, Noise, found that under implementation of the proposed Plan, less than significant impacts would occur under six standards of significance (NOISE-1, 3, 4, 5, 6, and 7), with significant impacts occurring under one standard of significance (NOISE-2). This significant impact would be mitigated to a level of less than significant through Mitigation Measure NOISE-2.

Neither the proposed Plan nor the No DAAP-West Alternative would result in the generation of excessive noise or the exposure of sensitive receptors to noise in excess of applicable standards or regulations. Under implementation of the proposed Plan, new residential uses would be required to adhere to applicable State and local standards for interior and exterior noise levels. Under the No DAAP-West Alternative, no new residential uses would be allowed in the Plan Area, and existing residential uses west of Winchester Boulevard would be excluded from the Plan Area. Both the proposed Plan and the No DAAP-West Alternative would continue to permit land uses with similar potential to generate excessive noise, and in both cases, existing regulations, including General Plan policies and Municipal Code provisions, would continue to apply, thereby ensuring that excessive noise is not generated. Given these considerations, impacts relating to the generation or reception of excessive noise would be comparable and less than significant under implementation of either the proposed Plan or the No DAAP-West Alternative.

Implementation of either the proposed Plan or the No DAAP-West Alternative would have the potential to expose persons to or generate excessive vibration or groundborne noise. Between the proposed Plan and the No DAAP-West Alternative, allowed land uses and future construction activities would have a similar potential to result in excessive vibration. However, in both cases, implementation of Mitigation Measure NOISE-2 would serve to reduce this impact to a less-than-significant level. Therefore, under implementation of either the proposed Plan or the No DAAP-West Alternative, impacts regarding vibration and groundborne noise would be comparable and less than significant.

Under implementation of the either the proposed Plan or the No DAAP-West Alternative, impacts related to substantial permanent increases to ambient noise levels would be less than significant. Between the proposed Plan and the No DAAP-West Alternative, allowed land uses would have a similar potential to result in excessive generation of noise, and in neither case would operations-related noise from land uses be anticipated to result in substantial permanent increases to ambient noise levels. Section 4.10 found that implementation of the proposed Plan would not result in substantial increases to ambient noise as a result of increased traffic. Given that the anticipated amount of traffic would be even lower under the No DAAP-West Alternative than under the proposed Plan, traffic-related substantial permanent increases to ambient noise levels would not be expected in either case. Therefore, under implementation of the proposed Plan or the No DAAP-West Alternative, noise impacts relating to substantial permanent increases to ambient noise levels would be comparable and less than significant.

With adherence to applicable regulations, impacts related to substantial temporary or periodic increases to ambient noise levels would be less than significant under implementation of either the proposed Plan or the No DAAP-West Alternative. Construction noise varies considerably based on site conditions, the distance to sensitive receptors, and the equipment used. Nevertheless, through adherence to relevant provisions of the Campbell Municipal Code, including limitations on construction hours and City discretion to regulate specific construction activities, such impacts would be reduced to a level of less than significant. Therefore, under implementation of the proposed Plan or the No DAAP-West Alternative, noise impacts relating to substantial temporary or periodic increases to ambient noise levels would be comparable and less than significant.

Since the Plan Area is not located in close proximity to a public use airport, a private use airport or airstrip, or a heliport, less than significant impacts or no impacts would occur in this respect under either the proposed Plan or the No DAAP-West Alternative. With regard to cumulative noise impacts, the measurement and regulation of noise inherently includes cumulative assessment since various sources of sound combine to create the overall noise level at any particular location. Similarly, projected permanent increases ambient noise levels incorporated projected traffic volumes that accounted for regional growth. Therefore, under implementation of the proposed Plan or the No DAAP-West Alternative, cumulative noise impacts would be comparable at a level of less than significant.

Given these considerations, under implementation of either the proposed Plan or the No DAAP-West Alternative, impacts related to excessive noise and vibration would substantially *similar* and less than significant.

5.7.2.11 POPULATION AND HOUSING

Section 4.11, Population and Housing, found that under implementation of the proposed Plan, less than significant impacts would occur under all four standards of significance.

Implementation of either the proposed Plan or the No DAAP-West Alternative would not induce substantial unexpected population growth or growth for which inadequate planning has occurred. As discussed in Section 4.11, anticipated future development under the proposed Plan would result in 726 new residents and 7,394 jobs. These increases in jobs and residents are consistent with planned population increases for Campbell within Priority Development Areas (PDAs) established by ABAG/MTC pursuant to Plan Bay Area. Under the No DAAP-West Alternative, there would be no potential for residential growth and equivalent potential for employment growth within the Plan Area. Therefore, impacts related to unanticipated or unplanned growth would be less than significant and comparable under implementation of either the proposed Plan or the No DAAP-West Alternative.

Implementation of either the proposed Plan or the No DAAP-West Alternative would not result in the displacement of substantial numbers of existing housing or people. Future development allowed by the proposed Plan or the No DAAP-West Alternative would not displace existing housing or people through redevelopment. Although the No DAAP-West Alternative would not include new residential uses, it would

also exclude existing residential uses from the Plan Area. Therefore, under implementation of either the proposed Plan or the No DAAP-West Alternative, impacts in these respects would be comparable and less than significant.

Implementation of either the proposed Plan or the No DAAP-West Alternative would not result in significant cumulative impacts with regard to population and housing in the area. As discussed in Section 4.11, the cumulative population increase from the proposed Plan and nearby projects in Los Gatos would be 1,611, which is less than 14 percent of ABAG anticipated population increase of 11,938, for Campbell and Los Gatos from 2010 to 2040. Under the No DAAP-West Alternative, no residential growth would occur in the Plan Area, resulting in decreased cumulative growth. Therefore, cumulative population growth would not exceed planned levels under either the proposed Plan or the No DAAP-West Alternative. As discussed in Section 4.11, cumulative projects, including the proposed Plan would generate a total of 10,408 new jobs within Campbell and Los Gatos. Given that ABAG projects an additional 13,260 jobs will be added in Campbell and Los Gatos between 2010 and 2040, cumulative projects, including the proposed Plan, would be within the total projected job growth by 2040. Therefore, under either the proposed Plan or the No DAAP-West Alternative cumulative impacts with respect to unexpected population growth would be comparable and less than significant.

Neither the proposed Plan nor the No DAAP-West Alternative would result in significant impacts related to Population and Housing. Therefore, potential impacts under the No DAAP-West Alternative would be *similar* to those under the proposed Plan.

5.7.2.12 PUBLIC SERVICES AND RECREATION

Section 4.12, Public Services and Recreation, found that under implementation of the proposed Plan, adherence to existing policies and programs would ensure that impacts under all twelve standards of significance would be less than significant.

Implementation of either the proposed Plan or the No DAAP-West Alternative would not result in impacts or cumulative impacts arising from the provision of or need for new or physically altered fire protection facilities. The SCCFD has confirmed that the existing facilities, equipment, and staffing levels would be adequate to accommodate growth allowed by the proposed Plan.[24] The cumulative setting for fire protection services takes into account growth allowed by the proposed Plan, in combination with growth projected by ABAG in the service area of the SCCFD, which includes the cities of Campbell, Los Altos, Monte Sereno, and Saratoga, and towns of Los Altos Hills and Los Gatos. Given that residential growth potential would be lower under the No DAAP-West Alternative and employment growth potential would be the same, fire service needs and any potential for attendant impacts would thereby be reduced. Compliance with the State and local regulations, in conjunction with SCCFD's planning processes, would ensure that future growth

[24] Stocksick, Debbie, Operations Captain, Santa Clara County Fire Department. Personal communication with Travis Bradley, PlaceWorks, July 29,2014.

allowed by either the proposed Plan or the No DAAP-West Alternative would result in comparable less than significant impacts and cumulative impacts in this respect.

Implementation of either the proposed Plan or the No DAAP-West Alternative would not result in impacts or cumulative impacts arising from the provision of or need for new or physically altered police protection facilities. The CPD has confirmed that future development allowed by the proposed Plan would not result in the need for expansion or addition of facilities.[25] The cumulative setting for police protection services takes into account growth allowed by the proposed Plan, in combination with cumulative projects in Campbell (see Table 4-1). Given that residential growth potential would be lower and employment growth potential would be equivalent under the No DAAP-West Alternative, police service needs and the potential for attendant impacts would thereby be reduced. Based on confirmation by the Campbell Police Department, along with compliance with the General Plan policies discussed in Section 4.12, future growth allowed by either the proposed Plan or the No DAAP-West Alternative would result in comparable less than significant impacts and cumulative impacts in this respect.

Implementation of either the proposed Plan or the No DAAP-West Alternative would not result in impacts or cumulative impacts arising from the provision of or need for new or physically altered school facilities. As discussed in Section 4.12, the payment of school fees is deemed to fully mitigate the impacts of new development on school facilities, per California Government Code Section 65995. Cumulative projects would add new students to the CUSD and CUHSD in addition to those generated by development allowed by the proposed Plan or the No DAAP-West Alternative, which could result in the need for new or expanded school facilities. However, these cumulative projects would also be subject to the school mitigation fees discussed above. Moreover, the No DAAP-Alternative would not include any residential uses that could generate additional needs for school facilities. Therefore, implementation of either the proposed Plan or the No DAAP-West Alternative would result in comparable, less than significant impacts and cumulative impacts related to the Campbell Union School District (CUSD) and the Campbell Union High School District (CUHSD).

Implementation of either the proposed Plan or the No DAAP-West Alternative would not result in impacts or cumulative impacts arising from the provision of or need for new or physically altered library facilities. As discussed in Section 4.12, buildout allowed by the proposed Plan would occur over the 2040 buildout horizon, which would result in a gradual increase in demand for library services. Given that the increased use of the library facilities would be gradual, the additional new library users in the Plan Area would not likely cause or accelerate the need for facility expansion.[26] With regard to cumulative impacts, future growth within the SCCLD will increase the demand for library services and facilities. The Santa Clara County Library Strategic Plan accounts for the entire SCCLD service area and provides a basis for analyzing the most efficient allocation of funds both for the district as a whole as well as among the different libraries

[25] Cefalu, Joe, Captain, City of Campbell Police Department. Personal email communications with Travis Bradley, PlaceWorks, July 28, 2014

[26] Griffen, Chuck, Financial and Administrative Services Manager, Personal Communications with Travis Bradley, PlaceWorks, July 23, 2014.

in the SCCLD service area. This would not only allow for adequate funding to satisfy demand at the Campbell Community Library, but would also ensure that surrounding libraries are adequate to fulfill demand, which in turn would reduce the demand at the Campbell Community Library by reducing deficiencies at surrounding facilities. Overall, compliance with General Plan policies related to library services and coordination with the SCCLD would avoid the need for new or physically altered library facilities. Therefore, implementation of either the proposed Plan or the No DAAP-West Alternative would result in comparable, less than significant impacts and cumulative impacts related to library facilities.

Implementation of either the proposed Plan or the No DAAP-West Alternative would not result in impacts or cumulative impacts arising from the provision of or need for new or physically altered park and recreation facilities. As discussed in Section 4.12, development allowed by the proposed Plan could bring 726 new residents to the city, thereby increasing use of existing parkland. Adding 726 new residents to the city's existing population, the City of Campbell would still be in compliance with the adopted City standard with a parkland ratio of 6.3 acres parkland per 1,000 residents.[27] Additionally, given that equal employment growth and no residential growth are anticipated under the No DAAP-West Alternative, it would result in a lower potential for impacts to park and recreation facilities. Future development under either the proposed Plan or the No DAAP-West Alternative would be required to comply with requirements for developers to pay impact fees to maintain existing parks and recreation facilities, as well as requirements for residential developments to dedicate parklands or pay in-lieu fees to accommodate and offset their fair share of impacts to parklands. Therefore, implementation of either the proposed Plan or the No DAAP-West Alternative would result in comparable less than significant impacts and cumulative impacts related to new or physically altered park and recreation facilities.

Implementation of either the proposed Plan or the No DAAP-West Alternative would not result in impacts or cumulative impacts arising from increased use of existing neighborhood and regional parks or other recreational facilities, such that substantial physical deterioration of the facility would occur, or be accelerated. As discussed in Section 4.12, an increase to population would occur as result of development allowed by the proposed Plan, thereby increasing the use of existing neighborhood and regional parks or other recreational facilities. However, under either the proposed Plan or the No DAAP-West Alternative developers would be required to pay impact fees to mitigate potential impacts to existing parklands and recreation facilities as a result of growth allowed by either alternative. New development allowed by the either alternative may also include the development of on-site open space that could help to off-set or reduce potential use of existing parkland. Given that equivalent employment growth and no residential growth are anticipated under the No DAAP-West Alternative, it would result in a lower potential for impacts to park and recreation facilities. Future development under either the proposed Plan or the No DAAP-West Alternative would be required to comply with requirements for developers to pay impact fees to maintain existing parks and recreation facilities, as well as requirements for residential developments to dedicate parklands or pay in-lieu fees to accommodate and offset their fair share of impacts to parklands.

[27] 40,027 existing population + 726 new residents = 40,753 new population. 258 acres / 40,753 population x 1,000 residents = 6.3 acres per 1,000 residents

Therefore, implementation of either the proposed Plan or the No DAAP-West Alternative would result in comparable less than significant impacts and cumulative impacts related to physical deterioration of park or recreation facilities.

Implementation of either the proposed Plan or the No DAAP-West Alternative would not result in impacts or cumulative impacts arising from inclusion or required construction or expansion of recreational facilities. As discussed above, the City currently meets its adopted standard of providing 4 acres of parkland per 1,000 residents, and would continue to meet this standard with development allowed by the proposed Plan. New development allowed by the proposed Plan or the No DAAP-West Alternative may also include the development of on-site open space that could help to off-set or reduce potential use of existing parkland. Given that equivalent employment growth and no residential growth are anticipated under the No DAAP-West Alternative, it would result in a lower potential for impacts to park and recreation facilities. Future development under either the proposed Plan or the No DAAP-West Alternative would be required to comply with requirements for developers to pay impact fees to maintain existing parks and recreation facilities, as well as requirements for residential developments to dedicate parklands or pay in-lieu fees to accommodate and offset their fair share of impacts to parklands. Therefore, implementation of either the proposed Plan or the No DAAP-West Alternative would result in comparable, less than significant impacts and cumulative impacts related to inclusion or required construction or expansion of recreation facilities.

Neither the proposed Plan nor the No DAAP-West Alternative would result in significant impacts related to provision of public services. Therefore, potential impacts under the No DAAP-West Alternative would be *similar* to those under the proposed Plan.

5.7.2.13 TRANSPORTATION AND TRAFFIC

As described in Section 5.6.2.13, implementation of the proposed Plan would result in less-than-significant impacts under five standards of significance (TRAF-3 through TRAF-7) and significant and unavoidable impacts under three standards of significance (TRAF-1, TRAF-2, and TRAF-8).

Implementation of either the proposed Plan or the No DAAP-West Alternative would not conflict with an applicable plan, ordinance or policy establishing measures of effectiveness for the performance of the circulation system with respect to alternative forms of transportation. The proposed Plan and the No DAAP-West Alternative would include circulation and pedestrian improvements that would be consistent with local and regional goals regarding transportation alternatives by serving to improve the pedestrian realm and increase connectivity and bicycle and transit access. Therefore, in this respect, impacts under implementation of either the proposed Plan or the No DAAP-West Alternative impacts would be comparable and less than significant.

The No DAAP-West Alternative would have slightly lower trip generation and traffic volumes relative to the proposed Plan. Due to changes from existing land uses, development of the DAAP-West Zone would result in decreases in inbound trips during the a.m. peak hour as well as outbound trips during the p.m. peak hour. However, the DAAP-West Zone accounts for only 3 percent of the total Plan trip generation. As such, the

No DAAP-West Alternative would likely have a negligible effect on the transportation impacts identified for the proposed Plan. As shown in Table 5-3, this alternative would not result in any changes to the intersection impacts of the proposed Plan. Therefore, as under the proposed Plan, the No DAAP-West Alternative would result in 15 significant and unavoidable intersection impacts.

Implementation of either the proposed Plan or the No DAAP-West Alternative would not substantially increase hazards due to a design feature or result in inadequate emergency access. When roadway modifications are proposed under either the proposed Plan or the No DAAP-West Alternative, such modifications would need to go through an independent review process to determine that the modifications conform with design standards and requirements. Thus, as long as all applicable design standards are requirements are followed, implementation of either the proposed Plan or the No DAAP-West Alternative would result in comparable less than significant impacts in these respects.

Implementation of either the proposed Plan or the No DAAP-West Alternative would not result in changes to air traffic patterns or a substantial under-supply of parking. The proposed Plan does not affect the location, design, or operation of any of the region's airports. While the new air travel demand potentially generated by development allowed by the proposed Plan has not been estimated, it is not expected to cause any of the region's airports to reach or exceed operational capacity. Since the No DAAP-West Alternative would not feature any net increase in residents in the area, it would also not impact area air traffic. Projects developed under the proposed Plan or No DAAP-West Alternative would be subject to the parking rates and requirements in the Municipal Code. Projects under the proposed Plan would be encouraged to incorporate the parking management strategies outlined in the Plan. Therefore, the impact with respect to parking would be less than significant and comparable under either the proposed Plan or the No DAAP-West Alternative.

Given these considerations, the No DAAP-West Alternative would result in a *slight improvement* in comparison to the proposed Plan due to the lower trip generation and traffic volumes anticipated under the No DAAP-West Alternative.

5.7.2.14 UTILITIES AND SERVICE SYSTEMS

Section 4.14, Utilities and Service Systems, found that under implementation of the proposed Plan, less than significant impacts would occur under all 13 standards of significance.

Under implementation of either the proposed Plan or the No DAAP-West Alternative, sufficient water supplies would be available from existing entitlements. As discussed in Section 4.14, the SJWC's WSA concluded there will be adequate water supplies to meet projected increased demands associated with development under the proposed Plan, using conservative assumptions regarding potable water use for normal hydrologic, single-dry year, and multiple-dry year conditions. The SJWC has supply flexibility in meeting the increase in water demand projected under the proposed Plan, due to its variety of available water supply sources, ongoing coordination with the SCVWD, increasing water conservation efforts, and water supply contingency planning. Since the No DAAP-West Alternative would result in equivalent

employment and no residential growth in the Plan Area, adequate water supplies would likewise exist for this alternative. Given that water demand would be lower under the No DAAP-West Alternative, the impact on water resources would be a slight improvement compared to the proposed Plan.

Implementation of neither the proposed Plan nor the No DAAP-West Alternative would require or result in the construction of new water facilities or expansion of existing facilities. As discussed above, the water demand associated with the proposed Plan would be served with available and planned water supplies provided by SJWC. Thus, any facility construction or expansion would be included in the UWMPs adopted by the SJWC and the SCVWD. Planned construction and expansion projects would be the responsibility of the SJWC or the SCVWD at the time they are proposed, and potential impacts would be subject to independent environmental review. Additionally, as discussed in Section 4.14, future development under the proposed Plan or the No DAAP-West Alternative would be located within an already developed urban area and, therefore, would connect to the existing water distribution system. Given any future construction/expansion of water infrastructure would be the responsibility of SJWC/SCVWD, comparable less than significant impacts would occur under either the proposed Plan or the No DAAP-West Alternative.

Implementation of either the proposed Plan or the No DAAP-West Alternative would not result in cumulative impacts to the water supply. While development under the proposed Plan or the No DAAP-West Alternative would contribute to an increased cumulative demand for water supply, the increased demand would not exceed the long-term supply under normal hydrologic circumstances, as discussed above. Additionally, SJWCs 2010 UWMP determined that the water supply will be sufficient to accommodate future demand in the SJWC service areas through 2035 (and 2040, by extrapolation), under normal conditions and during dry conditions, with appropriate conservation measures. Since the No DAAP-West Alternative would result in equivalent potential for employment growth and no potential for residential growth, impacts with respect to water supply under this alternative would also be less than significant. With additional adherence with applicable local, regional, and State regulations, policies, and other considerations, cumulative impacts with respect to water supply would be comparable and less than significant under the proposed Plan or the No DAAP-West Alternative.

Implementation of either the proposed Plan or the No DAAP-West Alternative would not exceed wastewater treatment requirements of the applicable RWQCB. As discussed in Section 4.14, increases in wastewater generation associated with buildout of the proposed Plan would not be significant relative to currently available excess treatment capacity. In addition, the very conservatively estimated wastewater generation for the proposed Plan will be less than the currently estimated excess capacity in the WVSD collection system, even before planned improvements to the system. Additionally, with continued compliance with applicable regulations, projected wastewater generated from potential future development under the proposed Plan would not exceed the wastewater treatment requirements or capacity of the SJ/SCWPCP. Given that the No DAAP-West Alternative would result in equivalent potential employment growth and no potential residential growth, demands on sanitary systems would be even less than under the proposed Plan, also resulting in a less-than-significant impact. Therefore, with regard to exceeding

wastewater treatment requirements, comparable less than significant impacts would occur under either the proposed Plan or the No DAAP-West Alternative.

Implementation of either the proposed Plan or the No DAAP-West Alternative would not require or result in the construction of new wastewater treatment facilities or expansion of existing facilities. As discussed above and in Section 4.14, future wastewater demands from development under either the proposed Plan or the No DAAP-West Alternative would not exceed the design or permitted capacity of the wastewater treatment plant serving the proposed Plan. Development under the proposed Plan or the No DAAP-West Alternative would continue to be provided with wastewater collection and treatment services from the WVSD collection system and the SJ/SCWPCP treatment plant. Existing infrastructure would be preserved in place and, if necessary, extensions and/or additions to sewer collection systems would be installed to provide wastewater service to structures proposed by the proposed Plan. As discussed in Section 4.14, although creation of new or expanded sanitary system infrastructure could create environmental effects, compliance with applicable regulations and standard conditions of approval would serve to mitigate any potential adverse physical effects of these activities. Impacts from any future construction or expansion of wastewater facilities would be project-specific, and would require permitting and review in accordance with CEQA, which would ensure that any environmental impacts are disclosed and mitigated to the extent possible. Given that the No DAAP-West Alternative would result in equivalent potential for employment growth and no potential for residential growth, demands on sanitary systems would be even less than under the proposed Plan, making construction or expansion of facilities less likely, and therefore also resulting in a less-than-significant impact. Therefore, with regard to the need to construct or expand wastewater facilities, comparable less than significant impacts would occur under either the proposed Plan or the No DAAP-West Alternative.

Implementation of either the proposed Plan or the No DAAP-West Alternative would not result in a determination by the wastewater treatment provider that it does not have adequate capacity to serve the proposed Plan's projected demand in addition to the provider's existing commitments. As discussed in Section 4.14, the proposed Plan's worst-case estimated increase in wastewater flow represents less than 2 percent of the excess capacity available at the SJ/SCWPCP. Additionally, with continued compliance with applicable regulations listed below, wastewater generated from the proposed Plan or the No DAAP-West Alternative would not exceed the permitted capacity of the SJ/SCWPCP treatment plant. As discussed above, the No DAAP-West Alternative would result in equivalent potential for employment growth and no potential for residential growth, which would reduce potential future generation of wastewater. Therefore, in this respect, implementation of either the proposed Plan or the No DAAP-West Alternative would result in comparable less than significant impacts relating to capacity determinations by the wastewater treatment provider.

Implementation of either the proposed Plan or the No DAAP-West Alternative, in combination with past, present, and reasonably foreseeable projects, would not result in significant cumulative impacts with respect to wastewater treatment. As discussed in Section 4.14, buildout of the proposed Plan would generate a moderate 2 percent increase in the volume of wastewater delivered for treatment at SJ/SCWPCP, and this

increase would occur incrementally until the 2040 buildout horizon. Based on the recent trends of diminishing wastewater treatment demand and the projected population growth in the service area, cumulative wastewater treatment demand over the proposed Plan buildout period is far below the excess capacity of the SJ/SCWPCP. Because the cumulative demand would not substantially impact the existing or planned capacity of the wastewater treatment systems, which have sufficient capacity for wastewater than would be produced by the proposed Plan, the construction of new wastewater treatment facilities would not be necessary. As discussed above, the No DAAP-West Alternative would result in equivalent potential for employment growth and no potential for residential growth, which would reduce potential future generation of wastewater. Therefore, implementation of either the proposed Plan or the No DAAP-West Alternative would result in comparable less than significant cumulative impacts relating to wastewater treatment.

Implementation of the proposed Plan or the No DAAP-West Alternative would require construction of new storm drainage facilities or expansion of existing facilities to accommodate future development; however, all storm water retention and conveyance facilities would be constructed in compliance with federal, State, and local regulations, including metering of flow, and would therefore not result in cumulative impacts related to storm drainage. The Plan Area is largely developed and almost entirely covered with building roofs, hardscapes, or paved surface parking lots, with the exception of landscaped areas. Additionally, the Plan Area is already served by existing storm drainage facilities. Given that the No DAAP-West Alternative would result in equivalent potential residential growth and decreased potential employment growth, there would be no increased need to expand or construct storm drainage facilities above that of the proposed Plan. Moreover, environmental impacts resulting from individual projects related to the expansion or construction of stormwater drainage would be project-specific, and would require permitting and review in accordance with CEQA, which would ensure that any environmental impacts are disclosed and mitigated to the extent possible. Impacts related to provision of storm drainage facilities are typically localized, since the purpose of such systems is to convey stormwater to nearby waterways or floodways. In the case of the Plan Area, storm drainage facilities would convey water to nearby percolation ponds and Los Gatos Creek. As discussed above and in Section 4.11-8, Hydrology and Water Quality, neither the proposed Plan nor the No DAAP-West Alternative is anticipated to result in significant increases in stormwater runoff with the potential to affect storm drainage facilities beyond the Plan Area. Therefore, implementation of either the proposed Plan or the No DAAP-West Alternative would result in comparable less than significant project-specific or cumulative impacts relating to storm drainage facilities.

Under implementation of either the proposed Plan or the No DAAP-West Alternative, future development would be served by a landfill with sufficient permitted capacity to accommodate anticipated solid waste disposal needs. As discussed in Section 4.14, solid waste generated from implementation of the proposed Plan would account for less than 1 percent of the daily capacity at the Monterey Peninsula Landfill. Given that the No DAAP-West Alternative would result in equivalent potential employment growth and no potential residential growth, the need for landfill capacity would be decreased under the No DAAP-West Alternative. As such, implementation of the proposed Plan or the No DAAP-West Alternative would have comparable less than significant impacts with regard to daily capacity at each of the two main landfill

facilities serving the city. The two landfills that receive the majority of the city's solid waste are likely to reach their permitted maximum capacities between 2048 and 2107, respectively, as shown in the Table 4.14-8. As such, there is more than adequate landfill capacity for the solid waste generated by implementation of either the proposed Plan or the No DAAP-West Alternative. In addition, there are 13 other landfills that received waste from the city in 2013. In the event that one or both of the landfills currently receiving waste from the city was unable to continue in that capacity, it is likely that another landfill would be able to provide capacity. Additionally, with continued compliance with applicable regulations leading to increased recycling and waste diversion, anticipated rates of solid waste disposal from the proposed Plan or the No DAAP-West Alternative would likely decrease, further diminishing impacts in regard to permitted landfill capacity. Therefore, implementation of either the proposed Plan or the No DAAP-West Alternative would result in comparable less than significant impacts relating to solid waste disposal.

Implementation of either the proposed Plan or the No DAAP-West Alternative would comply with federal, State, and local statutes and regulations related to solid waste. As discussed in Section 4.14, the City of Campbell has complied with State requirements to reduce the volume of solid waste through recycling and reuse of solid waste. The General Plan includes goals, policies, and strategies that promote recycling and conservation, and help ensure adequate waste collection and disposal facilities are available for the residents and workers of Campbell. Together these policies and actions help to ensure that implementation of either the proposed Plan or the No DAAP-West Alternative would be consistent with statutes and regulations related to solid waste, and would thus result in comparable less than significant impacts in this regard.

Implementation of either the proposed Plan or the No DAAP-West Alternative, in combination with past, present, and reasonably foreseeable development, would not result significant cumulative impacts with respect to solid waste. The buildout of the proposed Plan will increase the quantity of solid waste for disposal. Since the two landfill facilities that take approximately 97 percent of the city's solid waste (in 2013) are not expected to close until between 2048 and 2107, respectively, it is unlikely that Campbell or other jurisdictions that use the same facilities will eventually experience insufficient future landfill capacity to accommodate existing or increased population and employment levels before the horizon year of the proposed Plan. Given that the No DAAP-West Alternative would result in equivalent potential employment growth and no potential residential growth, the need for landfill capacity would be decreased under the No DAAP-West Alternative, further diminishing potential cumulative impacts. In addition, there are 13 landfills that received waste from the city in 2013. If one or more of the two landfills currently receiving 97 percent of the waste were unavailable in the future, it is likely the city's solid waste volume could be increased at one or more of the other landfills that already serve the city. Therefore, with continued compliance with applicable regulations, implementation of the proposed Plan or the No DAAP-West Alternative, in combination with past, present and reasonably foreseeable development, would result in comparable less than significant impacts with respect to cumulative solid waste disposal impacts.

Implementation of either the proposed Plan or the No DAAP-West Alternative would not result in a substantial increase in natural gas and electrical service demands, and would not require new energy supply

facilities and transmission infrastructure or capacity enhancing alterations to existing facilities. Under both the proposed Plan and the No DAAP-West Alternative, proposed new development would be constructed using energy efficient modern building materials and construction practices. With the implementation of these General Plan Policies and compliance with the CALGreen Building Code and Campbell Green Building Policies, significant energy conservation and savings would be realized in any new development within the Plan Area. Even with the energy saving practices in place, it is possible that new electrical connections, switches and/or transformers might be required to serve new structures and/or handle additional loads in the Plan Area under either the proposed Plan or No DAAP-West Alternative. Potential environmental impacts from possible new electrical connections, switches, and/or transformers in the proposed Plan Area are not anticipated to be significant and, to the extent such upgrades may be necessary, their environmental impacts would be evaluated individually, consistent with any overarching improvement plans adopted by energy providers. Given that the No DAAP-West Alternative would result in equivalent potential employment growth and no potential residential growth, the need for new electrical or natural gas infrastructure would be decreased under the No DAAP-West Alternative, further diminishing the potential for impacts. In addition, buildout of the proposed Plan or the No DAAP-West Alternative would not significantly increase energy demands in the context of the entire PG&E service territory for electricity and natural gas generation, transmission and distribution. As a result, new energy supply facilities and transmission infrastructure, or capacity-enhancing alterations to existing facilities, would not be required as a direct result of the proposed Plan or the No DAAP-West Alternative. Therefore, implementation of either the proposed Plan or the No DAAP-West Alternative would result in comparable less than significant impacts relating to gas and electrical service demands.

Given these considerations, because the No DAAP-West Alternative would not include increases to residents in the Plan Area, demand on Utilities and Service Systems would be reduced and impacts would therefore represent a *slight improvement* compared to the proposed Plan.

5.8 ENVIRONMENTALLY SUPERIOR ALTERNATIVE

In addition to the discussion and comparison of impacts of the proposed Plan and the alternatives, Section 15126.6 of the CEQA Guidelines requires that an "environmentally superior" alternative be selected and the reasons for such a selection be disclosed. In general, the environmentally superior alternative is the alternative that would be expected to generate the least amount of significant impacts. Identification of the environmentally superior alternative is an informational procedure and the alternative selected may not be the alternative that best meets the identified goals of the project. Additionally, in accordance with State CEQA Guidelines Section 15126.6(e)(2), if the environmentally superior alternative is the "No Project" Alternative, the EIR shall also identify an environmentally superior alternative among the other alternatives.

Based on the above analysis, which is summarized in Table 5-2, the No Project Alternative is the environmentally superior alternative. Compared with the proposed Plan the No Project Alternative would slightly or substantially reduce impacts related to six topics (air quality, biological resources, cultural resources, hazards and hazardous materials, transportation and traffic, and utilities and service systems);

would have similar impacts under six topics (aesthetics, geology and soils, land use and planning, noise, population and housing, and public services and recreation); and would slightly worsen impacts under two topics (greenhouse gas emissions and hydrology and water quality).

Among the other alternatives, the Reduced Development Alternative would be the second environmentally superior alternative compared to the proposed Plan. Compared with the proposed Plan, the Reduced Development Alternative would slightly reduce impacts related to six topics; would have similar impacts under eight topics; and would not worsen impacts under any topic. The No DAAP-West Alternative would slightly reduce impacts related to six topics; would have similar impacts under seven topics; and would slightly worsen impacts under one topic. The Reduced Development Alternative would generally meet the Plan objectives, although it would provide fewer jobs for the City of Campbell. The No DAAP-West Alternative would generally meet the Plan objectives, although it would not provide new housing in close proximity to anticipated transit improvements and employment centers. Although all the alternatives are regarded as environmentally superior to the proposed Plan, none of these alternatives would completely achieve the objectives of the proposed Plan for the reasons stated herein.

6. CEQA-Mandated Sections

This chapter provides an overview of the impacts of the Dell Avenue Area Plan (proposed Plan) based on the analyses presented in this Draft EIR. The topics covered in this chapter include growth inducement, unavoidable significant impacts, and significant irreversible changes. A more detailed analysis of the effects the Plan would have on the environment and proposed mitigation measures to minimize significant impacts are provided in Chapter 4 of this Draft EIR.

6.1 IMPACTS FOUND NOT TO BE SIGNIFICANT

Section 15128 of the CEQA Guidelines states:

> *"An EIR shall contain a statement briefly indicating the reasons that various possible significant effects of a project were determined not to be significant and were therefore not discussed in detail in the EIR."*

As part of the Notice of Preparation (NOP) scoping process, it was determined that the proposed Plan would not have significant effects on the following environmental issues; therefore, they are not discussed in detail in Sections 4.1 through 4.14 of this Draft EIR:

- **Agriculture and Forestry Resources.** The Plan Area does not contain any Prime Farmland, Unique Farmland, or Farmland of Statewide Importance as mapped by the Farmland Mapping and Monitoring Program, nor does it contain any parcels under a Williamson Act contract. In addition, the Plan Area is not currently zoned for forestland or timberland. Therefore, the proposed project would have no impact on agriculture and forestry resources.
- **Mineral Resources.** The Plan Area does not contain any known mineral resources or mineral extraction operations. Therefore, the proposed Plan would have no impact on mineral resources.

Sections 6.1.1 and 6.1.2 provide greater detail about why the proposed Plan would not have a significant effect on agriculture and forestry resource and mineral resources.

6.1.1 AGRICULTURAL AND FORESTRY RESOURCES

The proposed Plan is located within the City of Campbell, which is an urbanized city. Maps prepared pursuant to the Farmland Mapping and Monitoring Program of the California Resources Agency, categorize land within Campbell as Urban and Built-Up Land.[1] There are no agricultural lands classified as Prime

[1] California Resources Agency, Farmland Mapping and Monitoring Program. Santa Clara County Important Farmland 2010, accessed on August 5, 2014.

Farmland, Unique Farmland, or Farmland of Statewide Importance (Farmland) within the City of Campbell. In addition, the California Land Conservation (Williamson) Act 2010 Status Report identifies land in Santa Clara County that is currently under Williamson Act contract.[2] Potential future development permitted as a result of the proposed Plan would not occur within lands zoned for agricultural use in Campbell. Therefore, there would not be a not conflict with existing zoning for agricultural use, or a Williamson Act contract.

According to 2006 mapping data from the California Department of Forestry and Fire Protection, the City does not contain any woodland or forestland cover;[3] hence, the City does not contain land zoned for Timberland Production nor does the Campbell Zoning Map identify any areas zoned for Timberland Production.[4] Consequently, there would be no impacts with regard to agriculture and forestry resources.

6.1.2 MINERAL RESOURCES

The State of California, recognizing the value of preserving the State's mineral deposits, in order to achieve a sustainable future, enacted the Surface Mining and Reclamation Act of 1975 (SMARA). The objective of SMARA is to assist local governments in conserving mineral deposits, including mapping mineral resources in order to emphasize conservation and development of these areas. Campbell does not have mineral resource zones (MRZ) classified as MRZ-2, which are areas where adequate information indicates that significant mineral deposits are present, and MRZ-3, which are areas containing mineral deposits for which the significance cannot be evaluated from available data. Further, the city is largely urbanized and therefore, there are no areas in the city identified for protection or conservation with regard to mineral resources given those areas are already developed and/or not considered suitable for conservation.

6.2 GROWTH INDUCEMENT

Section 15126.2(d) of the CEQA Guidelines requires that an EIR discuss the ways in which a proposed project could foster economic or population growth, or the construction of additional housing, either directly or indirectly, in the surrounding environment. Typical growth-inducing factors might include the extension of urban services or transportation infrastructure to a previously unserved or under-served area, or the removal of major barriers to development. This section evaluates the proposed Plan's potential to create such growth inducements. Not all aspects of growth inducement are negative; rather, negative impacts associated with growth inducement occur only where the growth associated with the project would cause adverse environmental impacts.

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[2] California Department of Conservation, 2010, California Land Conservation (Williamson) Act 2010 Status Report, page 23, http://www.conservation.ca.gov/dlrp/lca/stats_reports/Documents/2010%20Williamson-%20Act%20Status%20Report.pdf, accessed on August 5, 2014.

[3] California Department of Forestry and Fire Protection Fire and Resource Assessment Program, Land Cover Map, accessed on August 5, 2014.

[4] City of Campbell, 2013 General Plan, Zoning Map http://www.ci.campbell.ca.us/166/Zoning-and-Land-Use, accessed on August 5, 2014.

The proposed Plan would directly induce population, employment, and economic growth by allowing residential, commercial, and office development on vacant lands and redevelopment of existing properties. Implementation of the proposed Plan would result in the following growth by 2040, as reported in Chapter 3, Project Description, of this Draft EIR:

- 300 new residential units
- 726 new residents
- 2,292,000 net new square feet of commercial
- 20,000 net new square feet of retail
- 7,394 net new jobs

As described in Section 4.11, Population and Housing, implementation of the proposed Plan would not exceed the level of population or employment growth foreseen in regional planning efforts, so there has been adequate planning to ensure that the direct population and employment growth would not cause adverse environmental impacts.

The proposed Plan is not expected to result in indirect growth inducement because the Plan Area is located in a highly urbanized and already developed area of Campbell, so the project would not extend urban services to previously unserved areas.

Development allowed by the proposed Plan would involve demolition and construction activities that could generate some temporary employment opportunities, which could temporarily induce growth indirectly. However, given the temporary nature of such opportunities, it is unlikely that construction workers would relocate to Campbell as a result of the proposed Plan. As such, the proposed Plan would not be considered growth-inducing from a short-term employment perspective.

In addition, the 7,394 net new jobs that would be generated through implementation of the proposed Plan could indirectly induce population growth by attracting people who are newly employed in the Plan Area to live there. However, many new employees would not relocate to Campbell or the Plan Area, as they may already be local. For those that do relocate to the Plan Area, a portion of their housing needs would be met by the new residential development that is called for in the Plan. Therefore, implementation of the proposed Plan would not result in significant indirect growth inducement.

6.3 UNAVOIDABLE SIGNIFICANT IMPACTS

Section 15126.2(b) of the CEQA Guidelines requires that an EIR describe any significant impacts that cannot be avoided, even with the implementation of feasible mitigation measures. As detailed in Sections 4.1 through 4.14 of this Draft EIR, six of the potential environmental impacts associated with the proposed Plan were found to be significant and unavoidable. Table 6-1 lists the significant impacts of the proposed Plan. Mitigation Measures proposed to reduce these impacts can be found in Table 1-1 of Chapter 1, Executive Summary, as well as in Chapter 4, Environmental Evaluation, of this Draft EIR.

TABLE 6-1 SIGNIFICANT AND UNAVOIDABLE IMPACTS OF THE PROPOSED PLAN

Air Quality	
AIR-2	Implementation of the proposed Plan would violate an air quality standard or contribute substantially to an existing or projected air quality violation.
AIR-3	Implementation of the proposed Plan would result in a cumulatively considerable net increase of any criteria pollutant for which the Plan region is in nonattainment under an applicable federal or State ambient air quality standard (including releasing emissions that exceed quantitative thresholds for ozone precursors).
AIR-6	Implementation of the proposed Plan would cumulatively contribute to air quality impacts in the San Francisco Bay Area Air Basin.
Transportation and Traffic	
TRAF-1	Implementation of the proposed Plan would cause six intersections to fall below the level of service standard.
TRAF-2	Implementation of the proposed Plan would cause freeway segments to fall below the level of service standard.
TRAF-8	Implementation of the proposed Plan, in combination with past, present, and reasonably foreseeable projects, would result in additional cumulatively considerable impacts.

Section 15126.2(b) of the CEQA Guidelines requires that when significant and unavoidable impacts are identified, their implications and the reasons why the project is being proposed despite these effects be described. The primary purpose of the proposed Plan is described in detail in Chapter 3, Project Description, of this Draft EIR and the implications of the significant and unavoidable impacts are discussed in Sections 4.2 and 4.13 of this Draft EIR. Overall, the proposed Plan is aims to transform the Plan Area into a 21st Century business park that retains and attracts high-tech businesses. Section 3.4 of Chapter 3 clearly articulates the objectives of the proposed Plan. Some of these objectives include allowing for land uses that encourage efficient use of land through sustainable development patterns, enhancing open space and improving open space access, creating an integrated network of multi-modal connections, encouraging environmental and economic sustainability, improving the design and character of the Plan Area, and increasing private investment. The Mitigation Measures proposed for the proposed Plan consider modifications that attempt to lessen potential significant impacts. For the six significant impacts listed above, the Mitigation Measures proposed would be insufficient to reduce the impact below a significant level. The proposed Plan is being proposed despite these significant and unavoidable impacts for the reasons described in the proposed Plan objectives as follows:

- **A High Tech and Innovation Oriented Business District**: Encourage the efficient use of land use through sustainable development patterns, a mixture of uses, and development intensities that support transit and walking. Ensure uses are compatible with and supportive of a high-tech office environment and discourage the continuance of existing uses that are not consistent with this character. Provide opportunities for small start-ups and incubator businesses within the larger workplace infrastructure. Rehabilitate and improve existing buildings and create avenues for independent cafes and restaurants to operate. Ensure that the notion of "technology" is apparent through stunning architecture and a memorable urban environment.

- **Enhanced Open Space and Improved Open Space Access**: Orient and design development to interact with existing ponds and creekside natural areas at Los Gatos Creek Park. Enhance existing trails and create new connections between the Plan Area and Los Gatos Creek Park. Carefully create a central public space around the existing water recharge facility, pending study and coordination with the Santa Clara Valley Water District (SCVWD). Infuse the Plan Area with smaller, functional open spaces in new development that provide places to rest, recreate, and gather. Seek to protect and enhance the natural character of the creek by allowing solar access, creating landscaped building edges, and using appropriate building materials. Transition buildings downward in height at approaches the waterfront.
- **An Integrated Network of Multimodal Connections**: Enhance existing roadways with sidewalks and pedestrian amenities, and create new pedestrian, bicycle, and vehicular facilities to improve connectivity. Create clear, safe, and direct pathways to the proposed VTA light rail station, and integrate it into the larger pedestrian network.
- **Environmental and Economic Sustainability**: Encourage new development and public improvements that incorporate green design and stormwater management features to reduce stormwater runoff into existing streams and preserve existing infrastructure. Ensure new buildings incorporate sustainable features in their design, including appliances requiring limited water and energy usage and building design that takes advantage of solar access and incorporates reused materials where possible. Encourage new development that will attract strong and growing businesses to Campbell, whose employees will contribute to the local economy, stimulate business, and strengthen the city's economic stance in the region.
- **Improved Design and Character**: Balance modern development styles with the small-town feel of Campbell. Incorporate and protect cherished amenities, including views and open spaces. Create memorable streets, gateways, nodes, plazas, and other new places for gathering and leisure activity. Consider special architectural elements and enhanced landscaping at key locations.
- **Sensitivity to Existing Businesses**: Provide a framework for which new high-tech development can exist harmoniously with existing businesses. Adapt land uses that are inclusive of and that accommodate businesses of traditional sectors and formats. Protect and enhance the physical layout and functionality of existing businesses through protective design standards that are focused on better placemaking and quality of life for current and future employees.
- **Enhanced Lifestyle and Vitality**: Provide amenities and places of activity, commerce, and trade that support a high-tech workplace culture. Ensure these amenities, such as restaurants, cafes, workout and spa facilities, childcare, markets, bars, and recreational uses, are also beneficial to the wider community, bringing an after-work-hours energy to the area.
- **Context-Sensitive Mixed-Use Residential Opportunities**: Support high-quality housing in mixed-use formats (retail and residential) on the west side of Winchester Boulevard, which will create an employment-to-housing synergy and enhance the overall character of the street. Encourage ground floor commercial along Winchester Boulevard to support high-tech industry, and provide

neighborhood-serving uses that also cater to the needs of adjoining neighborhoods. Ensure that upper floor residential uses transition in scale toward the San Tomas neighborhood to the west.

- **Increased Private Investment**: Align policies, strategies, and City processes to remove barriers to private investment, leverage funding, and increase the support for positive change at the Dell Avenue area.

When decision makers in Campbell consider whether or not to approve the General Plan Amendment, Zoning Ordinance Amendment, and San Tomas Area Neighborhood Plan Amendment, required for the proposed Plan, pursuant to CEQA Guidelines Section 15021(d), the City would be required to adopt a Statement of Overriding Considerations to reflect the ultimate balancing of competing public objectives.

6.3.1 SIGNIFICANT IRREVERSIBLE CHANGES

Section 15126.2(c) of the CEQA Guidelines requires an EIR to discuss the extent to which the proposed project would commit nonrenewable resources to uses that future generations would probably be unable to reverse. The three CEQA-required categories of irreversible changes are discussed below.

6.3.1.1 CHANGES IN LAND USE THAT COMMIT FUTURE GENERATIONS

CEQA Guidelines section 15126.2(c) recognizes that primary and secondary impacts of a project can commit future generations to similar uses and such a change could be a significant irreversible environmental change. An example of these secondary impacts provided by the CEQA Guidelines is the improvement of highways which would provide access to previously inaccessible areas. The CEQA Guidelines require consideration and discussion of such potential effects.

The proposed Plan is intended to guide future development in the southern tip of Campbell, in the Dell Avenue area, nestled between major transportation corridors and open space, as well as adjacent to the Town of Los Gatos and the City of San Jose. The Plan Area is currently identified in the City's General Plan Zoning Map as appropriate for light industrial and controlled manufacturing land uses. New development under the proposed Plan would largely occur on sites either already developed or in close proximity to existing development. While the types of land uses contained in the proposed Plan would not be identical to what is currently permitted, the proposed land uses would only intensify the existing urban setting of the Plan Area. Because the Plan Area is already developed and is located in an urban area that already contains these uses, the proposed Plan is not expected to result in any land use changes that would commit future generations to uses that are not already prevalent in the vicinity of the Plan Area.

6.3.1.2 IRREVERSIBLE DAMAGE FROM ENVIRONMENTAL ACCIDENTS

Potential environmental accidents of concern include those that would have adverse effects on the environment or public health due to the nature or quantity of material released during an accident and the receptors exposed to that release. Demolition and construction activities associated with development

allowed by the proposed Plan would involve some risk for environmental accidents. However, these activities would be monitored by City, State, and federal agencies, and would follow professional industry standards for safety and construction. Additionally, the land uses allowed by the proposed Plan would not include any uses or activities that are likely to contribute to or be the cause of a significant environmental accident. As a result, the proposed Plan would not pose a substantial risk of environmental accidents.

6.3.1.3 LARGE COMMITMENT OF NONRENEWABLE RESOURCES

CEQA Guidelines section 15126.2(c) recognizes that use of nonrenewable resources may be irreversible since a large commitment of such resources makes removal or nonuse thereafter unlikely. Consumption of nonrenewable resources includes issues related to increased energy consumption, conversion of agricultural lands, and lost access to mining reserves. Development allowed by the proposed Plan would require water, electric, and gas service, as well as additional resources for construction. Additionally, the ongoing operation of land uses allowed by the proposed Plan would involve the use of nonrenewable resources. Construction and ongoing maintenance allowed by the proposed Plan would irreversibly commit some materials and nonrenewable energy resources. Materials and resources used would include, but are not limited to, nonrenewable and limited resources such as oil, gasoline, sand, gravel, asphalt, and steel. These materials and energy resources would be used for infrastructure development, transportation of people and goods, and utilities. After construction, energy sources including oil and gasoline would be used for lighting, heating, and cooling of residences and businesses, as well as transportation of people to and from the Plan Area.

However, the proposed Plan, and its associated design guidelines, encourage new development to employ sustainable building and site design principles that support pedestrian activity and respond to other sustainability principles such as minimizing impervious surfaces, orienting toward solar access, and incorporating energy-efficient elements. In addition, the proposed Plan includes standards and concepts that promote walking, bicycling, and transit use as alternatives to driving.

Although the construction and ongoing operation of land uses allowed by the proposed Plan would involve the use of nonrenewable resources, through the inclusion of sustainability policies and concepts and compliance with applicable standards and regulations, the proposed Plan would not represent a large commitment of nonrenewable resources.

The Plan Area does not contain any agricultural land, nor does it provide access to a mining reserve, so it would not affect those natural resources.

7. Organizations and Persons Consulted

This Draft EIR was prepared by and in consultation with the following consultants and individuals:

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